

HONOAPI'ILANI HIGHWAY IMPROVEMENTS PROJECT,
WEST MAUI: UKUMEHAME TO LAUNIUPOKO

Appendix 9 – Public Comment Period Documents

September 2025

Prepared for



Honoapi'ilani Highway
Improvements

Prepared by



September 2025



Contents

DEIS Public Comments – Comment Log

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DEIS Public Comments – Comment Log

Commentor	Organization	Submission No.	Submission Type	Comment	Comment No.	DEIS Section	RTC Comment
Lee Chamberlain	Maui Bicycling League	1	Email	I am writing to express strong support for the integration of the West Maui Greenway (WMG) into the Honoapiʻilani Highway realignment project. The WMG, as part of the Hele Mai Maui Legacy Projects, presents a significant opportunity to foster sustainable, multimodal transportation that strengthens resilience and community connectivity in West Maui. (1)	1	Ch. 3.5	31
				Strategic Implementation of Segment 6. (1)The WMG Final Report (September 2022) identified Segment 6 (Olowalu to Lahaina Pali Trailhead) as a priority due to its potential to repurpose the realigned Honoapiʻilani Highway. Alternative A scored highest in the evaluation due to its scenic views, strong recreational connections, and the minimal need for new right-of-way (ROW). By utilizing the existing highway, this option is both cost-effective and highly feasible, despite its location within the sea-level rise (SLR) exposure area.	1		31
				Compliance with the Navahine Settlement Commitments . (1)TThe WMG supports the Navahine Settlement’s mandate to expand multimodal transportation infrastructure, including pedestrian pathways and bikeways, to reduce vehicle miles traveled (VMT) and support decarbonization goals. Public Transit, Pedestrian, and Bikeway Expansion: The WMG aligns with interim goals to integrate alternative transportation options statewide. Specific Deadlines: Planning and budgeting for multimodal infrastructure must begin by April 2025, per the Mid-Range Transportation Plan (MRTP) and the Statewide Transportation Improvement Program (STIP). Budgeting Prioritization: Projects such as the WMG that align with decarbonization and VMT reduction goals are prioritized within a five-year timeline for infrastructure completion.	1		31
				Integration with Complete Streets Policy (1) . The WMG is a model project for the Complete Streets policy, which requires transportation projects to prioritize safety and accessibility for all users. Policy Integration: The WMG will create safe, separated pathways for cyclists and pedestrians and improve public transit access. Complete Streets Assessment: Beginning in April 2025, all Capital Improvement Projects (CIPs), including the WMG, must undergo assessments to document compliance with Complete Streets principles. Expenditure Prioritization: The WMG’s focus on multimodal connectivity positions it for priority funding under the Complete Streets framework, ensuring that resources are allocated to support this vital project.	1		31
				Alignment with Act 131 and the Hawaiʻi Bike Plan (1) . The WMG aligns with Act 131’s requirement for a multimodal, accessible, and sustainable transportation system and the Hawaiʻi Bike Plan’s vision for a statewide network of protected bike paths. Act 131 emphasizes separated pathways that improve public safety, health, and quality of life.	1		31
				Current Funding and Federal Support. The WMG has secured significant financial support, including: RAISE Grant: \$15 million awarded to the WMG to support development and implementation efforts. Inclusion in STIP (MC28): Ensures that the project is recognized as a priority for state and federal transportation funding allocations. This available funding underscores the importance of expediting the WMG by integrating Segment 6 into the Honoapiʻilani Highway realignment project, ensuring that the funds are utilized effectively and within the required timelines. (2)	2	Ch. 3.5	34
				Environmental and Permitting Benefits. Repurposing the existing highway corridor may qualify for a Categorical Exclusion (CE) under 23 CFR 771.111(f), as the project involves minimal environmental impact. This streamlined approach reduces the need for extensive environmental reviews and accelerates project implementation. Public Health and Emergency Preparedness. The WMG will enhance community health by promoting active transportation and equitable access to safe recreational spaces. Additionally, the greenway can function as a non-motorized evacuation route, supporting emergency response efforts in disaster scenarios. Recommendation: I respectfully urge HDOT and FHWA to incorporate the West Maui Greenway into the Honoapiʻilani Highway realignment plan by repurposing the existing highway for Segment 6. This approach will maximize cost-efficiency, adhere to policy mandates, and support West Maui’s resilience, safety, and community connectivity goals. (3) Thank you for your commitment to building a sustainable and resilient transportation future for West Maui.	3	Ch. 3.5	31

Thorne Abbott	Coastal Planners LLC	2	Email	We fully support. HDOT's efforts of adaptive realignment of this critical highway inland. Previously the County approved a subdivision in the Ukumehame section for highway relocation and creation of a linear coastal park. County council also authorized purchase of the land to relocate the highway inland, uphill and out of the tsunami inundation zone. This may be a prudent route to use for the relocated highway. (4)	4	Ch. 1	2
Carter Barto	Aloha Self Storage Lahaina	3	Email	I am writing to express my strong support for the proposed project to realign Honoapiilani Highway inland (5) and please also expand it from two lanes to four lanes. (6) As a daily commuter who relies on this highway to travel between my job in West Maui and my home in Pukalani, I have firsthand experience with the challenges posed by the current state of this vital roadway. The most recent alignment proposal makes the most sense for the long term viability of this highway.	5,6	Ch. 1	3,8
				Honoapiilani Highway serves as the sole viable connection between these regions, making it a critical infrastructure for residents, businesses, and visitors alike (7). However, its current alignment and capacity have proven inadequate in meeting the demands of a growing population. Increasing traffic is often caused by whale watchers, high tides washing salt water over the road, and frequent traffic jams or closures due to accidents and brush fires. The need for this project is both urgent and clear, and I urge decision-makers to prioritize its implementation for the following reasons:	7	Ch. 1	6
				Safety (7): The existing highway’s proximity to the coastline exposes it to flooding, erosion, and other hazards, particularly during extreme weather events. Relocating the highway inland will enhance safety for all users by mitigating these risks. Additionally, the expansion to four lanes will reduce congestion-related accidents by allowing for smoother traffic flow, safer overtaking opportunities, and detour options during unfortunate closures caused by fatal traffic accidents.	7	Ch. 1	6
				Economic Vitality (7): As the primary route connecting West Maui to Central Maui, Honoapiilani Highway supports the movement of goods, services, and workforce. This need has dramatically increased following the August 2023 fires, which displaced much of the workforce to Central Maui, adding additional daily commuters who still work in West Maui. Delays and disruptions caused by traffic congestion or road closures have a significant economic impact. A four-lane highway moved inland will ensure more reliable and efficient travel, benefiting local businesses and sustaining economic growth.	7	Ch. 1	6
				Quality of Life (7): For daily commuters like myself, the current two-lane configuration often results in extended travel times and frustration. On some occasions, I have been unable to return home or make it to work, losing an entire workday or being forced to stay overnight. The proposed re-alignment along with an expansion to four lanes will alleviate congestion, allowing residents to spend less time on the road and more time with their families or engaging in their communities.	7	Ch. 1	6
				Environmental Considerations (7): While moving the highway inland may raise concerns about environmental and cultural impacts, the current alignment’s vulnerability to sea-level rise and coastal erosion poses a long-term environmental threat. A carefully planned realignment can minimize ecological and cultural disruption while safeguarding the highway’s longevity.	7	Ch. 1	6
Janice and James Revells	-	4	Webform	Emergency Preparedness (7): In times of natural disasters or emergencies, Honoapiilani Highway serves as a critical evacuation route and access point for emergency services. Expanding the highway’s capacity and moving it to a safer location will ensure that it can fulfill this role effectively.	7	Ch. 1	6
				I urge the State of Hawaii DOT and County of Maui to act swiftly to approve, fund, and complete this project. The benefits of an inland, four-lane Honoapiilani Highway far outweigh the costs, and its timely completion is essential for the safety, economic stability, and overall well-being of our community. (7) Thank you for considering my comments. I appreciate the opportunity to contribute to this important decision-making process.	7	Ch. 1	6
Janice and James Revells	-	4	Webform	The proposed route does not show access to the Ukumehame Firing Range nor beach accesses for the general public. The four ranges are used almost daily by the numerous clubs and MPD. There is also a building used for firearm safety classes. Driving to Laniupoko and then returning toward Kahului to get to access the ranges and the beaches is ludicrous. (8) The majority of the users are local and are coming from Central. Upcountry and South Maui. Driving miles into Lahaina to just turn around to get back to the ranges and beaches is stupid. . Not having reasonable accesses to this area would encourage criminal activity and safety and health hazards. Response time for First Responders would be greatly increased. The general public needs are not being served. This realignment serves to improve drive time into Lahaina and the beauty and use of this area is Lost..	8	Ch. 3.5	37
Victoria Kaluna-Palafox	-	5	Webform	My concern is to not disturb the true function of Aina. That, can never be repaired, unless we can better protect, what is. (9) Mahalo	9	Ch. 3.7	52
Kevin Bridges	-	6	Webform	Alternative 1 would be the best alternative as it provides the shortest distance and will provide outstanding views. However, the preferred alternative would adequately address the ocean flooding issue and stand a better chance of not being delayed with nuisance lawsuits. (10)	10	Ch. 2	17
	-			My biggest comment is to speed up the construction timeline. The proposed construction timeline is way too long; this needs to be done now! The federal government just provided \$2 billion for Lahaina housing needs so that should free up state and local money to get this project started and finished sooner. The vulnerability threat to west side is only getting worse with time and needs to be fixed sooner rather than later. Get this extremely critical project finished sooner. (11)	11	Ch. 1	9
Carter Barto		7	Webform	I express strong support for the proposed project to realign Honoapiilani Highway inland and please also expand it from two lanes to four lanes. (12) As a daily commuter who relies on this highway to travel between West Maui and Central Maui, I have firsthand experience with the challenges posed by the current state of this vital roadway. Honoapiilani Highway serves as the sole viable connection between these regions, making it a critical infrastructure for residents, businesses, and visitors alike. However, its current alignment and capacity have proven inadequate in meeting the demands of a growing population and increasing traffic. (12.) The need for this project is both urgent and clear, and I urge decision-makers to prioritize its implementation. (12)	12	Ch. 1	6
Darrell Tanaka	-	8	Webform	The homeless situation is getting worse in Olowalu, they are slowly taking over the beach area at Mile Marker 14....when the new highway is built that area will become a derelict destination....we should make it into a state park and manage it to prevent it from being trashed, its a popular tourist and local spot to take kids to the beach and snorkel and fish...in fact, make the area from Ukumehame park all the way to Olowalu general store a state beach park. (13)	13	Ch. 3.5	42

Benny Martin	-	9	Webform	My family and I, like so many others, were deeply affected by the devastating wildfires in Lahaina. We lost our home and everything we had worked so hard for. In the aftermath, we saved what we could and decided to purchase an agricultural lot in the Ukumehame subdivision, where many other displaced families have also found a place to rebuild. It has been a journey of resilience, and the Ukumehame subdivision offers us a chance to start anew. However, I am deeply concerned about the proposed highway realignment options, especially Alternative 4, which would run directly through many of our homes in the subdivision. (14) This would have a significant and disruptive impact on the families who are already struggling to rebuild their lives. While I truly appreciate the environmental decision to move the highway away from the coastline, I strongly encourage consideration of Alternatives 2 and 3 for our section of the realignment, as they seem to pose less of a threat to the homes and families already established in the area. (14) I would greatly appreciate any information on when and where in-person testimonials or meetings will take place to discuss these important decisions. This is a critical issue for the families in Ukumehame, and we need to have our voices heard as we work toward rebuilding both our homes and our community. Thank you for considering our concerns.	14	Ch. 2	19
Robert Santos	-	10	Webform	Can I see the details of the work to be done including their staging area? (15)	15	Ch. 2	25
Tara King	-	11	Webform	I really hope you are going to rebuild Weinberg Court .Between PrisonSt.and Dickenson St. (16). That was the Giant (for Maui) apartment building.I think the address was 161 Honoapiilani Hwy.Naturally offer the original tenants that are still here 1st dibs.I was there since June '08, 15 years.I loved living there.I cared about my neighbors.Irwin Miyamoto was the manager.We had a good relationship with him and his family.My son left a week after the fire,he was so devastated,But I'm still here.I would love to be back in Lahaina,but I couldn't find another apartment.63 apts.altogether.We wait and hope.I still have severe PTSD.I hope you understand.Mahalo,Tara	16	Ch. 2	26
C-T Folding	-	12	Webform	Can there be a separate biking, walking, golf cart lane, with it's own divider along the side? So many bikers are on Honoapi'ilani Hwy they deserve their own "green lane". (17) Thanks	17	Ch. 2	23
Kai Kalani	-	13	Webform	The next question is when do we get an escape route, not just a road down from Ulupalakua lookup down exactly 2.2 miles to the road at Makena golf course? (18) Thompson road, aka "Oprah's road" might be a handshake deal for MFD, but what about the rest of us trying to get down the hill for another fire event? (18 cont.)	18	Ch. 2	28
Darrell Tanaka	-	14	Webform	when you build the new highway, please ensure there is ample beach access routes periodically along the shoreline...DOT has recently cut off several of our traditional beach accesses from the McGregor's point to Olowalu and we don't appreciate losing our ability to fish and gather. (19) thank you.	19	Ch. 3.5	43
Raymond Ishii	Valley Isle Sports Shooters Club	15	Webform	Aloha I am Raymond Ishii the current President of the Valley Isle Sports Shooters Club, which is the oldest and largest user of the Ukumehame Firing range. While I fully support moving the existing highway inland there are a number of concerns I have. The routes appear to run makai of the firing lines which we are grateful although a couple are uncomfortable close to the range. (20) The Ukumehame Firing Range is the only legal firing range on the island and is used by thousands of sportsmen's practicing marksmanship and exercising their 2nd Amendment rights. It is also used by Law Enforcement and the military on a regular basis for Firearms and riot control training, Whenever unexploded ordnance is found on Maui, they take it to the range to blow it up. I have been on the range when EOD had blown up everything from IEDs, hand grenades, live artillery shell to 100 pounds of TNT. The preferred alternative route for the bypass is an elevated viaduct that will run makai of the firing ranges, with access to the range and the beach parks will be via the Ukumehame subdivision and back tracking on the existing highway. That section of highway between Ukumehame Beach Park and Papalaua State Wayside park often has waves breaking over the wall and with sea water covering the road. This is the section that is in most the danger to eventually fall into the ocean. Is the state planning to maintain that section of the highway to it existing standards for eternity or will it abandon that section of highway once the ocean claims it, and we will lose access to the range and beach park. To avoid the above, would it be possible to install a turn lane before the viaduct begins on the Pali side to allow direct access to the range and beach parks, plus a merge lane on to the highway for Maalaea bound traffic. (21) That section of highway is protected from the ocean by the Papalaua State Wayside Park. This will give direct access to the public to these areas and allow Emergency Vehicle responding to the area more direct access and quicker response time. It will also allow the state to simply block off the section of the road between Papalaua Park and Ukumehame park once the road is damaged by the ocean.	20	Ch. 3.5	36
				Another concern is the height of the viaduct, one or more of the routes has the entrance road the to range being under the viaduct. Will the viaduct be high enough to allow fire trucks and heavy equipment to drive under it. Due to the constant threat of brush fires on the Pali, and medical calls to the range, the more access Emergency Services has the better. (20)	20	Ch. 3.5	36
				Lastly during construction, will we be allowed access to the range. Understandably while the viaduct is being constructed, the section under it will be blocked off. Will a temporary road be constructed to allow access under a completed section of the viaduct to ensure access to the public firing range. (22) Thank You for allowing me to comment on this matter. Raymond Ishii President, Valley Isle Sports Shooter Club	22	Ch. 3.5	40
Robert Cole	-	16	Webform	Please do everything possible to make this happen. This is so very important for the island, the community, and the planet. (23) Mahalo, Robert.	23	Ch. 1	6
Dan Dennison	-	17	Email	Testimony in Support of the Realignment of Honoapi'ilani Highway with Emphasis on West Maui Greenway Connectivity. Aloha members of the committee, I am writing to express my support for the proposed 6.5-mile mauka relocation of the Honoapi'ilani Highway. This critical realignment will safeguard a vital transportation corridor that serves as a lifeline for West Maui residents, workers, and visitors, addressing the escalating risks posed by rising sea levels and climate change. (24) As we work toward a more resilient future, this project is a pivotal step in West Maui's recovery, resilience, and sustainability. However, while I support the realignment project, it is essential to highlight a complementary opportunity to strengthen active transportation options and preserve the vision of the West Maui Greenway (WMG). I respectfully urge the Hawai'i Department of Transportation (HDOT) to prioritize the following key elements within this project: 1. Utilization of the Old Highway 30 for West Maui Greenway Segments 6 and 7. (25) The existing coastal highway presents an ideal route for a dedicated bike and pedestrian path. Repurposing this scenic corridor as a multi-use trail is a cost-effective solution that supports safe, non-motorized transportation and recreation. This approach would facilitate the implementation of Segments 6 and 7 of the WMG (as outlined on pages 111 and 51 of the WMG Master Plan), creating a continuous and connected path linking West Maui communities. 2. Alignment with Climate and Community Goals. Incorporating the WMG within the realignment project would align with Maui's commitment to climate resilience, as outlined in the Nā Wahine Climate Settlement Agreement. A multi-modal transportation corridor, featuring pedestrian and bike-friendly infrastructure, supports efforts to reduce emissions, promote healthy lifestyles, and enhance disaster preparedness. 3. Community-Driven Design for Long-Term Benefits. By transforming the former highway into a recreational and commuting pathway, we can create a lasting community asset that bolsters economic recovery, public health, and local tourism. A dedicated bike and pedestrian trail would provide safe, scenic access to key cultural and natural landmarks, fostering community pride and environmental stewardship. In summary, while I support the current realignment effort, I respectfully request that the HDOT integrates plans for the West Maui Greenway into the redevelopment of the former highway route. By repurposing this space for non-motorized transportation, we can build a legacy of sustainable infrastructure that meets the needs of future generations and supports West Maui's long-term recovery and growth. (25 Cont.) Sincerely, Dan Dennison Honolulu.	24	Ch. 1	6
					25	Ch 3.5	31
					25	Ch. 3.5	31

Donna Clayton	West Maui Greenway Alliance	18	Email	Testimony in Support of the Realignment of Honoapiʻilani Highway with Emphasis on West Maui Greenway Connectivity. Aloha members of the committee, I am writing to express my support for the proposed 6.5-mile mauka relocation of the Honoapiʻilani Highway. This critical realignment will safeguard a vital transportation corridor that serves as a lifeline for West Maui residents, workers, and visitors, addressing the escalating risks posed by rising sea levels and climate change. (26) As we work toward a more resilient future, this project is a pivotal step in West Maui's recovery, resilience, and sustainability. However, while I support the realignment project, it is essential to highlight a complementary opportunity to strengthen active transportation options and preserve the vision of the West Maui Greenway (WMG). I respectfully urge the Hawaiʻi Department of Transportation (HDOT) to prioritize the following key elements within this project: 1. Utilization of the Old Highway 30 for West Maui Greenway Segments 6 and 7. (27) The existing coastal highway presents an ideal route for a dedicated bike and pedestrian path. Repurposing this scenic corridor as a multi-use trail is a cost-effective solution that supports safe, non-motorized transportation and recreation. This approach would facilitate the implementation of Segments 6 and 7 of the WMG (as outlined on pages 111 and 51 of the WMG Master Plan), creating a continuous and connected path linking West Maui communities. 2. Alignment with Climate and Community Goals. Incorporating the WMG within the realignment project would align with Maui's commitment to climate resilience, as outlined in the Nā Wahine Climate Settlement Agreement. A multi-modal transportation corridor, featuring pedestrian and bike-friendly infrastructure, supports efforts to reduce emissions, promote healthy lifestyles, and enhance disaster preparedness. 3. Community-Driven Design for Long-Term Benefits. By transforming the former highway into a recreational and commuting pathway, we can create a lasting community asset that bolsters economic recovery, public health, and local tourism. A dedicated bike and pedestrian trail would provide safe, scenic access to key cultural and natural landmarks, fostering community pride and environmental stewardship. In summary, while I support the current realignment effort, I respectfully request that the HDOT integrates plans for the West Maui Greenway into the redevelopment of the former highway route. By repurposing this space for non-motorized transportation, we can build a legacy of sustainable infrastructure that meets the needs of future generations and supports West Maui's long-term recovery and growth. (27 Cont.) Thank you for the opportunity to provide testimony. I encourage my fellow community members to participate in this process and advocate for an active transportation network that prioritizes safety, sustainability, and connectivity. Mahalo nui loa for your consideration. Donna Clayton/West Maui Greenway Alliance	26	Ch. 1	6
					27	Ch. 3.5	32
					27	Ch. 3.5	31
Constantine Mittendorf	-	19	Webform	Testimony in SUPPORT of Honoapiʻilani Highway Realignment – Connect the West Maui Greenway Aloha committee members, I am writing to support realigning the Honoapiʻilani Hwy and expanding the West Maui Greenway. Specifically, I support the proposed 6.5-mile mauka relocation for starters. This realignment is critical and will safeguard a vital transportation corridor. Realignment will mitigate against risks posed by rising sea levels, wildfire, and climate change. This project is a pivotal step in West Maui's recovery, resilience, and sustainability. (28) I urge the Hawaiʻi Department of Transportation (HDOT) to prioritize the following: Use the Old Highway 30 for West Maui Greenway. (29) The existing coastal highway presents an ideal route for a dedicated bike and pedestrian path. Further, it would help diversify transportation and options in case of emergency. It would be absolutely fantastic for our keiki and future. Folding the former highway into the West Maui Greenway will create a major community asset that bolsters economic recovery, public health, and local quality of life. Please incorporate the WMG within the realignment project. (29 Cont.) It would align with Maui's commitment to climate resilience, as outlined in the Nā Wahine Climate Settlement Agreement. Including the West Maui Greenway into this project will likely also help the Maui County and the State of Hawaii in reaching it's legal obligations regarding climate change and public safety. Mahalo nui loa for your consideration. Constantine Mittendorf January 23, 2025	28	Ch. 1	6
					29	Ch. 3.5	31
Jerome Kellner	-	20	Email	Aloha members of the committee, I support the proposed 6.5-mile mauka relocation of the Honoapiʻilani Highway. (30) I urge the Hawaiʻi Department of Transportation to prioritize key elements: Utilization of the Old Highway 30 for West Maui Greenway Segments 6 and 7. (31) The coastal highway is an ideal route for a dedicated bike and pedestrian path. Repurposing this corridor as a multi-use trail supports safe, non-motorized transportation and recreation.This approach facilitates the implementation of Segments 6 and 7 of the WMG (as outlined on pages 111 and 51 of the WMG Master Plan), creating a continuous and connected path linking West Maui communities. A multi-modal transportation corridor, featuring pedestrian and bike-friendly infrastructure, supports efforts to reduce emissions, promote healthy lifestyles, and enhance disaster preparedness. I support the current realignment effort, and request that the HDOT integrates plans for the West Maui Greenway into the redevelopment of the former highway route. (31 Cont.) Jerome Kellner	30	Ch. 1	6
					31	Ch. 3.5	31
Richard Gailey	-	21	Webform	To all concerned, The Island is a cultural Entity, moving the Honoapiʻiani Highway is within everyone's responsibility to protect this sacred place. (32) Mahalo.	32	Ch. 3.7	52
Van Fischer	Olowalu Ranch LLC	22	Email	Aloha, My name is Van Fischer and I am writing to you as the owner of lot 19, CPR Unit C in the Olowalu Mauka subdivision. Our property is located just mauka of the existing highway intersection with Luawai Street and wraps around to the back of the existing homes on Olowalu Village Road. We recently purchased this land and are in the planning stages of implementing a farming operation. The proposed highway location just cuts a small corner of our property and we are relieved that it will not destroy our vision for our farm. That said, we believe there are a number of reasons why a minor adjustment to a small section of the highway moving the route approximately 150-200 feet mauka will improve the safety and flow of traffic and help to avoid valuable natural resources. (33) As you are aware, most of the subdivision lots in this area have been condominiumized. I have attached a map as exhibit A for your reference. INTERSECTION ALIGNMENT & SAFETY: Once the highway is relocated, its intersection with Luawai Street will become the main intersection for access into Olowalu. Due to sea level rise, the existing highway will need to be closed off both north and south of Olowalu so all traffic will come down Luawai Street. Lower Olowalu will become an even more popular designation once the beaches are more secluded and user friendly. As the preferred Highway route is currently designed, it does not cross Luawai Street at a right angle creating an unsafe intersection for vehicles entering the highway from both the subdivision above the new highway and out of the lower Olowalu village (34). This intersection absolutely must be signalized with right turn lanes. (35) For vehicles driving up Luawai Street to the highway, there is a bend in the road that will prevent drivers from seeing the traffic that is stopped at the light causing a dangerous situation with lack of safe stopping distance. (See exhibit B). If the highway is relocated 150-200 feet mauka in this small section as proposed on exhibit B, the highway will cross Luawai Street at a right angle providing maximum sight distance for vehicles using the intersection and more stopping distance for vehicles approaching the intersection from the lower road. (34 Cont.) It also makes more sense to locate the detention basin next to this intersection as it can be used to collect the water that flows down Luawai Street in heavy rain events. (34 Cont) TOPOGRAPHY: The topography along a section of the mauka lot line of lot 19 CPR Unit C has a very steep 10-12 foot tall cut bank that runs along that property line in the exact area where the proposed highway crosses that property corner. Due to the continued rise up the hill, building the highway in this spot will result in the sloped bank of the highway will be approximately 20 feet high or more. Simply moving the highway mauka 100 feet or so will eliminate this situation. (36) In the area we are proposing the highway be moved to, the cross section topography is reasonable and will not add cost to the construction of the highway. (See exhibit C).	33	Ch. 5	110, 111
					34	Ch. 5	113
					35	Ch. 5	111, 113
					36	Ch. 5	114

				PROTECTION OF NATURAL RESOURCES: Mopua Stream is shown on the Olowalu maps as running straight down mauka to makai crossing through lot 19. It is an open stream from the mauka property line to the existing highway where a culvert crosses the highway into the ocean but is an underground stream above our property. The open section of this stream is teaming with life and well worth protecting. (37) In our exploration of the property, it appears there is also an underground stream channel that runs along the mauka property line of lots 19 and 20. (38) At a point on the Lot 20 mauka property line there is an existing abandoned pump house and moving water is visible in the bottom of the trench. It appears water comes together from multiple directions to this point and then flows underground along our mauka property line into the open section of Mopua Stream. Moving the highway mauka as we propose will protect this valuable water source as we do not know if it is coming from springs or other underground streams. (38 Cont.) Provisions should also be made for a culvert to be placed under the highway should State wish to re-establish all of Mopua Stream as an open channel in the future. (39) (See exhibit C)	37, 38, 39	Ch. 5	115
				FARM SOIL PROTECTION: The other consideration in locating the highway should be the protection of quality farming soil. The property above our mauka property line is very rocky and not suitable for farming. It is at best pasture land. All of lot 19 and 20 are comprised of good quality soil and it would be a shame to use any more of that land for the highway than absolutely necessary. (40) The viability of this soil to produce food plants and trees is clearly evidenced by the extensive crops being grown on the two farms by the regenerative farm stand and the two farms and orchards makai of the highway. Moving the highway mauka just the proposed distance protects an additional six or more acres of this soil.	40	Ch. 5	116
				HOUSING: The route as proposed cuts directly through Lot 19 CPR Unit A and Lot 20 CPR Units A and B and includes a proposed detention basin in that area. As such, the State will need to acquire most if not all of each of these parcel rendering the remainder unbuildable as home sites. (41) These parcels are well suited to local style housing and should be saved if possible. (See exhibit A). The land just mauka of these parcels consists of an agricultural parcel that is designated as part of the subdivision Greenway Open Space. If the State agrees to move the highway as proposed, the owners of Lot 20 Units A and B would be willing to donate an open space easement on one acre of the Lot 20 CPR Units A and B to offset a portion of the loss of the required greenway at no cost to the State. (41 Cont.) (See exhibit C). Moving the highway as suggested will add needed safety features, protect natural resources and reduce the cost of the project. We respectfully request that the State take a thorough look at all of the benefits this small adjustment will accomplish. Sincerely, Van Fischer	41	Ch. 5	117
Anna Nalaniewalu Vinuya-Palakiko	-	23	Email	My name is Anna Nalaniewalu Vinuya-Palakiko. I am the 3rd great grand daughter of James Palakiko and Julia Piko of Olowalu and 3rd great cousin of Lily, James Jr and Maui Palakiko. All 5 are buried on top of Pu'u Kilea in unmarked burials. My family kuleana aina is in Olowalu Valley and Ukumehame Valley (42). Our ohana of this area are; Palakiko,Piko, Pu'upa'a,Ka'awili,Pupuhi, Kaumaka, Kaho'opi'i, and Cason/Napaepae. It has been brought to my attention that our aina and iwi in Olowalu are in harms way. I have attempted multiple times to have my ohana burials marked and chained off to help prevent future vandalism because it has happened in past (42). example: petroglyphs with non prehistoric markings, names carved in the rocks and ceremonial items taken from the burials. My request is for them to be on the burial protection list and marked so visitors will know that it's protected Native Hawaiian burial site. (42) I also have death certificates proving my family is buried here if needed.	42	Ch. 3.6	45
	-			The proposed APE (orange line) I say A'ole completely to this option because this would expose my family burials and bring more harm and vandalism with the road directly in front of it... there would be little to no protection for them... The proposed Alternate route #1 (red line) I say A'ole completely to this option because my grandmother foundation can still be found within the bushes, near the old water tower fronting Naho'oikaika aina just behind the Olowalu General store. I come to this area to mourn and to honor my deceased kupuna, coming here brings me comfort and helps me to stay grounded. I say NO to APE and Alternate #1 because they both would disrupt the land of which my family lived and is buried upon and lacks of respect to our people Kanaka Maoli because it offers no protection for our iwi and some of the only untouched aina left here in west maui. (43)	43	Ch. 3.6,	47
	-			With this plan there is no acknowledgment of the ancient burials, heiau, reef, trees, water ways and uses, taro fields, and animals example: the endangered species ; Nene bird. (44) In order for me to ever be in agreement. There would have to be many steps taken to ensure all of which I addressed are acknowledged and cared for to the upmost respect as if it was your own families burials and kuleana. Protections in place for areas that have already been acknowledged to have ancient burials and Ka'iwaloa heiau. Research and surveyance of the land and water in and around Olowalu before construction using archaeologist, historians, and burial council. (45) Reviewing land patents, LCA land commission awards, survey records, and acknowledging water and land right given to our people from our Ali'i. (46) Allow for the people of the aina to determine the clarity of the research and surveyance. Starting with taking care of the people of the land and what is truly important our family history the only thing left for us to hold on too.. In conclusion, the only option that I would be in agreement with is Alternate #2, * It is far enough away from both my family burials, kuleana land and foundation to provide more distance in hopes to give more protection from unwanted vandalism or desecration. * It is far enough away to offer protection of archeological sites ae, Petroglyphs, Ka'iwaloa, Lanakila Church, and Japanese burials. I say NO (A'ole) to APE and Alternate #1. (47) I look forward to our future conversations to talk about my ohana and Olowalu. Thank you for your time and understanding of my concerns, Sincerely, Anna Nalaniewalu Vinuya-Palakiko	44, 45, 46	Ch. 3.6,	46
	-				47	Ch. 5	49
Saman Dias	Maui Bicycling League	24	Email	A Message from the Maui Bicycling League Chair: Help Shape West Maui's Future. Aloha Members of the Committee, My name is Saman Dias, and I am the Chair of the Maui Bicycling League. I am submitting this testimony to express my strong support for the proposed 6.5-mile mauka relocation of the Honoapi'ilani Highway. This project is critical for safeguarding this vital transportation corridor from the impacts of rising sea levels and climate change, ensuring the safety and connectivity of West Maui's communities. (48)	48	Ch. 1	6
				While I wholeheartedly support the realignment, I urge the Hawai'i Department of Transportation (HDOT) to seize this opportunity to enhance active transportation options by incorporating the West Maui Greenway (WMG) into the project. Specifically, I encourage prioritizing the following elements: Utilization of Old Highway 30 for West Maui Greenway Segments 6 and 7: (49) The existing coastal highway offers an unparalleled opportunity to create a safe, scenic bike and pedestrian path. Repurposing this corridor as a dedicated multi-use trail is a cost-effective and sustainable solution to advance Segments 6 and 7 of the WMG Master Plan, fostering a connected network of paths for the benefit of residents and visitors alike. Alignment with Climate and Community Goals: Incorporating the WMG into the highway realignment aligns with the Nā Wahine Climate Settlement Agreement and Maui's broader climate resilience goals. A multi-modal transportation corridor featuring pedestrian- and bike-friendly infrastructure reduces emissions, supports healthy lifestyles, and enhances disaster preparedness. Creating a Community-Driven Asset for Long-Term Benefits: Transforming the former highway into a recreational and commuting pathway will provide a lasting asset for the community, fostering economic recovery, public health, and local tourism. A dedicated bike and pedestrian trail will also preserve access to West Maui's cultural and natural landmarks, reinforcing our shared commitment to sustainability and stewardship.	49	Ch. 3.5	31
				This project is not only about improving infrastructure but also about building a resilient, sustainable future for West Maui. By integrating the West Maui Greenway into the realignment project, we can create a legacy that prioritizes safety, connectivity, and environmental responsibility for generations to come. Mahalo nui loa for considering my testimony. I encourage my fellow advocates and community members to join me in supporting this critical project and ensuring that the West Maui Greenway vision becomes a reality. Respectfully submitted, Saman Dias Chair, Maui Bicycling League			

Jason	-	25	Email & Webform	I'm writing in regards to the proposed hwy improvements in Olowalu/Ukumehame. I oppose all builds except maybe build 1 as long as this build doesn't demolish my wifes 2nd great grandmother's foundation located in the bushes right next to the old water tower/general store. (50) I'm completely against build 4 and your purple project line is going right through the side of Pu'u Kilea and exactly where the oldest petroglyphs are located (50).	50	Ch.1	18
				If you look up old satellite images from 1950 and compare them to now the land looks exactly the same so what is the purpose of this? (51) Is the land disappearing or is this a ploy to get Olowalu Town eventually passed? We don't want a new hwy that will increase taxes and bring in more millionaires. It's already hard enough to survive and the majority of kanaka have already been forced out due to the high cost of living. Only a few of the original families remain in Olowalu.	51	Ch 1	10
				After all of the attempts for olowalu town and now this hwy why is there still no attempts to protect our ancient sites like Kaiwaloa Heiau,Petroglyphs, and the many burials we have in Olowalu. (52) This includes my wifes ohana that is buried on top of Pu'u Kilea and the burials near our families land in Paumauau Olowalu. We find people literally standing on top of the burials drinking and watching the sunset and they have no clue what they are standing on or they just don't care. The only thing protected in this area are the mansions and of course they recently put up a new gate blocking our access to the heiau. So I say no to your new hwy and please fix what is already there (50 cont). Mahalo Jason	52	Ch. 2	45
Tavor White	-	26	Webform	Maui has a dearth of mixed-use public spaces, other than perhaps beaches, where people can enjoy our beautiful corner of the planet. And, beaches are not conducive for bicycles. Our island is a small place. So, maximizing green areas is essential to our quality of life. I urge you to design and approve plans that do so. (53) Mahalo.	53	Ch. 3.5	44
Dave Veldman	-	27	Email	Aloha Ken and members of the Committee! My name is David Veldman and I live in the Kaanapali Golf Estates. I have recently read about the proposed realignment of the Honoapi'ilani Highway. I am very supportive of the proposed 6.5 mile mauka relocation. (54) As planners for Maui's future this would seem to me to be an important component to safeguard the critical transportation corridor that serves West Maui.	54	CH1	6
				I have also been aware of and fully support the West Maui Greenway vision. This is a terrific opportunity to create a dedicated bike and pedestrian path along the old highway. Repurposing this corridor into a scenic bike and pedestrian corridor is an obvious positive and would help further the vision of the West Maui Greenway. (55) Thank you for listening. Dave Veldman	55	Ch. 3.5	31
Allen Surbida	-	28	Email	Aloha, County/state must keep the Ukumehame Firing Range where it is and provide easy access to the only range we have . This project is great but developers should make sure that the range entries are kept open and easy accessible. (56)	56	Ch. 3.5	36
John Rafael	-	29	Email	The Ukumehame Firing Range is the only public range on Maui. It needs to stay open and be easily accessible to the people. (57)	57	Ch. 3.5	36
David Kingdon	-	30	Webform	I strongly support the reallocation of older, makai sections of the Honoapi'ilani Highway to be designated, redesigned, and *maintained* as a dedicated multi-use path for running, cycling, and allied activities. (58)	58	Ch. 3.5	31
				This should also include prohibition or limitation of the use of 'e-bikes,' as many of those are capable of traveling at higher or even highway speeds, which could pose a danger to those employing muscle-powered sport and recreation. (59) As a bicycle commuter, distance runner, and a paramedic serving this area of Maui, I can personally and professionally attest that dedicating this portion of H-pi'ilani for running, cycling and the like will both promote health and improve safety. Further, if well-engineered, maintained, and marketed, this could actually provide a world class 'hike & bike' path for residents and visitors alike. Maui should be actively seeking adventure travelers, who typically have a lower environmental impact, more cultural sensitivity, with the same or even higher economic injects as more sedentary travelers. Thank you for your consideration.	59	Ch. 3.5	33
Michele McLean	-	31	Webform	Please use roundabouts at intersections whenever possible. (60) Mahalo! -Michele.	60	Ch. 3.14	92
Cesar Martin del Campo	-	32	Webform	Support for Honoapi'ilani Highway Improvements Project and Request for Correct Categorization of Parcel 48002115 To: Hawai'i Department of Transportation (HDOT) Subject: Public Comment on Honoapi'ilani Highway Improvements Project – Build Alternative 1. Dear Project Team, I am writing to express my support for the Honoapi'ilani Highway Improvements Project and its goals to improve transportation infrastructure while addressing environmental and safety concerns. (61) I appreciate the effort and planning involved in designing a project of this scale to benefit our community.	61	Ch1	6
				However, I would like to address a critical issue regarding the classification and evaluation of Parcel 48002115, which has been flagged for full acquisition under Build Alternative 1. It is essential that the property's current and planned uses are accurately reflected in the project documentation to ensure an equitable and informed process. 1. Misclassification of Parcel Use The current project documentation categorizes Parcel 48002115 as “not in use,” which does not accurately reflect its status. Specifically: The parcel is actively utilized for grass farming operations, supported by established water connections and other agricultural infrastructure. (62) Farming activities are currently underway, generating revenue and contributing to the agricultural economy of the area. Additionally, the lot is being developed with architectural plans for a residential structure to complement its agricultural use. (62 Cont.) This active farming operation and planned development demonstrate that the parcel is a valuable and productive asset, rather than idle or undeveloped land. If you have any questions, please contact me. Cesar El Toro Zoysia Turf - Maui Grass Farm LLC.	62	Ch 3.4	29
Anonymous 1	-	33	Testimony - Written	Shoreline access - Will the County also be working concurrently to provide shoreline access for the 6 mile stretch? What access to Ukumehame Beach Park and Thousand Peaks will be provided? Parking? (63)	63	Ch. 3.5,	43
				Squatting/ Homeless - How will the State/ County address safety and cleanliness along the shoreline? (64) The abandoned portion of cut mountain has become overtaken by homeless and abandoned vehicles.	64	Ch. 3.5	43
				Bike Lanes - How will cycling be addressed along the realignment and across the viaduct and bridge structures? (65)	65	Ch. 3.5	32
				Will a separate bike path along the shoreline be built? (66)	66	Ch. 2	22
Kathy Kihune	-	34	Testimony - Written	Thank you for making the time to bring many stakeholders together from Olowalu and Ukumehame. It has been very informative and positive hearing the available/ potential routes in an effort to mitigate sea level rise along with environmental concerns. (67) Applaud the open communication of your team. Mahalo.	67	Ch.1	1
Brandon Hazlet	-	35	Testimony - Written	For the Olowalu portion: use the mauka/ northern section of option #1 until it crosses option #2 then pick up that option. Basically use the uphill section of each 1&2 - a mauka hybrid - don't use the makai section of either. (68)	68	Ch. 2	20
Michele Lincoln	-	36	Testimony - Written	From past experience, SHPD does not verify accuracy of development information provided. Archaeologists and government departments are often more in compliance with the wishes of their employers and prospect of future work. For example, Kahoma Village reported no substantial historical importance. However , it was the homestead of David Malo LCA 3702, battle ground between Kam the Great and the high Chief of Maui, and part of the 'Alamihi Fishpond Complex. So, my suggestion is to consult with lineal descendants from each area the road goes thru to ensure pre-contact, iwi, and other cultural historical things are protected and preserved. (69) Least amount of impact to important Hawaiian sites. Iwi safes memorials for any disturbed iwi within the area.	69	Ch. 3.6	46
Anonymous 2	-	37	Testimony - Written	Please keep the communities as peaceful and untouched as possible. A highway through a community will change it forever, if possible please create the highway furthest away from infringing on local people. Please create a highway that encourages safety and more efficient transportation but discourages further development that does not enhance nor empower local people. (70) I hope the money allocated to the highway also gives money to remaining old, poor infrastructure and giving it back to the 'aina and for all locals to take care of and grow. I am confident we can find more creative solutions that empower and center our locals more. Federal funding is [illegible], but if we need more money to bring better solutions, I hope we pursue more money, maybe through private sources?	70	Ch. 2	19

Anonymous 3	-	38	Testimony - Written	Safety - Will intersections have lighting, signals, emergency roadside phones etc...? (71)	71	Ch. 3.14	93
	-			Travel Lanes Surface - Will the road be asphalt or pccp? [concrete] (72)	72	Ch. 3.14	95
	-			Cultural Preservation - Will any monies/ resources be steered back to the communities of Ukumehame and Olowalu for preservation and education? (73)	72	Ch. 3.7	50
Anonymous 4	-	39	Testimony - Written	It would be great if the project included returning the shoreline of the original highway to a more natural state; with minimal shoreline hardening. I'm concerned that giving this responsibility to the County will just result in miles of homeless encampments like those on the old highway when the bypass went in. (74)	74	Ch. 3.5	42
Linda Nahina Magallanes	-	40	Testimony - Written	Remove trees - prefer route 1. There are burials in the area where the preferred is located on the map. Very concerned about burials. (75)	75	Ch. 1, Ch. 3.6,	48
Jonathan Verona	-	41	Phone Call	Concern of the possible homeless camp and increase in homeless in the area between the existing Honoapiilani Highway and the Realigned Highway. (75)	75	Ch. 3.5	42
Tamara Paltin	Maui County Council	42	Email	Aloha Ms. Takara and Ms. Sullivan, I am writing to provide comments pertaining to the Notice of Intent to Prepare an Environmental Impact Statement regarding potential improvements to the Honoapi'ilani Highway (State Route No. 30) between milepost 11 in the vicinity of Papalaua Wayside Park in Ukumehame and milepost 17 in Launiupoko. As stated in the Draft Notice of Intent, "Improvements are needed to provide a reliable transportation facility that would not be inundated by the predicted 3.2-foot sea level rise and undermined by coastal erosion."			
				I firmly believe and strongly support the Honoapi'ilani Highway's proposed 6.5-mile mauka relocation as a necessary step in improving the safety and resilience of West Maui's transportation system. (76) The Federal Highway Administration began discussions on realignment, as early as June 2007. Since then, no advancements have been made. Now, swift action is needed to safeguard this essential highway from the growing threats posed by climate change and sea level rise, as well as ensure continuous connectivity for locals and tourists, who depend on this route for work and leisure.	76	Ch. 1	4
				Furthermore, I would like to encourage the Departments to think about implementing active transportation choices, particularly the West Maui Greenway (WMG) (77). Developed in 2022 as a vision for a proposed 25-mile multipurpose path that would connect Ukumehame to Lipoa Point, it can be viewed as a strategy to increase the region's resilience through sustainable, multimodal transportation for present and future generations. As such, I respectfully urge the Hawai'i Department of Transportation (HDOT) to prioritize the following key WMG elements within the project:	77	Ch. 1	6
				Use of (Old) State Route 30 for Segments 6 and 7. Segments 6 and 7 (the southernmost sections, from Lahaina Pali Trailhead to Launiupoko Beach Park) of the WMG are best served by the current (Old) State Route 30 since it could offer a dedicated bike and pedestrian path. Transforming this scenic road into a continuously connected, pedestrian and bike-friendly corridor, would promote safe, nonmotorized travel and recreation, that also serves as a cost-effective means of connecting West Maui communities. (78)	78	Ch. 3.5	31
				Conformity with Climate and Community Goals. Including the WMG in the highway realignment project is in line with Maui's commitment to climate resilience, as well as meets the Navahine v. Hawai'i Department of Transportation et al., Climate Settlement Agreement (2024), which requires the state to develop a plan to drastically reduce greenhouse gas emissions from the transportation sector with the goal of Zero Emissions by 2045. This multifunctional trail also promotes healthy lifestyles and augments disaster preparedness by serving as an evacuation route. Designed by the Community for Long-Term Benefits. Transforming Honoapi'ilani Highway into a recreational and commuting pathway would create a lasting community asset that boosts economic recovery, tourism, and public health. A designated bike and pedestrian path would promote environmental stewardship and community pride by offering secure, picturesque access to important natural and cultural landmarks.			
Nancy Haley	-	43	Zoom testimony	As part of HDOT's broader goal to repair the coastal highway network from Mā'alaea to north of Lahaina, the Honoapi'ilani Highway Improvements Project will bring much-needed service dependability and resilience. This project also offers a rare chance to incorporate the West Maui Greenway as a crucial component of this reconstruction (76).	76	Ch. 1	4
				The August 2023 wildfires has forced our community to rethink present and future disaster recovery and infrastructure planning. Conversion of the former highway into a cycling and pedestrian path, as well as an evacuation route, will shape a legacy of sustainable infrastructure that will benefit West Maui for many years to come (76). I respectfully ask for your consideration of incorporating the West Maui Greenway into the Honoapi'ilani Highway Improvement Project, and I look forward to seeing this move forward with these important elements included. Thank you for your time and consideration of this critical matter. Please feel free to contact me at: Tamara.Paltin@mauicounty.us. Me ka 'oia'i'o, Tamara Paltin Councilmember	76	Ch. 1	4
				My name is Nancy Haley, I've been a resident of Maui for, uh, 40 years, and, uh, I have listened to discussions about moving the highway back for a long time - it's been going on for a long time, so I'm kind of excited about that. I could see how it could really benefit the island.			
Cesar Martin del Campo	-	44	Zoom testimony	Um, I did have a question and I haven't read the EIS, uh, statements, I haven't read the paperwork yet, so I really need to do that and I will do that. But I was wondering about, things that came into my mind were, you know, when all the, unfortunately, when all the debris was moved to the Olowalu dump site after the Lahaina fires, and Bissen, Mayor Bissen, said that that will also be transported over to the Central Maui landfill at one time. And So I'm just kind of wondering, in my mind I was thinking, how is that going to impact these plans for the highway? (79) There's been concern about the dump site, the current dump site, possibly leeching into the coastal waters off of Olowalu. And so I'm just kind of wondering – and then this whole movement of transport trucks moving back and forth to get to the Central Maui landfill - so I'm just kind of wondering how that all ties into your EIS – have you taken a look at that? And do you think your highway proposal would affect that in some way, environmentally? (79) Or, you know, I sort of have some questions about that.	79	Ch. 3.18	107
				Ok, it seems like, uh, the preferred alternative – I know it's still not final – but, uh, it seems like, uh, our property will be impacted in the Ukumehame subdivision, I was just wondering, um, if there is gonna be someone contacting us to understand the level of impact to our farming operations – or who will be the best person for me to contact, in order to have a discussion. (80)	80	Ch. 3.4	29
Saman Dias	Maui Bicycle League	45	Zoom testimony	I am a, um, Maui, West Maui, resident and have been in Maui for over 25 years, in the west side, and I'm also the chair for Maui Bicycle League. So I would like to first, um, start with thanking the HDOT and FHWA and the consultants for a great job that you folks are doing, we are very appreciative.			
				Um, Maui Bicycling League do not oppose to the, uh, realignment. However, we have, we want to address, um, some, um, points to ensure part of the realignment that you folks do not forget the West Maui Greenway, and all of you very well aware, and the community as well, in Segment 3/4/5, and Segment 6/7, Segment 6 and 7, are getting exacted by the realignment; segment 3/4/5 also received recently acknowledgement for raised grant. So this 6/7 is really important to us. We want to ensure that – I am calling it old highway after the new highway begins – the old highway is getting realigned with segment 3/4/5 and the connectvity, uh, will continue to connect 6/7 to 3/4/5. So it's part of the design of the old highway – it's important that we do not forget the West Maui greenway 6 and 7. (81)	81	Ch. 3.5	31
				Um, and it should be part of the design to incorporate the bicycle pedestrian pathways, specifically safe for our children, as well as for our Kupuna – so do not forget that. And also, the new highway it is really important that we incorporate, somehow, safe bicycling and pedestrian crossing, very important, do not forget the pedestrian crossing to be incorporated to the new highway. (82)	82	Ch. 1	23

				Um, and you all are aware of the Navahine settlement agreement, uh, where HDOT has made commitments to reducing the carbon footprint, and, please use this as an opportunity to build that bike network that you all are supposed to complete in year 2030. (83) So these are just reinforcing – I have been talking to you folks every opportunity – I also had sent testimonies, and I’m just taking this opportunity as a way to remind again. And Mahalo, and thank you so much.	85	Ch. 3.5	
Karen Comcowich	-	46	Zoom testimony	I’m a West Maui resident. I drive the Honoapiilani Highway multiple times a week for, um, commuting to and from work, and I fully support this project because I see the wave impacts that are happening along the highway. (84)	84	Ch. 1	5
				I would like to echo what Saman said, that it’s really important to have pedestrian access that goes across the highway, and to ensure that the bicycle alignments are respected, and that safe bicycle infrastructure is included in the plan. (85)	85	Ch. 2	23, 30
				I would also like to say, um, say that there should be a location where there is some sort of passing zone (86) , uh, because one of the dangerous things that does happen is getting stuck behind visitors who are site seeing while people are commuting, um, encourages people to pass in unsafe ways. So if there is just a passing zone so people can get around the slower drivers.	86	Ch. 1	7
				And past that, um, avoiding Kuleana parcels as much as impacts to Kuleana parcels as much as possible. (87) I was impressed that uh archaeological resources and the environmental resources have been thought about as much as they had in the plan. And that’s all my comments for now – I’ll submit written comments.	87	Ch. 3.4	30
Teje Roy	-	47	Zoom testimony	Um, I’m agreeing with everyone else, I do drive the Pali a lot, like 4 times a week, and um getting stuck behind slow drivers and then having crazy fast drivers trying to pass them in bad areas – I think maybe widening the road in certain areas for passing would be great. (88)	88	Ch. 3.14	7
	-			And then, um, also, I just wanna go on the record: I don’t really, I mean I understand route 3 and 4 just from looking at the maps – but they do worry me a little bit because they go by the petroglyphs and, um, recently the petroglyphs have been getting vandalized, and so I’m afraid it would kind of instigate more of that happening (89) or maybe even road blocks, or traffic jamming up there from people pulling over to look in that area doesn’t really have a lot of parking space for people to be pulling over and looking at them. So I would ask you guys, if you do go route 3 and 4, to take that into consideration. And that’s all I really have to say. I do want to read up more on this, there is a lot to read up on, so... um, but yeah, that’s all I’d like to say.	89	Ch. 2	18
Jason Potts	-	48	Zoom testimony	Um, is there a way to ask questions on here, or is it just for comments? Sorry. Okay, my, my question was like with the highway that’s already there, specifically in Olowalu, what is going to be done with that? (90) I haven’t heard anything about that, so I’m a little confused.	90	Ch.1	18
	-			And then my other question was, the, um, I noticed on the map...where was it...was that your preferred build was going to go through 2 of those large rock mounds from the old, like, sugarcane company, right. I’ve been told there’s possibly bones in that. So, what will be happen- like what will happen if you guys find bones during construction? (91)	91	Ch. 3.6	51
	-			Okay, perfect, yeah, and I, I did submit testimony. It was through email, I’m not sure if you got it, um, my wife did also. Um, her family owns Kuleana in the back near the petroglyphs, so, hopefully you got our testimony. That’s pretty much it, I just had those questions, so, appreciate your time, thank you.			
Daniel Ornelas	-	49	Webform	Please consider making the road 4 lanes when built to allow better flow of traffic for those that commute to the west side for work. Impatient motorists stuck behind those driving below the speed limit routinely drive aggressively through this section in order to pass clusters of slower drivers. Building 2 lanes either direction will allow these motorists to safely pass slower drivers and reduce congestion through Lahaina. (92)	92	Ch. 1	8
Elaine Baker	-	50	Webform	Routing across any portion of the closed Olowalu Landfill should be avoided so that buried waste is not exposed to the environment. (93)	93	Ch. 3.18	107
				Routing across any portion of the Olowalu Recycling and Refuse Center will result in a reduction of solid waste services for West Maui. (94)	94	Ch. 3.17	106
Saman Dias	Maui Bicycling League	51	Email	Aloha, I am writing to provide testimony on the Honoapi’ilani Highway (State Route 30) realignment and strongly urge HDOT and FHWA to incorporate the West Maui Greenway (WMG) as part of this project. This realignment presents an unprecedented opportunity to enhance multimodal transportation, improve emergency evacuation infrastructure, and align with long-standing but unfulfilled state policies—most notably Act 214 (2007), which mandated the use of cane haul roads for emergency evacuation.			
				1. HDOT’s Failure to Implement Act 214 – A Costly Oversight. The 2007 Act 214 directed HDOT to incorporate cane haul roads into emergency evacuation planning. Yet over 100 lives were lost in the August 2023 Lahaina fire—many of which could have been prevented had these evacuation routes been open and accessible. The Honoapi’ilani Highway realignment must correct this tragic failure by formally incorporating cane haul roads as emergency evacuation routes. HDOT must negotiate with private landowners for right-of-way access and develop permanent emergency routes as part of this highway realignment. Failure to integrate emergency evacuation routes now would be a continuation of HDOT’s past neglect and put West Maui residents at continued risk. (95)	95	Ch. 1	12
				2. West Maui Greenway as a Vital Multimodal Corridor & Emergency Route. The West Maui Greenway (WMG), identified in the Hele Mai Maui Legacy Projects, is a critical component of West Maui’s future transportation network. This project is already funded in part and aligns with state and federal transportation priorities. Use of (Old) State Route 30 for WMG’s Segment 6: The realigned Honoapi’ilani Highway creates a perfect opportunity to repurpose the old highway as a dedicated bike/pedestrian corridor. (96) This cost-effective solution promotes safe, non-motorized travel while doubling as an emergency evacuation route for residents and visitors. Conformity with Climate & Community Goals: Navahine Settlement Agreement (2024): HDOT must drastically reduce transportation-sector greenhouse gas emissions and prioritize multimodal solutions. Act 131 & Complete Streets Policy: State law mandates that new highways must be bike-friendly and accommodate pedestrians. (95 cont.) The WMG achieves this.	96	Ch. 3.5	31
				Current Funding & Alignment with Federal/State Priorities. The WMG has secured substantial funding, and it is listed as a priority in multiple state and federal programs: \$15 million RAISE Grant – Federal funds awarded for WMG implementation. Inclusion in the Statewide Transportation Improvement Program (STIP) – Recognized as a priority transportation project for Hawai’i. Hele Mai Maui MPO Plan & Hawai’i Bike Plan – Officially designated as a core component of Maui’s transportation future. With this funding in place, HDOT must act immediately to integrate WMG into the highway realignment. Delays in implementation put these funds at risk.			
				4. A Safer Highway for Bicyclists & Pedestrians. The new Honoapi’ilani Highway must not repeat past mistakes—it must be designed with safety in mind: Separated Bike Lanes & Pedestrian Crossings: The highway realignment must include protected bicycle infrastructure, in accordance with the Complete Streets Policy & Act 131. Safe pedestrian crossings must be prioritized to reduce conflict with vehicle traffic. Disaster Preparedness Through Smart Design: The WMG serves dual purposes—as a transportation corridor and evacuation route in case of future wildfires or climate-related disasters (97)	97	Ch. 2	23
				Conclusion & Urgent Request for Action. The Honoapi’ilani Highway realignment is not just a highway project—it is a life-saving infrastructure upgrade. HDOT must implement the long-overdue Act 214 (2007) by formally incorporating cane haul roads as emergency evacuation routes. WMG’s Segment 6 must be integrated into the old highway to maximize the state’s investment in safe, sustainable transportation. The new highway must be bike-friendly, pedestrian-accessible, and aligned with state & federal multimodal goals. This is a critical moment for West Maui. HDOT and FHWA cannot afford to overlook these urgent priorities. I urge immediate action to ensure no more lives are lost due to lack of proper evacuation routes. Mahalo for your time and consideration. Respectfully submitted, Saman Dias Chair, Maui Bicycling League			

Kellee Emmerich	-	52	In-person verbal testimony	Hi, my name's Kellee Emmerich. I have been a Lahaina resident for almost 40 years. We owned a home on Lahainaluna Road. And during the Lahaina Fire we lost our home. One of my children, my daughter, and her family also lost their home in Wahikuli. And after living in -- at the Hyatt for eight months we were -- it was very healing to move to Ukumehame. We bought a property in Ukumehame. And we put two tiny houses there, which we are farming now. We have chickens. We planted over 20 trees. And we have a barn that we're going to be building.			
	-			And so it would be very inconvenient and disappointing if -- the higher up the highway was, it would be possibly affecting our property. And so my request is that it goes as low as possible through County land rather than through the resident or the residential areas or the agricultural areas or, yeah, private property. I'm concerned also about the noise from the road noise. The closer up it comes to the --where the people are living. So my request is that it would just stay as low as possible on the highway (98). I think that's it.	98	Ch. 2	21
Brad Emmerich	-	53	In-person verbal testimony	So after the fire I realized that this is going to be something that takes a long time. And so I needed to find a house or something -- a place for my family to live. So that's when we lived at property there in Ukumehame. I originally was trying to find a friend or something like that or somebody that was wanting to allow me to put a -- either a mobile home or something on their property. That's when somebody said, "Well, why don't you just look at the ones there in Ukumehame?" Which we had looked at earlier in the year but it was out of our ability. Anyway, to make a long story short, so after the fire I realized it was going to take a long time before we could rebuild. So we went and found something there in Ukumehame. And, like Kellee was saying, we were at the Hyatt for eight months. So while we were there we were working hard at trying to build something in Ukumehame. But it was difficult getting through all the process.			
	-			At any rate, now that we're there, of course, we really like the property and so we're more invested in what happens as far as the road is concerned. And there is property below us – the property that's next to the highway that is all County property. And there are “no trespassing” signs all over. But of course people have moved in there and, you know, they put up homesteads really -- gates and fences and right next to the "no trespassing" signs. (99) But it just -- it makes sense to me that the State would put the highway there at the County property at the bottom of Ukumehame development. And then my other concern was the noise mitigation -- if there was a way that they could --they would certainly -- my hope would be they would consider that because right now we can hear the highway noise. But when we go inside, you know, then at least you can't hear it when you're inside. But if the highway was closer it gets louder. And so my hope would be that they would take that into consideration also since we are a resident – that they would do something to try to mitigate the noise -- lessen the noise. (99 Cont.) That's it.	99	Ch. 2	21
Raymond Ishii	-	54	In-person verbal testimony	Hi, my name is Raymond Ishii. Is this thing on? Okay. I'm the president of the Valley Isle Sports Shooters Club, which is the oldest and largest user of Ukumehame Firing Range. While I fully support moving the existing highway, in that there are a number of concerns I have. The roads appear to run parallel to fire lines, which we are very grateful for, although there is a couple routes that were uncomfortably close. But my understanding is that's going to change.			
	-			The questions I have is right now to access the range and the Papaluaa Wayside Park we have to drive past the range via the Viaduct exit to the Ukumehame subdivision, then backtrack on the existing highway. (101) The question I had, which was actually answered, was is the State going to maintain that highway to a correct standard where you can actually drive on it. And I was told that's going to be turned over to the County. So that's a County question now. Because that section of road – if anybody's driven it -- is probably going to fall in the ocean pretty soon. Because if you look every so often you'll see the -- basically the ocean undercutting the existing jersey barriers. So the question I have is, number one, is that road going to be maintained? (101 Cont.)	101	Ch. 3.5	38
	-			The second question I have -- to avoid that, prior on the left side of the bypass would it be possible to just simply restripe existing road and put in a turn lane so we can get direct access and not have to basically bypass everything? That will give access to both the range and the beach park. (102) Then, going back the other way, a merge lane.	102	Ch. 3.5	39
	-			My understanding is a viaduct is going to be 25 feet high, which is good so emergency vehicles can go under it. But the other question we had was during construction will people be allowed access basically to the range because they're going to build the viaduct over the existing road? (103) And that's it for the range.	103	Ch. 3.5	39
David McPherson	-	55	In-person verbal testimony	I have one comment though as far as the highway itself -- if there's any thought about putting protected passing lanes on that highway? Because if anybody's driven it, what happens is you get behind somebody going 20, 30 miles an hour and you got a line of cars, you know, half mile, mile long. Then you get one guy ten cars back who's late for work and he's going to start passing people. So has there been any thought about putting passing lanes on that highway? Not the whole thing but just intermittently to let people around slow people. (104) That's all I got.	104	Ch. 1	7
	-			Hi, my name is David McPherson. I live in Kipuka Village. Most people know it as Olowalu Village. I've been there for about ten years with my family. As we look at the alternate routes, it seems -- and I would like to see it go a little bit higher away from the homes. There's a lot more space Mauka. Hopefully there's no park sites or anything that would be -- that would hinder that to be pushed further away from our homes. We have a small little village there. And it seems like it goes, you know, fairly close. So that's one thing that I would really like to see happen is that it would be pushed further away from our homes for the noise. (105)	105	Ch. 5	112
	-			And second of all, for the design team, if you thought about putting guardrails up (106) -- I know guardrails are to stop cars when there's no other runways that they can slow down. But guardrails keep vagrants out of State-covered lands. And that's a really – putting guardrails up would save our County and State dollars in not having to clean up cars. (106) I mean, if you do the stretch from Olowalu to Ukumehame you're going to see cars littered up there, especially if you take a helicopter and you fly over. It is unbelievable. And that takes a lot of money, a lot of effort, and it damages our wetland areas. So to keep everybody out of there, guardrails would eliminate anybody really driving into State-covered land or places that they should not be trespassing. (106) That's just one thing that I wanted to say on that.· Thank you, everybody, for coming. Appreciate it.	106	Ch. 2	22
Jason Wolford	-	56	In-person verbal testimony	Good evening. My name's Jason Wolford. I'm with SAST. We're a nonprofit training organization at Ukumehame Firing Range. (107) We're a nonprofit. We teach firearm safety and training. My concern is along with the fires when the range was closed -- people need accesses through that. So during the construction are we still going to be able to access that? (107) Because people want to go hunt. They need to be able to sight rifles in for ethical hunting purposes and things like that. If it's shut down another six to eight months during the construction of that, you're just going to have people going other places shooting and as well as being able to take firearms, classes, and trainings -- and safety trainings -- which is required by the State of Hawaii. You're basically going to be locking people out of access to these constitutional rights as well if we don't have access to that.	107	Ch. 3.5	40
	-			And my second question is I understand they're making it three lanes for finances and things like that. What happens when there's an accident on that elevated roadway? Whether there's guardrails and the vehicles are stopped there and people need to get through or -- how are you going to get people off of that? (108) If there's a fatality we all know the road shuts down here for six to eight hours. How are people going to get off of that elevated roadway to be able to at least go one way or the other to get back somewhere else rather than sitting in their cars for six to eight hours?	108	Ch. 5	118

Van Fischer	-	57	In-person verbal testimony	Hello, my name is Van Fischer. I own six acres in Olowalu right where the wai stream goes up right below where the proposed highway is going to go through. Fortunately, the new highway that's proposed barely clips the corner of my property. So I'm grateful that it misses mine. But my neighbors are not so fortunate. I'm here to ask you to move the intersection of Luawai and the highway Mauka, like, 150 feet for a number of reasons. One, the way that it hits Luawai Street now is at an angle so it doesn't create a right-angle intersection. (109) So you're going to have to realign the side roads as opposed to realign the highway. If you just move the proposed highway up about 150 feet it changes the arc of the highway as it comes through. And then it hits Luawai Street at a right angle so you have a proper intersection. That intersection's going to need to be signalized because it's going to be a very busy intersection going down into Olowalu Village. (109)	109	Ch. 5	111, 113
	-			Another issue is that on the back of our property lines -- Lot 20 and Lot 19 -- there's a subservice tributary to Mapua Stream. And there's an old pumphouse right where you're putting your highway through where if you go down in there you can see there's water flowing under there. And that is a tributary into Mapua Stream, (110) which runs right through mine and Dave's property just down further. The rest of Mapua Stream up above is also subterranean. But in the section through our property it's an open stream and there's tons of life in there. And we would like to protect it and enhance it if possible. And putting the highway through there is not going to accomplish that. (110)	110	Ch. 5	115
	-			There is a substantial topography difference between the area where the highway can go right above Lots 19 and 20 as opposed to below. There's about a 12-foot vertical bank. And if it were moved up then you wouldn't have to deal with that bank. (111) If you do have to deal with the bank, behind my property's going to be a 20-foot-high embankment to support that highway up there. So for these reasons I'd like to ask that you move it.	111	Ch. 5	114
	-			The most important reason probably is that right where you go through Lot 20 there was two parcels there -- A and B -- just on the southside of the wai stream where there was two two-and-a-half-acre parcels there with two local families who are in contract to buy those to build their homes on. (112) And now they can't build their homes there. You're going right through those properties. And all it would take is to move it 150 feet Mauka into an open space tract that's already there that nobody's going to be building on. (112) So I would appreciate it if you would look into it. I feel really good. I spoke with Jamie about this and I feel like she really understood and cared about what I was saying. So I'm hopeful that you will take this into consideration. Thank you.	112	Ch. 5	117
Nick Nielson	-	58	In-person verbal testimony	Hello, my name is Nick Nielson. I'm a property owner in Ukumehame. Most of my concerns have been addressed so far so I'm just going to note one concern for us. We're kind of concerned about the hours of construction -- if there's going to be limits or it's going to be a 24-hour operation and how that noise will be addressed and recorded before and after construction. Will there be a decibel meter at our location now and that's compared to construction? (113) That's it.	113	Ch. 3.16	105
Malihini Keahi	-	59	In-person verbal testimony	Aloha. I'm Malihini Keahi. I'm from Lahaina all my life. You know, my dad was Moon Keahi. And my father used to help a lot of representatives who were trying to make a change on the west side. And the craziest thing was that every time they wanted to add a road something else was coming. So again, you know, I live in Leali'i. I spoke my piece up there. I think what I'm afraid of more so is the highway. So you take up more land. You open up the highway. And then you infringe on people in Olowalu.(114) Some of them are wanting the changes. But you know what? I think leave Olowalu as peaceful as it is. It doesn't stop traffic to come into Lahaina. Today I had an appointment on the other side. I came back this way. Traffic was backed up on the bypass.· And I think the more road you make the more people come. (114)	114	Ch. 1	10
	-			And with what Lahaina has just already gone through it's, like, this is too much. It's just too much. I think Lahaina, Olowalu needs to be rethink -- I know they were wanting to make a whole village and a whole town. That place is sacred. I think the few people that know about it and the people that have learned about it in this last 20 years is plenty enough. We need to speak -- we need to share the history of Olowalu, not condemn it because we're going to have more people coming in. You know, that area -- it's been sacred for me all my life growing up (115) . Whenever we were gathering with my grandmother there we'd always end up down by Olowalu Pier and we would spend a week or a month, especially when my grandparents were alive, and we'd all gather. Everybody who was from Pu'ukoli'i on this side of the island -- we'd go to Olowalu. That is gone now. Yeah. My babies grew up there. My grandbabies today -- they don't -- they enjoy it there because of the feeling and as we grew up there. But Olowalu is special. And those of you that are there, you're very blessed. And I just feel that this whole highway thing -- and I know progress is progress.	115	Ch 3.7	52
	-			But, like I said, every time we add a road something else is happening. It gets developed.(114 cont) All the work that Tanya did of exposing our history is going to be covered all over again. Maybe not all the areas, but most of it -- of her hard work, of our past. And that is today that is going on -- that we get to know of our past, our history. For our children and our grandchildren and our great-grandchildren -- they'll never see that. It's going to be covered.(115 cont.) And you add one more road -- that's not going to help.			
	-			You know what? After the fire, traffic was very little. People respected and got only on the bypass through Lahaina and Keawe. And that got all messed up, yes. And then we asked these two, "Why couldn't you do the road Mauka and take it to Honokowai?" We said no more money. But you talk about money. So why don't you work on that part? (116)·	116	Ch. 2	27
Ms. Keele	-	60	In-person verbal testimony	You know, above -- So, anyway, I didn't mean to come talk but I had to say something. And I have my family Naho'oikaikas Olowalu and I was really worried where that road was going to change because they're right above the store. (117) And that's why I'm here.	117	Ch. 3.6	47
	-			So mahalo to having this in Lahaina. I think that's really helpful. I want to recognize that, Director Sniffen, you've done this a couple times now. So thank you -- coming to the community to have conversations. I'm happy to see so many people from the area that we're discussing because I found out about this meeting because I opened my, like, Lahaina Strong weekly email today. So they happened to have it in there. And so just advertisement wise if there's something better that you guys could do for future engagement because our community is really overwhelmed. And so we need to have a little bit of notice so we can plan around things.			
	-			I do want to acknowledge that in the presentation it looks like someone did realize it since you had these printed because on the boards it does say "a grassy median" and that made me very uncomfortable. So I want to make sure that we are talking about that as a native plant median and not a grassy of some sort. (118)	118	Ch. 3.11	70
	-			And then just engagement wise, you know, I'm just kind of wondering, like, how you've done it and how much you've done because this is something that, especially on Maui, we've found is that we just -- there just isn't really engagement. People say there's engagement and, like, yeah, some people go the meetings but, like, it's always the same groups of us that do. And I appreciate the explanation of the preferred versus the alternatives. I think that was really helpful.			
	-			I do think that cultural concerns is very -- it's a very significant conversation for us to have. You know, we know that there's going to be Iwi where we're talking about. And so having a plan for that -- because my understanding is, like, the state law, like, doesn't exist about it.· Like, you find Iwi and you stop. And that's, like, the law. So, you know, just being mindful of those kind of things because we know that's going to happen. (119)	119	Ch. 3.6	46
	-			And then to Dave's point, I really liked the comment about the guardrails. (120)	120	Ch. 2	22
	-			And I also enjoyed the comment about the passing lanes.(121) And I don't know that that's necessarily an option, but I do think that at the very least we should have signs that say, like, pull over to let other cars pass or something because that absolutely happens. And I think encouraging people to drive faster around isn't great.But letting people know, like, "Hey, you're driving too slow -- get out of the way" is, like, very helpful to those in our community who have to commute every day and deal with all these tourists. And I think that's really it. Otherwise, everything's been covered. So mahalo for having this.	121	Ch.1	7

Victoria Kaluna-Palafox	-	61	In-person verbal testimony	Aloha. Good evening. My name is Victoria Kaluna-Palafox. I live in Ukumehame. I am and we are Ukumehame restoration wetlands and restoration of Limu projects working in Ukumehame. Also working with Olowalu. We pray that we connect with our ohanas here in Lahaina so that we can continue the growth of Limu to renourish our oceans again and to protect our wetlands. And with that, Ukumehame for many, many years has been very dry. The wetlands has had no life until a couple years ago. If you go to Pohaku Aeko Street there's, like, a culvert they made. Over there it used to be all dry. The only time that wetlands used to fill up is when the rains used to come and a little seepage from the ocean floor. Today in that culvert there's water in there and there's fishes. There is life right where you're thinking of putting that highway. I ask you not to do it. I ask you to go ahead, bring your scientists, and check our 'Aina Ukumehame because it's coming alive again. There is fishes where you wouldn't think there is fishes. There are water pools in Ukumehame where there weren't water pools. (122) It is starting to show us. There was one developer -- and the only developer back there -- he tried to help the community by building eight cottages. In order to get their cottages built he covered up a wetland pool and put the eight houses on it. My question to you -- how are you going to run your highway? With a big berm or are you doing dry pipe? If it is dry pipe I am against dry pipe because the wetlands are important for us, especially at this time. We need to start concentrating on growing food for our people. And this is where it should be Ukumehame Olowalu -- the largest land in Lahaina. Open, barren, good 'Aina for grow food. (123) The other part that I am very concerned about is all the wetland pools. There's a special one that I talked to Tanya and I talked to Pua today. It was always kept within the Kupuna's, Mana', and Mo'olelo. We have not shared that space yet. As Olowalu has a cave up in the valley filled with water and that land belonged to the Nahina and Ho'oikaika's, today Peter Martin wants to funnel that water out. Ukumehame is the same. It is a land of food growth. We need to look into that history. The wetlands of Ukumehame starts from the pipe and it comes almost all the way to the river. The reason why I'm saying almost to the river is because the river's water flow comes within that passage so the wetlands could stop at one certain point. Again -- Yeah. Again I will repeat -- many years from the time of the first development that area was all wet. Within the last year or so water has been seeping under the road. Kane has found his way, therefore bringing the fishes back to where they was in time past.(123, cont.) I thank you very much for the time.	122	Ch. 3.10	71
	-		In-person verbal testimony		123	Ch. 3.9	53
	-		In-person verbal testimony		123	Ch. 3.9	53
Linda Nahina Magallanes	-	62	In-person verbal testimony	Aloha mai kakou. My name is Linda Nahina Magallanes. I'm an original descendant of Olowalu -- my biggest concern. I know a lot of culture is significant in that area.(124) I had asked about cutting down the trees through Olowalu -- the tunnel trees. I was told they cannot. Why? You protect the trees but you're not protecting the cultural significance of Olowalu. Every bit of Olowalu is significant culturally. (124 Cont.) I know that because I'm also from Olowalu with the connection of my ohana Naho'oikaika and Keao. I used to live where the farm is right now that -- by the highway -- that coconut farm and butterfly -- I lived there until we moved into Lahaina. But my biggest concern is if you put the road up higher what about the heiau on the top? That heiau is still going strong. There's also Pu'u Kilea, which is -- our Kupunas are buried on top. (125) You're going to put one highway through that. You have Awalua, which is the outskirts of Olowalu on the Lahaina side. Then you've got Kapa'i, which is on the Wahikuli side of Olowalu. So also these places need to be named correctly. Not -- Kapa'i is not Olowalu. That's Kapa'i. (125) I said this in many meetings. I came to many meetings. I also was on you guys' Zoom meeting and somebody said they was going to get back to me and to today never got back. It really disappoints me because nobody listened because it's all about the road. If you cut the trees down, you got one road there. Use the old cane haul road. What's so hard about that? Instead of going up (124, cont) -- because even on the cane haul there's -- the cane road to the regular road has cemetery on the left. Check West Maui Land EIS and put that together with your EIS. Something will go right. That's all I got to say. I'm kind of angry and I'm sorry by coming out like this. But nobody listening to the people who from here of Maui, of Lahaina, in Olowalu. I'm very upset because nobody listens. They're just doing what they like, put roads where they like, but not listening to the people -- listening to the money. Thank you.	124	Ch 2	17
					124	Ch 2	17
					125	Ch 2	19, 52
					124	Ch. 5	17
Mr. Kaluna Palafox	-	63	In-person verbal testimony	I'm from Ukumehame. We're the first ones that you guys gonna plow through, you know, and come into our kuleana. That's like taking a part of our livelihood. (126) Even through how much you guys coming through, but you still coming through our kuleana. It was two generations. For me hard because now we feel like we are losing out again, you know, the kanaka -- always the ones to lose all their -- especially for a generation. You know, how much more the kanaka people got to lose? You know, it's already there. It's already stated. We're impacted. Land Commission awards but they no accept one TMK over that. You know, we become a loser again. You know, we suffering already with what we get. We see all our beaches being destroyed, being used as recreation (127) . Ukumehame is a recreational park. Outsiders come do surf lessons and the instructor is just as White as the person that came off of the plane. You know, I could see with a local, but no. So our land is being used as a recreation. Economy. You can make money. What about the people that already is suffering -- all the kanaka? You got to fight for Lahaina. How is that? My wife -- generations, two generations. How come she got to fight just to stay on our land? Plenty kanaka kawai got to fight for our land. We already fighting for our water so we can make money. The hotels, the greedy ones, sucking all up the water. But the people suffer with 20 percent of water. How is that? Even the kanaka -- they get first rights automatic -- first rights no questions asked. They get the right for the water, for the 'Aina. You cannot just come through and think you own and just plow through all our cultural sites or our wetlands or the river and life. (126 cont.) I mean, I'm pure Filipino. My dad came from the Philippines. My mom born here. But my heart is so kanaka. And I cry about all of that because I know all these kanakas out here is suffering. They're suffering. You know, I know it's hard for me. I got to see all this with my own eyes. I mean, I'm 66 years old. I watch Maui from when I was born in to today how things look is all messed up. You know, I sorry. But the County and the State -- they making it more kapulu. You come with the machine, plow any kind, don't even -- you, sorry, but half-ass -- kapulu. I'm sorry. But mahalo. I hope they will get to you guys. You know, you guys -- we the first families. You guys coming through -- you know, I'm sorry. I no like you guys come through my property and my -- it's not my property, my kuleana. And my great-great-grandkids behind me -- I'd like them live the same life as me. So fix the old highway. You guys will save a lot more money by just fixing it. (126 cont.) Mahalo.	126	Ch. 1	11
	-				127	Ch 3.5	43
	-				126	Ch. 1	11
	-				126	Ch. 1	11
Ms. Felice	-	64	In-person verbal testimony	You kind of just, I guess, nipped it in the bud by saying that you're not going to build a highway up north because we don't have the funding. Right? But we need another way out of Lahaina. If you were here during the fire you would understand. (128)	128	Ch. 2	27
Viktoriy A Sirova, US Department of the Interior	-	65	Email	The U.S. Department of the Interior (Department), as required by the Department of Transportation Act of 1966 (49 U.S.C. §303 and 23 U.S.C. §138), has reviewed the December 2024 DRAFT Section 4(f) Evaluation for Honoapi'ilani Highway Improvements Project West Maui: Ukumehame to Launiupoko. The Hawai'i Department of Transportation (HDOT) proposes to build a new six-mile alignment of the Honoapi'ilani Highway to provide a reliable transportation facility in West Maui and reduce the highway's vulnerability to coastal hazards. Several areas with archaeological resources in Olowalu and Ukumehame were evaluated for potential impacts by one or more Build Alternatives. A draft Programmatic Agreement between HDOT and the Hawai'i State Historic Preservation Division includes protocols to avoid, minimize, or mitigate adverse effects to archaeological historic properties and burials. The 4(f) evaluation concludes that the Build Alternatives will not have direct, temporary, or constructive use of 4(f) resources within the Olowalu Sugar Plantation Historic District or on individually eligible and contributing resources in Olowalu. In Ukumehame, there are no eligible architectural historic properties - i.e., no 4(f) protected historic resources.			

	-			The Department, through the National Park Service (NPS), concurs with a de minimis finding, that the project will have no adverse effects on any Section 4(f) properties within the project area. (129) If you have specific questions related to our comments, please contact Danette Woo Nolan at Danette_Woo@nps.gov. For all other questions, please contact me at Viktoriya_Sirova@ios.doi.gov.	129	Ch 4	109
Hawaii State Department of Health, Clean Air Branch	-	66	Email	All project activities shall comply with Hawaii Administrative Rules (HAR), Chapter 11-59 and 11-60.1. (130) If your proposed project: <i>Requires an Air Pollution Control Permit</i> You must obtain an air pollution control permit from the Clean Air Branch (130) and comply with all applicable conditions and requirements. If you do not know if you need an air pollution control permit, please contact the Permitting Section of the Clean Air Branch. Permit application forms can be found here: https://health.hawaii.gov/cab/permit-application-forms/	130	Ch 3.15	99
	-			<i>Has the potential to generate fugitive dust</i> You must reasonably control the generation of all airborne, visible fugitive dust (130 cont.). Note that construction activities that occur near existing residences, businesses, public areas and major thoroughfares exacerbate potential dust concerns. It is recommended that a dust control management plan be developed which identifies and mitigates all activities that may generate airborne, visible fugitive dust. The plan, which does not require Department of Health approval, should help you recognize and minimize potential airborne, visible fugitive dust problems. Construction activities must comply with the provisions of Hawaii Administrative Rules, §11- 60.1-33 on Fugitive Dust. In addition, for cases involving mixed land use, it is strongly recommended that buffer zones be established, wherever possible, in order to alleviate potential dust concerns. You must provide reasonable measures to control airborne, visible fugitive dust from the road areas and during the various phases of construction. These measures include, but are not limited to, the following: Planning the different phases of construction, focusing on minimizing the amount of airborne, visible fugitive dust-generating materials and activities, centralizing on-site vehicular traffic routes, and locating potential dust-generating equipment in areas of the least impact; Providing an adequate water source at the site prior to start-up of construction activities; Landscaping and providing rapid covering of bare areas, including slopes, starting from the initial grading phase; Minimizing airborne, visible fugitive dust from shoulders and access roads; Providing reasonable dust control measures during weekends, after hours, and prior to daily start-up of construction activities; and Controlling airborne, visible fugitive dust from debris being hauled away from the project site. If you have questions about fugitive dust, please contact the Enforcement Section of the Clean Air Branch. Please also see fugitive dust fact sheet at: https://health.hawaii.gov/cab/files/2024/02/Hawaii-Fugitive-Dust-Fact-Sheet-February-2024.pdf.	130	Ch 3.15	99
	-			Includes construction, demolition, or renovation activities that involve potential asbestos and lead containing materials (131) Please contact the Indoor and Radiological Health Branch at (808) 586-4700 or visit: https://health.hawaii.gov/irhb/ Increases the population and potential number of vehicles in an area (132) The creation of apartment buildings, complexes, and residential communities may increase the overall population in an area. Increasing the population in an area may inadvertently lead to more air pollution via vehicle exhaust. Vehicle exhaust releases pollutants in the air that can negatively impact human health and air quality, including lung irritants, carcinogens, and greenhouse gases.	131	Ch 3.15	100
	-			Ensure that drivers keep vehicle idling times to three (3) minutes or less. Consider and incorporate support for alternative transportation options such as bike racks and/or electric vehicle charging stations where possible. If you have any questions, please contact the Clean Air Branch at (808) 586-4200 or at cab@doh.hawaii.gov.	132	Ch 3.15	101
	-		Email	The Department of Health (DOH), Clean Air Branch (CAB), will no longer be responding directly to requests for comments on the following documents (including pre-consultation, early consultation, preparation notice, draft, final, addendums, and/or supplements): Environmental Impact Statements (EIS) Environmental Assessments (EA) Anticipated Finding of No Environmental Significant Impacts (AFONSI) Conservation District Use Applications (CDUA) Special Management Area Permits (SMAP) For agencies or project owners requiring DOH-CAB comments on one or more of these documents, please utilize the DOH-CAB Standard Comments below regarding your project’s responsibilities to maintain air quality and any necessary permitting. DOH-CAB Standard Comments are also available on the DOH-CAB website located at: https://health.hawaii.gov/cab/files/2024/07/Standard-Comments-for-Land-Use-Reviews-Clean-Air-Branch-July_2024.pdf. If you have any questions, please the Clean Air Branch at (808) 586-4200.			
Kathleen Rooney, Ulupono Initiative	-	67	Email	Ulupono Initiative appreciates the Hawaii Department of Transportation’s work on this realignment project and generally supports the chosen alternative; we acknowledge the significant amount of care and time spent on this project to bring it to this point. We also appreciate the department’s transparent approach on the website, particularly the explicit connection to the Olowalu project, as well as discussions on Maui County’s role in the use of the old road. While acknowledging these efforts, we recommend — similar to our past comments — that consideration be made to strengthening the multimodal and active transportation components within the project framework. This could include any number of more robust commitments, including: • Consider modifying the current cross-section design to be more amenable to active transportation elements, such as a moving the roads more inward and including a multi-use path. • Strengthen financial commitments to the active transportation infrastructure. While the West Maui Greenway represents a promising initiative, securing dedicated funding would ensure its implementation. Similar funding considerations could benefit the Olowalu project, creating a comprehensive active transportation network. (133) This list is not exhaustive, and Ulupono stands ready to collaborate on the exploration of these and other options with Hawaii Department of Transportation. Mahalo, Kathleen Rooney Director, Transportation Policy and Programs Ulupono Initiative	133	Ch 3.14	96
Jeremy Morgan	U.S. Army Corps of Engineers	68	Email	Thank you for allowing the U.S. Army Corps of Engineers the opportunity to provide comments on the Honoapiʻilani Highway Improvements Project draft EIS. When fill quantities and impact areas within aquatic resources are finalized, please submit a Corps permit application to CEPOH-RO@usace.army.mil, so we can begin the review process for discharges of fill under Section 404 of the Clean Water Act.		Ch. 3.9	67
Brian J. Neilson	Hawaii Department of Land and Natural Resources - Division of Aquatic Resources	69	Email	The project will cross two major streams—Ukumehame and Olowalu—but the Draft Environmental Impact Statement (EIS) does not adequately assess the potential impacts of the highway relocation on these streams. Both streams are home to endemic Hawaiian gobies, including the IUCN-listed Sicyopterus stimpsoni, and snails, which have been observed during the CWRM/DAR stream monitoring. (134) As these species are amphidromous, they rely on healthy and continuous stream habitats for their life cycles. Therefore, we recommend that a more detailed analysis of impacts to the stream habitats be included in this EIS. (134) Additionally, the EIS does not clearly specify the type of stream crossing to be used. The impact on water flow and habitat connectivity will differ significantly depending on whether a culvert, bridge, or viaduct is employed. It is important to note that culverts, overtime, can develop undercuts and erosion, which can obstruct the migration of stream species and disrupt habitat continuity. These potential issues should be avoided. There are also no clearly defined Best Management Practices (BMPs) for stream protection during construction. (135)	134	Ch. 3.10	60
					135	Ch. 3.10	61

				The report identifies Alternative 2 as the preferred route for Olowalu and Alternative 1 for Ukumehame. However, in Table S-3, a new column labeled "Preferred Alternative" appears, which the score does not seem to align with Ukumehame's Alternative 1. Figure S-6 depicts the preferred alternative route, but it labels it as U-1 and 0-2, making it difficult to clearly distinguish the modified section. According to Table S-3, the preferred alternative is intended to reduce impacts to the wetland, and we would like to see a clearer depiction of how this route has been modified from Alternative 1 on the map. Furthermore, it would be appreciated if wetland and other waterbodies are delineated in the map to assess the impact to the area more accurately. (136) Although 0-3/4 and U-4 did not achieve the highest overall score, from an environmental perspective, these alternatives perform well by minimizing impacts to the wetland and preserving the vulnerable lower stream reach habitat. This habitat is crucial for two of our endemic goby species, Eleotris sandwicensis and Stenogobius hawaiiensis, which are unable to migrate to the upper reaches. (137)	136	3.9	63
				Additionally, the sea level rise simulation indicates that certain sections of the preferred U1 route will be adjacent to or within the sea level rise exposure area, potentially increasing the risk of coastal hardening and erosion in the future. (138)	138	Ch. 3.13	89
Dina U. Lau	Hawaii DLNR - Engineering Division	70	Email	The rules and regulations of the National Flood Insurance Program (NFIP), Title 44 of the Code of Federal Regulations (44CFR), are in effect when development falls within a Special Flood Hazard Area (high-risk areas). Be advised that 44CFR, Chapter 1, Subchapter B, Part 60 reflects the minimum standards as set forth by the NFIP. Local community flood ordinances may stipulate higher standards that can be more restrictive and would take precedence over the minimum NFIP standards. The owner of the project property and/or their representative is responsible for researching the Flood Hazard Zone designation for the project. Flood zones subject to NFIP requirements are identified on FEMA's Flood Insurance Rate Maps (FIRM). (139) If there are questions regarding the local flood ordinances, please contact the applicable County NFIP coordinating agency below: Oahu: City and County of Honolulu, Department of Planning and Permitting (808) 768-8098. Hawaii Island: County of Hawaii, Department of Public Works (808) 961-8327. Maui/Molokai/Lanai County of Maui, Department of Planning (808) 270-7139. Kauai: County of Kauai, Department of Public Works (808) 241-4849.	139	Ch. 3.11	88
Ciara W.K. Kahahane	Hawaii DLNR - Commission on Water Resource Management	71	Email	We recommend the use of best management practices (BMP) for stormwater management to minimize the impact of the project to the existing area's hydrology while maintaining on-site infiltration and preventing polluted runoff from storm events. (140) Stormwater management BMPs may earn credit toward LEED certification. More information on stormwater BMPs can be found at http://planning.hawaii.gov/czm/initiatives/low-impact-development/ There may be the potential for ground or surface water degradation/contamination and recommend that approvals for this project be conditioned upon a review by the State Department of Health and the developer's acceptance of any resulting requirements related to water quality. (141)	140	Ch. 3.9	65
					141	Ch. 3.9	66
Michael Cain	Hawaii DLNR - Office of Conservation and Coastal Lands	72	Email	The Department of Land and Natural Resources (DLNR), Office of Conservation and Coastal Lands (OCCL) is responding the request for comments on the DEIS for the proposed Honoapi'ilani Highway Improvements. The OCCL regulates land uses in the Conservation District. The preferred alternative as presented in the DEIS moves the existing highway out of the Conservation District and away from coastal hazards and sea level rise. According to the plans as presented in the DEIS, the intent of DOT is to leave the existing road and shoreline hardening structures in place, and to transfer ownership and maintenance responsibilities to Maui County to become a local access road. OCCL would like to see an assessment of the cost and long-term impact to the shoreline of removal of the existing road and all affiliated protective structures. (142) Given the history and exposure of portions of the existing road to high waves, high tides and sea level rise, ongoing hardening and continual maintenance operations in the Conservation District may be required to maintain the road in service.	142	Ch. 1	13
				Portions of the old road are in the Limited Subzone of the Conservation District. Per HAR §15-5-12, the objective of the Limited Subzone is to “limit uses where natural conditions suggest constraints on human activities”. The natural conditions at the location of the existing highway have necessitated the improvement plan and realignment of the road away from coastal hazards and sea level rise. As identified in the DEIS, approximately four of the six miles of highway proposed for relocation are in the sea level rise exposure area (SLR-XA) at a predicted 3.2ft of sea level rise. The DEIS acknowledges that continued use of the highway at its existing location would require ongoing maintenance work and hardening to achieve short-term fixes to the chronic impacts of coastal hazards. Footnote 5 on page 2-12 of the DEIS states the following: “As part of the relinquishment process, HDOT and the FHWA must concur that the land is not needed for federal-aid Highway purposes in the foreseeable future, that the new roadway segment and its traffic operations would not be adversely affected by relinquishments, and that the lands are not suitable to restore, preserve, or improve the scenic beauty of the new roadway.” The lands which are currently occupied by the existing highway are suitable for restoration. Naturalization of the shoreline would improve public access, return public trust land to the public, and benefit reef health at the Olowalu reef by enabling the land to naturally filter freshwater runoff. Restoration may provide a more substantial storm and wave buffer for the areas of the realigned highway which will remain in the SLR-XA. Finally, the scenic beauty of the realigned road will be improved if the existing road is removed and restored to a natural beach profile. (143)	143	Ch. 1	14
				Please contact Amy Wirts, University of Hawaii Sea Grant Extension Agent and OCCL Coastal Lands Program Coordinator at (808) 587-0376 or by email atAmy.E.Wirts@hawaii.gov, should you have any questions regarding this matter.			
Russell Y. Tsuji	Hawaii DLNR - Land Division Maui District	73	Email	We have no comments.			
Kathleen Rooney	Ulupono Initiative	74	Webform	Ulupono Initiative appreciates the Hawaii Department of Transportation’s work on this realignment project and generally supports the chosen alternative; we acknowledge the significant amount of care and time spent on this project to bring it to this point. We also appreciate the department’s transparent approach on the website, particularly the explicit connection to the Olowalu project, as well as discussions on Maui County’s role in the use of the old road. While acknowledging these efforts, we recommend — similar to our past comments — that consideration be made to strengthening the multimodal and active transportation components within the project framework. (153) This could include any number of more robust commitments, including: • Consider modifying the current cross-section design to be more amenable to active transportation elements, such as a moving the roads more inward and including a multi-use path. (153)	153	Ch. 3.14	96
				• Strengthen financial commitments to the active transportation infrastructure. While the West Maui Greenway represents a promising initiative, securing dedicated funding would ensure its implementation. Similar funding considerations could benefit the Olowalu project, creating a comprehensive active transportation network. (153) This list is not exhaustive, and Ulupono stands ready to collaborate on the exploration of these and other options with Hawaii Department of Transportation. Mahalo, Kathleen Rooney Director, Transportation Policy and Programs Ulupono Initiative.	153	Ch.3.14	96
					153	Ch. 3.14	96
Juile Durham	-	75	Email	Aloha, I am writing to express my support for the proposed 6.5-mile mauka relocation of the Honoapi'ilani Highway, in conjunction with the Maui Greenway Project . Before moving to the islands in 2018, I had lived in two towns/cities (Boulder, CO and Melbourne, Australia) with amazing greenway infrastructure, and had travelled to several others (Austin, TX, Copenhagen, DEN, Sydney, AUS) I saw the benefits that the greenways brought to the communities where they were located. They were heavily utilized for commuting and exercise, but also created environmental enhancement and protection. The greenways created natural buffers and green spaces and reduced congestion, but also created a tighter knit sense of community and a peaceful environment for nearby home owners.	154	Ch.3.5	31

				My dream is that Maui could become another model community which demonstrates the positive impacts of greenspace and greenways, and this is the perfect opportunity to begin making this happen. I feel like it could be a key component to recreating a sense of renewal on the West Side while also creating a sense of newness and hope in the community and island at large. Further, this is a critical realignment that will safeguard a vital transportation corridor that serves as a lifeline for West Maui residents, workers, and visitors, addressing the escalating risks posed by rising sea levels and climate change. As we work toward a more resilient future, this project is a pivotal step in West Maui's recovery, resilience, and sustainability. I respectfully urge the Hawai'i Department of Transportation (HDOT) to prioritize the following key elements within this project: 1. Utilization of the Old Highway 30 for West Maui Greenway Segments 6 and 7. (154) The existing coastal highway presents an ideal route for a dedicated bike and pedestrian path. Repurposing this scenic corridor as a multi-use trail is a cost-effective solution that supports safe, non-motorized transportation and recreation. This approach would facilitate the implementation of Segments 6 and 7 of the WMG (as outlined on pages 111 and 51 of the WMG Master Plan), creating a continuous and connected path linking West Maui communities. 2. Alignment with Climate and Community Goals. Incorporating the WMG within the realignment project would align with Maui's commitment to climate resilience, as outlined in the Nā Wahine Climate Settlement Agreement. A multi-modal transportation corridor, featuring pedestrian and bike-friendly infrastructure, supports efforts to reduce emissions, promote healthy lifestyles, and enhance disaster preparedness. 3. Community-Driven Design for Long-Term Benefits. By transforming the former highway into a recreational and commuting pathway, we can create a lasting community asset that bolsters economic recovery, and public health. A dedicated bike and pedestrian trail would provide safe, scenic access to key cultural and natural landmarks, fostering community pride and environmental stewardship. In summary, while I support the current realignment effort, I respectfully request that the HDOT integrates plans for the West Maui Greenway into the redevelopment of the former highway route. By repurposing this space for non-motorized transportation, we can build a legacy of sustainable infrastructure that meets the needs of future generations and supports West Maui's long-term recovery and growth. Thank you for the opportunity to provide testimony. Mahalo nui loa for your	154	Ch. 3.5	31
Dr. Marion Ceruti	-	76	Email	Aloha Mr. Tatsuguchi, Mahalo for the opportunity to comment on the EIS for the proposed road project. In general, the idea is good but care should be taken to provide sufficient exits and roads in the makai direction for beach access, to include better parking, particularly at the Ukumehame beach park, on the mauka side of the existing road, (155) if possible. Moreover, more and better parking is needed at the Ukumehame Firing Range to keep users from having to park their cars in the mud puddles. This is a great opportunity to upgrade the parking at Papalaua to do something about the drainage problem that has plagued the area for years. (156) It might be necessary to relocate the nenes in the area temporarily, for their safety. (157) E Hana Kakou, Dr. Marion Ceruti, West Maui resident	155	Ch. 3.5	43
					156	Ch. 3.5	41
					157	Ch. 3.10	72
Roy Ikeda	Hawaii Department of Education	77	Email	Dear Mr. Tatsuguchi, Thank you for your email dated January 6, 2025. Based on the information provided and despite the Lahaina Bypass Highway serving as an alternate route for Honoapiilani Highway, the Hawaii State Department of Education (Department) is concerned about commute times and traffic patterns for its students, parents, and staff as there are many that have been displaced to different parts of the island due to the West Maui Wildfires. With the uncertainty that still lies ahead, the Department requests that your staff and consultants meet with the administrators of Lahainaluna High, Lahaina Intermediate, and Nahienaena Elementary Schools to present traffic impacts leading to and from each of these campuses and specific timelines associated with the project. (159) Should you have any questions, please contact Cori China, of the Facilities Development Branch, Planning Section, at (808) 784-5080 or via email at cori.china@k12.hi.us. We appreciate the opportunity to comment. Sincerely, Roy Ikeda Interim Public Works Manager Planning Section	159	Ch. 3.14	97
Dennis R. Eyler	-	78	Email	Aloha, I was able to attend the first four of the public presentation of the DEIS for this project on January 23. I have filled out the form that was handed out and I have attached a copy to this email. My interest in this project is based on several things. 1. My wife and I have been regular visitors to Maui since the 1990's. In 2012, after I retired, we bought a residence here and since then, we spend several months of the year on the island. 2. We were shocked and saddened at what happened to Lahaina as a result of the fires. We know several people who lost their homes. 3. I would like to help in the island's recovery. 4. I spent my career as a traffic and highway preliminary design engineer, and I worked as an employee for 2 state transportation departments and then as a consultant for government agencies for 35 years and worked on highway projects in 6 different states. I have attached a copy of my resume. 5. Since the 1990's I have been involved with the development and implementation of projects meeting the design criteria of the Super-2 highway concept and also in the development and implementation of reduced conflict intersections (RCIs). The RCI concept utilizes the proven safety benefits of certain roundabout features but also strives to minimize the added travel time to the major roadway when it intersects with low volume minor roadways. I have attached a few of the technical papers I have presented on these topics. The most recent was at the University of Minnesota's Center for Transportation Studies annual meeting in 2023. It was on the subject of the Super-2 and in that presentation, I referenced the completed section of the Lahaina Bypass on pages 14 and 35. 6. I am also very impressed by the high daily traffic volumes carried by the existing facility. Of course, I also realize that the flows are fairly balanced directionally and that there are no high-volume crossing roadways due to the roadway following the coastline. 7. In viewing the various materials of this projects DEIS, I quickly concluded that the project as a whole is badly needed. The environmental issues are many and I certainly have no problem with the preferred alignment and its proposed limited access 8. I do have some questions about the geometry that is proposed for those limited access intersections. I also realize that the figures in the DEIS are conceptual and not final. A. The use of left side acceleration lanes without sufficient length to allow entering traffic to get up to speed and the requiring those vehicles to merge right. In my experience left side merges and lane drops have proven to have higher crash rates. Having those entering left turns sit in the center of the roadway without any physical, lateral buffering space from traffic passing on both sides at higher speeds, would seem to be uncomfortable for the drivers and may result in sideswipe crashes. However, since there are many existing locations with left side merges on Maui, my concerns would be greatly lessened if the crash data shows that they perform safely on Maui. (160) 9. The Reduced Conflict Intersection (RCI) design concept eliminates those problems and provides the following benefits. All conflict points involve traffic headed in on direction conflicting with another single traffic movement. At all conflict points the "threat" or priority traffic movement is always approaching from the left or from ahead, never from the right. Since drivers sit on the left sides of their vehicles, this provides good visibility when selecting a gap to enter or cross traffic. No left turns are required into higher speed, higher volume traffic flows. Those features provide safety advantages similar to roundabouts. In addition, RCIs provide two stage crossings of the heavy, high-speed traffic movements and two stage left turns onto the major roadways for any length vehicle. Vehicles of any length are not required to cross both directions of the major roadway while requiring a gap in both directions. (160 cont.)	160	Ch. 3.14	94
					160	Ch. 3.14	94

10. The Minnesota DOT recently announced that on their rural divided highways, they will no longer construct full movement intersections without traffic signals or roundabouts (160 cont.) being provided on day 1. Instead, they will use J-turns or Restricted Crossover U-turns (RCUTS), both of those designs meet the criteria of the RCI. Here is a picture of a MnDOT J-turn for an intersection on a divided highway. Traffic entering from the minor road desiring to cross or turn or turn left, waits for a gap in traffic approaching from the left and then crosses the through lanes and enters the turn lane for the downstream U-turn. The turn lane length for the U-turn is based on speed and storage needs. At the U-turn intersection, a pavement “loon” or widening is provided to accommodate the turning path of the design vehicle making that U-turn. There are other possible designs based on speeds and major roadway traffic volumes. There have been RCUT intersections built on high volume, high-speed roadways where traffic on the minor street turns right, merges, then weaves across to a downstream U-turn Lane. The distances needed for that weave are typically greater than 1700 feet. A J-turn on a high-volume, two-lane roadway would probably not need to use a design where entering traffic gets up to speed, merges, then exits, and slows to make the U-turn. With only one through lane, a gap in the traffic is likely to arrive due to a slow vehicle and the minor roadway vehicle desiring to cross or make a left onto the major roadway can easily get to the U-turn Lane. Here is a typical sign used on the minor roadway approaches. Here’s an example of a full RCUT intersection. It’s located at US-212 and MN-284 in Cologne, MN. This type of intersection is being used in Minnesota, Wisconsin, Maryland, North Carolina (they call them Super Streets) and Texas.

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Here is a list of the attachments. 1. DEIS comment form. 2. My resume. 3. The Super-2 presentation at the U of M CTS conference in 2023. 4. Alternative Intersection Designs Wis ACEC-2009. 5. Sketches of possible Reduced Conflict Intersection designs for use of a “Super-2” roadway along with other information. Look these materials over and use them as you desire. I will not have any communications with the public regarding this material. I will always defer to the people responsible for operating the highways. I will be on Maui and available to meet, if you so desire, until February 27th. I’ll be back on Maui during the first two weeks in June. If your consultant Jamie Bentz wants to contact me, when we are both in Minnesota, she is welcome to do so. Mahalo for your efforts on this project. I am looking forward to its completion. Dennis R. Eyler Aloha, my wife and I are part-time residents of Maui. We spend 3+ months of the year on island. I am also a retired traffic and highway preliminary design engineer. I am very interested in this project as well as the upcoming planned extension of the Lahaina bypass. As a modest effort on my part to help in the recovery of the area after the Lahaina fire. I am offering my modest assistance, if desired. I have attached my resume and a few technical papers and presentations. Also attached is a more thorough description of my offer of assistance.

Dear Mr. Tatsuguchi, Thank you for this opportunity to provide comments on the Honoapi’ilani Highway Improvements Project (HHIP) Draft Environmental Impact Statement and the proposed preferred alternative, dated January 2025. The Honoapi’ilani Highway from Ukumehame to Launiupoko in West Maui ranks as one of the most threatened highways in the state of Hawai’i because of rising sea levels, king tides, storm surges and other coastal hazards fueled by climate change. The Hawai’i Department of Transportation has prioritized this important road connecting central Maui to the growing West Maui community because of its risk from coastal erosion.

What we are working on. **Our team at The Nature Conservancy (TNC) has been working on a ridge to reef approach to protecting and restoring the sensitive environments adjacent to the 939-acre Olowalu reef tract that involve working with community and government partners to establish a vision for a restored coastal area and watershed. We have been excited about the opportunity presented by the highway realignment to collaborate to protect key ecosystem functions.** (161) Our comments emphasize the need to protect the unique coral reef and future wetland extent, preserve Pāpalaua sediment retention basin and its sediment capture capacity, design ecologically sensitive stream crossings, and recommend a drainage plan that uses green infrastructure to filter and infiltrate stormwater.

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With regards to the Honoapi’ilani Highway Improvement Project (HHIP), TNC is focused on three areas: 1) Reducing sedimentation to the coral reef; 2) Implementing a suite of mauka-makai protective and restorative interventions that protect the reef, wetlands and streams, and 3) Visioning, with Hawai’i Department of Transportation, Highways Division (HDOT), County of Maui, partners, and community the future of this existing Honoapi’ilani (makai) highway as a place where people and nature thrive. (162) We see the opportunity to utilize nature-based solutions for preservation and restoration of the coral reef, shorelines, wetlands, recreational spaces, and infrastructure. We have published several reports that may be useful: one on sediment sources, another on wetland extent, and a third on 2022 coral reef surveys.

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Coral reef and wetland ecosystems are in need of protection. Coral reef ecosystems are key to protecting the shoreline from waves and storm impacts, including the current highway, and these systems are threatened by both global and local stressors. Recent studies show that coral larvae are struggling to find places to settle in the sedimented benthos, and that adult corals are subject to sediment and heat stressors. Coral cover remains reduced compared to the 2010s. Corals are not only organisms to protect, they also protect our coastal infrastructure from wave events and sea level rise (Storlazzi et al 2019). Once abundant wetlands in the area are important habitat for endangered waterbirds and plants and serve to provide hazard mitigation in coastal areas, such as absorption and filtering of surface waters and flood reduction. Upland forests both protect soils from erosion and provide essential groundwater recharge function to provide water for nature and people. Sedimentation damages coral reefs. Sediment is one of the most pervasive and damaging threats to coral reef. A recent geomorphological survey by TNC demonstrated that the Pāpalaua watershed is the most degraded watershed in the area, and one of the largest contributors to sediments downstream. Upland shrublands have been decimated by fire and drought in the last twenty years, leading to orders of magnitude higher levels of erosion compared to previous centuries. Former native forest that grew on highly erodible soils in the upland bog have been lost, especially along the edges of the Pāpalaua and Manawaipueo stream basins. Data from the water quality monitoring group Hui O Ka Wai Ola show that all of the coastal areas in the Olowalu-Ukumehame region are above the state coastal turbidity standard, while Ukumehame stream has been highlighted since 2001 (and as recently as 2022) by the Hawai’i Department of Health as an impaired stream because of turbidity.

What TNC is doing to help. Olowalu: The Road to Resilience - Community Design for the Existing Highway and Surrounding Areas The planned HHIP provides opportunities to re-imagine the Olowalu-Ukumehame coastal corridor by incorporating park spaces, traditional biocultural practices, and nature-based solutions for coastal resiliency. This project aims to strengthen coastal ecosystems, reduce pressures on the Olowalu-Ukumehame reef system, and improve resilience in the area that includes the existing roadway to adapt to climate change effects, including sea level rise. Through research, analysis, and engagement with stakeholders and community, TNC and University of Hawai’i Community Design Center are leading a process culminating in a conceptual design for local and state stakeholders as the effects of climate change threaten the shoreline. (163)

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Through the recently completed first phases of community engagement, specifically referencing the HHIP, we received comments from over 80 participants who voiced common concerns regarding disturbance of cultural resources or `iwi kūpuna as the preferred alternative is pursued; disturbance to Ukumehame Wetlands and native species by the preferred alternative; the desire for sustained access to the shoreline between the new alternative and the existing highway; and concerns around management and maintenance of the land areas between the “old” and the “new” roadways in order to prevent fire, illegal dumping and human encampments. We look forward to working together to help address some of these concerns as our respective projects progress. We appreciate the ongoing support of HDOT as this project moves forward. For more information, please refer to the project engagement website at: <https://storymaps.arcgis.com/stories/2ba79613d0aa4da182fe9bc34cc10cc7>

Collaboration on wetland and mauka restoration. **A primary threat to reef health comes not from the sea but from the mountains above: sediment is carried in surface water from mauka lands impacted by non-native feral ungulates, poor land use practices, and fire. These stressors contribute to habitat degradation and erosion. The DLNR Division of Forestry & Wildlife (DOFAW) is embarking on a three-year NOAA Transformational Habitat project, “Olowalu Mauka to Makai,” which will implement a full suite of ecosystem-based, mauka-to-makai conservation measures. With DOFAW, TNC will partner with Kipuka Olowalu and Coral Reef Alliance on projects including wetland restoration planning, sediment management, and community engagement, working to address threats and hazards throughout the Olowalu and Ukumehame ahupua`a. This project is inter-related with and impacted by the realignment project, so we look forward to continued communication and collaboration with you as our projects progress. (164)** For more information, please refer to: <https://dlnr.hawaii.gov/dofaw/>

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Comments for the EIS. 1. **Protect Pāpalaua-Ukumehame wetlands. The degraded wetlands of Pāpalaua and Ukumehame are important for both flood water and sediment retention, and have historically been a crucial part of the Ukumehame watershed hydrologic system. (165)** According to local knowledge-keepers, Ukumehame once had thriving wetlands that were home to endangered waterbirds like ae’o and ‘ālae ‘ula, whose habitat along the leeward Maui coast has been reduced by agriculture, development and drought. The draft EIS highlights vestige native plant communities that are surviving in the reduced footprint of the former wetlands, including akulikuli, ‘ae’ae, naupaka and milo. Sea level rise is expected to expand the area into where the bypass is proposed to go, and groundwater levels will rise. We will be working with DOFAW on wetland restoration planning in two State parcels that will be affected by the bypass. **We agree with the assessment of Ansari and Erickson documented in Section 3.9.3.1 of the prime wetland areas, and we ask you to also consider that ewe identified a broader buffer of wetlands in the regions (Maui Environmental Consultants, 2024) (166).**

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We appreciate the comment that “new construction in wetlands and floodplains is to be avoided unless there is no practicable alternative to the construction.” (3.9-24), and advocate for HDOT to make all efforts to reduce impact to current, former, and potential wetlands, and the proposed wetland restoration area. **We strongly advocate that the highway realignment include a viaduct to bypass the existing wetland areas. Wetland areas will likely expand in the future, and existing restoration planning would be adversely affected by the realignment without a viaduct. (167)** In particular, wetland birds would struggle to find habitat next to the highway. Efforts to avoid these vital wetlands, as habitats, ecosystems, and areas to retain land-based sediments and remove pollutants would align with the aims of the partners currently working in the area. **2. Reduce sediments and increase groundwater infiltration. We commend efforts to reduce erosion during the project, and advocate for watershed-scale efforts to reduce erosion in the project area more broadly as a strategy to protect the reef. (168)** As identified in the draft EIS, the area is comprised of fine alluvial sediments, which are sensitive to disturbance and removal of vegetation. We hope to not only reduce short term sedimentation, but to create a landscape that is more efficient at reducing sediment in the longer term.

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Maintain the efficiency of Pāpalaua Retention Basin. The maintenance and preservation of sediment retention basins is one of the key methods to hold back sediment in the near-term, as outlined by the West Maui Community Plan, and is the primary intervention needed for Pāpalaua. **The Pāpalaua basin serves as the primary retention basin for the Makiwa gulch intermittent stream. (169)** The basin has been shown to be a large contributor of fine sediments due to degraded upland conditions. The basin was installed in 1999, and has since filled with sediment above the original height of the standpipes, and has not received regular maintenance. It is at risk of overflow in every storm event, delivering sediment directly into coastal waters. For larger flows the basin is undersized. Additional retention capacity through maintenance and possible redesign is needed to prevent further ecosystem damage to the coral reef. **The proposed preferred alternative in Ukumehame reduces the footprint of the basin. Increased attention to replacing the sediment retention capacity is needed. (169)** We recommend considering drainage plans upland of the proposed bypass to serve as additional areas for retention. In addition, we would hope that the project would instigate a reconsideration of operations and maintenance of the existing basin, the redevelopment of culverts, and a re-design of the volume of the basin to make sure that it is the most efficient possible for protecting the downstream reef from sedimentation. Incorporate nature-based solutions alongside best practices for stormwater management. The proposed alternative builds would traverse the Olowalu and Ukumehame landscapes approximately along elevation. To address the main threats for the region – namely sedimentation to the reef and future drought/flooding cycles – **best management practices for stormwater, groundwater and surface flows that exceed County design standards are needed to protect ecosystem health, along with operations and maintenance plans that are practicable and have clear ownership models. In particular, we recommend that where possible, drainage swales that incorporate grasses and plants that can hold back sediment be used, or a similar nature-based alternative. If possible, the grading plans can include earthen berms to disperse water more broadly for infiltration. (170)**

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We recommend that the goal for the drainage system be to infiltrate water or deliver it to the wetland instead of shunting it quickly to the ocean. The conceptual study conducted (p. 3.9-25) was not included in the Appendices, so at this point it is not clear on how to collaborate to improve those BMPs to increase infiltration or sediment holding capacity. **The draft EIS refers to using 100-yr storms for bridges and 50-yr storms for culverts. It would be important to consider the effects of increased storm intensity, especially for culverts, and how this may impact overall sediment movement on the landscape. (171)** The 2018 floods in Kauai showed that large storm events can alter the coastal ecosystem trajectories for many years, if not decades (Rodgers et al 2021). Careful planning may be able to mitigate some of these concerns.

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3. Stream crossing mitigation. **Ukumehame and Olowalu streams have been identified by the State of Hawai’i Division of Aquatic Resources (DAR) as important for their aquatic species diversity, with over five species of native fish and invertebrates found in both streams. (172)** Hawai’i’s native stream animals have amphidromous life cycles meaning that they spend their larval stages in the ocean (salt water), then return to freshwater streams to spend their adult stage and reproduce. Newly hatched fish larvae are carried downstream to the ocean where they become part of the planktonic pool in the open ocean. The larvae remain at sea from a few weeks to a few months, eventually migrating back into a fresh water stream as juvenile hinana, or post larvae. The ability for juvenile fish to migrate upstream is critical to population success. **Minimizing long stretches of concretized stream and incorporating small pools and riffles with artificial materials would help to make sure larvae can make it upstream to their final habitat. (173)** The draft EIS proposes that either “BMPs that have either been preapproved or coordinated with regulated agencies” be used to minimize water quality effect to the streams (p. 7-4) We would add, though, that the **BMPs to assist o’opu migration may be different than those used to mitigate water quality impairment. Consultation with the Division of Aquatic Resources for guidance on best construction may be needed to make the stream habitat functional for Hawaii’s stream organisms. (173)** We advocate that the alternative road scenario be carefully planned to ensure that key bridge crossings are ecologically sound for o’opu `akupa and other diadramous native species.

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				Recommendations. Given the importance of the above factors, we make the following recommendations for mitigation measures: 1. Preserve the maximum extent of former, current, and potential wetlands; (Section 3.9.8) We support the creation of a viaduct to reduce disruption to the wetland to support future wetland restoration actions on TMKs 48002002, 48002039 48002045, 48002046 and 48002047. 2. Preserve the sediment retention capacity of Pāpalaua basin; (Section 3.11.7) Replace the area used by the bypass in Pāpalaua basin with improved functionality for the area that remains. Remove existing sediments after bypass construction. Improve efficiency by supporting or developing an operations and maintenance plan. Redesign basin to increase sediment retention and flood prevention capacity. 3. Prioritize a drainage plan that uses green infrastructure to filter stormwater and increases groundwater infiltration (Section 3.12.6) Consider drainage systems on the upland side of the bypass that use nature-based approaches to capturing sediment and infiltrating groundwater, such as green-grey drainage swales and vegetated buffers for velocity dissipation. 4. Build ecologically sensitive stream crossings at Ukumehame and Olowalu streams. (Section 3.9.8) If a stream needs to be hardened at the crossover, consider best practices for keeping stream cool, shaded, and oxygenated. The crossings at Olowalu, Ukumehame, and intermittent Pāpalaua streams must be carefully designed for water flow as well as preservation and maintenance of biological processes. Summary. The Nature Conservancy is invested in working with community, State, and County partners on the restoration and revitalization of the Olowalu and Ukumehame ahupua’a from mauka to makai. We look forward to working with you as a partner to ensure lasting benefits for people and nature. Thank you for your consideration, Emily J. Fielding Hawai’i Marine Conservation Director, Kim Falinski, PhD, PE Coastal and Estuarine Scientist			
Robert Schmidt	Maui Department of Environmental Management	80	Email	Thank you for the opportunity to comment on the Honoapiilani Highway Improvements Draft Environmental Impact Statement (DEIS). The County of Maui, Department of Environmental Management has the following comments related to the Honoapiilani Highway Improvements DEIS:			
				A portion of the proposed “common” route appears to encroach onto landfilled waste along the toe of closed Olowalu Landfill. Constructing structures and roadways on landfilled waste should be avoided. Please advise if this project does plan to place the improved highway on top of landfilled waste at the Closed Olowalu Landfill. (174)	174	Ch. 3.18	108
				The proposed route also appears to pass through the existing Olowalu Convenience Center (OCC) at the Closed Olowalu Landfill. OCC is the only recycling and waste transfer station for the West Maui community. Please advise if the OCC will be affected, and if so, the plan to relocate the OCC to another location to allow the County of Maui to continue providing this service to the local community. (175)	175	Ch. 3.17	106
Should you have any questions or comments, please contact Sage Kiyonaga, Solid Waste Engineer, at (808) 270-7941.							
Cesar Ivan Martin del Campo Garcia	Maui Grass Farm LLC	32 (duplicate)	Email	Dear Project Team, I am writing to express my support for the Honoapi’ilani Highway Improvements Project and its goals to improve transportation infrastructure while addressing environmental and safety concerns. I appreciate the effort and planning involved in designing a project of this scale to benefit our community. However, I would like to address a critical issue regarding the classification and evaluation of Parcel 48002115, which has been flagged for full acquisition under Build Alternative 1. It is essential that the property’s current and planned uses are accurately reflected in the project documentation to ensure an equitable and informed process. 1. Misclassification of Parcel Use. The current project documentation categorizes Parcel 48002115 as “not in use,” which does not accurately reflect its status. Specifically: The parcel is actively utilized for grass farming operations, supported by established water connections and other agricultural infrastructure. Farming activities are currently underway, generating revenue and contributing to the agricultural economy of the area. This active farming operation and planned development demonstrate that the parcel is a valuable and productive asset, rather than idle or undeveloped land. 2. Support for the Project and Request for Reevaluation. I fully support the objectives of the Honoapi’ilani Highway Improvements Project and recognize the importance of enhancing the region’s transportation network. At the same time, I request the following: 1. <u>Reevaluation of Parcel 48002115’s classification in project documentation to accurately reflect its active agricultural use, ongoing farming operations, and planned developments</u> . 2. Assurance that compensation and project decisions account for the parcel’s true value and active use, rather than being based on an inaccurate “not in use” designation. (176) Collaborative Approach. I remain committed to working collaboratively with the HDOT and project team to support the project’s success. By addressing this issue and ensuring an accurate representation of Parcel 48002115, we can achieve a fair and equitable outcome that aligns with the project’s goals while respecting the contributions of local landowners. Conclusion. I respectfully request that the project team reevaluate the classification of Parcel 48002115 and ensure its active farming operations and development plans are accurately reflected in all documentation. I look forward to working with the HDOT to address these concerns and support the successful implementation of this important project. Thank you for your time and attention to this matter. Please feel free to contact me if additional details or documentation would be helpful. Sincerely, Cesar Ivan Martin del Campo Garcia President, El Toro Soysia Turf - Maui Grass Farm LLC	176	3.4	28
Mahesh Cleveland	EarthJustice	81	Email	Earthjustice submits the following public comments on the proposed Honoapi’ilani Highway Improvements, West Maui: Ukumehame to Launiupoko (the “Honapi’ilani Project” or “Project”), for which a draft environmental impact statement (“DEIS”) was published in The Environmental Notice on January 8, 2025.			
				Earthjustice commends the Hawai’i Department of Transportation (“HDOT”) for proactively responding to the climate crisis by undertaking the complex endeavor of realigning portions of the Honoapi’ilani Highway that are highly vulnerable to sea level rise and coastal hazards, and that serve as the main artery to West Maui in an area of high cultural, archaeological, ecological, and recreational significance. We also continue to value and acknowledge HDOT for its groundbreaking leadership and commitments to decarbonizing the state transportation system in accordance with state law and the landmark settlement in the youth-led climate lawsuit Navahine F., et al. v. Dep’t of Transp., 1CCV-22-0000631 (“Navahine Settlement”), appended hereto as Attachment A. The Honoapi’ilani Project presents a historic opportunity for HDOT to create a best-in-class model for adapting to climate change (i.e., sea level rise and coastal hazards), while at the same time also mitigating climate change by incorporating sensible bicycle and pedestrian-friendly measures that would ultimately reduce car traffic and greenhouse gas emissions, while promoting public health and mobility for Hawai’i’s residents. (177) We offer these comments to enhance the Project’s climate benefits, and to allow for full consideration of its climate-related impacts, mitigation measures, and alternatives through the environmental review process.	177	Ch. 1	3
				HDOT Should Disclose and Mitigate the Project’s Climate Change Impacts, Consistent With the Navahine Settlement. The Navahine Settlement contains provisions to decarbonize the state transportation system through HDOT’s transportation projects and their prerequisite environmental review documents. These provisions are key components of the settlement’s broader vision, commitment, and roadmap to achieve “zero [greenhouse gas] emissions across all transportation modes within the State,” including from “ground transportation” under Haw. Rev. Stat. (“HRS”) § 225P-8.1 HDOT’s environmental review of the proposed Honoapi’ilani Project should contain analyses and mitigation measures to reduce greenhouse gas emissions, consistent with the Navahine Settlement and state law. (178)	178	Ch. 3.15	102

				For example, the Navahine Settlement requires HDOT to “implement policies and procedures to ensure that Complete Streets improvements remain part of the project throughout the planning and development process.”² Hawaiʻi’s Complete Streets statute requires HDOT to “adopt a complete streets policy that seeks to reasonably accommodate convenient access and mobility for all users of the public highways,” including “pedestrians, bicyclists, transit users, motorists, and persons of all ages and abilities.”³ The mandate applies specifically to “new construction, reconstruction, and maintenance” of highways such as the Honoapiʻilani Project.⁴ The Honoapiʻilani Project, as proposed in the DEIS, lacks any Complete Streets improvements for pedestrians, bicyclists, and transit users. (179) The DEIS specifically states that “[t]he Project does not include bicycle lanes or other bicycle or pedestrian facilities for any of the Build Alternatives.”⁵ The DEIS further notes that once the realignment is complete, the affected portions of the existing Honoapiʻilani Highway will be deeded to County of Maui (“County”)⁶ for use in conjunction with the West Maui Greenway Plan for a coastal bicycle and pedestrian pathway from Lipoa Point to Ukumehame,⁷ while acknowledging that “formal plans have not been developed.”⁸	179	Ch. 5	23
				Deeding the existing highway to the County without any certainty or commitments around what will happen to it afterward, while also building a new highway without any designated bike or pedestrian facilities, runs the risk of creating a second roadway or bypass without any Complete Streets accommodations on either. It would also impede compliance with the Navahine Settlement’s requirement for HDOT to “complete the pedestrian, bicycle, and transit networks in coordination with the counties as contemplated under HRS § 264-142, with a goal of completing this work in five years.”⁹ Given that federal and other funding for the West Maui Greenway Plan is uncertain, HDOT should provide funding for the West Maui Greenway Plan Segments 6 and 7, which would be located on or along the portions of the existing highway that will be deeded to the County¹⁰ and have not yet been funded. (180)	180	Ch. 1	35
				HDOT should also include a shaded, protected bike and pedestrian pathway through the center of the realigned highway to comply with the Navahine Settlement and Complete Streets mandate and ensure this \$160.8M¹¹ Project contributes to decarbonizing the state transportation system. This pathway should provide for integration and linkages with the West Maui Greenway, in consultation with stakeholders. (181) Indeed, providing bike and pedestrian facilities in both the original and realigned highways—both of which are contemplated to be (re)constructed in this case—would maximize multimodal accommodations and properly comply with the Complete Streets mandate and other state laws.	181	Ch.2	24
				The Navahine Settlement further requires HDOT to “develop and implement an objective, scientifically-based methodology to assess and report the total, long-term [greenhouse gas] emission and [vehicle miles traveled] impacts of each infrastructure project,”¹² specifically for use in “preparing environmental review documents for its transportation projects.”¹³ Such analyses are not included in the DEIS.¹⁴ (182) Given that HDOT must develop and implement this methodology by April 2025,¹⁵ any subsequent environmental review documents should disclose these Project impacts.	182	Ch. 3.15	103
				HDOT should specifically consider and compare the greenhouse gas emissions and vehicle miles traveled impacts of (1) constructing the new highway while closing or keeping the existing highway open to motorist traffic, and (2) including or omitting bike and pedestrian facilities on the existing and new highways. (183) These analyses will enable full disclosure of the Honoapiʻilani Project’s impacts, as well as informed consideration of mitigation measures and alternatives.	183	Ch. 3.15	104
				The Navahine Settlement further mandates that “Level of Service is discontinued as a criterion for project prioritization,”¹⁶ which goes hand-in-hand with the requirement to instead assess each project’s greenhouse gas and vehicle miles traveled impacts. As the youth highlighted in Navahine, level of service, a metric assessing how quickly cars move along a roadway, “promotes projects that induce additional traffic and ultimately increase congestion over time and imposes blind spots and barriers against multimodal projects.”¹⁷ Any subsequent environmental review documents should avoid use of or reliance on level of service to evaluate the Honoapiʻilani Project.¹⁸ (184)	184	Ch. 3.14	98
				HDOT Should Disclose and Consider Alternatives that Account for Updated Sea-Level Rise Projections. HDOT’s stated purpose and need for realigning the Honoapiʻilani Highway is “to address existing coastal erosion and flooding vulnerabilities as well as future coastal erosion and flooding caused by anticipated sea level rise.”¹⁹ Indeed, around two-thirds of the highway span proposed for realignment “are considered exposed and potentially vulnerable to sea level rise.”²⁰ HDOT acknowledges that, among a variety of potential hazards to transportation infrastructure in West Maui, sea level rise is “the most urgent,” while the associated risks of passive flooding, storm surges, and coastal erosion are already occurring and predicted to worsen.²¹ To fulfill the Project’s stated purpose and need to adapt to sea level rise, HDOT should disclose and consider alternatives that account for updated sea level rise projections. The alternatives considered in the DEIS are all based on the conservative assumption that ocean levels will rise by 3.2 feet by 2100.²² More recent estimates, however, predict that sea level may rise by closer to 4 feet and by as much as 6 feet by 2100,²³ (185) which would move the projected sea level rise inundation area further mauka. HDOT should disclose these updated sea level projections and consider alternatives that plan for and adapt to them. Along these lines, HDOT should consider the costs and risks of underestimating sea level rise, including the estimated costs of having to relocate the Honoapiʻilani Highway again in the event of sea level rise exceeds 3.2 feet by 2100.	185	Ch. 3.13	90
				HDOT Should Disclose and Mitigate the Climate Change Effects from Leaving the Existing Highway In Place. The DEIS acknowledges the harm that climate change and sea level rise are “already causing to the existing highway,”²⁴ but does not discuss how relinquishing the existing highway to the County will affect the environment. (186) So long as the County keeps the existing highway in place and sea levels continue rising, the existing highway will increasingly serve as shoreline armoring that would harm beach and reef ecosystems, including monk seal habitat.²⁵ HDOT should, at minimum, consider these harmful effects and measures to mitigate them.	186	Ch. 3.13	91
				HDOT Should Disclose the Honoapiʻilani Project’s Reasonably Foreseeable Growth-Inducing Effects As discussed in our December 23, 2022 scoping comments, appended hereto as Attachment E, HDOT should disclose and analyze any reasonably foreseeable growth-inducing effects from the Honoapiʻilani Project. For example, to the extent that any plans to develop Olowalu Town are still in the works and would be dependent on implementing the Honoapiʻilani Project, HDOT must address these effects.²⁶ (187)	187	Ch. 1	15
				We appreciate the opportunity to comment on the Honoapiʻilani Project, which could be precedent-setting for proactively adapting to climate change, while incorporating sensible and timely design measures to reduce greenhouse gas emissions from transportation. Please contact us if you have any questions or would like to discuss this further. Respectfully submitted, /s/ Mahesh Cleveland Isaac Moriwake Kylie Wager Cruz Mahesh Cleveland EARTHJUSTICE			
Karen Comcowich	Maui County Long Range Division	82	Email	PROJECT DESCRIPTION: The State Department of Transportation is proposing to realign the Honoapiʻilani Highway to provide a reliable transportation facility in West Maui and improve Honoapiʻilani Highway’s resilience by reducing the highways vulnerability to coastal hazards.			
				LONG RANGE DIVISION COMMENTS: The realignment of Honoapiʻilani Highway out of the Sea-Level Rise Exposure Area (SLR-XA) is supported in the Maui County General Plan and more specifically by the West Maui Community Plan. (188)	188	Ch 5	119
				However, multimodal transportation options and Complete Streets elements should be incorporated into the Honoapiʻilani Highway Improvements. In addition, thoughtful consideration should be given to the road design to ensure the realigned highway retains and enhances the existing character and scenic resources found in Ukumehame and Olowalu. The inclusion of trees and landscaping appropriate to the microclimate is also important (189)	189	Ch. 5	120

GENERAL COMMENTS. The realignment of Honoapiʻilani Highway out of the SLR-XA is supported by the West Maui Community Plan (WMCP), the Maui Island Plan (MIP) and the Countywide Policy Plan (CWPP) (see WMCP Policy 2.2.10, and Action 2.21; MIP 6.4.3 Action 3; CWPP H.1.b.). The design of the Honoapiʻilani Highway Improvements will need to incorporate multimodal and Complete Street design elements, while thoughtfully considering the existing character and scenic resources of the communities through which it passes (189 cont.) (MIP 6.4.3 a, and b; CWPP H.1.b, c, and g). WMCP 2.2.10 Improve resilience of the transportation system to climate change related hazards such as sea level rise, flooding, and wildfires. WMCP Action 2.21 Work in partnership with the State Department of Transportation to prioritize and facilitate realignment of Honoapiʻilani Highway out of the coastal hazard zone, and manage public lands makai of the realigned highway as wetlands, public parks, and open space.	189	Ch. 5	120
MIP Goal 6.4 An interconnected, efficient, and well-maintained, multimodal transportation system. Objective 6.4.3 An island-wide, multimodal transportation system that respects and enhances the natural environment, scenic views, and each community’s character. 6.4.3 a. Ensure that the roadway and transit alignments respect the natural environment and scenic views. 6.4.3 b. Ensure that roadways and transit systems in rural areas and small towns enhance community character. 6.4.3-Action 3 Urge the State to relocate Honoapiʻilani Highway mauka between the Pali and Puamana, and develop a network of parks and open space on the makai side of the highway, in accordance with the Pali to Puamana Master Plan.			
CWPP H. Diversify Transportation Options. Goal: Maui County will have an efficient, economical, and environmentally sensitive means of moving people and goods. Objective 1: Provide an effective, affordable, and convenient ground-transportation system that is environmentally sustainable. b. Plan for the efficient relocation of roadways for the public benefit. c. Support the use of alternative roadway designs, such as traffic-calming techniques and modern roundabouts. d. Increase route and mode options in the ground-transportation network. e. Ensure that roadway systems are safe, efficient, and maintained in good condition. g. Design new roads and roadway improvements to retain and enhance the existing character and scenic resources of the communities through which they pass. CONCERNS AND OPPORTUNITIES. Multimodal Transportation. The Maui County General Plan, including the West Maui Community Plan, supports transportation projects that increase active transportation, including biking and walking, and transit services. Honoapiʻilani Highway is the primary connection between West Maui and the rest of the island of Maui. Designing the realigned portions of the highway to support transit, bike and pedestrian access would provide multiple benefits from resilience actions by increasing transportation options and making walking and bicycling safe and easy between and within communities. (190)	190	Ch. 5	121
WMCP 2.2.1 Improve West Maui’s active transportation network by increasing multimodal transportation options, incorporating Complete Streets, adding new sidewalks, and improving existing sidewalks and other pedestrian and bicycle facilities. WMCP 2.1.4 Prioritize projects that provide multiple benefits from resilience actions. WMCP 2.2.5 Support increased transit service within and between West Maui’s neighborhoods, parks, and commercial areas, and between the Kahului Airport and West Maui hotels. WMCP 2.5.9 Encourage and increase active transportation options throughout West Maui to promote public health and reduce auto use and carbon emissions.			
MIP Goal 6.4 An interconnected, efficient, and well-maintained, multimodal transportation system. Objective 6.4.1 Provide for a more integrated island-wide transportation and land use planning program that reduces congestion and promotes more efficient (transit-friendly) land use patterns. 6.4.1.a. Plan for an integrated multi-modal transportation system comprised of public transit, bicycle, pedestrian, automobile, and other transportation modes. 6.4.1.b. Refocus transportation investment from the construction of additional roadways only for the automobile to the expansion of a multimodal transportation system. 6.4.1.c. Encourage the use of “complete streets” design methods. MIP Goal 6.5 An island-wide transit system that addresses the needs of residents and visitors and contributes to healthy and livable communities. Objective 6.5.1 An integrated transit system that better serves all mobility needs of Maui’s residents and visitors. 6.5.1.b. Expand regional and inter-regional transit services, where appropriate, in heavily traveled corridors and within communities. 6.5.1.e. Require new development where appropriate, to provide right-of-ways (ROWS) to accommodate transit circulation and support facilities. 6.5.1.f. Identify, protect, and preserve, or acquire corridors for future inter-community transit use, including but not limited to, rail and also multimodal use corridors. CWPP H. Diversify Transportation Options. Goal: Maui County will have an efficient, economical, and environmentally sensitive means of moving people and goods. Objective 2: Reduce the reliance on the automobile and fossil fuels by encouraging walking, bicycling, and other energy-efficient and safe alternative modes of transportation. a. Make walking and bicycling transportation safe and easy between and within communities. b. Require development to be designed with the pedestrian in mind. c. Design new and retrofit existing rights-of-way with adequate sidewalks, bicycle lanes, or separated multi-use transit corridors. d. Support the development of a countywide network of bikeways, equestrian trails, and pedestrian paths. Trees and Landscaping. The West Maui Community Plan and Countywide Policy Plan support the inclusion of trees along public right of ways. The West Maui Community Plan specifies the use of native trees and landscaping that is appropriate to the microclimate. Trees and other appropriate landscaping should be included in the realigned Honoapiʻilani Highway Improvements. (191)	191	Ch. 5	122
WMCP 2.1.11 Require new developments to install landscaping that reduces water use, using drought resistant and micro-climate appropriate design and plants including native species, and gray water and water catchment systems where the State Department of Health allows it. WMCP 2.3.4 All development must implement recommendations of the Maui County Planting Plan for street and parking area trees, encouraging the use of native and endemic plants. Plants that are on the Hawaiʻi Pacific Weed Risk Assessment list must not be used. WMCP 2.3.12 Design landscape barriers along major roadways in such a manner as to maintain existing views of the mountains and ocean to the extent possible. WMCP 2.5.5 Include native trees that are appropriate for the microclimate in parks, along streets, trails, and greenways, and throughout the community to provide shade, beauty, and reduce sediment runoff. CWPP H. Diversify Transportation Options. Goal: Maui County will have an efficient, economical, and environmentally sensitive means of moving people and goods. Objective 4: Improve and expand the planning and management of transportation systems. h. Accommodate the planting of street trees and other appropriate landscaping in all public rights-of-way.			
Natural and Cultural Resources. The Maui County General Plan, the MIP and the WMCP all support protecting and enhancing natural and cultural resources. This includes using Low Impact Development strategies and vegetated buffers around gulches and wetlands, giving consideration to how agriculture areas will be impacted, particularly where there is active subsistence farming or loʻi cultivation, and ensuring access to kuleana lands. It is noted that the project proponents have consulted with community members in development of the Environmental Impact Statement Preparation Notice, including the Aha Moku Council and Lineal Decedents. As final alignment and design for Honoapiʻilani Highway Improvements are refined, protecting, and enhancing natural and cultural resources should be a priority. Continued involvement and collaboration with community members as plans are refined is encouraged. (192)	192	Ch. 5	123

WMCP 2.2.9 | Protect and enhance natural and cultural resources during implementation of transportation projects through early consultation and community engagement with resource management agencies, residents, and cultural practitioners. WMCP 2.3.1 | Ensure new development projects provide continued access to kuleana lands protected under Section 7-1, Hawai'i Revised Statutes. WMCP 2.3.2 | Gulches, as identified in the map in Figure 2.3 of this Plan, must remain in open space and no new permanent structures may be developed in or within 100 feet of the top of the bank of identified gulches, unless Low Impact Development strategies are implemented to prevent stormwater runoff. WMCP 2.3.3 | Protect ocean and stream water quality by requiring that wetlands, as defined by traditional historic knowledge or by Section 404 of the Clean Water Act, be preserved with vegetated buffer areas that are adequate to protect them from pollutants. WMCP 2.3.5 | Require implementation of Low Impact Development practices in developments in West Maui to reduce stormwater runoff and protect water quality. WMCP 2.3.8 | Preserve and protect the region's cultural resources and traditional lifestyles, including agricultural pursuits, such as subsistence agriculture on lands owned by the State Department of Hawaiian Home Lands in Honokōwai and lo'i cultivation of Native Hawaiians in Honokōhau Valley, Kahoma Valley, Kaua'ula Valley, Olowalu, and Ukumehame. WMCP 2.3.10 | Existing areas of open space, including agricultural lands and gulches, should be viewed as a resource to be protected and enhanced. WMCP 2.3.13 | The marine and nearshore environment and open space areas are important assets of the region and should be protected and preserved. Habitat connectivity for threatened and endangered species, watersheds, undeveloped shoreline areas and other environmentally sensitive lands must be preserved. WMCP 2.3.16 | All development projects must engage in consultation with the Aha Moku 'o Maui representative associated with the project area – either Moku 'o Lāhainā or Moku 'o Kā'anapali – and provide evidence of this engagement to the Department. WMCP 2.3.18 | Any ground-altering activities in the areas described in this Plan's ascription list must have a cultural monitor on site, due to the sensitive nature of these areas, until cultural overlay policies are established by the Council. See Appendix C | Cultural Reserve Ascription List.

MIP | Goal 2.1 | Our community respects and protects archaeological and cultural resources while perpetuating diverse cultural identities and traditions. Objective 2.1.3 | Enhance the island's historic, archaeological, and cultural resources. 2.1.3.f | Support opportunities for public involvement with the intent to facilitate the protection and restoration of historic and archeological sites, including consultation with stakeholders. 2.1.3.g | Encourage the resolution of land title questions relating to Land Commission Awards and Royal patents. 2.1.3.h | Ensure compliance with historic preservation laws, and discourage demolition of properties that are determined to be eligible for listing on the National or State Register of Historic Places.

CWPP| B. Preserve Local Cultures and Traditions | Goal: Maui County will foster a spirit of pono and protect, perpetuate, and reinvigorate its residents' multi-cultural values and traditions to ensure that current and future generations will enjoy the benefits of their rich island heritage. Objective 1: Perpetuate the Hawaiian culture as a vital force in the lives of residents. a. Protect and preserve access to mountain, ocean, and island resources for traditional Hawaiian cultural practices. f. Recognize and preserve the unique natural and cultural characteristics of each ahupua'a or district. h. Ensure the protection of Native Hawaiian rights. Objective 2 | Emphasize respect for our island lifestyle and our unique local cultures, family, and natural environment. d. Recognize the interconnectedness between the natural environment and the cultural heritage of the islands. Trails. **The protection and enhancement of trails is encouraged throughout the Maui County General Plan. While it is not expected that the Honoapi'ilani Highway Improvements will develop additional trails, preservation of existing trails and options for new connections should be incorporated. (193)**

WMCP 2.5.8 | Ensure existing government trails are preserved through the subdivision process or other approval process, such as land use designation change; reviews under Chapter 343, Hawai'i Revised Statutes; and reviews under Chapter 205A, Hawai'i Revised Statutes. Refer to the West Maui Trails Map (Figure 2.4, pg. 61) and consult with the Nā Ala Hele Trails and Access Program. WMCP 2.5.3 | Support the development of trails and greenways in West Maui as part of a larger integrated recreation and transportation network and manage existing public mauka to makai access along the tops of gulches as identified in Figure 2.3 (pg. 60) to prevent the spread of rapid 'Ōhi'a death, feral ungulates, and other invasive species in upper watersheds.

MIP | GOAL 2.1 | Our community respects and protects archaeological and cultural resources while perpetuating diverse cultural identities and traditions. OBJECTIVE 2.1.1 | An island culture and lifestyle that is healthy and vibrant a smeasured by the ability of residents to live on Maui, access and enjoy the natural environment, and practice Hawaiian customs and traditions in accordance with Article XII, Section7, Hawai'i State Constitution, and Section7-1, Hawai'i Revised Statutes(HRS). 2.1.1.c Ensure traditional public access routes, including native Hawaiian trails, are maintained for public use. MIP | Goal 6.6 | Maui will have a diverse range of active and passive recreational parks, wilderness areas, and other natural-resource areas linked, where feasible, by a network of greenways, bikeways, pathways, and roads that are accessible to all Objective 6.6.3 | An expanded network of greenways, trails, pathways, and bikeways. 6.6.3.c Collaborate with the State and private land owners to ensure perpetual access and proper stewardship of traditional trails and access systems.

CWPP | H. Diversify Transportation Options Goal: Maui County will have an efficient, economical, and environmentally sensitive means of moving people and goods. Objective 2: Reduce the reliance on the automobile and fossil fuels by encouraging walking, bicycling, and other energy-efficient and safe alternative modes of transportation. e. Support the reestablishment of traditional trails between communities, to the ocean, and through the mountains for public use. CWPP | G. Improve Parks and Public Facilities Goal: A full range of island-appropriate public facilities and recreational opportunities will be provided to improve the quality of life for residents and visitors. Objective 1 | Expand access to recreational opportunities and community facilities to meet the present and future needs of residents of all ages and physical abilities. a. Protect, enhance, and expand access to public shoreline and mountain resources. b. Expand and enhance the network of parks, multi-use paths, and bikeways.

Undergrounding Utilities. **Undergrounding utilities is supported throughout the Maui County General Plan. This may be an opportunity to work with MECO to underground utilities in the area where improvements are being implemented. (194)** WMCP 2.5.20 | Promote the placement of utilities underground in new areas of development and in existing areas, where possible, unless desecration of iwi kūpuna is likely to occur or if the development lies within areas of significant cultural resources in the proposed cultural overlay, a permit will be required. CWPP | I. Improve Physical Infrastructure Goal: Maui County's physical infrastructure will be maintained in optimum condition and will provide for and effectively serve the needs of the County through clean and sustainable technologies. Objective 4: Improve the planning and management of infrastructure systems. j. Promote the undergrounding of utility and other distribution lines for health, safety, and aesthetic reasons.

Scenic Resources and Community Character. Ensuring scenic vistas and community character are considered and retained in the design of new roads or roadway improvements is supported in the WMCP, the MIP and the CWPP. **While it is evident that the Honoapi'ilani Highway Improvements have considered the impacts of the alignment on the character and scenic resources of the surrounding area, it will also be important consider the character and scenic resources of the surrounding area in the design of the road and how it interacts with the surrounding communitites. (195)** WMCP 2.3.11 | Protect public mauka to makai view corridors in each subarea and scenic vistas.

MIP| Goal 6.4 | An interconnected, efficient, and well-maintained, multimodal transportation system Objective 6.4.2| Safe, interconnected transit, roadway, bicycle, equestrian, and pedestrian network. 6.4.2.a Ensure transit-, roadway-, and pedestrian-facilities design and level-of-service standards respect the unique character of our communities. Objective 6.4.3 | An island-wide, multimodal transportation system that respects and enhances the natural environment, scenic views, and each community’s character. 6.4.3.c Design all transit systems to respect visual corridors and Maui’s character.

CWPP | H. Diversify Transportation Options Goal: Maui County will have an efficient, economical, and environmentally sensitive means of moving people and goods. Objective 1: Provide an effective, affordable, and convenient ground-transportation system that is environmentally sustainable. o g. Design new roads and roadway improvements to retain and enhance the existing character and scenic resources of the communities through which they pass.

Parks and Open Space. **Although this is not part of the scope of this project the realignment will offer the possibility to achieve goals supported by the Maui County General Plan regarding protection and enhancement of shoreline resources, the developement of Parks and Open Space, and altenative modes of transportation makai of the realigned highway. (196)** WMCP 2.1.5 | Protect the shoreline and beaches by preserving waterfront land within the SLR-XA as open space wherever possible.

MIP | Goal 6.4 | An interconnected, efficient, and well-maintained, multimodal transportation system Objective 6.4.2: Safe, interconnected transit, roadway, bicycle, equestrian, and pedestrian network. 6.4.2.e Consider identification, acquisition where appropriate, and utilization of abandoned rightof-ways for bikeways, pedestrian pathways, and open-space networks.

MIP | Goal 6.6 Maui will have a diverse range of active and passive recreational parks, wilderness areas, and other natural-resource areas linked, where feasible, by a network of greenways, bikeways, pathways, and roads that are accessible to all Objective 6.6.3 An expanded network of greenways, trails, pathways, and bikeways. 6.6.3.a Link existing and future park sites, natural areas, the shoreline, and residential areas with a network of bikeways, pedestrian paths, trails, and greenways. 6.6.3.b Support the implementation of plans and programs that facilitate pedestrian mobility and access to active and passive recreation areas and sites.

CWPP | H. Diversify Transportation Options Goal: Maui County will have an efficient, economical, and environmentally sensitive means of moving people and goods. Objective 1: Provide an effective, affordable, and convenient ground-transportation system that is environmentally sustainable. f. Preserve roadway corridors that have historic, scenic, or unique physical attributes that enhance the character and scenic resources of communities. CWPP | A. Protect the Natural Environment Goal: Maui County’s natural environment and distinctive open spaces will be preserved, managed, and cared for in perpetuity. Objective 2: Improve the quality of environmentally sensitive, locally valued natural resources and native ecology of each island. a. Protect and restore nearshore reef environments and water quality. e. Mitigate the negative effects of upland uses on coastal wetlands, marine life, and coral reefs. CWPP | L. Mitigate Climate Change and Work Toward Resilience Goal: Minimize the causes and negative effects of climate change. Objective 2: Reduce the impacts of sea-level rise by acknowledging climate change, adapting, mitigating, and planning accordingly. Policies: a. Evaluate development to assess potential short-term and long-term sea-level rise impacts on nearshore environments. b. Improve efforts to mitigate and plan for the impact of sea-level rise. c. Protect undeveloped beaches, dunes, and ecosystems, and restore natural shoreline processes. e. Strengthen coastal-zone management, re-naturalization of shorelines, where possible, and filtration or treatment of urban and agricultural runoff.

The U.S. Environmental Protection Agency has reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act (CAA). The CAA Section 309 role is unique to EPA. It requires EPA to review and comment on the environmental impact of any proposed federal action subject to NEPA’s environmental impact statement requirements and to make its comments public. EPA 309 Review Summary. **EPA did not identify significant concerns to be addressed in the final EIS. (197)** We acknowledge and recognize our colleagues in the state for continuing the NEPA process to analyze and deliver this project following the devastating wildfire impacts to Lahaina just north of the proposed project area. We provided scoping comments to the Hawaii Department of Transportation and Federal Highways Administration and accepted the invitation to provide early coordination as defined in Title 23 United States Code Section 139(d) and (5), and Title 40 Code of Federal Regulations, part 1508.5 on April 29, 2022. **We note that many of our scoping comments were adopted in the development of the Draft EIS, and that our November 1, 2024, comments on the Administrative Draft EIS regarding aquatic resources and community engagement were fully addressed in the Draft EIS. (197 Cont.)** We appreciate HDOT and FHWA’s emphasis of continuing community dialogue (page 3.7-14) as it pertains to protecting cultural resources pursuant to the National Historic Preservation Act, Section 106. The EPA appreciates the opportunity to review this DEIS. If you have any questions, please contact me at (415) 972-3659 or the NEPA reviewer, Zac Appleton, at (415) 972-3321 or appleton.zac@epa.gov

We recommend culverts and bridges over streams be designed with the height and width to handle periodic massive surges of water from torrential rain events that are known to occur in the area. Due to climate change, 100-year storms may become more frequent. Flooding has the potential to destroy ae’o (Hawaiian stilt, Himantopus mexicanus knudseni) and nēnē (Hawaiian goose, Branta sandvicensis) nests that may be found in the project area. Additionally, ensuring culverts and bridges have the height and width to handle 100-year storm torrential rains may also minimize impacts to other trust resources protected under the Fish and Wildlife Coordination Act. (198) These recommendations also apply to Appendix 3.10 section 2.2.1.

For erosion control during construction, we recommend using materials (e.g., biosock) that are at least 3 feet (ft) in diameter to reduce chances of runoff into the ocean during torrential rain. (199) The typical 1 ft diameter biosock will likely not serve as an adequate barrier during torrential rainfall, especially in an area that is highly degraded, expansive ephemeral wetland habitat combined with known high flow rates in streams during these storm events. **Sedimentation runoff onto the beach and into the ocean degrades sea turtle habitat and has the potential to bury sea turtle nests. This emphasizes the importance of incorporating our Best Management Practices (BMPs) for Work In and Around Aquatic Environments to minimize project impacts. These BMPs may also help minimize impacts to other trust resources protected under the Fish and Wildlife Coordination Act. (199 Cont.)**

The DEIS describes monitoring for waterbirds by a qualified biologist, but then follows up with: The contractor will assign dedicated, trained, competent personnel to perform daily visual monitoring and nest surveys prior to the start of and during construction work to check for listed species bird nests. The daily monitoring protocol would include designated personnel to walk the project site every morning prior to the start of construction work to determine if any ESA-listed species nests are present at the work site and note if any listed individuals were present. **All surveys to detect for the presence of ae’o nests and ae’o exhibiting defensive nest protection behavior should be carried out by a qualified biologist with knowledge of the species’ life history. If heavy rains result in ephemeral wetlands, ‘alae ke’oke’o (Hawaiian coot, Fulica alai) should be surveyed for as well. (200)**

Francisco Dóñez	Environmental Protection Agency	83	Email			
					197	Ch. 116
Chelsie Javar-Salas	USFWS	84	Email		198	Ch. 3.968
					199	Ch. 3.969
					200	Ch. 3.1073

The DEIS describes morning surveys and monitoring for nēnē by a qualified biologist, but then follows up with: The contractor will assign dedicated, trained, competent personnel to perform daily visual monitoring and nest surveys prior to the start of and during construction work to check for listed species bird nests. The daily monitoring protocol would include designated personnel to walk the project site every morning prior to the start of construction work to determine if any ESA-listed species nests are present at the work site and note if any listed individuals were present. All surveys to detect for presence of nēnē nests and nēnē exhibiting defensive nest protection behavior should be carried out by a qualified biologist with knowledge of the species’ life history. (201)	201	Ch. 3.10	74
We recommend including all final biological survey and monitoring protocols in the final EIS under Appendix 3.10. We encourage your team to submit draft survey and monitoring protocols/standard operating procedures to our office for review and comments prior to finalization. We also encourage incorporating adaptive management into these procedures and triggers for modifying them. (202)	202	Ch. 3.10	75
The draft EIS states additional biological surveys will be performed by trained biologists in areas of “permanent BMPs.” The Service recommends providing more details about this objective, including protocols and habitat features that support listed species in the draft EIS. (203)	203	Ch. 3.10	76
We recommend that temporary signs be placed around the project area during construction to remind workers of the potential presence of ae’o and nēnē and to drive slowly (10 miles per hour as stated in the DEIS). Additionally, permanent signs should be placed along the highway through the Ukumehame wetland area alerting drivers of the potential presence of ae’o and nēnē and for reducing the speed limit through the area to minimize injury and mortality to listed birds from vehicle strikes. (204)	204	Ch. 3.10	77
Avoid placing staging areas in or directly adjacent to wetland habitat (jurisdictional and nonjurisdictional) and streambanks identified by the consultants to avoid and minimize impacts to habitat that supports listed waterbirds and nēnē. (205)	205	Ch. 3.10	78
Any hazing that occurs to nēnē must follow the 4(d) rule. We recommend keeping a copy of the regulations at the on-site office for easy reference. A key section of the 4(d) rule follows: Before implementing any such intentional harassment activities during the nēnē breeding season (September through April), a qualified biologist knowledgeable about the nesting behavior of nēnē must survey in and around the area to determine whether a nest or goslings are present. If a nest is discovered, the Service must be notified within 72 hours and the following measures implemented to avoid disturbance of nests and broods: No disruptive activities may occur within a 100-ft (30-meter) buffer around all active nests and broods until the goslings have fledged; Brooding adults (i.e., adults with an active nest or goslings) or adults in molt may not be subject to intentional harassment at any time; and The landowner must arrange follow-up surveys of the property by qualified biologists to assess the status of birds present. (206)	206	Ch. 3.10	79
Hawaiian yellow-faced bees are known to occur in scattered populations along the western coastline of Mauna Kahālāwai (Maui Komohana or West Maui Mountains). Coastal populations of yellow-faced bees occur in habitat along rocky shorelines with naupaka (Scaevola taccada) and tree heliotrope (Heliotropium arboreum) with either landscaped vegetation, nonnative kiawe (Neltuma pallida), or bare rock inland. Bees are restricted to an extremely narrow corridor, typically 33 to 66 ft (10 to 20 meters) wide, and do not occur on barren sandy beaches or inland, or on landscaped native plants on hotel grounds. Documented nectar plants include naupaka, ‘ilima (Sida fallax), ‘akoko (Euphorbia spp.), pua kala (Argemone glauca), naio (Myoporum sandwicense), and tree heliotrope. Threats to yellow-faced bees include habitat destruction and modification from land use change, nonnative plants, ungulates, and fire, along with predation by nonnative ants and wasps. Mahalo for including the Service’s avoidance and minimization measures for coastal Hawaiian yellow-faced bees.(207)	207	Ch. 3.10	80
Table 3.9.10 states that project effects on listed waterbirds and nēnē would be minimal due to the implementation of avoidance and minimization measures outlined in Appendix 3.10. The project may potentially impact ae’o and nēnē. Therefore, we recommend that the cumulative impacts analysis in the draft EIS include an assessment for the construction phase and the normal operations phase. This should specifically address how the highway designs in the Ukumehame area will avoid car strikes and minimize impacts to ae’o and nēnē. Additionally, we encourage your team to consider the anticipated increase in waterbird populations (ae’o and ‘alae ke’oke’o) and nēnē in the Ukumehame area following wetland restoration when conducting the cumulative impact analysis. Currently, neither Chapter 3.10 nor the Biological Resource Discussion in Appendix 3.10 includes an evaluation of the impacts to listed waterbirds and nēnē from the routine operations of the new highway after construction. (208)	208	Ch. 3.10	81
The draft EIS states nighttime work is not anticipated; however, if it does become necessary, the DOT and FHWA will consult with the Service (see Appendix 3.9, page 4). Chapter 3.10, Table 3.10.9 states the project does not anticipate to impact seabirds, as standard Service seabird avoidance and minimization measures will be implemented. However, Table 3.10.5 mentions that nighttime work may occur, but not during the seabird fallout season. Please confirm whether nighttime work will occur during the seabird fallout season. If it is determined that nighttime work will occur during the seabird fallout season, we recommend contacting our office several months in advance for guidance to avoid adverse impacts to listed seabirds. Additionally, we recommend following the 2022 Maui Dark Skies Ordinance for all permanent lighting. For permanent lighting, limit these lights as human safely considerations allow, and include light frequencies and intensities that have the least impact on seabirds and sea turtles. There is also a growing body of peer-reviewed literature and seabird groups to help guide you with the most current animal friendly lighting. (209)	209	Ch. 3.10	82
For revegetation efforts, we recommend using only native plants, in particular those documented in the biological survey: ‘ilima (Sida fallax), ‘iliahialo’e (Santalum ellipticum), ‘a’ali’i (Dodonaea viscosa), hoary abutilon (Abutilon incanum), akulikuli (Sesuvium portulacastrum), milo (Thespesia populnea), and naupaka (Scaevola taccada). If possible, we recommend avoiding disturbance to endemic plant species such as ‘iliahialo’e that currently occupy the project area. ‘Iliahialo’e is an endemic plant species to the Hawaiian Islands. Limiting disturbance of non-listed endemic plants help to prevent their decline. (210)	210	Ch. 3.10	83
For erosion control, we recommend following our comment in Chapter 3.9 above related to biosocks.			
To minimize collisions for seabirds, we recommend: Flagging the tops of monopoles, cranes, and crane wires/cables. Flagging fencing that extends above vegetation. (211)	211	Ch. 3.10	84
To avoid and minimize invasive species potential impacts to ESA listed species, we recommend incorporating our invasive species biosecurity protocols into your project planning (212) Attachment A). The proposed project will be transporting a substantial amount of materials (i.e., construction materials or aggregate, etc.), vehicles, machinery, equipment, and personnel between sites, which has the potential to unintentionally introduce invasive species to the project site. (212 Cont.)	212	Ch. 3.10	85
Under Mammals, the DEIS states that ‘ōpe‘ape‘a (Hawaiian hoary bat, Lasiurus cinereus semotus) have not been detected on Maui and cites Tomich 1986. Current data show that ‘ōpe‘ape‘a do occur on Maui (213): https://dlnr.hawaii.gov/wildlife/files/2021/01/MauiBatsHTHFebruary2020.pdf The DEIS states that if scheduling becomes a serious issue and cutting down or pruning trees taller than 15 feet cannot be avoided during the bat breeding season (June 1 through September 15), FHWA will consult with the Service. We recommend FHWA consult with us several months in advance if scheduling is anticipated to prevent implementing the Service’s avoidance and minimization measures for ‘ōpe‘ape‘a or any other listed species that occurs or may occur in the project area. (213 Cont.)	213	Ch. 3.10	86

Please include Service avoidance and minimization measures for sea turtles (honu (green sea turtles, <i>Chelonia mydas</i>) and honu‘ea (Hawksbill sea turtles, <i>Eretmochelys imbricata</i>)). Construction on, or in the vicinity of, beaches can result in sand and sediment compaction, sea turtle nest destruction, beach erosion, contaminant and nutrient runoff, and an increase in direct and ambient light pollution, which may disorient hatchlings or deter nesting females. Off-road vehicle traffic may result in direct impacts to sea turtles or nests, and contributes to habitat degradation through erosion and compaction. (214) Information for projects with a beach hardening, stabilization, or nourishment component: Projects that alter the natural beach profile, such as nourishment and hardening, including the placement of seawalls, jetties, sandbags, and other structures, are known to reduce the suitability of on-shore habitat for sea turtles. These types of projects often result in sand compaction, erosion, and additional sedimentation in nearshore habitats, resulting in adverse effects to the ecological community and may inhibit future sea turtle nesting. The hardening of a shoreline increases the potential for erosion in adjacent areas, resulting in subsequent requests to install stabilization structures or conduct beach nourishment in adjacent areas. Given projected sea level rise estimates, the likelihood of increase in storm surge intensity, and other factors associated with climate change, we anticipate that beach erosion will continue and likely increase. Where possible, projects should consider alternatives that avoid modifying or hardening of coastlines. Beach nourishment or beach hardening projects should evaluate the long-term effect to sea turtle nesting habitat and consider the cumulative effects.					214	Ch. 3.10	87
Avoidance and minimization measures include: No vehicle use on or modification of the beach/dune environment during the sea turtle nesting or hatching season (See nesting date ranges above); Do not remove native dune vegetation; Have a biologist familiar with sea turtles conduct a visual survey of the project site to ensure no basking sea turtles are present; If a basking sea turtle is found within the project area, cease all mechanical or construction activities within 100 feet until the animal voluntarily leaves the area; Cease all activities between the basking turtle and the ocean; Remove any project-related debris, trash, or equipment from the beach or dune if not actively being used; Do not stockpile project-related materials in the intertidal zone, reef flats, sandy beach and adjacent vegetated areas, or stream channels. (214 Cont.) Optimal sea turtle nesting habitat is a dark beach free of barriers that restrict sea turtle movement. Nesting turtles may be deterred from approaching or laying successful nests on lighted or disturbed beaches. They may become disoriented by artificial lighting, leading to exhaustion and placement of a nest in an inappropriate location (such as at or below the high tide line). Hatchlings that emerge from nests may also be disoriented by artificial lighting. Inland areas visible from the beach should be sufficiently dark to allow for successful navigation by hatchlings to the ocean. To avoid and minimize project impacts to sea turtles from lighting we recommend: Avoiding nighttime work during the nesting and hatching season; Minimizing the use of temporary and permanent lighting on or near beaches and shield all project-related temporary and permanent lights so the light is not visible from any beach; If lights can’t be fully shielded or if headlights must be used, fully enclose the light source with light filtering tape or filters; Incorporating design measures into the construction or operation of buildings adjacent to the beach to reduce ambient outdoor lighting such as tinting, reducing the height of exterior lighting to below 3 feet and pointed downward or away from the beach, and minimizing light intensity to the lowest level feasible and, when possible, include timers and motion sensors. (214 Cont.)					214	Ch. 3.10	87
Implementing our sea turtle avoidance and minimization measures, including our BMPs for Work In and Around Aquatic Environments, will also help avoid and minimize project impacts to sea turtle nesting habitat, including proposed critical habitat that overlaps with the northern end of the project area. Additionally, we recommend keeping workers, staging areas, and temporary resting equipment on the mauka side of the old highway, away from the beach, especially during sea turtle nesting season and within the proposed green sea turtle critical habitat. (214 Cont.)					214	Ch. 3.10	87
We recommend including conceptual designs of the preferred alternative viaduct through the Ukumehame area, including identified wetland habitat (jurisdictional and nonjurisdictional) in the area, architectural/design features aimed at reducing car strikes for nēnē and listed waterbirds (e.g., diversion poles and/or guardrails), and any land alterations to assist with stormwater management and highway runoff as described in section 3.9.8 of Chapter 3. (215)					215	Ch. 5	128
In section 5.1.1.3, the DEIS mentions guardrails would be placed on either side of the viaduct. We recommend clarifying whether the architectural design features aimed at reducing listed bird car strikes will be placed on one side or both sides of the highway. (216)					216		129
We recommend providing more details about the swales (Appendix 3.10) to control stormwater, and other highway design features aimed at minimizing highway contaminant runoff into wetland habitat to reduce impacts to nēnē, ae’o, and other listed waterbirds that may use the wetland habitat in the project area. Specifically, clarify where the stormwater will be diverted to or be collected, and will these areas have the potential to attract nēnē and listed waterbirds. (217)					217		130
Additionally, the proposed grassy swales adjacent to the road may increase the risk for nēnē car strikes. We recommend you inquire with the Nēnē Recovery Action Group about the proposed grassy swales and for potential alternative options for the swales, as applicable. (218)					218		131
Andrew Viloria	-	85	Webform	Aloha, I recognize this may be too late, but as a lifelong citizen I do not want this highway to cut through our only outdoor flat open firing range. It would make the inaccessibility of sport shooting that much more difficult for Hawaii citizens. Please reconsider these changes. (219) Mahalo, Andrew	219	Ch. 3.5	36



DEIS Public Comments – Agency Coordination

Council Chair
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January 28, 2025

Federal Highway Administration
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Attention: Richelle Takara
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300 Ala Moana Blvd., Room 3-229
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Hawai'i Department of Transportation
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Honolulu, HI 96813
Genevieve.h.sullivan@hawaii.gov

**RE: A Department of Transportation, Federal Highway Administration,
Environmental Impact Statement for the Honoapi'ilani Highway
Improvements Project**

Aloha Ms. Takara and Ms. Sullivan,

I am writing to provide comments pertaining to the Notice of Intent to Prepare an Environmental Impact Statement regarding potential improvements to the Honoapi'ilani Highway (State Route No. 30) between milepost 11 in the vicinity of Papalaua Wayside Park in Ukumehame and milepost 17 in Launiupoko,

As stated in the Draft Notice of Intent, "Improvements are needed to provide a reliable transportation facility that would not be inundated by the predicted 3.2-foot sea level rise and undermined by coastal erosion."

I firmly believe and **strongly support** the Honoapi'ilani Highway's proposed 6.5-mile mauka relocation as a necessary step in improving the safety and resilience of West Maui's transportation system. The Federal Highway Administration began discussions on realignment, as early as June 2007. Since then, no advancements have been made. Now, swift action is needed to safeguard this essential highway from the growing threats posed by climate change and sea level rise, as well as ensure continuous connectivity for locals and tourists, who depend on this route for work and leisure.

Furthermore, I would like to encourage the Departments to think about implementing active transportation choices, particularly the West Maui Greenway (WMG). Developed in 2022 as a vision for a proposed 25-mile

Council Chair
Alice L. Lee

Councilmembers
Tom Cook
Gabe Johnson
Tasha Kama
Tamara Paltin
Keani N.W. Rawlins-Fernandez
Shane M. Sinenci
Yuki Lei K. Sugimura
Nohelani U'u-Hodgins



Director of Council Services
David M. Raatz, Jr., Esq.

Deputy Director of Council Services
Richelle K. Kawasaki, Esq.

COUNTY COUNCIL
COUNTY OF MAUI
200 S. HIGH STREET WAILUKU,
MAUI, HAWAII 96793
www.MauiCounty.us

multipurpose path that would connect Ukumehame to Lipoa Point, it can be viewed as a strategy to increase the region's resilience through sustainable, multimodal transportation for present and future generations.

As such, I respectfully urge the Hawai'i Department of Transportation (HDOT) to prioritize the following key WMG elements within the project:

1. Use of (Old) State Route 30 for Segments 6 and 7

- Segments 6 and 7 (the southernmost sections, from Lahaina Pali Trailhead to Lauiniupoko Beach Park) of the WMG are best served by the current (Old) State Route 30 since it could offer a dedicated bike and pedestrian path.
- Transforming this scenic road into a continuously connected, pedestrian and bike-friendly corridor, would promote safe, nonmotorized travel and recreation, that also serves as a cost-effective means of connecting West Maui communities.

2. Conformity with Climate and Community Goals

- Including the WMG in the highway realignment project is in line with Maui's commitment to climate resilience, as well as meets the *Navahine v. Hawai'i Department of Transportation et al.*, Climate Settlement Agreement (2024), which requires the state to develop a plan to drastically reduce greenhouse gas emissions from the transportation sector with the goal of Zero Emissions by 2045.
- This multifunctional trail also promotes healthy lifestyles and augments disaster preparedness by serving as an evacuation route.

3. Designed by the Community for Long-Term Benefits

- Transforming Honoapi'ilani Highway into a recreational and commuting pathway would create a lasting

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community asset that boosts economic recovery, tourism,
and public health.

- A designated bike and pedestrian path would promote environmental stewardship and community pride by offering secure, picturesque access to important natural and cultural landmarks.

As part of HDOT's broader goal to repair the coastal highway network from Mā'alaea to north of Lahaina, the Honoapi'ilani Highway Improvements Project will bring much-needed service dependability and resilience. This project also offers a rare chance to incorporate the West Maui Greenway as a crucial component of this reconstruction.

The August 2023 wildfires has forced our community to rethink present and future disaster recovery and infrastructure planning. Conversion of the former highway into a cycling and pedestrian path, as well as an evacuation route, will shape a legacy of sustainable infrastructure that will benefit West Maui for many years to come.

I respectfully ask for your consideration of incorporating the West Maui Greenway into the Honoapi'ilani Highway Improvement Project, and I look forward to seeing this move forward with these important elements included.

Thank you for your time and consideration of this critical matter. Please feel free to contact me at: Tamara.Paltin@mauicounty.us or (808) 295-2967.

Me ka 'oia'i'o,

Tamara A.M. Paltin

Tamara Paltin
Councilmember



United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
1111 Broadway, Suite 1200
Oakland, CA 94607

February 18, 2025

IN REPLY REFER TO:
ER 25/0010
4111

Ken Tatsuguchi
HDOT Highways Planning Branch
869 Punchbowl Street, Room 301
Honolulu, HI 96813

Subject: U.S. Department of the Interior Comments – DRAFT Section 4(f) Evaluation for
*Honoapi'ilani Highway Improvements Project West Maui: Ukumehame to
Launiupoko, December 2024*

Dear Ken Tatsuguchi:

The U.S. Department of the Interior (Department), as required by the Department of Transportation Act of 1966 (49 U.S.C. §303 and 23 U.S.C. §138), has reviewed the December 2024 DRAFT Section 4(f) Evaluation for *Honoapi'ilani Highway Improvements Project West Maui: Ukumehame to Launiupoko*.

The Hawai'i Department of Transportation (HDOT) proposes to build a new six-mile alignment of the Honoapi'ilani Highway to provide a reliable transportation facility in West Maui and reduce the highway's vulnerability to coastal hazards. Several areas with archaeological resources in Olowalu and Ukumehame were evaluated for potential impacts by one or more Build Alternatives. A draft Programmatic Agreement between HDOT and the Hawai'i State Historic Preservation Division includes protocols to avoid, minimize, or mitigate adverse effects to archaeological historic properties and burials. The 4(f) evaluation concludes that the Build Alternatives will not have direct, temporary, or constructive use of 4(f) resources within the Olowalu Sugar Plantation Historic District or on individually eligible and contributing resources in Olowalu. In Ukumehame, there are no eligible architectural historic properties - i.e., no 4(f) protected historic resources.

TRANSMITTED ELECTRONICALLY – NO HARDCOPY TO FOLLOW

The Department, through the National Park Service (NPS), concurs with a de minimis finding, that the project will have no adverse effects on any Section 4(f) properties within the project area. If you have specific questions related to our comments, please contact Danette Woo Nolan at Danette_Woo@nps.gov. For all other questions, please contact me at Viktoriya_Sirova@ios.doi.gov.

Sincerely,

Viktoriya Sirova
Regional Environmental Officer

Electronic distribution: honoapiilanieis@online.wspis.com, ken.tatsuguchi@hawaii.gov

cc: Roxanne Runkel, National Park Service: Roxanne_Runkel@nps.gov
Danette Woo, National Park Service: Danette_Woo@nps.gov

Standard Comments for Land Use Reviews
Clean Air Branch
Hawaii State Department of Health
July 3, 2024

All project activities shall comply with Hawaii Administrative Rules (HAR), Chapter 11-59 and 11-60.1.

If your proposed project:

Requires an Air Pollution Control Permit

- You must obtain an air pollution control permit from the Clean Air Branch and comply with all applicable conditions and requirements. If you do not know if you need an air pollution control permit, please contact the Permitting Section of the Clean Air Branch.
- Permit application forms can be found here: <https://health.hawaii.gov/cab/permit-application-forms/>

Has the potential to generate fugitive dust

- You must reasonably control the generation of all airborne, visible fugitive dust. Note that construction activities that occur near existing residences, businesses, public areas and major thoroughfares exacerbate potential dust concerns. It is recommended that a dust control management plan be developed which identifies and mitigates all activities that may generate airborne, visible fugitive dust. The plan, which does *not* require Department of Health approval, should help you recognize and minimize potential airborne, visible fugitive dust problems.
- Construction activities must comply with the provisions of Hawaii Administrative Rules, §11- 60.1-33 on Fugitive Dust. In addition, for cases involving mixed land use, it is strongly recommended that buffer zones be established, wherever possible, in order to alleviate potential dust concerns.
- You must provide reasonable measures to control airborne, visible fugitive dust from the road areas and during the various phases of construction. These measures include, but are not limited to, the following:
 - Planning the different phases of construction, focusing on minimizing the amount of airborne, visible fugitive dust-generating materials and activities, centralizing on-site vehicular traffic routes, and locating potential dust-generating equipment in areas of the least impact;
 - Providing an adequate water source at the site prior to start-up of construction activities;
 - Landscaping and providing rapid covering of bare areas, including slopes, starting from the initial grading phase;
 - Minimizing airborne, visible fugitive dust from shoulders and access roads;
 - Providing reasonable dust control measures during weekends, after hours, and prior to daily start-up of construction activities; and
 - Controlling airborne, visible fugitive dust from debris being hauled away from the project site.
- If you have questions about fugitive dust, please contact the Enforcement Section of the Clean Air Branch. Please also see fugitive dust fact sheet at: <https://health.hawaii.gov/cab/files/2024/02/Hawaii-Fugitive-Dust-Fact-Sheet-February-2024.pdf>.

Includes construction, demolition, or renovation activities that involve potential asbestos and lead containing materials

- Please contact the Indoor and Radiological Health Branch at (808) 586-4700 or visit: <https://health.hawaii.gov/irhb/>

Increases the population and potential number of vehicles in an area

- The creation of apartment buildings, complexes, and residential communities may increase the overall population in an area. Increasing the population in an area may inadvertently lead to more air pollution via vehicle exhaust. Vehicle exhaust releases pollutants in the air that can negatively impact human health and air quality, including lung irritants, carcinogens, and greenhouse gases.
- Ensure that drivers keep vehicle idling times to three (3) minutes or less.
- Consider and incorporate support for alternative transportation options such as bike racks and/or electric vehicle charging stations where possible.

If you have any questions, please contact the Clean Air Branch at (808) 586-4200 or at cab@doh.hawaii.gov.

Comment Form



Honoapi'ilani Highway Improvements DEIS

We want to hear from you! Please share your comments and questions with our team before February 24, 2025. More information on the Honoapi'ilani Highway Improvements project can be found at www.honoapiilanihwyimprovements.com. Thank you for your participation!

Thank you for allowing the U.S. Army Corps of Engineers the opportunity to provide comments on the Honoapi'ilani Highway Improvements Project draft EIS. When fill quantities and impact areas within aquatic resources are finalized, please submit a Corps permit application to CEPOH-RO@usace.army.mil, so we can begin the review process for discharges of fill under Section 404 of the Clean Water Act.

Providing your contact information below is optional. It will allow us to add you to the mailing/email list to receive future project information.

Name: _____			
Address: _____			
City: _____	State: _____	Zip: _____	
Email: _____	Phone: _____		

Share your comments and questions by handing in this form at the hearing, by sending this form via mail or email, or by calling Ken Tatsuguchi from the Hawaii Department of Transportation.

Ken Tatsuguchi, HDOT
Email: ken.tatsuguchi@hawaii.gov
Phone: 808-587-1830

Federal Highway Administration, Hawaii Division
Attention: Richelle Takara, Division Administrator
Box 50206, 300 Ala Moana Blvd.,
Room 3-229, Honolulu, HI 96850



The questions below are **optional**, but intended to help our staff better understand what worked well and what improvements to consider for future public meetings.

How did you hear about this public meeting? *(please check)*

- ☐ Newspaper ☐ Email ☐ Community board ☐ Word-of-mouth ☐ Social media
☐ Other: _____

Was the information easy to understand and informative? ☐ Yes ☐ No

Please indicate which of the following best represents you:

- ☐ Local Resident ☐ Local Business/Industry/Trade Association ☐ Neighborhood Group
☐ Local Non-Profit Organization ☐ National Environmental Organization
☐ Local or State Government ☐ Federal or Tribal Government
☐ Other (please specify) _____

Answering the following questions is optional, but your response will be extremely helpful in ensuring the fairness and equity of HDOT's public involvement process. Submissions will be kept confidential and separate from any personally identifiable information.

What is your race?

- ☐ Black or African American ☐ American Indian or Alaskan Native ☐ Asian
☐ Hispanic or Latino ☐ White ☐ Native Hawaiian or Other Pacific Islander
☐ I prefer to self-describe: _____

What is the primary language spoken in your home?

- ☐ English ☐ Hawaiian ☐ Spanish ☐ Tagalog ☐ Vietnamese
☐ Other (Please specify): _____

Was project information translated into other languages appropriately?

- ☐ Yes ☐ No ☐ Specify: _____

Gender identity:

- ☐ Man ☐ Woman ☐ Non-binary ☐ I prefer to self-describe: _____

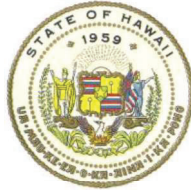
Do any individuals living in your home have a physical or mental impairment that substantially limits one or more major life activities?

- ☐ Yes ☐ No

Please suggest additional ways you think HDOT and FHWA can improve the inclusiveness of public outreach efforts. **Thank you for completing this survey!**

JOSH GREEN, M.D.
GOVERNOR | KE KIA'ĀINA

SYLVIA LUKE
LIEUTENANT GOVERNOR | KA HOPE KIA'ĀINA



DAWN N. S. CHANG
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT

STATE OF HAWAI'I | KA MOKU'ĀINA 'O HAWAI'I
DEPARTMENT OF LAND AND NATURAL RESOURCES
KA 'OIHANA KUMUWAIWAI 'ĀINA
LAND DIVISION

P.O. BOX 621
HONOLULU, HAWAII 96809

January 8, 2025

MEMORANDUM

TO:

DLNR Agencies:

- ☒ Div. of Aquatic Resources (kendall.l.tucker@hawaii.gov)
- ☐ Div. of Boating & Ocean Recreation
- ☒ Engineering Division (DLNR.ENGR@hawaii.gov)
- ☒ Div. of Forestry & Wildlife (rbyrosa.t.terrago@hawaii.gov)
- ☒ Div. of State Parks (curt.a.cottrell@hawaii.gov)
- ☒ Commission on Water Resource Management (DLNR.CWRM@hawaii.gov)
- ☒ Office of Conservation & Coastal Lands (sharleen.k.kuba@hawaii.gov)
- ☒ Land Division – Maui District (dlnr.land.maui@hawaii.gov)
- ☒ Aha Moku Advisory Committee (leimana.k.damate@hawaii.gov)

FROM: Russell Y. Tsuji, Land Administrator *Russell Tsuji*
SUBJECT: DEIS for **Honoapi'ilani Highway Improvements**
LOCATION: Ukumehame to Launiupoko, Lahaina, Island of Maui; Portions of TMK Plats:
(2) 4-7-001, 4-8-0001, 002, 003,004, and Honoapi'ilani Highway ROWs
APPLICANT: Hawaii Department of Transportation, Highways Division

Transmitted for your review and comment is information on the above-referenced subject matter. The DEIS was published on January 8, 2025, by the State Environmental Review Program (formerly the Office of Environmental Quality Control) at the Office of Planning and Sustainable Development in the periodic bulletin, The Environmental Notice, available at the following link:

https://files.hawaii.gov/dbedt/erp/The_Environmental_Notice/2025-01-08-TEN.pdf

Please submit any comments by **February 21, 2025**. If no response is received by this date, we will assume your agency has no comments. Should you have any questions, please contact Darlene Nakamura directly via email at darlene.k.nakamura@hawaii.gov. Thank you.

BRIEF COMMENTS:

- ☐ We have no objections.
- ☐ We have no comments.
- ☐ We have no additional comments.
- ☒ Comments are included/attached.

Signed:

Print Name:

Brian J. Neilson-Administrator

Division:

Aquatic Resources

Date:

02/21/2025

Attachments

cc: Central File

JOSH GREEN, M.D.
GOVERNOR | KE KIA'ĀINA

SYLVIA LUKE
LIEUTENANT GOVERNOR | KA HOPE KIA'ĀINA



STATE OF HAWAII | KA MOKU'ĀINA 'O HAWAII
DEPARTMENT OF LAND AND NATURAL
RESOURCES DIVISION OF AQUATIC RESOURCES

1151 PUNCHBOWL STREET, ROOM 330
HONOLULU, HAWAII 96813

Date: 2/21/2025

DAR # AR6823

DAWN N.S. CHANG
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT

RYAN K.P. KANAKA'OLE
FIRST DEPUTY

CIARA W.K. KAHAHANE
DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES
BOATING AND OCEAN RECREATION BUREAU
OF CONVEYANCES
COMMISSION ON WATER RESOURCE
MANAGEMENT
CONSERVATION AND COASTAL LANDS
CONSERVATION AND RESOURCES
ENFORCEMENT
ENGINEERING
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

MEMORANDUM

TO: Brian J. Neilson
DAR Administrator

FROM: Haruko Mauro-Koike, Aquatic Biologist

SUBJECT: Review of DEIS for Honoapi'ilani Highway Improvements

Request Submitted by: Russell Y. Tsuji, Land Administrator
Ukumehame to Launiupoko, Lahaina, Island of Maui; Portions of TMK Plats:
(2) 4-7-001, 4-8-0001, 002, 003, 004, and Honoapi'ilani Highway ROWs

Brief Description of Project:

Honoapi'ilani Highway (State Route 30) provides the main access between communities along the west coast of Maui and the rest of the island and is subject to periodic flooding and coastal erosion. The primary purpose of this project is to provide a reliable transportation facility in West Maui by reducing the highway's vulnerability to coastal hazards. Specifically, the project proposes to relocate about 6 miles of the highway away from the coastline from approximately milepost 11, in the vicinity of Pāpalaua Wayside Park to Launiupoko, at milepost 17, the existing southern terminus of Lāhainā Bypass.

Comments:

☐ No Comments ☒ Comments Attached

Thank you for providing DAR the opportunity to review and comment on the proposed project. Should there be any changes to the project plan, DAR requests the opportunity to review and comment on those changes.

Comments Approved: Brian J. Neilson Date: 02/21/2025
Brian J. Neilson
DAR Administrator

Comments

The project will cross two major streams—Ukumehame and Olowalu—but the Draft Environmental Impact Statement (EIS) does not adequately assess the potential impacts of the highway relocation on these streams. Both streams are home to endemic Hawaiian gobies, including the IUCN-listed *Sicyopterus stimpsoni*, and snails, which have been observed during the CWRM/DAR stream monitoring. As these species are amphidromous, they rely on healthy and continuous stream habitats for their life cycles. Therefore, we recommend that a more detailed analysis of impacts to the stream habitats be included in this EIS.

Additionally, the EIS does not clearly specify the type of stream crossing to be used. The impact on water flow and habitat connectivity will differ significantly depending on whether a culvert, bridge, or viaduct is employed. It is important to note that culverts, over time, can develop undercuts and erosion, which can obstruct the migration of stream species and disrupt habitat continuity. These potential issues should be avoided. There are also no clearly defined Best Management Practices (BMPs) for stream protection during construction.

The report identifies Alternative 2 as the preferred route for Olowalu and Alternative 1 for Ukumehame. However, in Table S-3, a new column labeled "Preferred Alternative" appears, which the score does not seem to align with Ukumehame's Alternative 1. Figure S-6 depicts the preferred alternative route, but it labels it as U-1 and O-2, making it difficult to clearly distinguish the modified section. According to Table S-3, the preferred alternative is intended to reduce impacts to the wetland, and we would like to see a clearer depiction of how this route has been modified from Alternative 1 on the map. Furthermore, it would be appreciated if wetland and other waterbodies are delineated in the map to assess the impact to the area more accurately.

Although O-3/4 and U-4 did not achieve the highest overall score, from an environmental perspective, these alternatives perform well by minimizing impacts to the wetland and preserving the vulnerable lower stream reach habitat. This habitat is crucial for two of our endemic goby species, *Eleotris sandwicensis* and *Stenogobius hawaiiensis*, which are unable to migrate to the upper reaches. Additionally, the sea level rise simulation indicates that certain sections of the preferred U1 route will be adjacent to or within the sea level rise exposure area, potentially increasing the risk of coastal hardening and erosion in the future.

JOSH GREEN, M.D.
GOVERNOR KA HONOKA'ĀINA
SYLVIA LUKE
LIEUTENANT GOVERNOR KA HONOKA'ĀINA



DAWN N. S. CHANG
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT

STATE OF HAWAII | KA MOKU'ĀINA 'O HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
KA 'ŌIHANA KUMUWAIWAI 'ĀINA
LAND DIVISION

P.O. BOX 621
HONOLULU, HAWAII 96809

January 8, 2025

MEMORANDUM

FROM: ~~TO:~~

DLNR Agencies:

- ☒ Div. of Aquatic Resources (kendall.l.tucker@hawaii.gov)
- ☐ Div. of Boating & Ocean Recreation
- ☒ Engineering Division (DLNR.ENGR@hawaii.gov)
- ☒ Div. of Forestry & Wildlife (rubyrosa.t.terrago@hawaii.gov)
- ☒ Div. of State Parks (curt.a.cottrell@hawaii.gov)
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- ☒ Office of Conservation & Coastal Lands (sharleen.k.kuba@hawaii.gov)
- ☒ Land Division – Maui District (dlr.land.maui@hawaii.gov)
- ☒ Aha Moku Advisory Committee (leimana.k.damate@hawaii.gov)

TO: FROM: Russell Y. Tsuji, Land Administrator *Russell Tsuji*
SUBJECT: DEIS for Honoapi'ilani Highway Improvements
LOCATION: Ukumehame to Launiupoko, Lahaina, Island of Maui; Portions of TMK Plats:
(2) 4-7-001, 4-8-0001, 002, 003, 004, and Honoapi'ilani Highway ROWs
APPLICANT: Hawaii Department of Transportation, Highways Division

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https://files.hawaii.gov/dbedt/erp/The_Environmental_Notice/2025-01-08-TEN.pdf

Please submit any comments by **February 21, 2025**. If no response is received by this date, we will assume your agency has no comments. Should you have any questions, please contact Darlene Nakamura directly via email at darlene.k.nakamura@hawaii.gov. Thank you.

BRIEF COMMENTS:

- ☐ We have no objections.
- ☐ We have no comments.
- ☐ We have no additional comments.
- ☒ Comments are included/attached.

Signed: *Dina U. Lau*
Print Name: Dina U. Lau, Acting Chief Engineer
Division: Engineering Division
Date: Feb 18, 2025

Attachments
cc: Central File

**DEPARTMENT OF LAND AND NATURAL RESOURCES
ENGINEERING DIVISION**

LD/Russell Y. Tsuji

Ref: DEIS for Honoapi'ilani Highway Improvements

Location: Ukumehame to Launiupoko, Lahaina, Island of Maui

TMK(s): (2) 4-7-001, 4-8-001, 002, 003, 004, and Honoapi'ilani

Highway ROWs

Applicant: Hawaii Department of Transportation, Highways Division

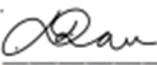
COMMENTS

The rules and regulations of the National Flood Insurance Program (NFIP), Title 44 of the Code of Federal Regulations (44CFR), are in effect when development falls within a Special Flood Hazard Area (high-risk areas). Be advised that 44CFR, Chapter 1, Subchapter B, Part 60 reflects the minimum standards as set forth by the NFIP. Local community flood ordinances may stipulate higher standards that can be more restrictive and would take precedence over the minimum NFIP standards.

The owner of the project property and/or their representative is responsible for researching the Flood Hazard Zone designation for the project. Flood zones subject to NFIP requirements are identified on FEMA's Flood Insurance Rate Maps (FIRM). The official FIRMs can be accessed through FEMA's Map Service Center (msc.fema.gov). Our Flood Hazard Assessment Tool (FHAT) (fhaw.hawaii.gov) could also be used to research flood hazard information.

If there are questions regarding the local flood ordinances, please contact the applicable County NFIP coordinating agency below:

- o Oahu: City and County of Honolulu, Department of Planning and Permitting (808) 768-8098.
- o Hawaii Island: County of Hawaii, Department of Public Works (808) 961-8327.
- o Maui/Molokai/Lanai: County of Maui, Department of Planning (808) 270-7139.
- o Kauai: County of Kauai, Department of Public Works (808) 241-4849.

Signed: 
DINA U. LAU, ACTING CHIEF ENGINEER

Date: Feb 18, 2025

JOSH GREEN, M.D.
GOVERNOR | KE KAUAI



DAWN N.S. CHANG
CHAIRPERSON

KENNETH S. FINK, M.D., MGA, MPH
AURORA KAGAWA-VIVIANI, PH.D.
WAYNE K. KATAYAMA
PAUL J. MEYER
LAWRENCE H. MIKE, M.D., J.D.
V.R. HINANO RODRIGUES

CIARA W.K. KAHANE
DEPUTY DIRECTOR

STATE OF HAWAII | KA MOKU'ĀINA 'O HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES | KA 'ŌHANA KUMUWAIWAI 'ĀINA
COMMISSION ON WATER RESOURCE MANAGEMENT | KE KAHUWAI PONO
P.O. BOX 621
HONOLULU, HAWAII 96809

Feb 3, 2025

REF: RFD.6371.6

TO: Mr. Russell Tsuji, Administrator
Land Division

FROM: Ciara W.K. Kahane, Deputy Director *Ciara Kahane*
Commission on Water Resource Management

SUBJECT: Honoapiʻilani Highway Improvements

FILE NO.: RFD.6371.6
TMK NO.: (2) 4-7-001, 4-8-0001, 002, 003,004

Thank you for the opportunity to review the subject document. The Commission on Water Resource Management (CWRM) is the agency responsible for administering the State Water Code (Code). Under the Code, all waters of the State are held in trust for the benefit of the citizens of the State, therefore all water use is subject to legally protected water rights. CWRM strongly promotes the efficient use of Hawaii's water resources through conservation measures and appropriate resource management. For more information, please refer to the State Water Code, Chapter 174C, Hawaii Revised Statutes, and Hawaii Administrative Rules, Chapters 13-167 to 13-171. These documents are available via the Internet at <http://dlnr.hawaii.gov/cwrn>.

Our comments related to water resources are checked off below.

- ☐ 1. We recommend coordination with the county to incorporate this project into the county's Water Use and Development Plan. Please contact the respective Planning Department and/or Department of Water Supply for further information.
- ☐ 2. We recommend coordination with the Engineering Division of the State Department of Land and Natural Resources to incorporate this project into the State Water Projects Plan.
- ☐ 3. We recommend coordination with the Hawaii Department of Agriculture (HDOA) to incorporate the reclassification of agricultural zoned land and the redistribution of agricultural resources into the State's Agricultural Water Use and Development Plan (AWUDP). Please contact the HDOA for more information.
- ☐ 4. We recommend that water efficient fixtures be installed and water efficient practices implemented throughout the development to reduce the increased demand on the area's freshwater resources. Reducing the water usage of a home or building may earn credit towards Leadership in Energy and Environmental Design (LEED) certification. More information on LEED certification is available at <http://www.usgbc.org/leed>. A listing of fixtures certified by the EAP as having high water efficiency can be found at <http://www.epa.gov/watersense>.
- ☒ 5. We recommend the use of best management practices (BMP) for stormwater management to minimize the impact of the project to the existing area's hydrology while maintaining on-site infiltration and preventing polluted runoff from storm events. Stormwater management BMPs may earn credit toward LEED certification. More information on stormwater BMPs can be found at <http://planning.hawaii.gov/czm/initiatives/low-impact-development/>
- ☐ 6. We recommend the use of alternative water sources, wherever practicable.
- ☐ 7. We recommend participating in the Hawaii Green Business Program, that assists and recognizes businesses that strive to operate in an environmentally and socially responsible manner. The program description can be found online at <http://energy.hawaii.gov/green-business-program>.
- ☐ 8. We recommend adopting landscape irrigation conservation best management practices endorsed by the Landscape Industry Council of Hawaii. These practices can be found online at http://www.hawaiiscape.com/wp-content/uploads/2013/04/LICH_Irrigation_Conservation_BMPs.pdf.

- ☒ 9. There may be the potential for ground or surface water degradation/contamination and recommend that approvals for this project be conditioned upon a review by the State Department of Health and the developer's acceptance of any resulting requirements related to water quality.
- ☐ 10. The proposed water supply source for the project is located in a designated water management area, and a Water Use Permit is required prior to use of water. The Water Use Permit may be conditioned on the requirement to use dual line water supply systems for new industrial and commercial developments.
- ☐ 11. The Hawaii Water Plan is directed toward the achievement of the utilization of reclaimed water for uses other than drinking and for potable water needs in one hundred per cent of State and County facilities by December 31, 2045 (§174C-31(g)(6), Hawaii Revised Statutes). We strongly recommend that this project consider using reclaimed water for its non-potable water needs, such as irrigation. Reclaimed water may include, but is not limited to, recycled wastewater, gray water, and captured rainwater/stormwater. Please contact the Hawai'i Department of Health, Wastewater Branch, for more information on their reuse guidelines and the availability of reclaimed water in the project area.
- ☐ 12. A Well Construction Permit(s) is (are) required before the commencement of any well construction work.
- ☐ 13. A Pump Installation Permit(s) is (are) required before ground water is developed as a source of supply for the project.
- ☐ 14. There is (are) well(s) located on or adjacent to this project. If wells are not planned to be used and will be affected by any new construction, they must be properly abandoned and sealed. A permit for well abandonment must be obtained.
- ☐ 15. Ground-water withdrawals from this project may affect streamflows, which may require an instream flow standard amendment.
- ☐ 16. A Stream Channel Alteration Permit(s) is (are) required before any alteration can be made to the bed and/or banks of a stream channel.
- ☐ 17. A Stream Diversion Works Permit(s) is (are) required before any stream diversion works is constructed or altered.
- ☐ 18. A Petition to Amend the Interim Instream Flow Standard is required for any new or expanded diversion(s) of surface water.
- ☐ 19. The planned source of water for this project has not been identified in this report. Therefore, we cannot determine what permits or petitions are required from our office, or whether there are potential impacts to water resources.
- ☐ OTHER:

If you have any questions, please contact Ryan Imata of the Groundwater Regulation Branch at (808) 587-0225 or Katie Roth of the Planning Branch (808) 587-0216.

MA-25-120 AW

JOSH GREEN, M.D.
GOVERNOR | KE KIA'ĀINA

SYLVIA LUKE
LIEUTENANT GOVERNOR | KA HOPE KIA'ĀINA



DAWN N. S. CHANG
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT

RECEIVED
OFFICE OF CONSERVATION
AND COASTAL LANDS

2025 FEB 14 PM 2:16

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DEPT. OF LAND &
NATURAL RESOURCES
STATE OF HAWAII

STATE OF HAWAII | KA MOKU'ĀINA 'O HAWAII'
DEPARTMENT OF LAND AND NATURAL RESOURCES
KA 'OIHANA KUMUWAIWAI 'ĀINA
LAND DIVISION

P.O. BOX 621
HONOLULU, HAWAII 96809

DEPT. OF LAND &
NATURAL RESOURCES
STATE OF HAWAII

January 8, 2025

MEMORANDUM

TO: **DLNR Agencies:**
X Div. of Aquatic Resources (kendall.l.tucker@hawaii.gov)
 Div. of Boating & Ocean Recreation
X Engineering Division (DLNR.ENGR@hawaii.gov)
X Div. of Forestry & Wildlife (rubyrosa.t.terrago@hawaii.gov)
X Div. of State Parks (curt.a.cottrell@hawaii.gov)
X Commission on Water Resource Management (DLNR.CWRM@hawaii.gov)
X Office of Conservation & Coastal Lands (sharleen.k.kuba@hawaii.gov)
X Land Division – Maui District (dlnr.land.maui@hawaii.gov)
X Aha Moku Advisory Committee (leimana.k.damate@hawaii.gov)

FROM: Russell Y. Tsuji, Land Administrator *Russell Tsuji*

SUBJECT: DEIS for Honoapi'ilani Highway Improvements

LOCATION: Ukumehame to Launiupoko, Lahaina, Island of Maui; Portions of TMK Plats:
(2) 4-7-001, 4-8-0001, 002, 003, 004, and Honoapi'ilani Highway ROWs

APPLICANT: Hawaii Department of Transportation, Highways Division

Transmitted for your review and comment is information on the above-referenced subject matter. The DEIS was published on January 8, 2025, by the State Environmental Review Program (formerly the Office of Environmental Quality Control) at the Office of Planning and Sustainable Development in the periodic bulletin, The Environmental Notice, available at the following link:

https://files.hawaii.gov/dbedt/erp/The_Environmental_Notice/2025-01-08-TEN.pdf

Please submit any comments by **February 21, 2025**. If no response is received by this date, we will assume your agency has no comments. Should you have any questions, please contact Darlene Nakamura directly via email at darlene.k.nakamura@hawaii.gov. Thank you.

BRIEF COMMENTS:

- () We have no objections.
() We have no comments.
() We have no additional comments.
(☒) Comments are included/attached.

Signed: *Michael Cain*
Print Name: MICHAEL CAIN
Division: OCCL
Date: _____

Attachments
cc: Central File

JOSH GREEN, M.D.
GOVERNOR | KE KIA'ĀINA

SYLVIA LUKE
LIEUTENANT GOVERNOR | KA HOPE KIA'ĀINA



STATE OF HAWAII | KA MOKU'ĀINA 'O HAWAII'
DEPARTMENT OF LAND AND NATURAL RESOURCES
KA 'OIHANA KUMUWAIWAI 'ĀINA
Office of Conservation and Coastal Lands
P.O. BOX 621
HONOLULU, HAWAII 96809

DAWN N.S. CHANG
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT
RYAN K.P. KANAKA'OLE
FIRST DEPUTY
CIARA W.K. KAHANE
DEPUTY DIRECTOR - WATER
AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
BUREAU OF CONVEYANCES
COMMISSION ON WATER RESOURCE
MANAGEMENT
CONSERVATION AND COASTAL LANDS
CONSERVATION AND RESOURCES
ENFORCEMENT
ENGINEERING
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

REF:OCCL:AW

Corr. MA-25-120

MEMORANDUM

TO: Russell Y. Tsuji, Administrator
Land Division Administrator

FROM: Michael Cain, Administrator
Office of Conservation and Coastal Lands (OCCL)

A handwritten signature in black ink, appearing to read "Michael Cain", is written over the "FROM:" line.

SUBJECT: Draft Environmental Impact Statement (DEIS) for Honoapi'ilani Highway Improvements, Ukumehame to Launipoko, Lahaina, Island of Maui; Portions of Tax Map Keys (TMKs) (2) 4-7-001, (2) 4-8-001, (2) 4-8-002, (2) 4-8-003, and (2) 4-8-004.

The Department of Land and Natural Resources (DLNR), Office of Conservation and Coastal Lands (OCCL) is responding the request for comments on the DEIS for the proposed Honoapi'ilani Highway Improvements. The OCCL regulates land uses in the Conservation District. The preferred alternative as presented in the DEIS moves the existing highway out of the Conservation District and away from coastal hazards and sea level rise. According to the plans as presented in the DEIS, the intent of DOT is to leave the existing road and shoreline hardening structures in place, and to transfer ownership and maintenance responsibilities to Maui County to become a local access road. OCCL would like to see an assessment of the cost and long-term impact to the shoreline of removal of the existing road and all affiliated protective structures. Given the history and exposure of portions of the existing road to high waves, high tides and sea level rise, ongoing hardening and continual maintenance operations in the Conservation District may be required to maintain the road in service.

Portions of the old road are in the Limited Subzone of the Conservation District. Per HAR §15-5-12, the objective of the Limited Subzone is to "limit uses where natural conditions suggest constraints on human activities". The natural conditions at the location of the existing highway have necessitated the improvement plan and realignment of the road away from coastal hazards and sea level rise. As identified in the DEIS, approximately four of the six miles of highway proposed for relocation are in the sea level rise exposure area (SLR-XA) at a predicted 3.2ft of sea level rise. The DEIS acknowledges that continued use of the highway at its existing location would require ongoing maintenance work and hardening to achieve short-term fixes to

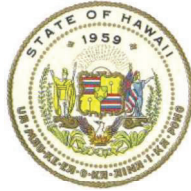
the chronic impacts of coastal hazards. Footnote 5 on page 2-12 of the DEIS states the following: "As part of the relinquishment process, HDOT and the FHWA must concur that the land is not needed for federal-aid Highway purposes in the foreseeable future, that the new roadway segment and its traffic operations would not be adversely affected by relinquishments, and that the lands are not suitable to restore, preserve, or improve the scenic beauty of the new roadway."

The lands which are currently occupied by the existing highway are suitable for restoration. Naturalization of the shoreline would improve public access, return public trust land to the public, and benefit reef health at the Olowalu reef by enabling the land to naturally filter freshwater runoff. Restoration may provide a more substantial storm and wave buffer for the areas of the realigned highway which will remain in the SLR-XA. Finally, the scenic beauty of the realigned road will be improved if the existing road is removed and restored to a natural beach profile.

Please contact Amy Wirts, University of Hawai'i Sea Grant Extension Agent and OCCL Coastal Lands Program Coordinator at (808) 587-0376 or by email at Amy.E.Wirts@hawaii.gov, should you have any questions regarding this matter.

JOSH GREEN, M.D.
GOVERNOR | KE KIA'ĀINA

SYLVIA LUKE
LIEUTENANT GOVERNOR | KA HOPE KIA'ĀINA



DAWN N. S. CHANG
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT

STATE OF HAWAI'I | KA MOKU'ĀINA 'O HAWAI'I
DEPARTMENT OF LAND AND NATURAL RESOURCES
KA 'OIHANA KUMUWAIWAI 'ĀINA
LAND DIVISION

P.O. BOX 621
HONOLULU, HAWAII 96809

January 8, 2025

MEMORANDUM

TO:

DLNR Agencies:

- ☒ Div. of Aquatic Resources (kendall.l.tucker@hawaii.gov)
- ☐ Div. of Boating & Ocean Recreation
- ☒ Engineering Division (DLNR.ENGR@hawaii.gov)
- ☒ Div. of Forestry & Wildlife (rubyrosa.t.terrago@hawaii.gov)
- ☒ Div. of State Parks (curt.a.cottrell@hawaii.gov)
- ☒ Commission on Water Resource Management (DLNR.CWRM@hawaii.gov)
- ☒ Office of Conservation & Coastal Lands (sharleen.k.kuba@hawaii.gov)
- ☒ Land Division – Maui District (dlnr.land.maui@hawaii.gov)
- ☒ Aha Moku Advisory Committee (leimana.k.damate@hawaii.gov)

FROM: Russell Y. Tsuji, Land Administrator *Russell Tsuji*
SUBJECT: DEIS for **Honoapi'ilani Highway Improvements**
LOCATION: Ukumehame to Launiupoko, Lahaina, Island of Maui; Portions of TMK Plats:
(2) 4-7-001, 4-8-0001, 002, 003,004, and Honoapi'ilani Highway ROWs
APPLICANT: Hawaii Department of Transportation, Highways Division

Transmitted for your review and comment is information on the above-referenced subject matter. The DEIS was published on January 8, 2025, by the State Environmental Review Program (formerly the Office of Environmental Quality Control) at the Office of Planning and Sustainable Development in the periodic bulletin, The Environmental Notice, available at the following link:

https://files.hawaii.gov/dbedt/erp/The_Environmental_Notice/2025-01-08-TEN.pdf

Please submit any comments by **February 21, 2025**. If no response is received by this date, we will assume your agency has no comments. Should you have any questions, please contact Darlene Nakamura directly via email at darlene.k.nakamura@hawaii.gov. Thank you.

BRIEF COMMENTS:

- ☐ We have no objections.
- ☒ We have no comments.
- ☐ We have no additional comments.
- ☐ Comments are included/attached.

Signed: _____

Print Name: _____

Division: _____

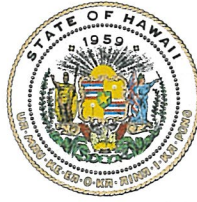
Date: _____

DLNR - MDLO

02/21/2025

Attachments

cc: Central File



**STATE OF HAWAII
DEPARTMENT OF EDUCATION
KA 'OIHANA HO'ONA'AUAO
P.O. BOX 2360
HONOLULU, HAWAII 96804**

OFFICE OF FACILITIES AND OPERATIONS

February 21 , 2025

Mr. Ken Tatsuguchi, PE
Hawaii Department of Transportation
Highways, Planning Branch
869 Punchbowl Street, Room 301
Honolulu, Hawaii 96813

Re: Honoapiilani Highway Improvements

Dear Mr. Tatsuguchi:

Thank you for your email dated January 6, 2025. Based on the information provided and despite the Lahaina Bypass Highway serving as an alternate route for Honoapiilani Highway, the Hawaii State Department of Education (Department) is concerned about commute times and traffic patterns for its students, parents, and staff as there are many that have been displaced to different parts of the island due to the West Maui Wildfires. With the uncertainty that still lies ahead, the Department requests that your staff and consultants meet with the administrators of Lahainaluna High, Lahaina Intermediate, and Nahienaena Elementary Schools to present traffic impacts leading to and from each of these campuses and specific timelines associated with the project.

Should you have any questions, please contact Cori China, of the Facilities Development Branch, Planning Section, at (808) 784-5080 or via email at cori.china@k12.hi.us.

We appreciate the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Roy Ikeda", is written over a horizontal line.

Roy Ikeda
Interim Public Works Manager
Planning Section

RI:ctc

c: Rebecca Winkie, Complex Area Superintendent, Hana-Lahainaluna-Lanai-Molokai Complex Area
Facilities Development Branch

RICHARD T. BISSEN, JR.
Mayor

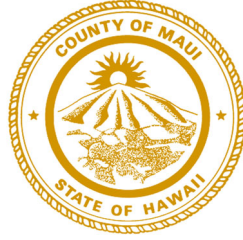
SHAYNE R. AGAWA, P.E.
Director

ROBERT SCHMIDT
Deputy Director

MICHAEL KEHANO, P.E.
Solid Waste Division

ERIC A. NAKAGAWA, P.E.
Wastewater Reclamation Division

Environmental Protection &
Sustainability Division



COUNTY OF MAUI
DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT
2145 KAOHU STREET, SUITE 102
WAILUKU, MAUI, HAWAII 96793

February 24, 2025

Mr. Ken Tatsuguchi, Project Manager
State of Hawaii, Department of Transportation, Highways Division
869 Punchbowl Street, Room 301
Honolulu, Hawai'i 96813
ken.tatsuguchi@hawaii.gov

Dear Mr. Tatsuguchi:

**SUBJECT: HONOAPIILANI HIGHWAY IMPROVEMENTS DEIS
COMMENTS**

Thank you for the opportunity to comment on the Honoapiilani Highway Improvements Draft Environmental Impact Statement (DEIS). The County of Maui, Department of Environmental Management has the following comments related to the Honoapiilani Highway Improvements DEIS:

- A portion of the proposed "common" route appears to encroach onto landfilled waste along the toe of closed Olowalu Landfill. Constructing structures and roadways on landfilled waste should be avoided. Please advise if this project does plan to place the improved highway on top of landfilled waste at the Closed Olowalu Landfill.
- The proposed route also appears to pass through the existing Olowalu Convenience Center (OCC) at the Closed Olowalu Landfill. OCC is the only recycling and waste transfer station for the West Maui community. Please advise if the OCC will be affected, and if so, the plan to relocate the OCC to another location to allow the County of Maui to continue providing this service to the local community.

Should you have any questions or comments, please contact Sage Kiyonaga, Solid Waste Engineer, at (808) 270-7941.

Sincerely,

for **SHAYNE R. AGAWA, P.E.**
Director, Department of Environmental Management

Honoapi‘ilani Highway Improvements Consultation Comments

Current Division Planner Contact:

James Buika – James.Buika@co.maui.hi.us

Long Range Division Planner Contact:

Karen Comcowich – Karen.Comcowich@co.maui.hi.us

PROJECT DESCRIPTION:

The State Department of Transportation is proposing to realign the Honoapi‘ilani Highway to provide a reliable transportation facility in West Maui and improve Honoapi‘ilani Highway’s resilience by reducing the highways vulnerability to coastal hazards.

LONG RANGE DIVISION COMMENTS:

The realignment of Honoapi‘ilani Highway out of the Sea-Level Rise Exposure Area (SLR-XA) is supported in the Maui County General Plan and more specifically by the West Maui Community Plan. However, multimodal transportation options and Complete Streets elements should be incorporated into the Honoapi‘ilani Highway Improvements. In addition, thoughtful consideration should be given to the road design to ensure the realigned highway retains and enhances the existing character and scenic resources found in Ukumehame and Olowalu. The inclusion of trees and landscaping appropriate to the microclimate is also important.

GENERAL COMMENTS

The realignment of Honoapi‘ilani Highway out of the SLR-XA is supported by the West Maui Community Plan (WMCP), the Maui Island Plan (MIP) and the Countywide Policy Plan (CWPP) (see WMCP Policy 2.2.10, and Action 2.21; MIP 6.4.3 Action 3; CWPP H.1.b.). The design of the Honoapi‘ilani Highway Improvements will need to incorporate multimodal and Complete Street design elements, while thoughtfully considering the existing character and scenic resources of the communities through which it passes (MIP 6.4.3 a, and b; CWPP H.1.b, c, and g).

- **WMCP 2.2.10** | Improve resilience of the transportation system to climate change related hazards such as sea level rise, flooding, and wildfires.
- **WMCP Action 2.21** | Work in partnership with the State Department of Transportation to prioritize and facilitate realignment of Honoapi‘ilani Highway out of the coastal hazard zone, and manage public lands makai of the realigned highway as wetlands, public parks, and open space.
- **MIP | Goal 6.4** | An interconnected, efficient, and well-maintained, multimodal transportation system.
Objective 6.4.3 | An island-wide, multimodal transportation system that respects and enhances the natural environment, scenic views, and each community’s character.
 - 6.4.3 a.** Ensure that the roadway and transit alignments respect the natural environment and scenic views.
 - 6.4.3 b.** Ensure that roadways and transit systems in rural areas and small towns enhance community character.

6.4.3-Action 3 | Urge the State to relocate Honoapi‘ilani Highway mauka between the Pali and Puamana, and develop a network of parks and open space on the makai side of the highway, in accordance with the Pali to Puamana Master Plan.

○ **CWPP | H. Diversify Transportation Options**

Goal: Maui County will have an efficient, economical, and environmentally sensitive means of moving people and goods.

Objective 1: Provide an effective, affordable, and convenient ground-transportation system that is environmentally sustainable.

b. Plan for the efficient relocation of roadways for the public benefit.

c. Support the use of alternative roadway designs, such as traffic-calming techniques and modern roundabouts.

d. Increase route and mode options in the ground-transportation network.

e. Ensure that roadway systems are safe, efficient, and maintained in good condition.

g. Design new roads and roadway improvements to retain and enhance the existing character and scenic resources of the communities through which they pass.

CONCERNS AND OPPORTUNITIES

Multimodal Transportation

The Maui County General Plan, including the West Maui Community Plan, supports transportation projects that increase active transportation, including biking and walking, and transit services. Honoapi‘ilani Highway is the primary connection between West Maui and the rest of the island of Maui. Designing the realigned portions of the highway to support transit, bike and pedestrian access would provide multiple benefits from resilience actions by increasing transportation options and making walking and bicycling safe and easy between and within communities.

- **WMCP 2.2.1** | Improve West Maui’s active transportation network by increasing multimodal transportation options, incorporating Complete Streets, adding new sidewalks, and improving existing sidewalks and other pedestrian and bicycle facilities.
- **WMCP 2.1.4** | Prioritize projects that provide multiple benefits from resilience actions.
- **WMCP 2.2.5** | Support increased transit service within and between West Maui’s neighborhoods, parks, and commercial areas, and between the Kahului Airport and West Maui hotels.
- **WMCP 2.5.9** | Encourage and increase active transportation options throughout West Maui to promote public health and reduce auto use and carbon emissions.
- **MIP| Goal 6.4** | An interconnected, efficient, and well-maintained, multimodal transportation system

Objective 6.4.1 | Provide for a more integrated island-wide transportation and land use planning program that reduces congestion and promotes more efficient (transit-friendly) land use patterns.

6.4.1.a. Plan for an integrated multi-modal transportation system comprised of public transit, bicycle, pedestrian, automobile, and other transportation modes.

6.4.1.b. Refocus transportation investment from the construction of additional roadways only for the automobile to the expansion of a multimodal transportation system.

6.4.1.c. Encourage the use of “complete streets” design methods.

- **MIP | Goal 6.5** An island-wide transit system that addresses the needs of residents and visitors and contributes to healthy and livable communities.

Objective 6.5.1 | An integrated transit system that better serves all mobility needs of Maui’s residents and visitors.

6.5.1.b. Expand regional and inter-regional transit services, where appropriate, in heavily traveled corridors and within communities.

6.5.1.e. Require new development where appropriate, to provide right-of-ways (ROWs) to accommodate transit circulation and support facilities.

6.5.1.f. Identify, protect, and preserve, or acquire corridors for future inter-community transit use, including but not limited to, rail and also multimodal use corridors.

- **CWPP | H. Diversify Transportation Options**

Goal: Maui County will have an efficient, economical, and environmentally sensitive means of moving people and goods.

Objective 2: Reduce the reliance on the automobile and fossil fuels by encouraging walking, bicycling, and other energy-efficient and safe alternative modes of transportation.

a. Make walking and bicycling transportation safe and easy between and within communities.

b. Require development to be designed with the pedestrian in mind.

c. Design new and retrofit existing rights-of-way with adequate sidewalks, bicycle lanes, or separated multi-use transit corridors.

d. Support the development of a countywide network of bikeways, equestrian trails, and pedestrian paths.

Trees and Landscaping

The West Maui Community Plan and Countywide Policy Plan support the inclusion of trees along public right of ways. The West Maui Community Plan specifies the use of native trees and landscaping that is appropriate to the microclimate. Trees and other appropriate landscaping should be included in the realigned Honoapi‘ilani Highway Improvements.

- **WMCP 2.1.11** | Require new developments to install landscaping that reduces water use, using drought resistant and micro-climate appropriate design and plants including native

species, and gray water and water catchment systems where the State Department of Health allows it.

- **WMCP 2.3.4** | All development must implement recommendations of the Maui County Planting Plan for street and parking area trees, encouraging the use of native and endemic plants. Plants that are on the Hawai‘i Pacific Weed Risk Assessment list must not be used.
 - **WMCP 2.3.12** | Design landscape barriers along major roadways in such a manner as to maintain existing views of the mountains and ocean to the extent possible.
 - **WMCP 2.5.5** | Include native trees that are appropriate for the microclimate in parks, along streets, trails, and greenways, and throughout the community to provide shade, beauty, and reduce sediment runoff.
- **CWPP | H. Diversify Transportation Options**
Goal: Maui County will have an efficient, economical, and environmentally sensitive means of moving people and goods.
Objective 4: Improve and expand the planning and management of transportation systems.
 - h. Accommodate the planting of street trees and other appropriate landscaping in all public rights-of-way.

Natural and Cultural Resources

The Maui County General Plan, the MIP and the WMCP all support protecting and enhancing natural and cultural resources. This includes using Low Impact Development strategies and vegetated buffers around gulches and wetlands, giving consideration to how agriculture areas will be impacted, particularly where there is active subsistence farming or lo‘i cultivation, and ensuring access to kuleana lands. It is noted that the project proponents have consulted with community members in development of the Environmental Impact Statement Preparation Notice, including the Aha Moku Council and Lineal Decedents. As final alignment and design for Honoapi‘ilani Highway Improvements are refined, protecting, and enhancing natural and cultural resources should be a priority. Continued involvement and collaboration with community members as plans are refined is encouraged.

- **WMCP 2.2.9** | Protect and enhance natural and cultural resources during implementation of transportation projects through early consultation and community engagement with resource management agencies, residents, and cultural practitioners.
- **WMCP 2.3.1** | Ensure new development projects provide continued access to kuleana lands protected under Section 7-1, Hawai‘i Revised Statutes.
- **WMCP 2.3.2** | Gulches, as identified in the map in Figure 2.3 of this Plan, must remain in open space and no new permanent structures may be developed in or within 100 feet of the top of the bank of identified gulches, unless Low Impact Development strategies are implemented to prevent stormwater runoff.
- **WMCP 2.3.3** | Protect ocean and stream water quality by requiring that wetlands, as defined by traditional historic knowledge or by Section 404 of the Clean Water Act, be preserved with vegetated buffer areas that are adequate to protect them from pollutants.

- **WMCP 2.3.5** | Require implementation of Low Impact Development practices in developments in West Maui to reduce stormwater runoff and protect water quality.
- **WMCP 2.3.8** | Preserve and protect the region's cultural resources and traditional lifestyles, including agricultural pursuits, such as subsistence agriculture on lands owned by the State Department of Hawaiian Home Lands in Honokōwai and lo'i cultivation of Native Hawaiians in Honokōhau Valley, Kahoma Valley, Kaua'ula Valley, Olowalu, and Ukumehame.
- **WMCP 2.3.10** | Existing areas of open space, including agricultural lands and gulches, should be viewed as a resource to be protected and enhanced.
- **WMCP 2.3.13** | The marine and nearshore environment and open space areas are important assets of the region and should be protected and preserved. Habitat connectivity for threatened and endangered species, watersheds, undeveloped shoreline areas and other environmentally sensitive lands must be preserved.
- **WMCP 2.3.16** | All development projects must engage in consultation with the Aha Moku 'o Maui representative associated with the project area – either Moku 'o Lāhainā or Moku 'o Kā'anapali – and provide evidence of this engagement to the Department.
- **WMCP 2.3.18** | Any ground-altering activities in the areas described in this Plan's ascription list must have a cultural monitor on site, due to the sensitive nature of these areas, until cultural overlay policies are established by the Council. See Appendix C | Cultural Reserve Ascription List.

- **MIP | Goal 2.1** | Our community respects and protects archaeological and cultural resources while perpetuating diverse cultural identities and traditions.

Objective 2.1.3 | Enhance the island's historic, archaeological, and cultural resources.

2.1.3.f | Support opportunities for public involvement with the intent to facilitate the protection and restoration of historic and archeological sites, including consultation with stakeholders.

2.1.3.g | Encourage the resolution of land title questions relating to Land Commission Awards and Royal patents.

2.1.3.h | Ensure compliance with historic preservation laws, and discourage demolition of properties that are determined to be eligible for listing on the National or State Register of Historic Places.

- **CWPP | B. Preserve Local Cultures and Traditions** |

Goal: Maui County will foster a spirit of pono and protect, perpetuate, and reinvigorate its residents' multi-cultural values and traditions to ensure that current and future generations will enjoy the benefits of their rich island heritage.

Objective 1: Perpetuate the Hawaiian culture as a vital force in the lives of residents.

a. Protect and preserve access to mountain, ocean, and island resources for traditional Hawaiian cultural practices.

f. Recognize and preserve the unique natural and cultural characteristics of each ahupua'a or district.

h. Ensure the protection of Native Hawaiian rights.

Objective 2 | Emphasize respect for our island lifestyle and our unique local cultures, family, and natural environment.

- d. Recognize the interconnectedness between the natural environment and the cultural heritage of the islands.

Trails

The protection and enhancement of trails is encouraged throughout the Maui County General Plan. While it is not expected that the Honoapiʻilani Highway Improvements will develop additional trails, preservation of existing trails and options for new connections should be incorporated.

- **WMCP 2.5.8** | Ensure existing government trails are preserved through the subdivision process or other approval process, such as land use designation change; reviews under Chapter 343, Hawaiʻi Revised Statutes; and reviews under Chapter 205A, Hawaiʻi Revised Statutes. Refer to the West Maui Trails Map (Figure 2.4, pg. 61) and consult with the Nā Ala Hele Trails and Access Program.
- **WMCP 2.5.3** | Support the development of trails and greenways in West Maui as part of a larger integrated recreation and transportation network and manage existing public mauka to makai access along the tops of gulches as identified in Figure 2.3 (pg. 60) to prevent the spread of rapid ʻŌhiʻa death, feral ungulates, and other invasive species in upper watersheds.
- **MIP | GOAL 2.1** | Our community respects and protects archaeological and cultural resources while perpetuating diverse cultural identities and traditions.
OBJECTIVE 2.1.1 | An island culture and lifestyle that is healthy and vibrant as measured by the ability of residents to live on Maui, access and enjoy the natural environment, and practice Hawaiian customs and traditions in accordance with Article XII, Section 7, Hawaiʻi State Constitution, and Section 7-1, Hawaiʻi Revised Statutes (HRS).
 - 2.1.1.c** Ensure traditional public access routes, including native Hawaiian trails, are maintained for public use.
- **MIP | Goal 6.6** | Maui will have a diverse range of active and passive recreational parks, wilderness areas, and other natural-resource areas linked, where feasible, by a network of greenways, bikeways, pathways, and roads that are accessible to all
Objective 6.6.3 | An expanded network of greenways, trails, pathways, and bikeways.
 - 6.6.3.c** Collaborate with the State and private land owners to ensure perpetual access and proper stewardship of traditional trails and access systems.
- **CWPP | H. Diversify Transportation Options**
Goal: Maui County will have an efficient, economical, and environmentally sensitive means of moving people and goods.

Objective 2: Reduce the reliance on the automobile and fossil fuels by encouraging walking, bicycling, and other energy-efficient and safe alternative modes of transportation.

e. Support the reestablishment of traditional trails between communities, to the ocean, and through the mountains for public use.

○ **CWPP | G. Improve Parks and Public Facilities**

Goal: A full range of island-appropriate public facilities and recreational opportunities will be provided to improve the quality of life for residents and visitors.

Objective 1 | Expand access to recreational opportunities and community facilities to meet the present and future needs of residents of all ages and physical abilities.

a. Protect, enhance, and expand access to public shoreline and mountain resources.

b. Expand and enhance the network of parks, multi-use paths, and bikeways.

Undergrounding Utilities

Undergrounding utilities is supported throughout the Maui County General Plan. This may be an opportunity to work with MECO to underground utilities in the area where improvements are being implemented.

- **WMCP 2.5.20 |** Promote the placement of utilities underground in new areas of development and in existing areas, where possible, unless desecration of iwi kūpuna is likely to occur or if the development lies within areas of significant cultural resources in the proposed cultural overlay, a permit will be required.

○ **CWPP | I. Improve Physical Infrastructure**

Goal: Maui County's physical infrastructure will be maintained in optimum condition and will provide for and effectively serve the needs of the County through clean and sustainable technologies.

Objective 4: Improve the planning and management of infrastructure systems.

j. Promote the undergrounding of utility and other distribution lines for health, safety, and aesthetic reasons.

Scenic Resources and Community Character

Ensuring scenic vistas and community character are considered and retained in the design of new roads or roadway improvements is supported in the WMCP, the MIP and the CWPP. While it is evident that the Honoapiʻilani Highway Improvements have considered the impacts of the alignment on the character and scenic resources of the surrounding area, it will also be important consider the character and scenic resources of the surrounding area in the design of the road and how it interacts with the surrounding communities.

- **WMCP 2.3.11 |** Protect public mauka to makai view corridors in each subarea and scenic vistas.

- **MIP | Goal 6.4** | An interconnected, efficient, and well-maintained, multimodal transportation system
Objective 6.4.2 | Safe, interconnected transit, roadway, bicycle, equestrian, and pedestrian network.
 - 6.4.2.a Ensure transit-, roadway-, and pedestrian-facilities design and level-of-service standards respect the unique character of our communities.**Objective 6.4.3** | An island-wide, multimodal transportation system that respects and enhances the natural environment, scenic views, and each community's character.
 - 6.4.3.c Design all transit systems to respect visual corridors and Maui's character.
- **CWPP | H. Diversify Transportation Options**
Goal: Maui County will have an efficient, economical, and environmentally sensitive means of moving people and goods.
Objective 1: Provide an effective, affordable, and convenient ground-transportation system that is environmentally sustainable.
 - **g.** Design new roads and roadway improvements to retain and enhance the existing character and scenic resources of the communities through which they pass.

Parks and Open Space

Although this is not part of the scope of this project the realignment will offer the possibility to achieve goals supported by the Maui County General Plan regarding protection and enhancement of shoreline resources, the development of Parks and Open Space, and alternative modes of transportation makai of the realigned highway.

- **WMCP 2.1.5** | Protect the shoreline and beaches by preserving waterfront land within the SLR-XA as open space wherever possible.
- **MIP | Goal 6.4** | An interconnected, efficient, and well-maintained, multimodal transportation system
Objective 6.4.2: Safe, interconnected transit, roadway, bicycle, equestrian, and pedestrian network.
 - 6.4.2.e Consider identification, acquisition where appropriate, and utilization of abandoned right-of-ways for bikeways, pedestrian pathways, and open-space networks.
- **MIP | Goal 6.6** Maui will have a diverse range of active and passive recreational parks, wilderness areas, and other natural-resource areas linked, where feasible, by a network of greenways, bikeways, pathways, and roads that are accessible to all
Objective 6.6.3 An expanded network of greenways, trails, pathways, and bikeways.
 - 6.6.3.a Link existing and future park sites, natural areas, the shoreline, and residential areas with a network of bikeways, pedestrian paths, trails, and greenways.

6.6.3.b Support the implementation of plans and programs that facilitate pedestrian mobility and access to active and passive recreation areas and sites.

○ **CWPP | H. Diversify Transportation Options**

Goal: Maui County will have an efficient, economical, and environmentally sensitive means of moving people and goods.

Objective 1: Provide an effective, affordable, and convenient ground-transportation system that is environmentally sustainable.

f. Preserve roadway corridors that have historic, scenic, or unique physical attributes that enhance the character and scenic resources of communities.

○ **CWPP | A. Protect the Natural Environment**

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

Objective 2: Improve the quality of environmentally sensitive, locally valued natural resources and native ecology of each island.

a. Protect and restore nearshore reef environments and water quality.

e. Mitigate the negative effects of upland uses on coastal wetlands, marine life, and coral reefs.

○ **CWPP | L. Mitigate Climate Change and Work Toward Resilience**

Goal: Minimize the causes and negative effects of climate change.

Objective 2: Reduce the impacts of sea-level rise by acknowledging climate change, adapting, mitigating, and planning accordingly.

Policies:

a. Evaluate development to assess potential short-term and long-term sea-level rise impacts on nearshore environments.

b. Improve efforts to mitigate and plan for the impact of sea-level rise.

c. Protect undeveloped beaches, dunes, and ecosystems, and restore natural shoreline processes.

e. Strengthen coastal-zone management, re-naturalization of shorelines, where possible, and filtration or treatment of urban and agricultural runoff.



REGION 9

SAN FRANCISCO, CA 94105

February 26, 2025

Richelle Takara, Division Administrator
Federal Highways Administration, Hawai'i Division
300 Ala Moana Boulevard, Room 3-229
Honolulu, Hawaii 96850

Ken Tatsuguchi, Project Engineer
Hawaii Department of Transportation Highways, Planning Branch
869 Punchbowl Street, Room 301
Honolulu, Hawaii 96813

Subject: EPA Comments for the Draft Environmental Impact Statement for the Honoapiilani
Highway Improvements Project Maui, Hawaii (CEQ# 20250002)

Dear Richelle Takara and Ken Tatsuguchi:

The U.S. Environmental Protection Agency has reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act (CAA). The CAA Section 309 role is unique to EPA. It requires EPA to review and comment on the environmental impact of any proposed federal action subject to NEPA's environmental impact statement requirements and to make its comments public.

EPA 309 Review Summary

EPA did not identify significant concerns to be addressed in the final EIS. We acknowledge and recognize our colleagues in the state for continuing the NEPA process to analyze and deliver this project following the devastating wildfire impacts to Lahaina just north of the proposed project area. We provided scoping comments to the Hawaii Department of Transportation and Federal Highways Administration and accepted the invitation to provide early coordination as defined in Title 23 United States Code Section 139(d) and (5), and Title 40 Code of Federal Regulations, part 1508.5 on April 29, 2022. We note that many of our scoping comments were adopted in the development of the Draft EIS, and that our November 1, 2024, comments on the Administrative Draft EIS regarding aquatic resources and community engagement were fully addressed in the Draft EIS. We appreciate HDOT and FHWA's emphasis of continuing community dialogue (page 3.7-14) as it pertains to protecting cultural resources pursuant to the National Historic Preservation Act, Section 106.

The EPA appreciates the opportunity to review this DEIS. If you have any questions, please contact me at (415) 972-3659 or the NEPA reviewer, Zac Appleton, at (415) 972-3321 or appleton.zac@epa.gov.

Sincerely,

Francisco Dóñez
Manager
Environmental Review Section 2



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Pacific Islands Fish and Wildlife Office
300 Ala Moana Boulevard, Room 3-122
Honolulu, Hawaii 96850



In Reply Refer To:
2023-0041712-S7-001

March 6, 2025

Richelle M. Takara, P.E.
Division Administrator
U.S. Department of Transportation
Federal Highway Administration
300 Ala Moana Blvd., Rm 3-299
Honolulu, Hawai'i 96850

Subject: Comments on Honoapi'ilani Highway Realignment Project Draft Environmental Impact Statement, Maui

Dear Richelle Takara:

This letter is in response to your January 6, 2025, request for U.S. Fish and Wildlife Service (Service) comments on the draft Environmental Impact Statement (DEIS) for the Honoapi'ilani Highway Improvement Project (HDA-HI, Federal-aid Project No. RAEM-030-1(059)). During the coordinating agency comment period, you specifically requested our comments on Chapters 3.9 (Water Resources, Wetlands, and Floodplains), 3.10 (Flora and Fauna, Endangered Species), and 5.0 (Preferred Alternative).

This letter has been prepared under the authority of and in accordance with provisions of the Endangered Species Act of 1973 (16 U.S.C. 1531 *et seq.*), as amended (ESA). Mahalo for incorporating our standard and project specific recommended avoidance and minimization measures for ESA listed species into the DEIS and for continuing to collaborate with us to refine, develop, and implement project specific avoidance and minimization measures to avoid adverse impacts. Additionally, we appreciate your efforts to incorporate our Best Management Practices (BMPs) for Work In and Around Aquatic Environments.

Chapter 3.9: Water Resources, Wetlands, and Floodplains

- We recommend culverts and bridges over streams be designed with the height and width to handle periodic massive surges of water from torrential rain events that are known to occur in the area. Due to climate change, 100-year storms may become more frequent. Flooding has the potential to destroy ae'o (Hawaiian stilt, *Himantopus mexicanus knudseni*) and nēnē (Hawaiian goose, *Branta sandvicensis*) nests that may be found in the project area. Additionally, ensuring culverts and bridges have the height and width to handle 100-year storm torrential rains may also minimize impacts to other trust

resources protected under the Fish and Wildlife Coordination Act. These recommendations also apply to Appendix 3.10 section 2.2.1.

- For erosion control during construction, we recommend using materials (e.g., biosock) that are at least 3 feet (ft) in diameter to reduce chances of runoff into the ocean during torrential rain. The typical 1 ft diameter biosock will likely not serve as an adequate barrier during torrential rainfall, especially in an area that is highly degraded, expansive ephemeral wetland habitat combined with known high flow rates in streams during these storm events. Sedimentation runoff onto the beach and into the ocean degrades sea turtle habitat and has the potential to bury sea turtle nests. This emphasizes the importance of incorporating our Best Management Practices (BMPs) for Work In and Around Aquatic Environments to minimize project impacts. These BMPs may also help minimize impacts to other trust resources protected under the Fish and Wildlife Coordination Act.

Chapter 3.10 Flora and Fauna, Endangered Species and Appendix 3.10

- The DEIS describes monitoring for waterbirds by a qualified biologist, but then follows up with: *The contractor will assign dedicated, trained, competent personnel to perform daily visual monitoring and nest surveys prior to the start of and during construction work to check for listed species bird nests. The daily monitoring protocol would include designated personnel to walk the project site every morning prior to the start of construction work to determine if any ESA-listed species nests are present at the work site and note if any listed individuals were present.*
 - All surveys to detect for the presence of ae‘o nests and ae‘o exhibiting defensive nest protection behavior should be carried out by a qualified biologist with knowledge of the species’ life history. If heavy rains result in ephemeral wetlands, ‘alae ke‘oke‘o (Hawaiian coot, *Fulica alai*) should be surveyed for as well.
- The DEIS describes morning surveys and monitoring for nēnē by a qualified biologist, but then follows up with: *The contractor will assign dedicated, trained, competent personnel to perform daily visual monitoring and nest surveys prior to the start of and during construction work to check for listed species bird nests. The daily monitoring protocol would include designated personnel to walk the project site every morning prior to the start of construction work to determine if any ESA-listed species nests are present at the work site and note if any listed individuals were present.*
 - All surveys to detect for presence of nēnē nests and nēnē exhibiting defensive nest protection behavior should be carried out by a qualified biologist with knowledge of the species’ life history.
- We recommend including all final biological survey and monitoring protocols in the final EIS under Appendix 3.10. We encourage your team to submit draft survey and monitoring protocols/standard operating procedures to our office for review and comments prior to finalization. We also encourage incorporating adaptive management into these procedures and triggers for modifying them.
- The draft EIS states additional biological surveys will be performed by trained biologists in areas of “permanent BMPs.” The Service recommends providing more details about this objective, including protocols and habitat features that support listed species in the draft EIS.

- We recommend that *temporary* signs be placed around the project area during construction to remind workers of the potential presence of ae‘o and nēnē and to drive slowly (10 miles per hour as stated in the DEIS). Additionally, *permanent* signs should be placed along the highway through the Ukumehame wetland area alerting drivers of the potential presence of ae‘o and nēnē and for reducing the speed limit through the area to minimize injury and mortality to listed birds from vehicle strikes.
- Avoid placing staging areas in or directly adjacent to wetland habitat (jurisdictional and nonjurisdictional) and streambanks identified by the consultants to avoid and minimize impacts to habitat that supports listed waterbirds and nēnē.
- Any hazing that occurs to nēnē must follow the 4(d) rule. We recommend keeping a copy of the regulations at the on-site office for easy reference. A key section of the 4(d) rule follows:
 - Before implementing any such intentional harassment activities during the nēnē breeding season (September through April), a qualified biologist knowledgeable about the nesting behavior of nēnē must survey in and around the area to determine whether a nest or goslings are present. If a nest is discovered, the Service must be notified within 72 hours and the following measures implemented to avoid disturbance of nests and broods:
 - No disruptive activities may occur within a 100-ft (30-meter) buffer around all active nests and broods until the goslings have fledged;
 - Brooding adults (i.e., adults with an active nest or goslings) or adults in molt may not be subject to intentional harassment at any time; and
 - The landowner must arrange follow-up surveys of the property by qualified biologists to assess the status of birds present.
- Hawaiian yellow-faced bees are known to occur in scattered populations along the western coastline of Mauna Kahālāwai (Maui Komohana or West Maui Mountains). Coastal populations of yellow-faced bees occur in habitat along rocky shorelines with naupaka (*Scaevola taccada*) and tree heliotrope (*Heliotropium arboreum*) with either landscaped vegetation, nonnative kiawe (*Neltuma pallida*), or bare rock inland. Bees are restricted to an extremely narrow corridor, typically 33 to 66 ft (10 to 20 meters) wide, and do not occur on barren sandy beaches or inland, or on landscaped native plants on hotel grounds. Documented nectar plants include naupaka, ‘ilima (*Sida fallax*), ‘akoko (*Euphorbia* spp.), pua kala (*Argemone glauca*), naio (*Myoporum sandwicense*), and tree heliotrope. Threats to yellow-faced bees include habitat destruction and modification from land use change, nonnative plants, ungulates, and fire, along with predation by nonnative ants and wasps. Mahalo for including the Service’s avoidance and minimization measures for coastal Hawaiian yellow-faced bees:
 - If an action will occur in or adjacent to known occupied habitat, a buffer area around the habitat may be required and can be worked out on a site-specific basis through consultation with the Service.
 - For coastal species, protect all coastal strand habitat from human disturbance, including:
 - No fires or wood collecting.

- Leave woody debris in place.
 - Restrict vehicles to existing roads and trails.
 - Post educational signs to inform people of the presence of sensitive species.
- Avoiding disturbance (i.e., humans, machines, cars, staging) of coastal vegetation on the makai side of the original road will help avoid and minimize impacts to yellow-faced bees.
- Table 3.9.10 states that project effects on listed waterbirds and nēnē would be minimal due to the implementation of avoidance and minimization measures outlined in Appendix 3.10. The project may potentially impact ae‘o and nēnē. Therefore, we recommend that the cumulative impacts analysis in the draft EIS include an assessment for the construction phase and the normal operations phase. This should specifically address how the highway designs in the Ukumehame area will avoid car strikes and minimize impacts to ae‘o and nēnē. Additionally, we encourage your team to consider the anticipated increase in waterbird populations (ae‘o and ‘alae ke‘oke‘o) and nēnē in the Ukumehame area following wetland restoration when conducting the cumulative impact analysis. Currently, neither Chapter 3.10 nor the Biological Resource Discussion in Appendix 3.10 includes an evaluation of the impacts to listed waterbirds and nēnē from the routine operations of the new highway after construction.
- The draft EIS states nighttime work is not anticipated; however, if it does become necessary, the DOT and FHWA will consult with the Service (see Appendix 3.9, page 4). Chapter 3.10, Table 3.10.9 states the project does not anticipate to impact seabirds, as standard Service seabird avoidance and minimization measures will be implemented. However, Table 3.10.5 mentions that nighttime work may occur, but not during the seabird fallout season. Please confirm whether nighttime work will occur during the seabird fallout season. If it is determined that nighttime work will occur during the seabird fallout season, we recommend contacting our office several months in advance for guidance to avoid adverse impacts to listed seabirds. Additionally, we recommend following the 2022 Maui Dark Skies Ordinance for all permanent lighting. For permanent lighting, limit these lights as human safety considerations allow, and include light frequencies and intensities that have the least impact on seabirds and sea turtles. There is also a growing body of peer-reviewed literature and seabird groups to help guide you with the most current animal friendly lighting.
- For revegetation efforts, we recommend using only native plants, in particular those documented in the biological survey: ‘ilima (*Sida fallax*), ‘iliahialo‘e (*Santalum ellipticum*), ‘a‘ali‘i (*Dodonaea viscosa*), hoary abutilon (*Abutilon incanum*), akulikuli (*Sesuvium portulacastrum*), milo (*Thespesia populnea*), and naupaka (*Scaevola taccada*). If possible, we recommend avoiding disturbance to endemic plant species such as ‘iliahialo‘e that currently occupy the project area. ‘Iliahialo‘e is an endemic plant species to the Hawaiian Islands. Limiting disturbance of non-listed endemic plants help to prevent their decline.
- For erosion control, we recommend following our comment in Chapter 3.9 above related to biosocks.

- To minimize collisions for seabirds, we recommend:
 - Flagging the tops of monopoles, cranes, and crane wires/cables.
 - Flagging fencing that extends above vegetation.
- To avoid and minimize invasive species potential impacts to ESA listed species, we recommend incorporating our invasive species biosecurity protocols into your project planning (Attachment A). The proposed project will be transporting a substantial amount of materials (i.e., construction materials or aggregate, etc.), vehicles, machinery, equipment, and personnel between sites, which has the potential to unintentionally introduce invasive species to the project site.
- Under Mammals, the DEIS states that ‘ōpe‘ape‘a (Hawaiian hoary bat, *Lasiurus cinereus semotus*) have not been detected on Maui and cites Tomich 1986. Current data show that ‘ōpe‘ape‘a do occur on Maui:

<https://dlnr.hawaii.gov/wildlife/files/2021/01/MauiBatsHTHFebruary2020.pdf>

 - The DEIS states that if scheduling becomes a serious issue and cutting down or pruning trees taller than 15 feet cannot be avoided during the bat breeding season (June 1 through September 15), FHWA will consult with the Service. We recommend FHWA consult with us several months in advance if scheduling is anticipated to prevent implementing the Service’s avoidance and minimization measures for ‘ōpe‘ape‘a or any other listed species that occurs or may occur in the project area.
- Please include Service avoidance and minimization measures for sea turtles (honu (green sea turtles, *Chelonia mydas*) and honu‘ea (Hawksbill sea turtles, *Eretmochelys imbricata*)). Construction on, or in the vicinity of, beaches can result in sand and sediment compaction, sea turtle nest destruction, beach erosion, contaminant and nutrient runoff, and an increase in direct and ambient light pollution, which may disorient hatchlings or deter nesting females. Off-road vehicle traffic may result in direct impacts to sea turtles or nests, and contributes to habitat degradation through erosion and compaction. Information for projects with a beach hardening, stabilization, or nourishment component: Projects that alter the natural beach profile, such as nourishment and hardening, including the placement of seawalls, jetties, sandbags, and other structures, are known to reduce the suitability of on-shore habitat for sea turtles. These types of projects often result in sand compaction, erosion, and additional sedimentation in nearshore habitats, resulting in adverse effects to the ecological community and may inhibit future sea turtle nesting. The hardening of a shoreline increases the potential for erosion in adjacent areas, resulting in subsequent requests to install stabilization structures or conduct beach nourishment in adjacent areas. Given projected sea level rise estimates, the likelihood of increase in storm surge intensity, and other factors associated with climate change, we anticipate that beach erosion will continue and likely increase. Where possible, projects should consider alternatives that avoid modifying or hardening of coastlines. Beach nourishment or beach hardening projects should evaluate the long-term effect to sea turtle nesting habitat and consider the cumulative effects. Avoidance and minimization measures include
 - No vehicle use on or modification of the beach/dune environment during the sea turtle nesting or hatching season (See nesting date ranges above).
 - Do not remove native dune vegetation.

- Have a biologist familiar with sea turtles conduct a visual survey of the project site to ensure no basking sea turtles are present.
- If a basking sea turtle is found within the project area, cease all mechanical or construction activities within 100 feet until the animal voluntarily leaves the area.
- Cease all activities between the basking turtle and the ocean.
- Remove any project-related debris, trash, or equipment from the beach or dune if not actively being used.
- Do not stockpile project-related materials in the intertidal zone, reef flats, sandy beach and adjacent vegetated areas, or stream channels.
- Optimal sea turtle nesting habitat is a dark beach free of barriers that restrict sea turtle movement. Nesting turtles may be deterred from approaching or laying successful nests on lighted or disturbed beaches. They may become disoriented by artificial lighting, leading to exhaustion and placement of a nest in an inappropriate location (such as at or below the high tide line). Hatchlings that emerge from nests may also be disoriented by artificial lighting. Inland areas visible from the beach should be sufficiently dark to allow for successful navigation by hatchlings to the ocean. To avoid and minimize project impacts to sea turtles from lighting we recommend:
 - Avoiding nighttime work during the nesting and hatching season.
 - Minimizing the use of temporary and permanent lighting on or near beaches and shield all project-related temporary and permanent lights so the light is not visible from any beach.
 - If lights can't be fully shielded or if headlights must be used, fully enclose the light source with light filtering tape or filters.
 - Incorporating design measures into the construction or operation of buildings adjacent to the beach to reduce ambient outdoor lighting such as tinting, reducing the height of exterior lighting to below 3 feet and pointed downward or away from the beach, and minimizing light intensity to the lowest level feasible and, when possible, include timers and motion sensors.
- Implementing our sea turtle avoidance and minimization measures, including our BMPs for Work In and Around Aquatic Environments, will also help avoid and minimize project impacts to sea turtle nesting habitat, including proposed critical habitat that overlaps with the northern end of the project area. Additionally, we recommend keeping workers, staging areas, and temporary resting equipment on the mauka side of the old highway, away from the beach, especially during sea turtle nesting season and within the proposed green sea turtle critical habitat.

Chapter 5.0 Preferred Alternative

- We recommend including conceptual designs of the preferred alternative viaduct through the Ukumehame area, including identified wetland habitat (jurisdictional and nonjurisdictional) in the area, architectural/design features aimed at reducing car strikes for nēnē and listed waterbirds (e.g., diversion poles and/or guardrails), and any land alterations to assist with stormwater management and highway runoff as described in section 3.9.8 of Chapter 3.

- In section 5.1.1.3, the DEIS mentions guardrails would be placed on either side of the viaduct. We recommend clarifying whether the architectural design features aimed at reducing listed bird car strikes will be placed on one side or both sides of the highway.
- We recommend providing more details about the swales (Appendix 3.10) to control stormwater, and other highway design features aimed at minimizing highway contaminant runoff into wetland habitat to reduce impacts to nēnē, ae‘o, and other listed waterbirds that may use the wetland habitat in the project area. Specifically, clarify where the stormwater will be diverted to or be collected, and will these areas have the potential to attract nēnē and listed waterbirds.
- Additionally, the proposed grassy swales adjacent to the road may increase the risk for nēnē car strikes. We recommend you inquire with the Nēnē Recovery Action Group about the proposed grassy swales and for potential alternative options for the swales, as applicable.

If you have questions pertaining to our recommendations, or our shared responsibilities under the ESA, please contact Carrie Harrington at carrie_harrington@fws.gov or 808-207-4698. When referring to this project, please include the follow reference number: 2023-0041712-S7-001.

Sincerely,

Hawai ‘i and Maui Nui Team Manager
Pacific Islands Fish and Wildlife Office

Attachment A. Service Invasive Species Biosecurity Protocol for Maui

Attachment A.

PIFWO Invasive Species Biosecurity Protocols
(Updated July 2024)

Project activities may introduce or spread invasive species, causing negative ecological consequences to new areas or islands, resulting in potential impacts to fish, wildlife, and their habitat. For example, seeds of invasive plant species (e.g., *Chromolaena odorata*, *Senecio madagascariensis*, *Cyathea cooperi*, or *Miconia calvescens*) can be inadvertently transported on equipment from a previous work site to a new site where the species are not present. Likewise, equipment used in an area infected with a pathogen or insect pest that can have ecological consequences (e.g., rapid ‘ōhi‘a death (*Ceratocystis spp.*), black twig borer (*Xylosandrus compactus*), or naio thrips (*Klambothrips myopori*), if not properly decontaminated, can act as a vector to introduce the pathogen into a new area. Additionally, vehicles must be properly inspected and cleaned to ensure vertebrate or invertebrate pests do not stowaway and spread to other areas. These are just a few examples of how even well-intended project activities may inadvertently introduce or spread invasive species.

To avoid and minimize invasive species potential impacts to fish, wildlife, and their habitat we recommend incorporating general biosecurity protocols into your project planning (see below). Additional consultation is recommended if project activities involve transportation of materials, equipment, vehicles, etc. between islands or transpacific movement of materials or equipment.

Invasive Species Biosecurity Protocol

The following biosecurity protocol is recommended to be incorporated into planning for your project to avoid or minimize transportation of invasive species with potential to impact to fish, wildlife, and their habitat. Cleaning, treatment, and/or inspection activities are the responsibility of the equipment or vehicle owner and operator. However, it is ultimately the responsibility of the action agency to ensure that all project materials, vehicles, machinery, equipment, and personnel are free of invasive species before entry into a project site. Please refer to the resources listed below for current removal/treatment recommendations that may be relevant to your project.

1. Cleaning and treatment:

Project applicants should assume that all project materials (i.e., construction materials, or aggregate such as dirt, sand, gravel, etc.), vehicles, machinery, and equipment contain dirt and mud, debris, plant seeds, and other invasive species, and therefore require thorough cleaning. Treatment for specific pests, for example, trapping and poison baiting for rodents, or baiting and fumigation for insects, should be considered when applicable. For effective cleaning we offer the following recommendations prior to entry into a project site:

- a. Project materials, vehicles, machinery, and equipment must be pressure washed thoroughly (preferably with hot water) in a designated cleaning area. Project materials, vehicles, machinery, and equipment should be visibly free of mud/dirt (excluding aggregate), seeds, plant debris, insects, spiders, frogs (including frog eggs), other vertebrate species (e.g., rodents, mongoose, feral cats, reptiles, etc.), and rubbish. Areas of particular concern include bumpers, grills, hood

compartments, wheel wells, undercarriage, cabs, and truck beds. Truck beds with accumulated material are prime sites for hitchhiking invasive species.

- b. The interior and exterior of vehicles, machinery, and equipment must be free of rubbish and food, which can attract pests (i.e., rodents and insects). The interiors of vehicles and the cabs of machinery should be vacuumed clean particularly for any plant material or seeds.
2. Inspection:
 - a. Following cleaning and/or treatment, project materials, vehicles, machinery, and equipment, must be visually inspected by its user, and be free of mud/dirt (excluding aggregate), debris, and invasive species prior to entry into a project site. For example, careful visual inspection of a vehicle's tires and undercarriage is recommended for any remaining mud that could contain invasive plant seeds.
 - b. Any project materials, vehicles, machinery, or equipment found to contain invasive species (e.g., plant seeds, invertebrates, rodents, mongoose, cats, reptiles, etc.) must not enter the project site until those invasive species are properly removed/treated.
3. For all project site personnel:
 - a. Prior to entry into the project site, visually inspect and clean your clothes, boots or other footwear, backpack, radio harness, tools and other personal gear and equipment for insects, seeds, soil, plant parts, or other debris. We recommend the use of a cleaning brush with sturdy bristles. Seeds found on clothing, footwear, backpacks, etc., should be placed in a secure bag or similar container and discarded in the trash rather than being dropped to ground at the project site or elsewhere.
4. Additional considerations:
 - a. Consider implementing a Hazard Analysis and Critical Control Point (HACCP) plan (<https://www.fws.gov/policy/A1750fw1.html>) to improve project planning around reducing the risk of introducing or spreading invasive species.
 - b. When applicable, use pest-free or low-risk sources of plants, mulch, wood, animal feed or other materials to be transported to a project site.
 - c. For projects involving plants from nurseries (e.g., outplanting activities, etc.), all plants should be inspected, and if necessary, appropriately cleaned or treated for invasive species prior to being transported to the project site.
 - d. Avoid unnecessary exposure to invasive species at a particular site (to the extent practical) to reduce contamination and spread. For example, if your project involves people or equipment moving between multiple locations, plan and organize timelines so that work is completed in native habitat prior to working in a disturbed location to reduce the likelihood of introducing a pest into the native habitat.
 - e. Maintain good communication about invasive species risks between project managers and personnel working on the project site (e.g., conduct briefings and training about invasive species). Ensure prevention measures are communicated to the entire project team. Also consider adding language on biosecurity into

contracts or permitting mechanisms to provide clarity to all involved in the project. Report any species of concern or possible introduction of invasive species to appropriate land managers.

For current removal/treatment recommendations please refer to the following:

Hawaiian Islands:

- Hawai‘i Island – <https://www.biisc.org/>
- **Maui** – <https://mauiinvasive.org/>
- Moloka‘i - <https://www.molokaiisc.org/>
- Lāna‘i - <https://pulamalanai.com/>
- O‘ahu – <https://www.oahuisc.org/>
- Kaua‘i – <https://www.kauaiisc.org/>

Species-Specific Biosecurity Protocols

The following section contains specific protocols for a few select invasive species of concern in the Pacific Islands highlighted because of their potential to easily spread and cause great harm to native species and habitats. Other invasive species may not have existing specific protocols or may already be minimized by implementing the general invasive species protocols above (e.g., invasive plants, invertebrates, larger vertebrates). Information on other invasive species can be found in the island specific links below. As new threats emerge that require development of species-specific protocols, those may be added to this list.

Table 1. Current island distribution of invasive species with specific biosecurity protocols in the Pacific Islands (PIFWO jurisdiction).

Island	Invasive Species with Specific Protocols			
	Rapid ‘Ōhi‘a Death	Little Fire Ant	Coconut Rhinoceros Beetle (CRB)	Brown Treesnake
Island of Hawai‘i	widespread	widespread	detected	not present
Maui	present	incipient	detected in Nov 2023, not observed since. The state and Service recommend implementing CRB biosecurity BMPs	not present
O‘ahu	incipient	incipient	widespread	not present
Kaua‘i	widespread	not present	not present	not present

Rapid ‘Ōhi‘a Death (ROD)

If working directly with ‘ōhi‘a trees (e.g., sampling suspected trees, clearing an area of ‘ōhi‘a, etc.) or in an area(s) known to be highly infested with ROD, additional consultation is recommended.

Current Distribution of ROD: island of Hawai‘i, Maui, O‘ahu, Kaua‘i (
<https://cms.ctahr.hawaii.edu/rod>

While ROD is not currently reported on Moloka‘i at this time, if you are in ‘ōhi‘a forest it would be prudent to take precautions. Also, consider where the equipment to be used on Moloka‘i will be coming from, and if from an island with confirmed ROD, take the necessary precautions.

Rapid ‘Ōhi‘a Death (ROD) is caused by a fungal pathogen (*Ceratocystis* spp.) that attacks and kills ‘ōhi‘a trees (*Metrosideros polymorpha*). ‘Ōhi‘a is endemic to the Hawaiian Islands and is the most abundant native tree species, comprising approximately 80 percent of Hawai‘i’s remaining native forests.

For more information about ROD including its current distribution, ROD science updates, and the latest on ROD protocol, please visit www.rapidohiadeath.org.

To reduce the risk of spreading ROD, the following best management practices and decontamination protocol are recommended:

Best Management Practices for ROD

1. Never transport any part of an ‘ōhi‘a tree between different areas of an island or to a different island.
2. Do not use equipment from ROD infected islands on another island unless it is very specialized equipment and follows the decontamination protocol described below.
3. Avoid wounding ‘ōhi‘a trees and roots with mowers, chainsaws, weed eaters, and other tools. If an ‘ōhi‘a receives a minor injury like a small broken branch, then give the injury a clean, pruning-type cut (close to the main part of the trunk or branch) to promote healing, and then spray the entire wounded area with a pruning seal.
4. Always report suspect ROD ‘ōhi‘a trees observed within your project area. ROD is a wilt disease that cuts off the supply of water and nutrients to the tree. The primary symptom to look for is an entire canopy or a large branch with dying leaves or red discolored leaves. Please record the GPS coordinates and location and take a picture of the tree if possible. Please report suspected ROD ‘ōhi‘a trees to the following agencies:
 - a. Island of Hawai‘i – BIISC: 808-969-8268 (ohialove@hawaii.edu)
 - b. Maui – MISC: 808-573-6472 (miscpr@hawaii.edu)
 - c. Moloka‘i – TNC: 808-553-5236 ext. 6585 (lbuchanan@tnc.org)
 - d. O‘ahu – OISC: 808-266-7994 (oisc@hawaii.edu)
 - e. Kaua‘i – KISC: 808-821-1490 (kisc@hawaii.edu)

ROD Decontamination Protocol

1. Clothes, footwear, backpacks, and other personal equipment
 - a. Before leaving the project site, remove as much mud and other contaminants as possible. Use of a brush with soap and water to clean gear is preferred. Footwear,

backpacks, and other gear must be sanitized by spraying with a solution of >70 percent isopropyl alcohol or a freshly mixed 10 percent bleach solution.

2. Vehicles, machinery, and other equipment

- a. Vehicles, machinery, and other equipment must be thoroughly hosed down with water (pressure washing preferred) and visibly free of mud and debris, then sprayed with a solution of >70 percent isopropyl alcohol or a freshly mixed 10 percent bleach solution. Use of a “pump-pot” sprayer is recommended for the solution and a hot water wash is preferred. Be sure to thoroughly clean the undercarriage, truck bed, bumpers, and wheel wells.
- b. If non-decontaminated personnel or items enter a vehicle, then the inside of the vehicle (i.e., floor mats, etc.) must be subsequently decontaminated by removing mud and other contaminants and sprayed with the one of the same aforementioned sanitizing solutions.

3. Cutting tools

- a. All cutting tools, including machetes, chainsaws, and loppers must be sanitized to remove visible mud and other contaminants. Tools must be sanitized using a solution of >70 percent isopropyl alcohol or a freshly mixed 10 percent bleach solution. One minute after sanitizing, one may apply an oil-based lubricant to chainsaw chains or other metallic parts to prevent corrosion as bleach is corrosive to metal.

NOTE: When using a 10 percent bleach solution, surfaces should be cleaned with a minimum contact time of 30 seconds. Bleach must be mixed daily and used within 24 hours, as once mixed it degrades. Bleach will not work to disinfect surfaces that have high levels of organic matter such as sawdust or soil. Because bleach is also corrosive to metal, a water rinse after proper sanitization is recommended to avoid corrosion.

Little Fire Ant (LFA)

For the most current status on distribution and infestations, please visit <http://stoptheant.org/lfa-in-hawaii/>

The little fire ant (*Wasmannia auropunctata*), or LFA, is an invasive species with a painful sting that can inhabit many different environments. In Hawai‘i, it often infests agricultural fields and farms, damaging crops and stinging unsuspecting workers. Little fire ants are also highly disruptive to native tropical ecosystems and harmful to wildlife. Slow moving, but tiny and capable of foraging 24 hours a day with multiple queens per colony, LFA is a formidable threat to biodiversity, agriculture, and quality of life on tropical islands in the Pacific.

For more information about LFA including helpful guides and workshops for treating or detecting LFA, please visit www.littlefireants.com.

To reduce the risk of spreading LFA, the following biosecurity protocol is recommended:

Biosecurity Protocol for LFA

1. For projects involving plants from nurseries (e.g., outplanting activities, etc.), all plants should be inspected for little fire ants and other pests prior to being transported to the project site. If plants are found to be infested by ants of any species, plants should be sourced from an alternative nursery and the infested nursery should follow treatment protocols recommended by the Hawai'i Ant Lab (<https://littlefireants.com/wp-content/uploads/2020-Management-of-Pest-Ants-in-Nurseries-min.pdf>).
2. All work vehicles, machinery, and equipment should follow steps 1 and 2 in the "Invasive Species Biosecurity Protocol" for (1) cleaning and treatment and (2) inspection for invasive ants prior to entering a project site.
3. Any machinery, vehicles, equipment, or other supplies found to be infested with ants (or other invasive species) must not enter the project site until it is properly treated (<https://littlefireants.com/how-to-treat-for-little-fire-ants-for-homeowners/#recommended-bait-products>) and re-tested. Infested vehicles must be treated following recommendations by the Hawai'i Ant Lab (<https://littlefireants.com/resource-center/>) or another ant control expert and in accordance with all State and Federal laws. Treatment is the responsibility of the equipment or vehicle owner. Ultimately however, it is the responsibility of the action agency to ensure that all project materials, vehicles, machinery, and equipment follow the appropriate protocol(s).
4. General Vehicle Ant Hygiene: Even the cleanest vehicle can pick up and spread little fire ant. Place MaxForce Complete Brand Granular Insect Bait (1.0 percent Hydramethylnon; https://labelsds.com/images/user_uploads/Maxforce%20Complete%20Label%201-5-18.pdf) into refillable tamper resistant bait stations. An example of a commercially available refillable tamper resistant bait station is the Ant Café Pro (<https://www.antcafe.com/>). Place a bait station (or stations) in the vehicle and note that larger vehicles, such as trucks, may require multiple stations. Monitor bait stations frequently (every week at a minimum) and replace bait as needed. If the bait station does not have a sticker to identify the contents, apply a sticker listing contents to the station.
5. Gravel, building materials, or other equipment such as portable buildings should be baited using MaxForce Complete Brand Granular Insect Bait (1.0 percent Hydramethylnon; https://labelsds.com/images/user_uploads/Maxforce%20Complete%20Label%201-5-18.pdf) or AmdroPro (0.73 percent Hydramethylnon; <https://connpest.com/labels/AMDROPRO.pdf>) following label guidance.
6. Storage areas that hold field tools, especially tents, tarps, and clothing should be baited using MaxForce Complete Brand Granular Insect Bait (1.0 percent Hydramethylnon; https://labelsds.com/images/user_uploads/Maxforce%20Complete%20Label%201-5-18.pdf) or AmdroPro (0.73 percent Hydramethylnon; <https://connpest.com/labels/AMDROPRO.pdf>) following label guidance.

7. Vehicles that have entered a project site known or thought to overlap with areas infested with LFA should subsequently be tested for LFA with baiting in accordance with protocol recommended by the Hawai'i Ant Lab (<https://littlefireants.com/survey-your-home-for-lfa/>).
8. If LFA are detected, please report it to 808-643-PEST (Hawai'i), 671-475-PEST (Guam), or 684-699-1575 (American Samoa). Please visit <https://littlefireants.com/identification-of-little-fire-ants/> for assistance in identifying LFA.

Coconut Rhinoceros Beetle (CRB)

Current Distribution of CRB in Hawai'i: O'ahu, detected on Maui in November 2023 but not observed since (there are ongoing search efforts: <https://governor.hawaii.gov/newsroom/hdoa-news-release-on-on-going-efforts-against-the-coconut-rhinoceros-beetle-on-maui/>)

The coconut rhinoceros beetle (*Oryctes rhinoceros*), or CRB, is a large, horned scarab beetle native to Southeast Asia. An invasive pest where it occurs outside of its native range, the adult beetles primarily attack coconut palms by boring into the crowns to feed on developing leaves. It is also known to feed on bananas, sugarcane, pineapples, oil palms, and pandanus trees. The larval grub stage burrow into and feed upon decomposing mulch and vegetation. On most Pacific Islands it lacks natural predators, leading to severe declines and extirpations of palm species where it has become established. On Guam, researchers have recently documented a shift of CRB to the island's native and threatened cycad tree (*Cycas micronesica*) (Marler et al. 2020). In the Hawaiian Islands, CRB is a documented threat to archipelago's native *Pritchardia* palm species.

For more information about CRB including the current situation in Guam and high/low-risk areas on O'ahu, please visit <http://cnas-re.uog.edu/crb/> or <https://www.crbhawaii.org/>.

To reduce the risk of spreading CRB, the following biosecurity protocol is recommended:

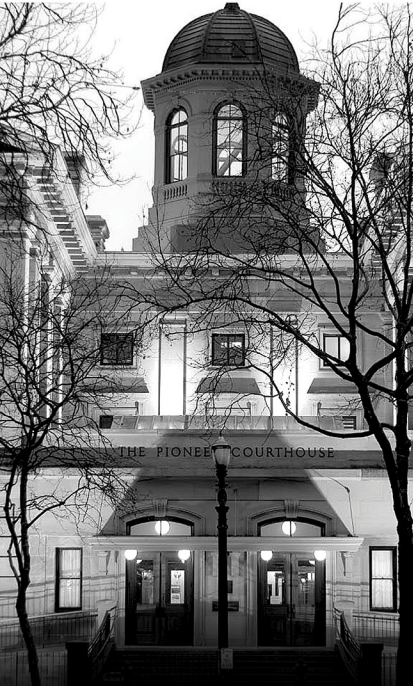
Biosecurity Protocol for CRB used on O'ahu (most can be applied to Maui)

1. Never transport green waste between islands and minimize the creation, storage, and transport of green waste within O'ahu, this also includes:
 - a. Mulch, bark, compost
 - b. Soil of any kind
 - c. Potted plants of any kind
 Additional consultation is recommended if the project involves transportation of materials, soil, equipment, vehicles, etc. between islands.
2. If felling or trimming palms, contact CRB Response for a free inspection ((808) 679-5244 or email at info@crbhawaii.org)
3. Keep green waste whole until it is ready to be treated and removed.
 - a. Chip green waste on site and transport it on the same day to a secure and managed green waste disposal site/facility.

- b. For chipped green waste in high-risk areas, re-chip prior to movement outside the infested area, treat with pesticide (when applicable), heat treatment (>130 degrees F), spread and dry, or store in sealed durable containers.
4. Minimize accumulations of green waste by regularly treating mulch piles or depositing it in sealed green waste bins. In low-risk areas, we also recommend thinly spreading mulch (less than 2 inches deep) and allowing it to dry (no irrigation).
5. If injured or dying coconut palm trees are observed or if CRB are detected, contact CRB Response at (808) 679-5244 or email at info@crbhawaii.org or online at <https://www.crbhawaii.org/report>.



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HELD ON

THURSDAY, JANUARY 23, 2025

5:00 P.M.

HELD AT

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2 DRAFT ENVIRONMENTAL IMPACT STATEMENT
3 PUBLIC COMMENTS
4 TAKEN ON
5 THURSDAY, JANUARY 23, 2025
6 5:00 P.M.
7

8 MR. KAM: My name is Allen Kam. I'm from
9 WSP. We're really happy to see you all here
10 tonight. Happy to see you guys enjoying the open
11 house. We're going to have that open until about
12 6:00 p.m. We're going to start to have a little
13 presentation at 6:00 p.m. In the meantime please go
14 and check out all the information that's over here.

15 (Public Comments:)

16 MS. EMMERICH: Hi, my name's Kellee
17 Emmerich. I have been a Lahaina resident for almost
18 40 years. We owned a home on Lahainaluna Road. And
19 during the Lahaina Fire we lost our home. One of my
20 children, my daughter, and her family also lost
21 their home in Wahikuli.

22 And after living in -- at the Hyatt for
23 eight months we were -- it was very healing to move
24 to Ukumehame. We bought a property in Ukumehame.
25 And we put two tiny houses there, which we are

1 farming now. We have chickens. We planted over 20
2 trees. And we have a barn that we're going to be
3 building.

4 And so it would be very inconvenient and
5 disappointing if -- the higher up the highway was,
6 it would be possibly affecting our property. And so
7 my request is that it goes as low as possible
8 through County land rather than through the resident
9 -- or the residential areas or the agricultural
10 areas or, yeah, private property.

11 I'm concerned also about the noise from
12 the road noise. The closer up it comes to the --
13 where the people are living. So my request is that
14 it would just stay as low as possible on the
15 highway. I think that's it.

16 THE REPORTER: First and last name again?

17 MR. EMMERICH: Brad Emmerich.

18 THE REPORTER: Okay. Ready when you are.

19 MR. EMMERICH: So after the fire I
20 realized that this is going to be something that
21 takes a long time. And so I needed to find a house
22 or something -- a place for my family to live. So
23 that's when we lived at property there in Ukumehame.

24 I originally was trying to find a friend
25 or something like that or somebody that was wanting

1 to allow me to put a -- either a mobile home or
2 something on their property.

3 That's when somebody said, "Well, why
4 don't you just look at the ones there in Ukumehame?"
5 Which we had looked at earlier in the year but it
6 was out of our ability.

7 Anyway, to make a long story short, so
8 after the fire I realized it was going to take a
9 long time before we could rebuild. So we went and
10 found something there in Ukumehame.

11 And, like Kellee was saying, we were at
12 the Hyatt for eight months. So while we were there
13 we were working hard at trying to build something in
14 Ukumehame. But it was difficult getting through all
15 the process.

16 At any rate, now that we're there, of
17 course, we really like the property and so we're
18 more invested in what happens as far as the road is
19 concerned. And there is property below us -- the
20 property that's next to the highway that is all
21 County property.

22 And there are no trespassing signs all
23 over. But of course people have moved in there and,
24 you know, they put up homesteads really -- gates and
25 fences and right next to the "no trespassing" signs.

1 But it just -- it makes sense to me that the State
2 would put the highway there at the County property
3 at the bottom of Ukumehame development.

4 And then my other concern was the noise
5 mitigation -- if there was a way that they could --
6 they would certainly -- my hope would be they would
7 consider that because right now we can hear the
8 highway noise.

9 But when we go inside, you know, then at
10 least you can't hear it when you're inside. But if
11 the highway was closer it gets louder. And so my
12 hope would be that they would take that into
13 consideration also since we are a resident -- that
14 they would do something to try to mitigate the noise
15 -- lessen the noise. That's it.

16 THE REPORTER: Perfect. Thank you.

17 (Break in audio.)

18 MR. ISHII: Hi, my name is Raymond Ishii.
19 Is this thing on? Okay. I'm the president of the
20 Valley Isle Sports Shooters Club, which is the
21 oldest and largest user of Ukumehame Firing Range.

22 While I fully support moving the existing
23 highway, in that there are a number of concerns I
24 have. The roads appear to run parallel to fire
25 lines, which we are very grateful for, although

1 there is a couple routes that were uncomfortably
2 close. But my understanding is that's going to
3 change.

4 The questions I have is right now to
5 access the range and the Papalaua Wayside Park we
6 have to drive past the range via the Viaduct exit to
7 the Ukumehame subdivision, then backtrack on the
8 existing highway.

9 The question I had, which was actually
10 answered, was is the State going to maintain that
11 highway to a correct standard where you can actually
12 drive on it. And I was told that's going to be
13 turned over to the County. So that's a County
14 question now.

15 Because that section of road -- if
16 anybody's driven it -- is probably going to fall in
17 the ocean pretty soon. Because if you look every so
18 often you'll see the -- basically the ocean
19 undercutting the existing jersey barriers. So the
20 question I have is, number one, is that road going
21 to be maintained?

22 The second question I have -- to avoid
23 that, prior on the left side of the bypass would it
24 be possible to just simply restripe existing road
25 and put in a turn lane so we can get direct access

1 and not have to basically bypass everything? That
2 will give access to both the range and the beach
3 park. Then, going back the other way, a merge lane.

4 My understanding is a viaduct is going to
5 be 25 feet high, which is good so emergency vehicles
6 can go under it. But the other question we had was
7 during construction will people be allowed access
8 basically to the range because they're going to
9 build the viaduct over the existing road? And
10 that's it for the range.

11 I have one comment though as far as the
12 highway itself -- if there's any thought about
13 putting protected passing lanes on that highway?
14 Because if anybody's driven it, what happens is you
15 get behind somebody going 20, 30 miles an hour and
16 you got a line of cars, you know, half mile, mile
17 long.

18 Then you get one guy ten cars back who's
19 late for work and he's going to start passing
20 people. So has there been any thought about putting
21 passing lanes on that highway? Not the whole thing
22 but just intermittently to let people around slow
23 people. That's all I got.

24 MR. KAM: Mahalo, Mr. Ishii.

25 Mr. McPherson?

1 MR. MCPHERSON: Hi, my name is David
2 McPherson. I live in Kipuka Village. Most people
3 know it as Olowalu Village. I've been there for
4 about ten years with my family.

5 As we look at the alternate routes, it
6 seems -- and I would like to see it go a little bit
7 higher away from the homes. There's a lot more
8 space Mauka. Hopefully there's no park sites or
9 anything that would be -- that would hinder that to
10 be pushed further away from our homes.

11 We have a small little village there. And
12 it seems like it goes, you know, fairly close. So
13 that's one thing that I would really like to see
14 happen is that it would be pushed further away from
15 our homes for the noise.

16 And second of all, for the design team, if
17 you thought about putting guardrails up -- I know
18 guardrails are to stop cars when there's no other
19 runways that they can slow down.

20 But guardrails keep vagrants out of State-
21 covered lands. And that's a really -- putting
22 guardrails up would save our County and State
23 dollars in not having to clean up cars.

24 I mean, if you do the stretch from Olowalu
25 to Ukumehame you're going to see cars littered up

1 there, especially if you take a helicopter and you
2 fly over. It is unbelievable. And that takes a lot
3 of money, a lot of effort, and it damages our
4 wetland areas.

5 So to keep everybody out of there,
6 guardrails would eliminate anybody really driving
7 into State-covered land or places that they should
8 not be trespassing. That's just one thing that I
9 wanted to say on that. Thank you, everybody, for
10 coming. Appreciate it.

11 MR. WOLFORD: Good evening. My name's
12 Jason Wolford. I'm with SAST. We're a nonprofit
13 training organization at Ukumehame Firing Range.
14 We're a nonprofit. We teach firearm safety and
15 training.

16 My concern is along with the fires when
17 the range was closed -- people need accesses through
18 that. So during the construction are we still going
19 to be able to access that? Because people want to
20 go hunt. They need to be able to sight rifles in
21 for ethical hunting purposes and things like that.

22 If it's shut down another six to eight
23 months during the construction of that, you're just
24 going to have people going other places shooting and
25 as well as being able to take firearms, classes, and

1 trainings -- and safety trainings -- which is
2 required by the State of Hawaii.

3 You're basically going to be locking
4 people out of access to these constitutional rights
5 as well if we don't have access to that.

6 And my second question is I understand
7 they're making it three lanes for finances and
8 things like that. What happens when there's an
9 accident on that elevated roadway?

10 Whether there's guardrails and the
11 vehicles are stopped there and people need to get
12 through or -- how are you going to get people off of
13 that? If there's a fatality we all know the road
14 shuts down here for six to eight hours.

15 How are people going to get off of that
16 elevated roadway to be able to at least go one way
17 or the other to get back somewhere else rather than
18 sitting in their cars for six to eight hours?

19 MR. FISCHER: Hello, my name is Van
20 Fischer. I own six acres in Olowalu right where the
21 wai stream goes up right below where the proposed
22 highway is going to go through.

23 Fortunately, the new highway that's
24 proposed barely clips the corner of my property. So
25 I'm grateful that it misses mine. But my neighbors

1 are not so fortunate.

2 I'm here to ask you to move the
3 intersection of Luawai and the highway Mauka, like,
4 150 feet for a number of reasons. One, the way that
5 it hits Luawai Street now is at an angle so it
6 doesn't create a right-angle intersection.

7 So you're going to have to realign the
8 side roads as opposed to realign the highway. If
9 you just move the proposed highway up about 150 feet
10 it changes the arc of the highway as it comes
11 through.

12 And then it hits Luawai Street at a right
13 angle so you have a proper intersection. That
14 intersection's going to need to be signalized
15 because it's going to be a very busy intersection
16 going down into Olowalu Village.

17 Another issue is that on the back of our
18 property lines -- Lot 20 and Lot 19 -- there's a
19 subservice tributary to Mapua Stream.

20 And there's an old pumphouse right where
21 you're putting your highway through where if you go
22 down in there you can see there's water flowing
23 under there. And that is a tributary into Mapua
24 Stream, which runs right through mine and Dave's
25 property just down further.

1 The rest of Mapua Stream up above is also
2 subterranean. But in the section through our
3 property it's an open stream and there's tons of
4 life in there. And we would like to protect it and
5 enhance it if possible. And putting the highway
6 through there is not going to accomplish that.

7 There is a substantial topography
8 difference between the area where the highway can go
9 right above Lots 19 and 20 as opposed to below.
10 There's about a 12-foot vertical bank. And if it
11 were moved up then you wouldn't have to deal with
12 that bank.

13 If you do have to deal with the bank,
14 behind my property's going to be a 20-foot-high
15 embankment to support that highway up there. So for
16 these reasons I'd like to ask that you move it.

17 The most important reason probably is that
18 right where you go through Lot 20 there was two
19 parcels there -- A and B -- just on the southside of
20 the wai stream where there was two two-and-a-half-
21 acre parcels there with two local families who are
22 in contract to buy those to build their homes on.

23 And now they can't build their homes
24 there. You're going right through those properties.
25 And all it would take is to move it 150 feet Mauka

1 into an open space tract that's already there that
2 nobody's going to be building on.

3 So I would appreciate it if you would look
4 into it. I feel really good. I spoke with Jamie
5 about this and I feel like she really understood and
6 cared about what I was saying. So I'm hopeful that
7 you will take this into consideration. Thank you.

8 MR. NIELSON: Hello, my name is Nick
9 Nielson. I'm a property owner in Ukumehame. Most
10 of my concerns have been addressed so far so I'm
11 just going to note one concern for us. We're kind
12 of concerned about the hours of construction -- if
13 there's going to be limits or it's going to be a 24-
14 hour operation and how that noise will be addressed
15 and recorded before and after construction. Will
16 there be a decibel meter at our location now and
17 that's compared to construction? That's it.

18 MS. KEAHI: Aloha. I'm Malihini Keahi.
19 I'm from Lahaina all my life. You know, my dad was
20 Moon Keahi. And my father used to help a lot of
21 representatives who were trying to make a change on
22 the west side.

23 And the craziest thing was that every time
24 they wanted to add a road something else was coming.
25 So again, you know, I live in Leali'i. I spoke my

1 piece up there. I think what I'm afraid of more so
2 is the highway.

3 So you take up more land. You open up the
4 highway. And then you infringe on people in
5 Olowalu. Some of them are wanting the changes. But
6 you know what? I think leave Olowalu as peaceful as
7 it is.

8 It doesn't stop traffic to come into
9 Lahaina. Today I had an appointment on the other
10 side. I came back this way. Traffic was backed up
11 on the bypass. And I think the more road you make
12 the more people come.

13 And with what Lahaina has just already
14 gone through it's, like, this is too much. It's
15 just too much. I think Lahaina, Olowalu needs to be
16 rethink -- I know they were wanting to make a whole
17 village and a whole town.

18 That place is sacred. I think the few
19 people that know about it and the people that have
20 learned about it in this last 20 years is plenty
21 enough. We need to speak -- we need to share the
22 history of Olowalu, not condemn it because we're
23 going to have more people coming in.

24 You know, that area -- it's been sacred
25 for me all my life growing up. Whenever we were

1 gathering with my grandmother there we'd always end
2 up down by Olowalu Pier and we would spend a week or
3 a month, especially when my grandparents were alive,
4 and we'd all gather.

5 Everybody who was from Pu'ukoli'i on this
6 side of the island -- we'd go to Olowalu. That is
7 gone now. Yeah. My babies grew up there. My
8 grandbabies today -- they don't -- they enjoy it
9 there because of the feeling and as we grew up
10 there.

11 But Olowalu is special. And those of you
12 that are there, you're very blessed. And I just
13 feel that this whole highway thing -- and I know
14 progress is progress. But, like I said, every time
15 we add a road something else is happening. It gets
16 developed.

17 All the work that Tanya did of exposing
18 our history is going to be covered all over again.
19 Maybe not all the areas, but most of it -- of her
20 hard work, of our past.

21 And that is today that is going on -- that
22 we get to know of our past, our history. For our
23 children and our grandchildren and our
24 great-grandchildren -- they'll never see that. It's
25 going to be covered. And you add one more road --

1 that's not going to help.

2 You know what? After the fire, traffic
3 was very little. People respected and got only on
4 the bypass through Lahaina and Keawe. And that got
5 all messed up, yes.

6 And then we asked these two, "Why couldn't
7 you do the road Mauka and take it to Honokowai?" We
8 said no more money. But you talk about money. So
9 why don't you work on that part? You know, above --

10 MR. KAM: Three minutes is up. Please
11 wrap up.

12 MS. KEAHI: So, anyway, I didn't mean to
13 come talk but I had to say something. And I have my
14 family Naho'oikaikas Olowalu and I was really
15 worried where that road was going to change because
16 they're right above the store. And that's why I'm
17 here.

18 MS. KEELE: So mahalo to having this in
19 Lahaina. I think that's really helpful. I want to
20 recognize that, Director Sniffen, you've done this a
21 couple times now. So thank you -- coming to the
22 community to have conversations.

23 I'm happy to see so many people from the
24 area that we're discussing because I found out about
25 this meeting because I opened my, like, Lahaina

1 Strong weekly email today. So they happened to have
2 it in there.

3 And so just advertisement wise if there's
4 something better that you guys could do for future
5 engagement because our community is really
6 overwhelmed. And so we need to have a little bit of
7 notice so we can plan around things.

8 I do want to acknowledge that in the
9 presentation it looks like someone did realize it
10 since you had these printed because on the boards it
11 does say "a grassy median" and that made me very
12 uncomfortable. So I want to make sure that we are
13 talking about that as a native plant median and not
14 a grassy of some sort.

15 And then just engagement wise, you know,
16 I'm just kind of wondering, like, how you've done it
17 and how much you've done because this is something
18 that, especially on Maui, we've found is that we
19 just -- there just isn't really engagement.

20 People say there's engagement and, like,
21 yeah, some people go the meetings but, like, it's
22 always the same groups of us that do. And I
23 appreciate the explanation of the preferred versus
24 the alternatives. I think that was really helpful.

25 I do think that cultural concerns is very

1 -- it's a very significant conversation for us to
2 have. You know, we know that there's going to be
3 Iwi where we're talking about.

4 And so having a plan for that -- because
5 my understanding is, like, the state law, like,
6 doesn't exist about it. Like, you find Iwi and you
7 stop. And that's, like, the law. So, you know,
8 just being mindful of those kind of things because
9 we know that's going to happen.

10 And then to Dave's point, I really liked
11 the comment about the guardrails. And I also
12 enjoyed the comment about the passing lanes.

13 And I don't know that that's necessarily
14 an option, but I do think that at the very least we
15 should have signs that say, like, pull over to let
16 other cars pass or something because that absolutely
17 happens. And I think encouraging people to drive
18 faster around isn't great.

19 But letting people know, like, "Hey,
20 you're driving too slow -- get out of the way" is,
21 like, very helpful to those in our community who
22 have to commute every day and deal with all these
23 tourists. And I think that's really it. Otherwise,
24 everything's been covered. So mahalo for having
25 this.

1 MS. KALUNA-PALAFIX: Aloha. Good evening.
2 My name is Victoria Kaluna-Palafox. I live in
3 Ukumehame. I am and we are Ukumehame restoration
4 wetlands and restoration of Limu projects working in
5 Ukumehame. Also working with Olowalu.

6 We pray that we connect with our ohanas
7 here in Lahaina so that we can continue the growth
8 of Limu to renourish our oceans again and to protect
9 our wetlands. And with that, Ukumehame for many,
10 many years has been very dry. The wetlands has had
11 no life until a couple years ago.

12 If you go to Pohaku Aeko Street there's,
13 like, a culvert they made. Over there it used to be
14 all dry. The only time that wetlands used to fill
15 up is when the rains used to come and a little
16 seepage from the ocean floor.

17 Today in that culvert there's water in
18 there and there's fishes. There is life right where
19 you're thinking of putting that highway. I ask you
20 not to do it.

21 I ask you to go ahead, bring your
22 scientists, and check our 'Aina Ukumehame because
23 it's coming alive again. There is fishes where you
24 wouldn't think there is fishes. There are water
25 pools in Ukumehame where there weren't water pools.

1 It is starting to show us.

2 There was one developer -- and the only
3 developer back there -- he tried to help the
4 community by building eight cottages. In order to
5 get their cottages built he covered up a wetland
6 pool and put the eight houses on it.

7 My question to you -- how are you going to
8 run your highway? With a big berm or are you doing
9 dry pipe? If it is dry pipe I am against dry pipe
10 because the wetlands are important for us,
11 especially at this time.

12 We need to start concentrating on growing
13 food for our people. And this is where it should be
14 -- Ukumehame Olowalu -- the largest land in Lahaina.
15 Open, barren, good 'Aina for grow food.

16 The other part that I am very concerned
17 about is all the wetland pools. There's a special
18 one that I talked to Tanya and I talked to Pua
19 today. It was always kept within the Kupuna's,
20 Mana', and Mo'olelo. We have not shared that space
21 yet.

22 As Olowalu has a cave up in the valley
23 filled with water and that land belonged to the
24 Nahina and Ho'oikaika's, today Peter Martin wants to
25 funnel that water out.

1 Ukumehame is the same. It is a land of
2 food growth. We need to look into that history.
3 The wetlands of Ukumehame starts from the pipe and
4 it comes almost all the way to the river.

5 The reason why I'm saying almost to the
6 river is because the river's water flow comes within
7 that passage so the wetlands could stop at one
8 certain point. Again --

9 MR. KAM: Your three minutes --

10 MS. KALUNA-PALAFIX: Yeah. Again I will
11 repeat -- many years from the time of the first
12 development that area was all wet. Within the last
13 year or so water has been seeping under the road.
14 Kane has found his way, therefore bringing the
15 fishes back to where they was in time past. I thank
16 you very much for the time.

17 MS. MAGALLANES: Aloha mai kakou. My name
18 is Linda Nahina Magallanes. I'm an original
19 descendant of Olowalu -- my biggest concern. I know
20 a lot of culture is significant in that area.

21 I had asked about cutting down the trees
22 through Olowalu -- the tunnel trees. I was told
23 they cannot. Why? You protect the trees but you're
24 not protecting the cultural significance of Olowalu.

25 Every bit of Olowalu is significant

1 culturally. I know that because I'm also from
2 Olowalu with the connection of my ohana Naho'oikaika
3 and Keao. I used to live where the farm is right
4 now that -- by the highway -- that coconut farm and
5 butterfly -- I lived there until we moved into
6 Lahaina.

7 But my biggest concern is if you put the
8 road up higher what about the heiau on the top?
9 That heiau is still going strong. There's also Pu'u
10 Kilea, which is -- our Kupunas are buried on top.
11 You're going to put one highway through that.

12 You have Awalua, which is the outskirts of
13 Olowalu on the Lahaina side. Then you've got
14 Kapa'i, which is on the Wahikuli side of Olowalu.
15 So also these places need to be named correctly.
16 Not -- Kapa'i is not Olowalu. That's Kapa'i.

17 I said this in many meetings. I came to
18 many meetings. I also was on you guys' Zoom meeting
19 and somebody said they was going to get back to me
20 and to today never got back.

21 It really disappoints me because nobody
22 listened because it's all about the road. If you
23 cut the trees down, you got one road there. Use the
24 old cane haul road. What's so hard about that?

25 Instead of going up -- because even on the

1 cane haul there's -- the cane road to the regular
2 road has cemetery on the left. Check West Maui Land
3 EIS and put that together with your EIS. Something
4 will go right. That's all I got to say.

5 I'm kind of angry and I'm sorry by coming
6 out like this. But nobody listening to the people
7 who from here of Maui, of Lahaina, in Olowalu. I'm
8 very upset because nobody listens. They're just
9 doing what they like, put roads where they like, but
10 not listening to the people -- listening to the
11 money. Thank you.

12 MR. KALUNA-PALAFIX: I'm from Ukumehame
13 We're the first ones that you guys gonna plow
14 through, you know, and come into our kuleana.
15 That's like taking a part of our livelihood. Even
16 through how much you guys coming through, but you
17 still coming through our kuleana. It was two
18 generations.

19 For me hard because now we feel like we
20 are losing out again, you know, the kanaka -- always
21 the ones to lose all their -- especially for a
22 generation. You know, how much more the kanaka
23 people got to lose?

24 You know, it's already there. It's
25 already stated. We're impacted. Land Commission

1 awards but they no accept one TMK over that. You
2 know, we become a loser again. You know, we
3 suffering already with what we get.

4 We see all our beaches being destroyed,
5 being used as recreation. Ukumehame is a
6 recreational park. Outsiders come do surf lessons
7 and the instructor is just as White as the person
8 that came off of the plane.

9 You know, I could see with a local, but
10 no. So our land is being used as a recreation.
11 Economy. You can make money. What about the people
12 that already is suffering -- all the kanaka? You
13 got to fight for Lahaina.

14 How is that? My wife -- generations, two
15 generations. How come she got to fight just to stay
16 on our land? Plenty kanaka kawai got to fight for
17 our land. We already fighting for our water so we
18 can make money.

19 The hotels, the greedy ones, sucking all
20 up the water. But the people suffer with 20 percent
21 of water. How is that? Even the kanaka -- they get
22 first rights automatic -- first rights no questions
23 asked. They get the right for the water, for the
24 'Aina.

25 You cannot just come through and think you

1 own and just plow through all our cultural sites or
2 our wetlands or the river and life. I mean, I'm
3 pure Filipino. My dad came from the Philippines. My
4 mom born here.

5 But my heart is so kanaka. And I cry
6 about all of that because I know all these kanakas
7 out here is suffering. They're suffering. You
8 know, I know it's hard for me. I got to see all
9 this with my own eyes.

10 I mean, I'm 66 years old. I watch Maui
11 from when I was born in to today how things look is
12 all messed up. You know, I sorry. But the County
13 and the State -- they making it more kapulu. You
14 come with the machine, plow any kind, don't even --
15 you, sorry, but half-ass -- kapulu.

16 MR. KAM: That's about time.

17 MR. KALUNA-PALAFIX: I'm sorry. But
18 mahalo. I hope they will get to you guys. You
19 know, you guys -- we the first families. You guys
20 coming through -- you know, I'm sorry. I no like
21 you guys come through my property and my -- it's not
22 my property, my kuleana.

23 And my great-great-grandkids behind me --
24 I'd like them live the same life as me. So fix the
25 old highway. You guys will save a lot more money by

1 just fixing it. Mahalo.

2 MS. FELICE: You kind of just, I guess,
3 nipped it in the bud by saying that you're not going
4 to build a highway up north because we don't have
5 the funding. Right? But we need another way out of
6 Lahaina. If you were here during the fire you would
7 understand.

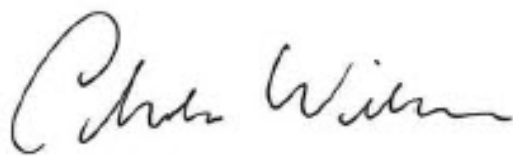
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CERTIFICATE

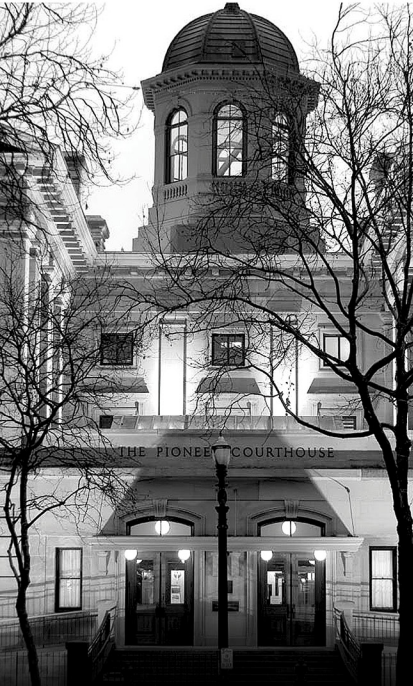
I, Chelsea Wilhelm, do hereby certify that I reported all proceedings adduced in the foregoing matter and that the foregoing transcript pages constitutes a full, true and accurate record of said proceedings to the best of my ability.

I further certify that I am neither related to counsel or any party to the proceedings nor have any interest in the outcome of the proceedings.

IN WITNESS HEREOF, I have hereunto set my hand this 10th of February, 2025.

A handwritten signature in cursive script, appearing to read "Chelsea Wilhelm", is written in dark ink.

Chelsea Wilhelm, #3541



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PUBLIC HEARING PRESENTATION:
DRAFT ENVIRONMENTAL IMPACT STATEMENT

PUBLIC COMMENTS

TAKEN ON
TUESDAY JANUARY 28, 2025
5:00 P.M.

PUBLIC HEARING PRESENTATION:
DRAFT ENVIRONMENTAL IMPACT STATEMENT
PUBLIC COMMENTS
TAKEN ON
TUESDAY JANUARY 28, 2025
5:00 P.M.

MS. HALLEY: My name is Nancy Halley.
I've been a resident of Maui for 40 years and I have
listened to discussions about moving the highway
back for a long time. It's been going on for a long
time, so I've kind of excited about that. I could
see how it could really benefit the island.

I did have a question and I haven't read
the EIS statements, I haven't read the paperwork yet
so I really need to do that; and I will do that.
But I was wondering about things that came into my
mind were, you know, when all the -- unfortunately,
all the -- the debris was moved to the Olowalu dump
site and after the Lahaina fires and Bissen, Mayor
Bissen, said that that will also be transported over
to the Central Maui Landfill at one time.

And so I'm just kind of wondering in my
mind I was thinking how is that going to impact
these plans for the highway? There's been concern

1 about the dump site -- the current dump site
2 possibly leaching into the coastal waters off of
3 Olowalu; and so I'm just kind of wondering.

4 And then this whole movement of transport
5 trucks moving back and forth to get to the Central
6 Maui Landfill, so I'm just kind of wondering how
7 that all ties into your EIS.

8 Have you taken a look at that and do you
9 think that your highway proposal would affect that
10 in some way environmentally or, you know, I still
11 have some questions about that.

12 MR. DEL CAMPO: Okay. It seems like the
13 preferred alternative -- I know it's still not the
14 final, but it seems like our property will be
15 impacted in the Ukumehame subdivision. I was just
16 wondering if there's going to be someone contacting
17 us to understand the level of impact to our farming
18 operations or who would be the best person for me to
19 contact in order to have a discussion?

20 MS. DIAS: Okay. Aloha. My name is Saman
21 Dias and that is spelled S-a-m-a-n, last name D-i-a-
22 s.

23 And I am a Maui -- West Maui resident and
24 have been on Maui over 25 years on the west side.
25 And I'm also the chair for Maui Bicycling League.

1 So I would like to first start with thanking the
2 HDOT and FHWA and the consultants for a great job
3 that you folks are doing. You are very appreciated.

4 Maui Bicycling League do not oppose to the
5 realignment. However, we have -- we want to address
6 some points to ensure part of the realignment that
7 you folks do not forget the West Maui Greenway and
8 all of you are very well aware and the community, as
9 well. And Segments 3, 4, 5 and Segments 6 and 7 --
10 Segments 6 and 7 are getting affected by the
11 realignment. Segments 3, 4, 5 also received
12 recently acknowledgment for race grant, so this 6/7
13 is really important to us. We want to ensure that
14 I'm calling it old highway after the new highway
15 begins.

16 The old highway is getting realigned with
17 Segments 3, 4, 5 and the connectivity will continue
18 to connect 6, 7 to 3, 4, 5. So as part of the
19 design of the old highway; it's important that we do
20 not forget the West Maui Greenway 6 and 7; and it
21 should be part of the design to incorporate the
22 bicycle/pedestrian pathways specifically safe for
23 our children, as well as for Kupuna. So do not
24 forget that.

25 And, also, the new highway it is really

1 important that we incorporate somehow safe bicycling
2 and pedestrian crossing. Very important, do not
3 forget the pedestrian covered crossing to be
4 incorporated to the new highway.

5 And you all are aware of the Navahine
6 Settlement Agreement where HDOT has made commitments
7 to reducing the carbon footprint and please use this
8 as a opportunity to build that bike network that you
9 all are supposed to complete in year 2030.

10 So these are just reinforcing, I have been
11 talking to you folks on every opportunity. I also
12 had sent testimonies and I'm just stating this
13 opportunity as a way to remind again. And mahalo
14 and thank you so much.

15 MS. COMCOWICH: Aloha. This is Karen
16 Comcowich, K-a-r-e-n, C-o-m-c-o-w-i-c-h. I'm a West
17 Maui resident. I drive the Honoapi'ilani Highway
18 multiple times a week for commuting to and from work
19 and I fully support this project because I see the
20 wave impacts that are happening around the highway.

21 I would like to echo what Saman said that
22 it's really important to have pedestrian access that
23 goes across the highway and to ensure that the
24 bicycle alignments are respected and that safe
25 bicycling infrastructure is included in the plan.

1 I would also like to say that there should
2 be a location where there's some sort of passing
3 zone because one of the dangerous things that does
4 happen is getting stuck behind visitors who are --
5 who are sightseeing while people are commuting,
6 encourages people to pass in unsafe ways. So if
7 there's just a passing zone so people can get around
8 the slower drivers.

9 And past that, avoiding kuleana parcels as
10 much as impacts the kuleana parcels as much as
11 possible. I was impressed that archeological
12 resources and the environmental resources have been
13 thought about as much as they have in the plan.

14 And that's all my comments for now. I'll
15 submit written comments.

16 MS. ROY: I'm agreeing with everyone else.
17 I do drive the Pali a lot, like four times a week;
18 and getting stuck behind slow drivers and then
19 having crazy fast drivers trying to pass in the bad
20 areas I think maybe widening the roads in certain
21 areas for passing would be great.

22 And then also I just want to go on the
23 record; I don't really -- I mean, I understand Route
24 3 and 4 just from looking at the maps, but they do
25 worry me a little bit because they go by the

1 petroglyphs and recently the petroglyphs have been
2 getting vandalized. And so I'm afraid it would kind
3 of instigate more of that happening or maybe even
4 roadblocks or traffic jamming up there from people
5 pulling over to look; and that area doesn't really
6 have a lot of parking space for people to be pulling
7 over and looking at them.

8 So I'd ask you guys if you do go Route 3
9 and 4 to take that into consideration; and that's
10 all I really have to say.

11 I do want to read up more on this.
12 There's a lot to read up on. So -- but, yeah,
13 that's all I'd like to say.

14 MR. POTTS: Okay. Yeah, so my name is
15 Jason Potts, P-o-t-t-s.

16 Is there a way to ask questions on here or
17 it's just for comments? Sorry.

18 MR. SHISHIDO: Yeah, you can go ahead and
19 ask questions and I can answer.

20 MR. POTTS: Okay. My question was, like,
21 with the -- the highway that's already there,
22 specifically in Olowalu, what is going to be done
23 with that? I haven't heard anything about that so
24 I'm a little confused.

25 MR. SHISHIDO: Yes. So that would

1 probably get turned over to the County, you know,
2 even when the other segments of Lahaina Bypass were
3 constructed, you know, there was all that discussion
4 with the County once there's, you know, a longer
5 segment and we have dual parallel routes and the,
6 like, existing highway would be turned over to the
7 County.

8 MR. POTTS: Okay. And then my other
9 question was I noticed on the map that the -- where
10 was it? So it's your preferred build that's going
11 to go through two of those large rock mounds from
12 the old like sugarcane company, right?

13 I've been told that there's possibly bones
14 in that, so what will be happen -- like, what will
15 happen if you guys find bones during construction?

16 MR. SHISHIDO: So prior to construction,
17 you know, we will be doing some sub-surface
18 investigations.

19 You know, as I mentioned, there's going to
20 be a programmatic agreement to address that and with
21 all of that they will lay out the steps on what
22 happens if you should discover any burials.

23 MR. POTTS: Okay. Perfect, yeah.

24 And I did submit testimony. It was
25 through email. I'm not sure if you got it. My wife

1 did, also. Her family owns kuleana in the back near
2 the petroglyphs, so hopefully, you got our
3 testimony.

4 That's pretty much it. I just had those
5 questions, so appreciate your time. Thank you.

6 (Public comments concluded at.)
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IN WITNESS HEREOF, I have hereunto set my hand this 11th day of February, 2025.



Chelsea Wilhelm, #3541



DEIS Public Hearing Presentation

ALOHA MAI

PUBLIC HEARING PRESENTATION: DRAFT ENVIRONMENTAL IMPACT STATEMENT

Honoapiʻilani Highway Improvements
West Maui, Ukumehame to Launiupoko



U.S. Department
of Transportation
**Federal Highway
Administration**



JANUARY 23, 2025



**Honoapiʻilani Highway
Improvements**



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Emily Engelbart
Public Involvement,
WSP





Public Hearing Agenda

- Welcome
- Presentation
 - Public Hearing Process
 - Purpose and Need
 - Alternatives
 - Environmental Screening
 - Preferred Alternative
 - Draft EIS Document and Public Availability Period
 - Project Schedule and Next Steps
- Public Testimony





Public Hearing Process

- Public hearings are your opportunity to give FHWA and HDOT your thoughts.
- Public hearings are required for Environmental Impact Statements.
- Public hearings share project information.
 - Open House area is for questions and conversations with project team
 - Presentation area is for formal presentation and public testimony
- Public hearings allow opportunity to give public testimony or one-on-one testimony to a court reporter. These will be part of the EIS records and Final EIS document.
- Written public comments are also part of the EIS record and Final EIS document.
 - Submit written comments in Open House area
 - Submit written comments to team no later than February 24, 2025



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Honoapiʻilani Highway
Improvements



- Project Area
- Existing Honoapi'ilani Highway
- Landmark
- Park

HONOAPI'ILANI HIGHWAY IMPROVEMENTS

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



Honoapi'ilani Highway
Improvements



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 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
- Total estimated cost for this project is approximately \$160 million.





Project Purpose and Need Statement

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.

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.





Factors in Determining Preferred Alternative

- Best opportunity to avoid and minimize adverse effects.
- Refinements to the alignment specifically address:
 - Archeological and cultural locations
 - Areas with wetlands/waters
 - Areas with known threatened and endangered wildlife
- Best accommodates environmental commitments and mitigation
- Minimizes private property acquisition
- Best opportunity to meet Purpose and Need while minimizing impacts



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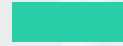


Honoapi'ilani Highway
Improvements

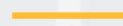


Project Alternatives

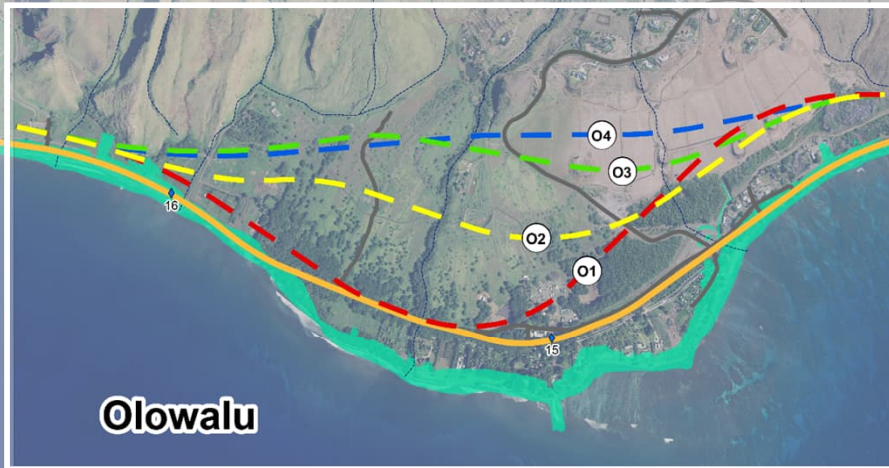
- Alternative 1
- Alternative 2
- Alternative 3
- Alternative 4



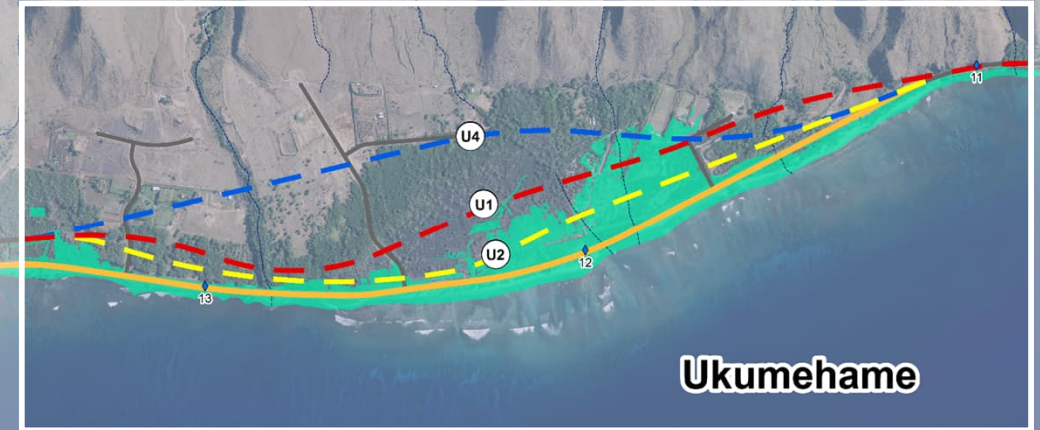
Sea Level Rise Exposure Area (SLR-XA) 3.2 Foot Vulnerability Area



Study Segment of Existing Honoapi'ilani Highway



Olowalu



Ukumehame



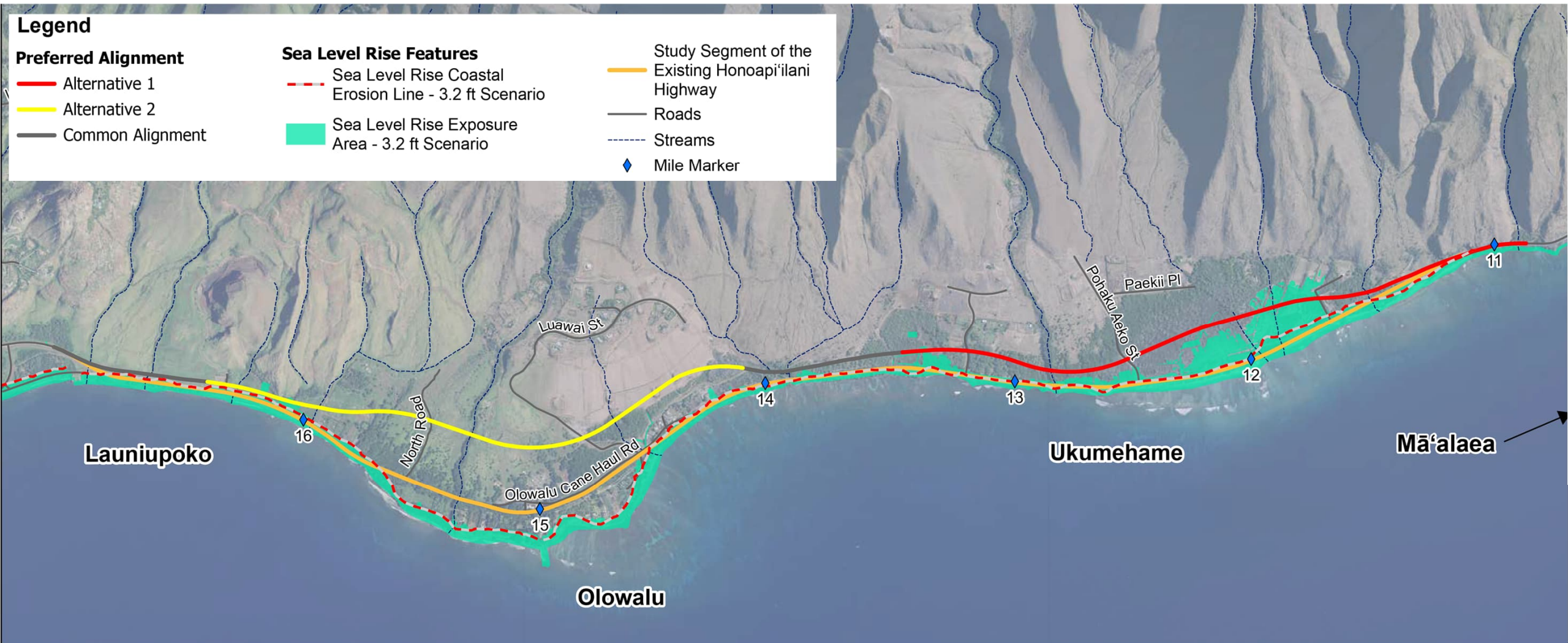
0 1,250 2,500 5,000
Feet



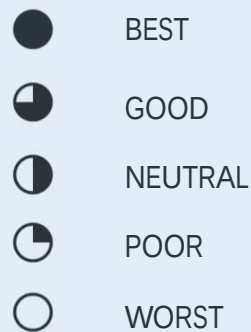
Honoapi'ilani Highway
Improvements



Complete Preferred Alternative



Olowalu



TOPIC	NO BUILD ALTERNATIVE	BUILD ALTERNATIVE 1	BUILD ALTERNATIVE 2	BUILD ALTERNATIVE 3	BUILD ALTERNATIVE 4	PREFERRED ALTERNATIVE
Preliminary Construction Cost Estimates	◑	◑	◐	◑	◑	◐
Land Use and Zoning	◑	◑	●	◑	◑	●
Agriculture and Farmlands	◑	◑	◐	◑	◑	◐
Community Services	◑	●	●	●	●	●
Land Acquisition, Displacement, and Relocation	●	◑	◐	◒	◒	◐
Parklands and Recreational Resources	●	◑	●	●	●	●
Archaeological and Architectural Historic Properties	●	◑	◐	◑	◒	●
Cultural Resources	●	◑	◐	◑	◒	●
Visual and Scenic Character	◑	◑	◐	◑	◒	◐
Water Resources, Wetlands, and Floodplains	○	◑	◐	◑	◑	◐
Flora and Fauna, Endangered Species	◑	◑	◐	◑	◑	◐
Geology, Soils, and Natural Hazards	◒	◑	●	●	●	●
Coastal Zone Management /Hawai'i Special Management Areas	○	◑	●	●	●	●
Climate Change and Sea Level Rise	○	●	●	●	●	●
Transportation	○	◑	●	●	●	●
Air Quality and Energy	◑	●	●	●	●	●
Noise	◑	●	●	●	◒	●
Infrastructure and Utilities	◑	●	●	●	●	●
Hazardous Materials	●	◑	●	●	●	●
Environmental Justice	◑	●	●	●	●	●

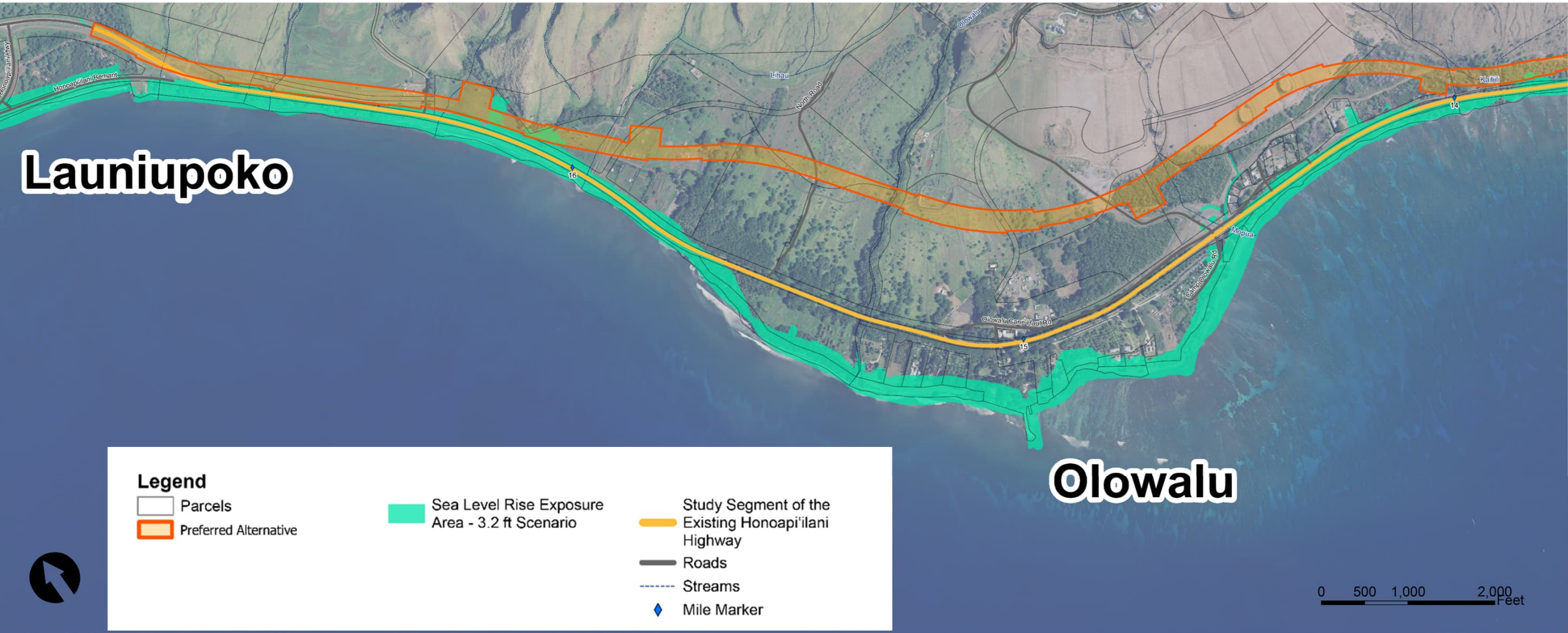
Alternative Impact Evaluation and Screening



Honoapi'ilani Highway
Improvements



Olowalu Preferred Alternative (Alternative 2)



Ukumehame

-  BEST
-  GOOD
-  NEUTRAL
-  POOR
-  WORST

TOPIC	NO BUILD ALTERNATIVE	BUILD ALTERNATIVE 1	BUILD ALTERNATIVE 2 AND 3	BUILD ALTERNATIVE 4	PREFERRED ALTERNATIVE
Preliminary Construction Cost Estimates					
Land Use and Zoning					
Agriculture and Farmlands					
Community Services					
Land Acquisition, Displacement, and Relocation					
Parklands and Recreational Resources					
Archaeological and Architectural Historic Properties					
Cultural Resources					
Visual and Scenic Character					
Water Resources, Wetlands, and Floodplains					
Flora and Fauna, Endangered Species					
Geology, Soils, and Natural Hazards					
Coastal Zone Management/Hawai'i Special Management Areas					
Climate Change and Sea Level Rise					
Transportation					
Air Quality and Energy					
Noise					
Infrastructure and Utilities					
Hazardous Materials					
Environmental Justice					

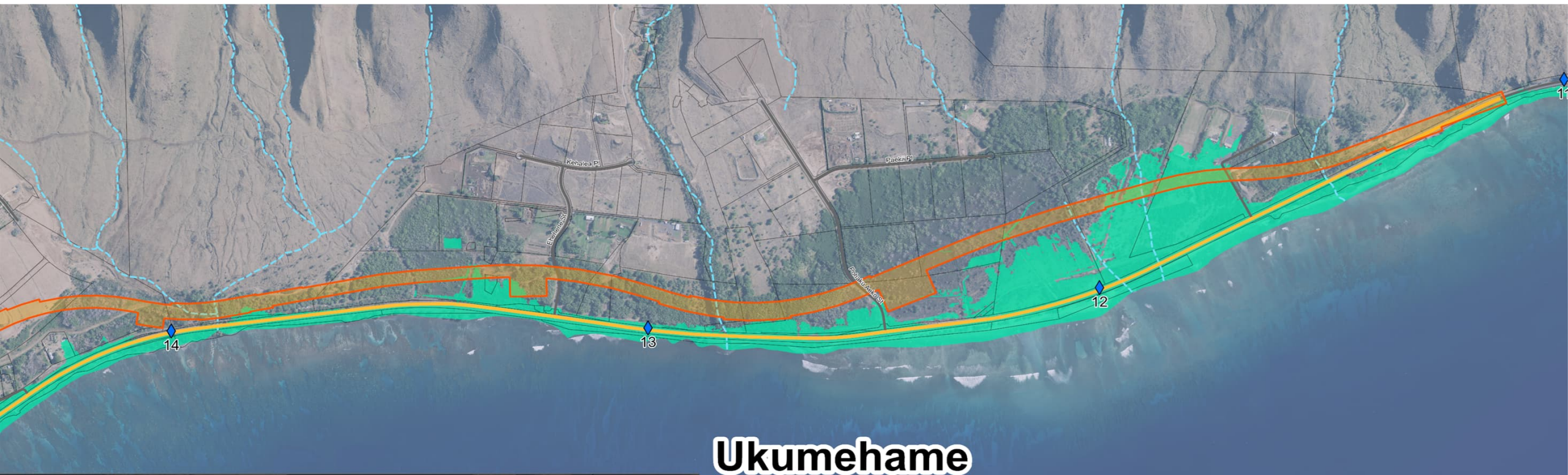
Alternative Impact Evaluation and Screening



Honoapi'ilani Highway
Improvements



Ukumehame Preferred Alternative (Alternative 1)



Legend

- | | | |
|-----------------------|--|---|
| Parcels | Sea Level Rise Exposure Area - 3.2 ft Scenario | Study Segment of the Existing Honoapi'ilani Highway |
| Preferred Alternative | Roads | Streams |
| | Mile Marker | |

0 500 1,000 2,000 Feet



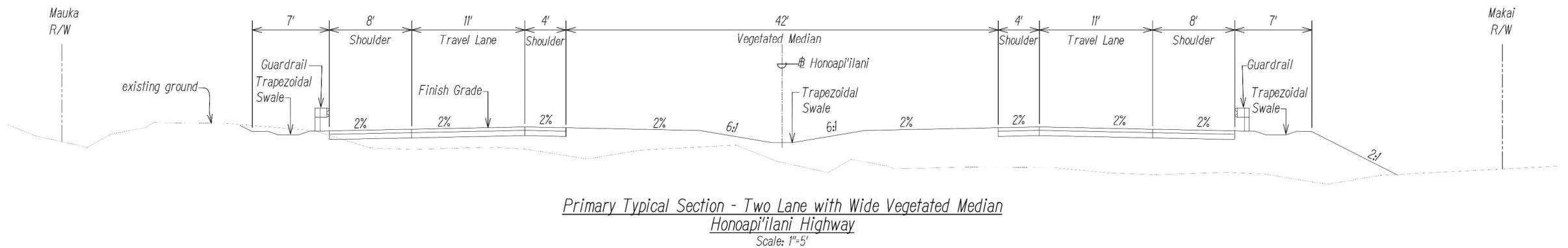
Honoapi'ilani Highway
Improvements



Design Elements

Basic Design Elements Include:

- 45 MPH posted speed limit
- 11-ft wide travel lanes
- Paved shoulders (4-ft min. at median, 8-ft outside)
- Guardrails where appropriate
- Wide vegetated medians (for improved safety and stormwater management)
- Acceleration / deceleration lanes at intersections
- Infiltration/detention ponds

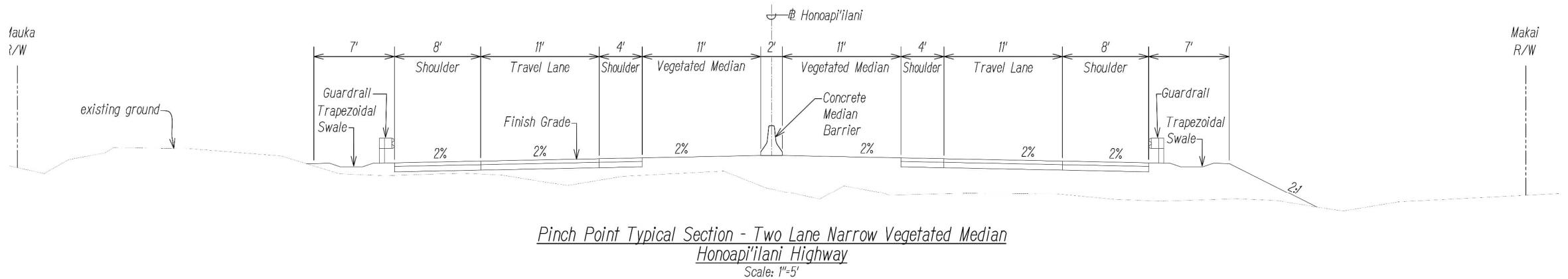
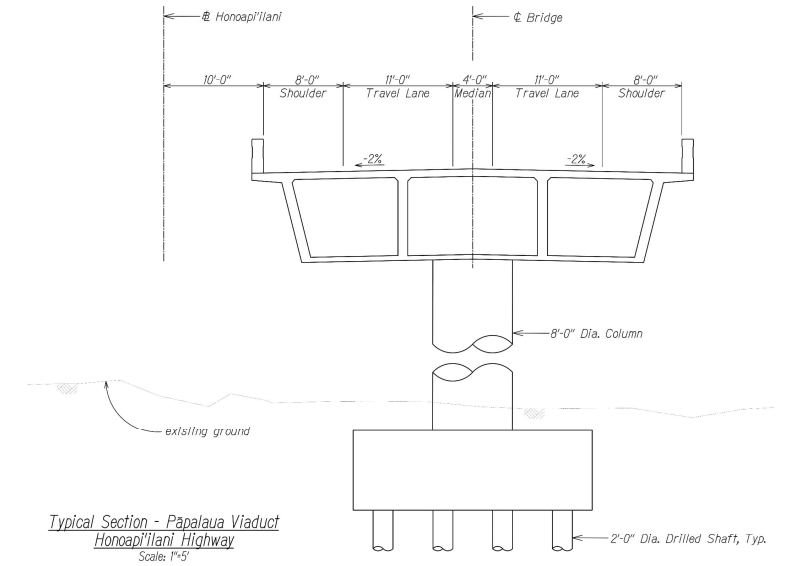




Design Elements

Variations in Design Elements Include:

- Narrower medians (to reduce footprint for preservation of archaeological and historic resources)
- Viaduct in Ukumehame (to span over sedimentation pond and wetland areas)
- Street lighting only at intersections





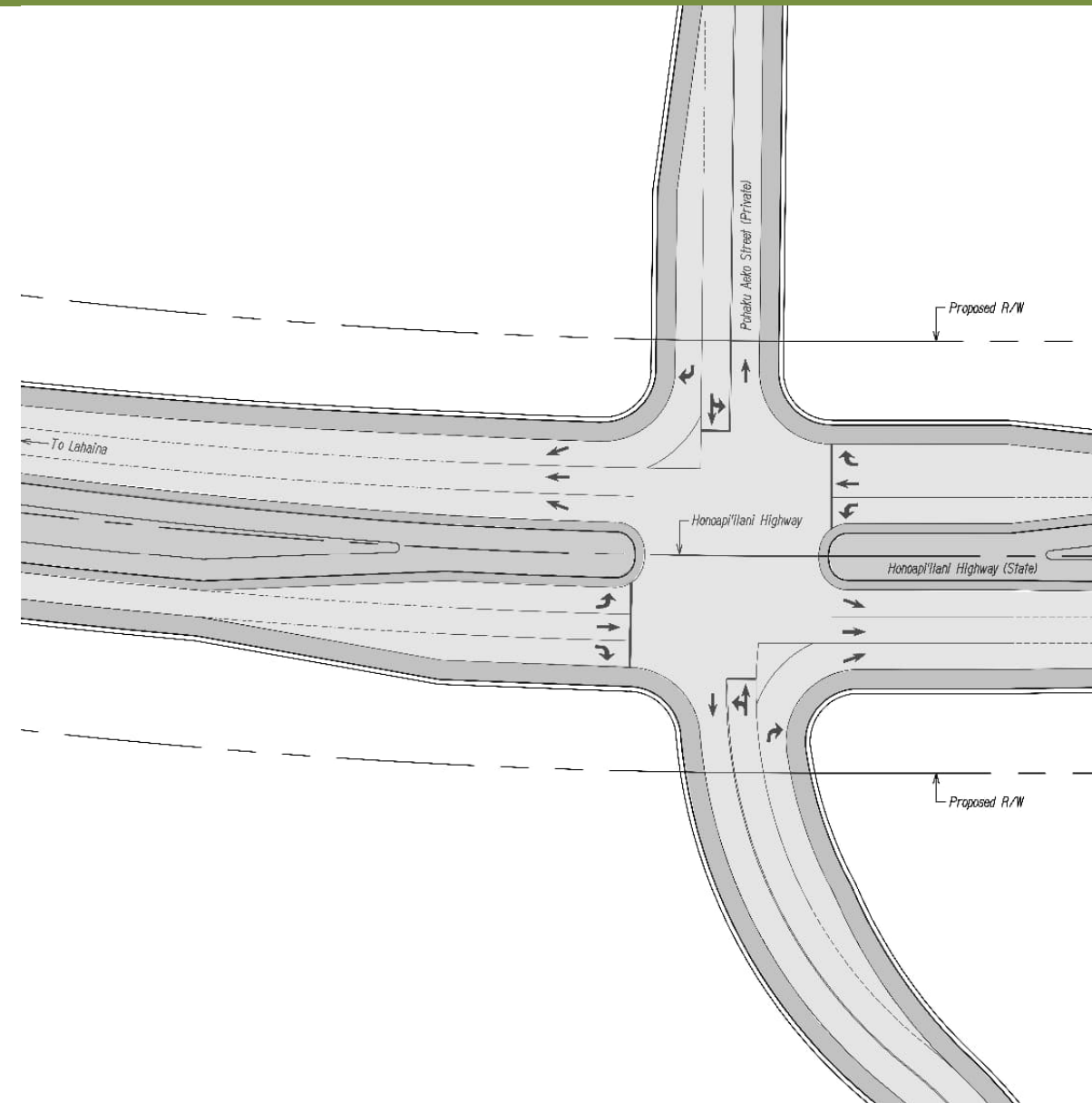
Design Elements

Typical Intersection Elements Include:

- Acceleration/deceleration lanes
- Turning lanes on main highway
- Streetlights

Proposed Intersections:

- Olowalu Recycling Center
- North Road
- Luawai Street (signalized)
- Ehehene Street
- Pohaku Aeko Street





Topics Included in this Environmental Impact Statement

Social, Economic, and Built Environment

- Land Use
- Land Acquisition, Displacement, and Relocation
- Agriculture and Farming
- Socioeconomic Conditions
- Environmental Justice
- Parklands and Recreational Facilities/ Beach Access
- Infrastructure and Utilities
- Hazardous Materials
- Visual and Scenic Character

Cultural and Historic Resources

- Archaeological and Architectural Historic Properties
- 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



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Other Environmental Studies Highlights

Historic and Cultural Resources

Section 106 / Chapter 6E

- Above ground surveys of archaeological and architectural resources have been completed
- The draft programmatic agreement has been drafted, but is not yet final
- Subsurface research will be completed on the preferred alternative before construction

Parks/Rec and Historic Sites

Section 4(f)

- The Draft EIS assessed several properties for Section 4(f). Only the Ukumehame Firing Range, was eligible for Section 4(f)
- The Ukumehame Firing Range is anticipated to have a “de minimis” (minimal) impact from the Preferred Alternative. This will be coordinated with the County of Maui
- A Section 4(f) de minimis evaluation will be included in the Final EIS.

Wetlands and Water Resources

Section 404

- Water features in the study area include approximately 21 acres of delineated wetlands
- Permanent impacts for the Preferred Alternative are not anticipated to exceed 0.1 acre in any delineated jurisdictional wetland.
- Compliance with Clean Water Act is ongoing through coordination with U.S. Army Corp of Engineers. Permitting will be completed during the next phase of the project

Endangered Species

Section 7 / Chapter 195d

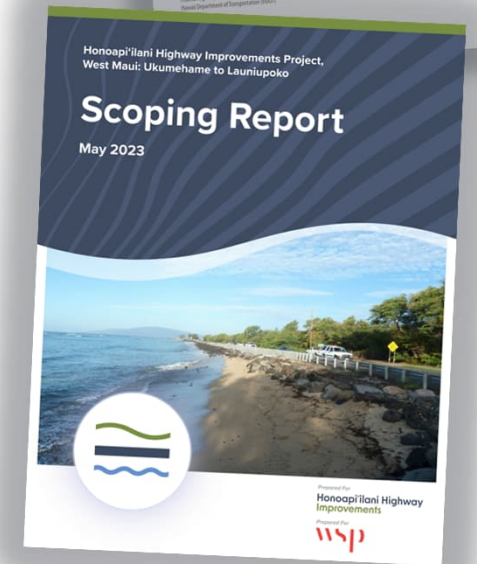
- Two listed species observed:
 - nēnē (Hawaiian Goose)
 - ae’o (Hawaiian Stilt)
- Endangered species consultation is ongoing with USFWS. Consultation with NOAA-NMFS has been completed
- Next steps: Determine final species protection measures with USFWS





EIS Timeline

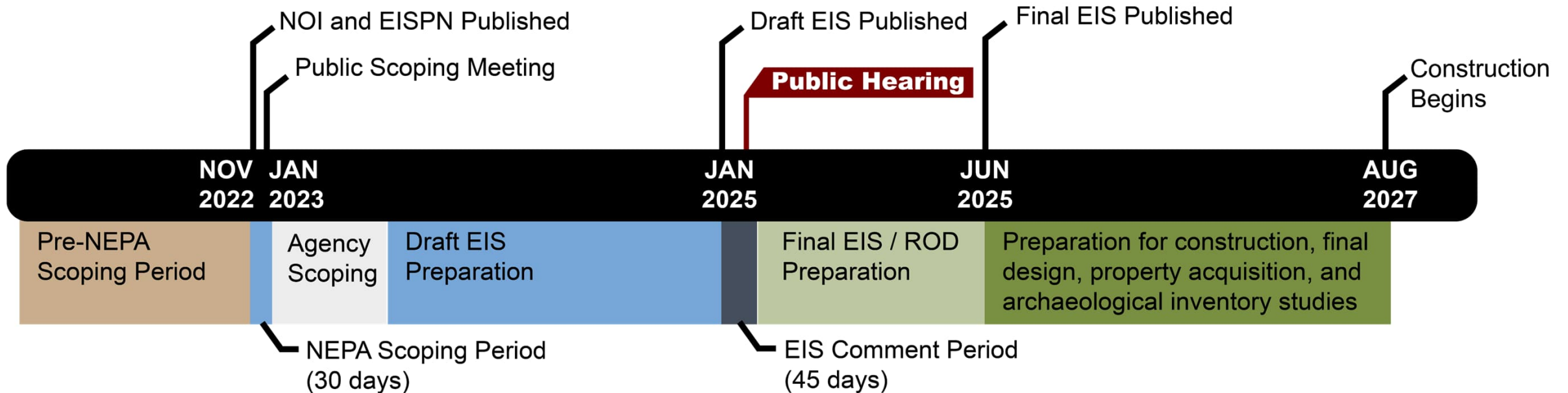
December 2021 to November 2022	Pre-NEPA/ HEPA early scoping period
November 22/23, 2022	Notice of Intent and EIS Preparation Notice
November 30, 2022	Scoping letters sent to agencies explaining the project and requesting input
December 2022	Three public scoping meetings, comment period closed December 31, 2022
May 2023	Scoping Report Published
August 2023	The Lahaina wildfire did not physically affect the highway project area; however, the environmental review timetable was extended by 10 months.
January 2025	DEIS Publication
January 2025	Public Hearings (comments due February 24, 2025)
June 2025	Anticipated FEIS/ROD Publication





Schedule and Next Steps

- Public Comment on Draft EIS ends on February 24, 2025
- Final EIS/Record of Decision expected June 2025





Providing Testimony or Comments

Provide comments in several ways:

- Verbal public testimony after project presentation
- Verbal one-on-one testimony to court reporter in designated area
- Written public comment via paper form in comment area
- On-line written public comment via website
- Email to honoapiilaniEIS@online.wspis.com



TO PROVIDE
COMMENT
SCAN HERE

[Honoapiilanihwyimprovements.com](https://honoapiilanihwyimprovements.com)

FHWA



Richelle.Takara@dot.gov



Federal Highway Administration, Hawaii Division
Attention: Richelle Takara, Division Administrator
Box 50206, 300 Ala Moana Blvd., Room 3-229
Honolulu, HI 96850

HDOT



Ken.tatsuguchi@hawaii.gov



Hawaii DOT Planning Branch
869 Punchbowl Street, Room 301
Honolulu, HI 96813-5097

Comment period is open until **February 24th, 2025**



**Honoapi'ilani Highway
Improvements**

MAHALO

Now: PUBLIC TESTIMONY



Meeting attendees will have 3 minutes each to share their comments



Please come forward when your name is called to give testimony



Please be respectful of others



The meeting is scheduled from 5 p.m. – 8 p.m.

Questions or Comments?

Contact: Ken Tatsuguchi,
Project Manager, HDOT
Ken.tatsuguchi@hawaii.gov



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