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

Appendix 8 – Scoping Report

September 2025

Prepared for

Honoapi‘ilani Highway Improvements

Prepared by

wsp

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Contents

WSP USA, Inc .
Scoping Report (May 2023)

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

Scoping Report

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Contents

Tables

Figures

Appendices

Acronyms

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

1. Overview

1.1 INTRODUCTION

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

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

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

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

1.2 PROJECT AREA

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

Figure 1. Project Area

2. Purpose and Need

2.1 PROJECT CONTEXT

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

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

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

2.2 PROJECT PURPOSE

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

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

2.3 PROJECT NEED

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

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

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

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

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

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

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

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

2.4 SECONDARY OBJECTIVES

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

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

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

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

2.4.2 Conform with Regional Land Use and Transportation Plans

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

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

3. Alternatives

3.1 INTRODUCTION

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

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

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

3.2 EVALUATION OF ALTERNATIVES LEADING TO DETERMINATION OF A PREFERRED ALTERANTIVE

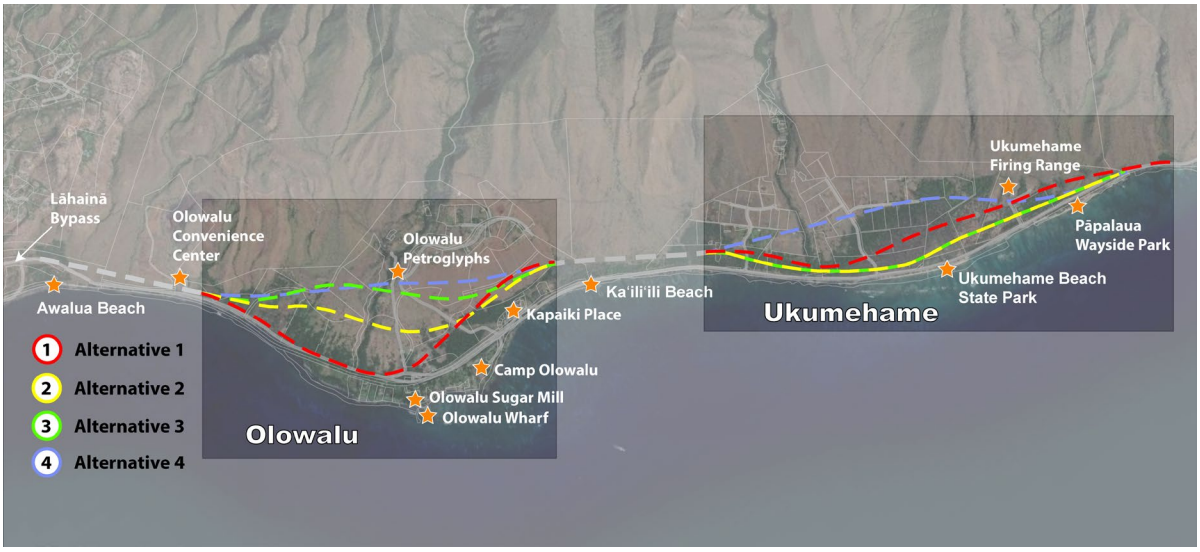
To determine the Preferred Alternative, HDOT and FHWA are using a multiple-phase approach to alternatives development and screening for the Project. The initial steps in this approach facilitate development of the broader concepts for alternatives in the scoping phase of the EIS process and an evaluation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

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

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

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

Figure 2. Alternatives Map



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

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

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

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

4. Public Involvement and Agency Coordination

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

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

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

4.1 SUMMARY OF COOPERATING AND PARTICIPATING AGENCIES

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

4.1.1 Early Coordination

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

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

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

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

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

4.1.2 Cooperating Agencies

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

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

Table 1. Cooperating Federal Agencies

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

Table 2. Cooperating State Agencies

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

Table 3. Cooperating County Agencies

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

4.1.3 Participating Agencies

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

Table 4. Participating Federal Agencies

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

Table 5. Participating State Agencies

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

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

Table 6. Participating Agencies: County of Maui

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

4.2 ENGAGING WITH THE PUBLIC

4.2.1 Project Website

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

4.2.2 Early Scoping Meetings

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

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

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

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

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

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

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

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

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

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

4.2.3 Scoping Meetings

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

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

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

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

4.3 CONTACT INFORMATION

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5. Response to Comments

5.1 INTRODUCTION

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

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

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

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

5.1.1 List of Speakers and Commenters

5.1.1.1 Public and Elected Officials (in Attendance)

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

5.1.1.2 Organizations

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

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

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

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

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

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

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

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

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

12. Mahesh Cleveland
13. MetroQuest Poll Participants

5.2 PURPOSE AND NEED, EIS PROCESS, GENERAL

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

Response 1: Comment noted.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Response 19: Comment noted.

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

Response 20: Comment noted.

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

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

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

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

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

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

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

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

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

5.3 ALTERNATIVES

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

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

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

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

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

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

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

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

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

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

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

5.4 TECHNICAL EVALUATIONS

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

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

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

Response 31: See responses within the table.

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

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

Figure 3. MetroQuest Dropped Point Map

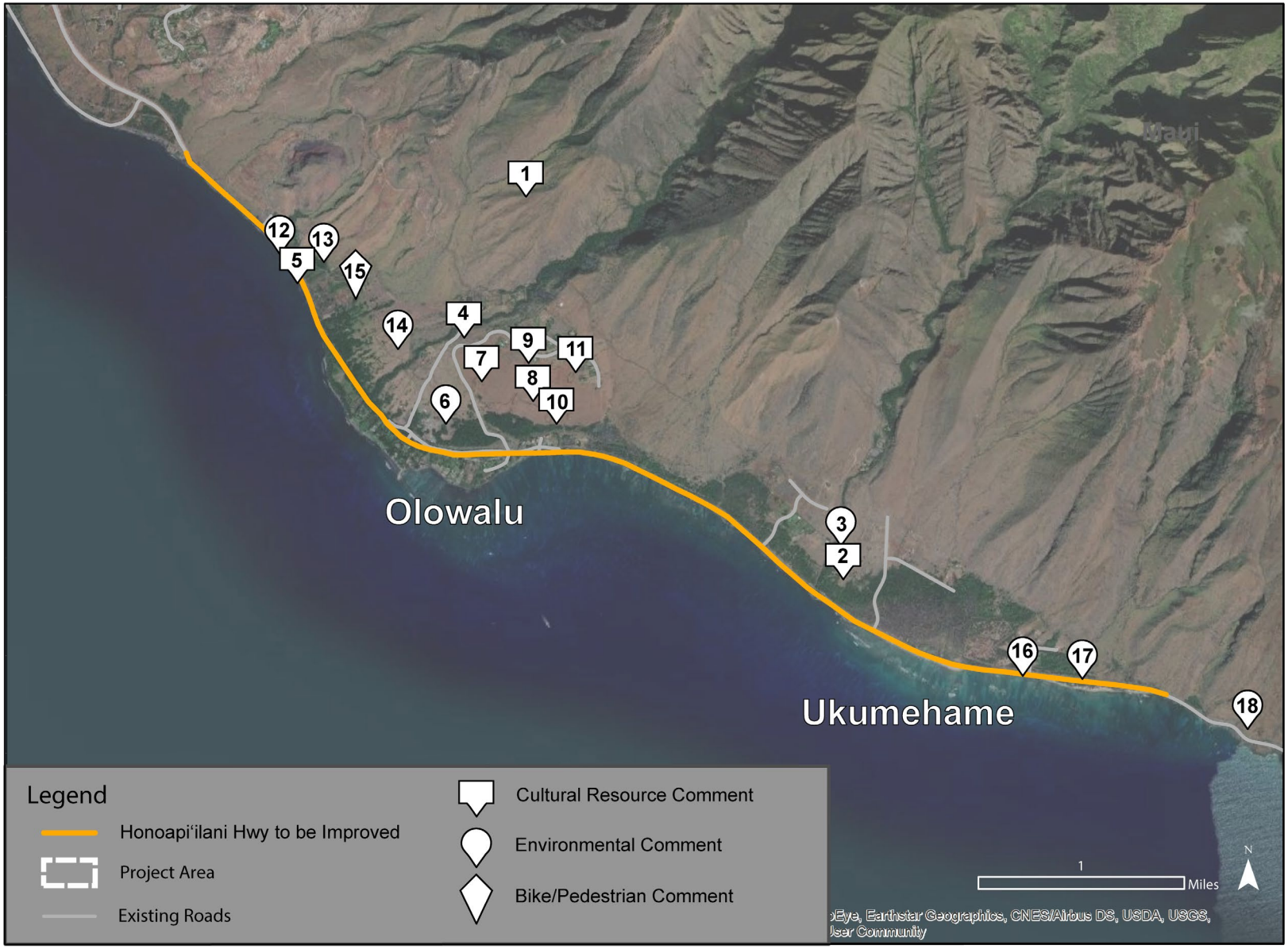

Table 7. MetroQuest Dropped Point Comment List

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

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

5.4.1 Land Use and Consistency with Related Governmental Plans and Policies

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

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

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

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

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

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

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

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

5.4.2 Land Acquisition, Displacement, and Relocation

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

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

5.4.3 Parklands and Recreational Resources/Beach Access

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

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

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

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

5.4.4 Archaeological and Historic Resources

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

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

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

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

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

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

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

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

5.4.5 Cultural Resources and Practices

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

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

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

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

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

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

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

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

5.4.6 Visual and Scenic Resources

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

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

5.4.7 Water Resources, Wetlands, and Floodplains

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

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

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

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

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

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

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

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

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

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

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

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

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

5.4.8 Natural Hazards

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

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

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

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

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

5.4.10 Construction Effects

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

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

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

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

5.4.11 Section 4(f)

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

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

5.4.12 Indirect and Cumulative Impacts

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

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

6. Environmental Considerations

6.1 INTRODUCTION

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

6.2 ENVIRONMENTAL REVIEW PROCESS

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

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

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

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

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

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

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

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

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

6.3 PERMITS AND APPROVALS

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

Table 8. List of Anticipated Permits and Approvals

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

* permits or approvals that may necessitate Chapter 343 environmental review

6.4 ENVIRONMENTAL ANALYSIS FRAMEWORK

6.4.1 Project Area

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

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

6.4.2 Transportation Analysis Year

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

6.4.3 Organization of the Environmental Impact Statement

The EIS will be organized in two volumes.

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

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

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

6.5 ENVIRONMENTAL ANALYSIS APPROACH AND METHODOLOGY

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