

May 19, 2026

RE: DRIP-19

To Whom It May Concern;

I am in strong opposition to Bills 163, 164, and 165 relating to the proposed Ho‘onani Village project under DRIP-19.

This testimony is not opposition to housing. Maui needs housing. Maui needs workforce housing. Maui needs stable communities, responsible infrastructure planning, and realistic long-term growth management. But what this Council is being asked to approve is not responsible planning. It is a large-scale entitlement package advancing ahead of the infrastructure, environmental review, water availability, wastewater capacity, cultural review, and public transparency necessary to justify urbanizing 166.511 acres of agricultural land in Central Maui.

The County is being asked to:

- expand the Urban Growth Boundary,
- amend the Wailuku-Kahului Community Plan from Agriculture to Business/Multi-Family,
- and rezone the property from Agricultural to M-1 Light Industrial.

These are not technical adjustments. These are permanent land-use transformations that fundamentally change the future development pattern of Central Maui.

The most important issue before this Council is not whether housing is needed. The issue is whether Maui County should approve foundational urban entitlements before the underlying infrastructure and environmental questions are answered.

The Planning Department itself warned this abbreviated Council-initiated process bypasses the normal private development review pathway and results in reduced impact analysis, reduced public input, and potential impacts to the community.

That warning alone should stop this process.

Instead, this Council appears prepared to approve the framework first and sort out the consequences later.

That is exactly how Maui repeatedly ends up with:

- overloaded infrastructure,
- deferred sewer upgrades,
- water uncertainty,
- worsening traffic,
- incomplete mitigation,

- and projects that evolve far beyond the original public representations used to gain approval.

The legislation itself guarantees almost nothing.

Bill 163 does not secure permanent affordability protections, guaranteed infrastructure timelines, secured water allocations, completed wastewater capacity, transportation mitigation, or binding long-term public safeguards.

What the Council is actually approving is the legal foundation for urban expansion.

Once the Urban Growth Boundary is expanded and the zoning is changed, the leverage shifts permanently away from the public and toward future project momentum.

That is the reality.

The water issue alone should prevent approval at this stage.

The Department of Water Supply estimated demand at approximately 1.384 million gallons per day while acknowledging the proposal relies on private wells within the Pa‘ia Aquifer System. DWS further acknowledged existing reported pumpage already exceeds the sustainable yield figures discussed in the project correspondence.

The County is effectively being asked to urbanize agricultural land before long-term water sustainability is resolved.

That is not planning.

That is speculation.

The wastewater concerns are equally serious.

The Department of Environmental Management acknowledged the project lies outside the County sewer service area and estimated wastewater generation exceeding one million gallons per day at full buildout. DEM further acknowledged the County system does not currently have sufficient treatment capacity and indicated future connection may not be possible until approximately 2029 or 2030 depending on future infrastructure expansion.

Again, the sequence here matters.

Approve first.

Figure infrastructure out later.

That is exactly the pattern residents are exhausted from watching.

Mauı residents are constantly told:

- there is not enough water,
- infrastructure is stressed,
- roads are overburdened,
- wastewater systems are aging,
- and development must be carefully controlled.

Yet somehow large-scale urban expansion proposals continue moving forward before those same concerns are actually resolved.

The contradiction is obvious.

The cultural resource concerns are also being treated far too lightly.

The Department of 'Ōiwi Resources acknowledged the cultural significance of the area and referenced known archaeological concerns and prior iwi kūpuna discoveries associated with nearby development activity.

These are not hypothetical risks. These are documented realities within the surrounding area.

Yet the Council is still being asked to move ahead before the Environmental Impact Statement process is fully completed.

The Planning Department itself questioned why the EIS Preparation Notice was withdrawn from County review and shifted toward the State Land Use Commission pathway.

The public deserves a direct answer:

Why are major entitlements advancing before the environmental review process is complete?

Why is the Council being asked to legislate first and analyze later?

That question becomes even more important when considering the broader pattern of development approvals on Maui.

Residents repeatedly hear one version of a project during entitlement hearings:

- workforce housing,
- community benefits,
- sustainability,
- smart growth,
- mixed-use balance,
- public need.

Then over time the terms evolve, densities shift, uses expand, conditions get amended, enforcement weakens, timelines stretch, and the original public narrative slowly changes.

That is why the public no longer simply evaluates the initial proposal. Residents evaluate the approval structure itself.

And this structure gives away enormous leverage upfront.

This project is also being advanced during a period when Maui already contains:

- vacant industrial land,
- underutilized commercial properties,
- partially occupied business parks,
- aging retail corridors,
- stalled redevelopment sites,
- and previously entitled urban inventory.

Those areas already have infrastructure, roads, drainage systems, utilities, and existing urban footprints.

Yet instead of prioritizing redevelopment, infill housing, adaptive reuse, and activation of existing commercial and industrial areas, the County is being asked to expand outward into agricultural land and create entirely new long-term infrastructure obligations.

That is not smart growth.

That is leapfrog expansion.

This also raises legitimate concerns regarding long-term speculative investment positioning tied to Opportunity Zone-style redevelopment models.

The federal government already demonstrated through Opportunity Zone 1.0 how tax-advantaged investment structures can rapidly reshape development patterns, land values, and institutional investment behavior. Discussions nationally surrounding future “OZ 2.0” style programs only increase the importance of careful land-use sequencing.

Whether intentional or not, expanding Urban Growth Boundaries and broad mixed-use industrial zoning before fully utilizing existing urban inventory creates the exact conditions speculative capital tends to target later.

Maui should be extremely cautious about creating new urban expansion zones while existing developed areas remain underutilized.

The public is repeatedly being told this proposal is inevitable and necessary. It is neither.

Large-scale development proposals must earn approval through:

- completed environmental review,
- secured infrastructure,
- demonstrated water sustainability,

- wastewater capacity,
- transportation analysis,
- enforceable affordability protections,
- cultural review,
- and public trust.

Those standards have not been met here.

I also believe residents should pay close attention to the role of former County planners who later transition into private development advocacy and entitlement work. That revolving-door relationship between government planning and private entitlement strategy is exactly why the public becomes concerned when projects appear structured around procedural shortcuts, incomplete filings, phased disclosures, or evolving project descriptions that change over time after initial approvals are secured.

The concern is not housing.

The concern is whether the County is once again being asked to approve the broadest possible entitlement structure first while the difficult realities are deferred into future amendments, future conditions, future negotiations, and future administrations.

That is not transparency.

That is not accountability.

And it is not responsible planning.

For those reasons, I respectfully urge the Committee and Council to deny or defer Bills 163, 164, and 165 until:

- the Environmental Impact Statement process is completed,
- the Planning Commission fully completes review,
- water availability is independently verified,
- wastewater treatment capacity is secured,
- transportation impacts are fully analyzed,
- cultural and archaeological review is completed,
- enforceable affordable housing protections are recorded,
- and the County demonstrates why existing urban inventory cannot first absorb a substantial portion of the proposed mixed-use expansion.

Maui residents are not anti-housing.

Residents are tired of irresponsible sequencing, speculative growth patterns, infrastructure deficits, and promises that change after approvals are granted.

Responsible planning requires restraint, sequencing, transparency, and accountability.

These bills, as currently proposed, fail those standards.

Edward Codelia, Maui Resident