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**VOLUNTARY ENVIRONMENTAL IMPACT  
STATEMENT PREPARATION NOTICE  
PROPOSED WAENA GENERATING STATION  
PROJECT**



**PREPARED FOR:  
Hawaiian Electric Company, Inc.**



**PREPARED BY:**



**P L A N N I N G  
S O L U T I O N S**

**JUNE 2023**

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## LIST OF ACRONYMS

BEES	Battery Energy Storage System
BMP	Best Management Practice
CAA	Clean Air Act
CIA	Cultural Impact Assessment
DLNR	Department of Land and Natural Resources
EIS	Environmental Impact Statement
EPA	Environmental Protection Agency
FEIS	Final Environmental Impact Statement
GHG	Greenhouse Gases
GCOD	Guaranteed Commercial Operations Date
HAR	Hawai‘i Administrative Rules
HDOH	State of Hawai‘i, Department of Health
HEPA	Hawai‘i Environmental Policy Act
HRS	Hawai‘i Revised Statutes
LUC	Land Use Commission
MSL	Mean Sea Level
MW	Megawatt
PSI	Planning Solutions, Inc.
PUC	Public Utilities Commission
RHR	Regional Haze Rule
RFP	Request for Proposal
SCS	Scientific Consultant Services, Inc.
SHPD	State Historic Preservation Division
SIP	Regional Haze State Implementation Plan
TMK	Tax Map Key
UIC	Underground Injection Control
VDEIS	Voluntary Draft Environmental Impact Statement
VEISPN	Voluntary Environmental Impact Statement Preparation Notice

# 1 INTRODUCTION

## 1.1 PROPOSAL SUMMARY

<b>Proposal Name:</b>	Waena Biodiesel Generating Station
<b>Island:</b>	Maui
<b>District:</b>	Wailuku
<b>TMK:</b>	(2) 3-8-003:023 and 024
<b>County Zoning:</b>	M-2 Heavy Industrial
<b>Permits or Approvals Required:</b>	Covered Source Air Quality Permit HRS § 6E-42 Historic Preservation Review Public Utility Commission General Order #7 Approval County Flammable/Combustible Liquid Fuel Tank Permit NPDES, General Construction County Grading Permit
<b>Project Proponent:</b>	Hawaiian Electric Company, Inc. P.O. Box 2750 Honolulu, Hawai‘i 96840-0001
<b>Consultant/Send Comments to:</b>	Planning Solutions, Inc. Julia Ham Tashima, <a href="mailto:julia@psi-hi.com">julia@psi-hi.com</a> , 808-550-4483 711 Kapi‘olani Boulevard, Suite 950 Honolulu, Hawai‘i 96813
<b>Summary:</b>	<p>The Waena Generating Station would only be implemented if it is selected through the Hawaiian Electric Stage 3 Request for Proposal (RFP) process or a specific set of potential future circumstances related to the availability of other firm generation projects that may be proposed by third parties. The Waena Generating Station consists of developing a 40-megawatt generating station with reciprocating engines fueled by biodiesel. The facility would connect to Maui’s electrical grid via the Waena Switchyard which is on the proposed site. In the event the Waena Generating Station is implemented, the proposed facility would provide Hawaiian Electric with a greater level of flexibility so that it could, among other goals, (a) maintain reliability while decommissioning older generating units elsewhere on Maui, and (b) accommodate a greater percentage of variable, renewable, dispatchable generation on the grid.</p> <p>Maui Electric proposed a larger generating station at the subject site in the late-1990s and completed an Environmental Impact Statement (EIS) for that project in 1997. Land use approvals (state and county rezonings)</p>

	<p>obtained at that time were informed by that EIS. The project proposed in the late-1990s was not built; the proposed Waena Generating Station project would comply with the relevant conditions associated with the late-1990s land use approvals.</p>
<p><b>Scoping Meeting Date, Time, and Location:</b></p>	<p>July 11, 2023, starting at 5:30 p.m. and ending at 7:00 p.m.</p> <p>Maui Electric Auditorium, 210 West Kamehameha Avenue, Kahului, HI 96732</p> <p>The meeting will also be accessible virtually, please visit <a href="https://www.hawaiianelectric.com/community-meetings">https://www.hawaiianelectric.com/community-meetings</a> for information.</p>

## 1.2 IMPLEMENTATION SCENARIOS

### 1.2.1 SELECTION VIA THE STAGE 3 REQUEST FOR PROPOSAL

Hawaiian Electric issued its Stage 3 Request for Proposals (RFP)<sup>1</sup> to acquire at least 40 MW of renewable firm generating capacity with the Waena Generating Station described in this VEISPN. The RFP was issued under Public Utilities Commission (PUC) docket number 2017-0352 and is dated January 23, 2023; more information regarding the RFP and its amendments can be found at <https://www.hawaiianelectric.com/clean-energy-hawaii/selling-power-to-the-utility/competitive-bidding-for-system-resources/stage-3-maui-rfp>. Developers in addition to Hawaiian Electric may submit responses to the RFP; they may propose similar or substantially different means of generating renewable firm power at the same or different sites on Maui. Should this proposal be selected by those evaluating the RFP responses, Hawaiian Electric would seek to implement the project in a manner that complies with the RFP, resulting agreements, and applicable rules, regulations, and site use conditions.

### 1.2.2 AS A PARALLEL PLAN

Hawaiian Electric may decide to continue to pursue the approvals necessary for the implementation of the proposed Waena Generating Station project even if it is not selected through the RFP process. Hawaiian Electric needs to ensure that it can continue to fulfill its obligation to provide continuous, sufficient, and reliable electric power to the Maui community if other generating proposals, including those selected through the Stage 3 RFP process, are insufficient, delayed, or unsuccessful. This parallel effort then would allow for the timely implementation of the proposed project if it is deemed necessary.

If the situation develops in a manner that results in Hawaiian Electric being confident that it could provide sufficient and reliable electric power to the Maui community for the foreseeable future without the proposed Waena Generating Station, then parallel processing of this project would be discontinued. For example, the process would cease if a viable 3<sup>rd</sup> party response to the Stage 3 RFP is selected and there is documented evidence that it can meet the required guaranteed

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<sup>1</sup> The Stage 3 RFP, finalized on January 20, 2023, seeks proposals to acquire at least 425 GWh annually of variable renewable dispatchable generation and at least 40 MW of renewable firm capacity. The RFP indicate that the goal is to have that capacity in service by December 1, 2027 (the GCOD).

commercial operations date (GCOD) of December 1, 2027. For the purposes of the VEIS, it is assumed that the Waena Generating Station will proceed to completion.

### 1.3 WHY THIS PROPOSAL DOES NOT TRIGGER HRS CHAPTER 343

Because the Waena Generating Station is being proposed by Hawaiian Electric, which is not a government agency, the plan is an “applicant action” under HRS Chapter 343 and HAR 11-200.1 (collectively referred to as the Hawai‘i Environmental Policy Act (HEPA)). Applicant actions are only required to comply with HEPA if they meet both parts of a two-part test codified in HAR § 11-200.1-9. The two parts are that the project:

1. Requires one or more approvals defined as a “discretionary consent” by a governmental agency prior to implementation; and
2. Involves one or more triggers identified in HRS § 343-5(a), which includes item (9)(E) “Power-Generating facility.”<sup>2</sup>

The Waena Generating Station does not meet the first part of the test. The approvals required to implement the proposal are listed in Section 2.2.1. Based on discussions with relevant State and County agencies who have confirmed this position, Hawaiian Electric does not believe that these approvals are defined as discretionary consent approvals subject to HEPA. This is primarily because the proposed site is owned by Hawaiian Electric, is in the state’s Urban District, and is already zoned M-2 (heavy industrial). Because this first test is not met the project is not subject to HEPA.

As proposed by Hawaiian Electric, the Waena Generating Station would also not meet the second part of the test. As noted above, the HRS § 343-5(a) list of HEPA-triggering projects includes a power-generating facility (item (9)(E)) and that such a facility is one that is fossil fueled and is rated to produce more than 5.0 MW of electricity. In this instance, the project is rated to produce more than 5.0 MW but Hawaiian Electric’s proposal is to operate the units exclusively with biodiesel, which is not considered a fossil fuel. As proposed, the project does not meet the second part of the applicant action test. However, Hawaiian Electric may be directed to use fossil fuel or may be required to use fossil fuel in the unlikely event that biodiesel is unavailable for extended periods of time over the projected 30-year life of the units. Because of this possibility, Hawaiian Electric is seeking permits that would allow it to operate the units using fossil fuel, even though that is not their primary intent. As such, an unplanned use of the facility may meet the second part of the applicant action test. However, because the first part of the two-part test is not met, compliance with HEPA is clearly not required.

Even though HEPA is not triggered, Hawaiian Electric, will evaluate and identify potential environmental impacts of the Waena Generating Station, consult with the community, and consider measures to avoid, minimize, and/or mitigate potential impacts.

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<sup>2</sup> “Power-generating facility” means: “(1) A new, fossil-fueled, electricity-generating facility, where the electrical output rating of the new equipment exceeds 5.0 megawatts;” (HRS § 343-2. Definitions).

## 1.4 WHY THIS PROPOSAL IS DESIGNATED FOR WAENA

Section 2.1.1 details that Hawaiian Electric previously proposed a larger power-generating facility on the subject site; that facility was never developed. Hawaiian Electric believes the identified Waena site (TMKs (2) 3-8-003:023 and 024) is the preferred location for the proposed project because: (i) detailed studies associated with the prior project identified the site as being optimal for development of a power-generating facility, factors identified in those studies continue to have merit; (ii) County of Maui zoning already allows for the site to be used as a power-generating facility with certain conditions that indicate a preference for renewable projects like the proposed project; (iii) Hawaiian Electric owns the site; and (iv) there is sufficient vacant space suitable for power generation and biodiesel storage at the site. Those factors allow for the Waena Generating Station to be implemented with minimal delay.

## 1.5 INPUT BEING SOUGHT FROM THE COMMUNITY

Comments can be sent to the address indicated in Section 1.1; please provide comments prior to August 24, 2023. Comments can also be submitted during the scoping meeting, information about the meeting is provided in Section 1.1; those wishing to make oral public comments during the public scoping meeting on July 11 should attend the meeting in person.

Input regarding the following topics would be particularly helpful:

- Comments on the purpose and need for the project (Section 1.6).
- Information regarding resources that are present in the project region. Chapter 3 provides an overview of the existing conditions in the project region.
- Information, including contact information, regarding groups or individuals that could be affected by the proposal and should be consulted.
- Input on the scope of studies (Chapter 4) and analyses to be conducted during the Voluntary Draft Environmental Impact Statement (VDEIS) to assess the probable impacts of the proposal.
- Information concerning other projects that are proposed in the Waena region.

## 1.6 PURPOSE AND NEED

The purpose of the proposed Waena Generating Station project is to respond to the firm, renewable generation component of the Stage 3 RFP. The purpose of the proposed project, and the Stage 3 RFP, is to ensure that Hawaiian Electric can continue to fulfill its obligation to provide continuous, sufficient, and reliable electric power to the Maui community.

New firm generation is needed on Maui because:

1. The Kahului Power Plant, which produces 37.6 megawatt (MW) of firm power using four steam boiler generators (designated K1 through K4) that are roughly 55 to 75 years old, is



required to be retired in 2027 to comply with the *Hawaii State Department of Health Regional Haze State Implementation Plan* (HDOH, 2022).<sup>3</sup>

2. The four Mitsubishi generating units at Mā‘alaea Power Plant (designated M10 through M13), which generate roughly 50 MW of firm power, are less than 30 years old but cannot be counted on to provide power beyond 2030 because parts required to keep them operational will no longer be available and they may also be affected by the Regional Haze Rule.
3. Several variable generation and energy storage projects that were selected as part of the Stage 1 and 2 Requests for Proposal (RFP)<sup>4</sup> processes have either been canceled or delayed, their future is uncertain, and/or their date of delivery is unknown.

## 1.7 OBJECTIVES

The primary objective of the proposed project is to continue to deliver economical, sufficient, and reliable electrical power to the Maui community after the Kahului Power Plant is decommissioned and in the event the Mā‘alaea Power Plant units experience maintenance-related failures or are otherwise required to shutdown.

Other objectives of the proposed project include:

- Increasing reliability of (and reducing risk to) the island’s electricity supply (maintaining an adequate system margin-of-reserve generating capacity) by replacing aging generators K1 through K4 and M10 through M13 with flexible generation that is designed to respond to evolving system needs.
- Allowing for more renewable integration by providing firm generation that can run on renewable fuels and is more flexible and scalable than the existing baseload generators.
- Facilitates the retirement of Kahului and Mā‘alaea fossil fuel generating units that are older and in the Tsunami Zone and close to sensitive environments.
- Using an expandable architecture to allow for the addition of generating capacity should load growth occur due to electric vehicle adoption.
- Helping balance variable, renewable generation effects on the island’s grid.

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<sup>3</sup> On July 1, 1999, the Environmental Protection Agency (EPA) issued the Regional Haze Rule (RHR) to establish goals and emission control strategies that make reasonable progress towards improving visibility in Mandatory Federal Class I areas. The goal of the RHR is to restore natural visibility conditions at all 156 Mandatory Federal Class I areas by 2064. The rule was revised in 2017 to strengthen visibility protection and to emphasize that states reduce man-made emissions of air pollutants that impair visibility. States are required to prepare Regional Haze State Implementation Plans (RH-SIPs) that provide long-term strategies for Class I areas to comply with the RHR. Hawai‘i’s Mandatory Federal Class I areas are Haleakala National Park on Maui Island and Hawai‘i Volcanoes National Park on Hawai‘i Island. The State of Hawai‘i submitted its Final draft of the SIP to the EPA to implement the RHR in August of 2022. <https://health.hawaii.gov/cab/files/2022/08/Final-2021HI-RHSIP.pdf>.

<sup>4</sup>In 2018, the Stage 1 RFP sought proposals for the capability to provide the supply of approximately 270,000 MWh per year of variable renewable dispatchable generation on the Island of Maui. The goal stated in the Stage 1 RFP was to have the capacity available no later than December 31, 2022. In 2019, the Stage 2 RFP solicited proposals for the supply 295,000 MWh annually of variable renewable dispatchable generation and energy storage on the Island of Maui. The goal stated in the Stage 2 RFP was to have the capacity available no later than December 31, 2025.

- Allowing the shutdown of certain units to address the regional haze rule requirements associated with the Kahului Generating Station and potentially certain Mā‘alaea generating units.

Furthermore, it is Hawaiian Electric’s objective to design and implement the proposed project in a manner that complies with the conditions of prior land use approvals associated with the project site (Section 2.1.1), to the extent applicable. Those prior land use approvals include Land Use Commission (LUC) *Docket No. A97-722* and a County of Maui *Unilateral Agreement and Declaration for Conditional Zoning*.

## 2 PROPOSED PROJECT

### 2.1 DESCRIPTION OF THE PROPOSED WAENA GENERATING STATION PARCELS

As indicated in Sections 1.1 and 1.4, the proposed project would be sited on two parcels in Waena, Central Maui. Table 2-1 provides a summary of the subject parcels.

**Table 2-1: Summary of Subject Parcels**

	<i>(2) 3-8-003:023</i>	<i>(2) 3-8-003:024</i>
Address	8001 Pulehu Road	8001 Pulehu Road
Recorded Fee Owner	Maui Electric Company Ltd.	Maui Electric Company Ltd.
Size	15.127 acres	50.573 acres
State District	Urban District	Urban District
County Zone	M2, Heavy Industrial	M2, Heavy Industrial

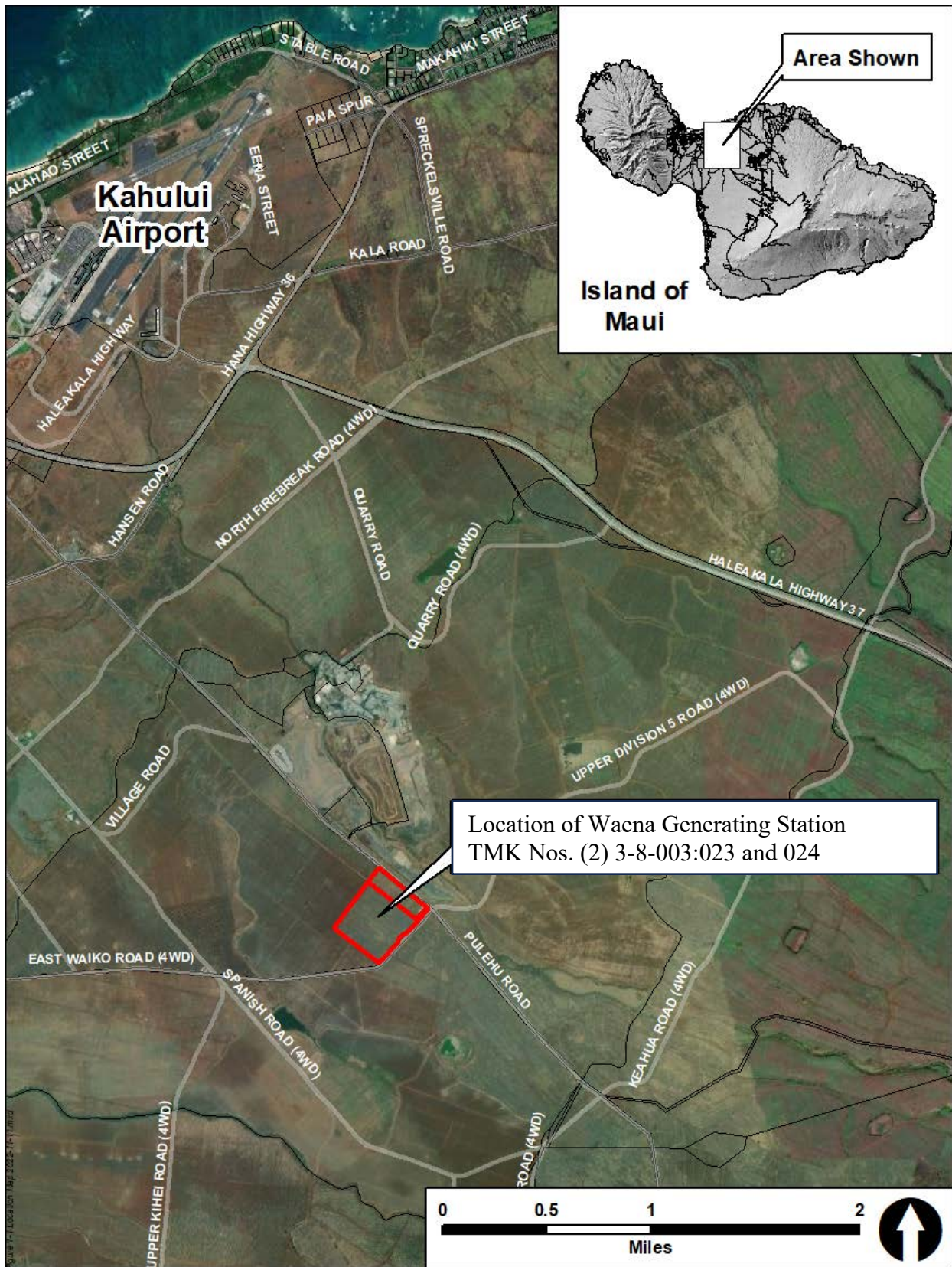
Note: On December 20, 2019, the State of Hawai'i Department of Commerce and Consumer Affairs approved Maui Electric Company, Limited's application to do business under the trade name "Hawaiian Electric" for the period from December 20, 2019 to December 19, 2024.

The parcels are accessed from Pulehu Road, southeast of the Central Maui Landfill at an elevation of roughly 350 feet. Hawaiian Electric, or its subsidiaries, have owned the parcels since 1996. After the acquisition by Hawaiian Electric, sugarcane cultivation continued on the bulk of the parcels. In roughly 2011, Hawaiian Electric began using a small portion of the site as a laydown and parking area. In 2015, sugarcane production ceased; the bulk of the site has been fallow land since then. Currently, the bulk of the site remains unused and a portion of the area near Pulehu Road is being developed as a switchyard. Figure 2-3 provides an aerial view of the parcels and Figure 2-4 provides ground-level photographs of existing conditions on the project site. Vegetation in the undeveloped portion of the site is described in Section 3.6.

Topographically, the parcels range from roughly an elevation of 320 to 370 feet. The ground surface slopes gradually from southeast to northwest.

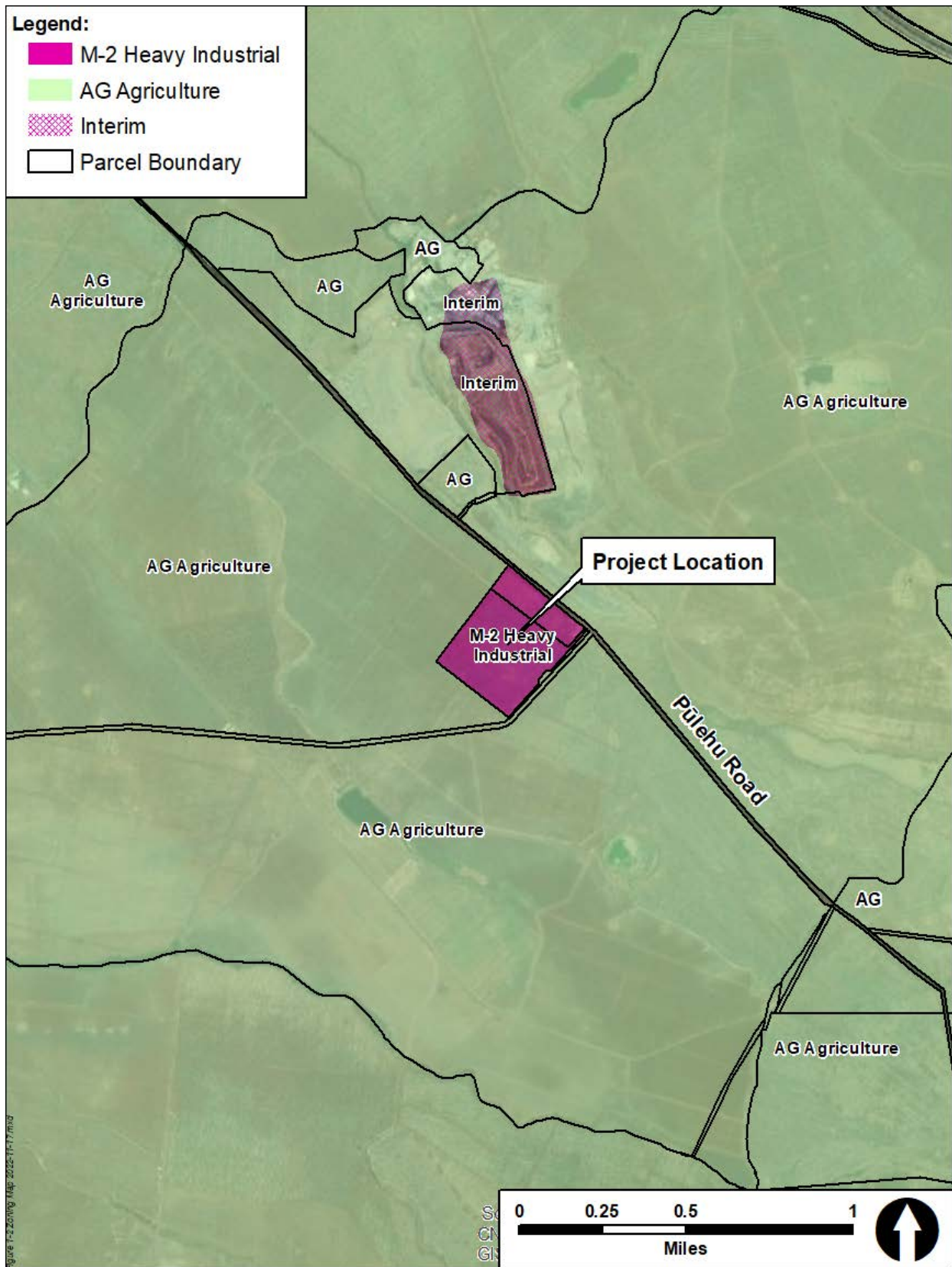
The surrounding properties on the south side of Pulehu Road are large, privately-owned, agriculturally zoned parcels that, like the project parcels, were formerly used for sugarcane production. The neighboring parcel on the north side of Pulehu Road is also large, privately-owned, and agriculturally zoned; it was also used for sugarcane production in the past, was a quarry in the 2000s, and is now primarily vacant and fallow. The Central Maui Landfill is further to the north on a parcel owned by the County of Maui.

Figure 2-1: Location Map

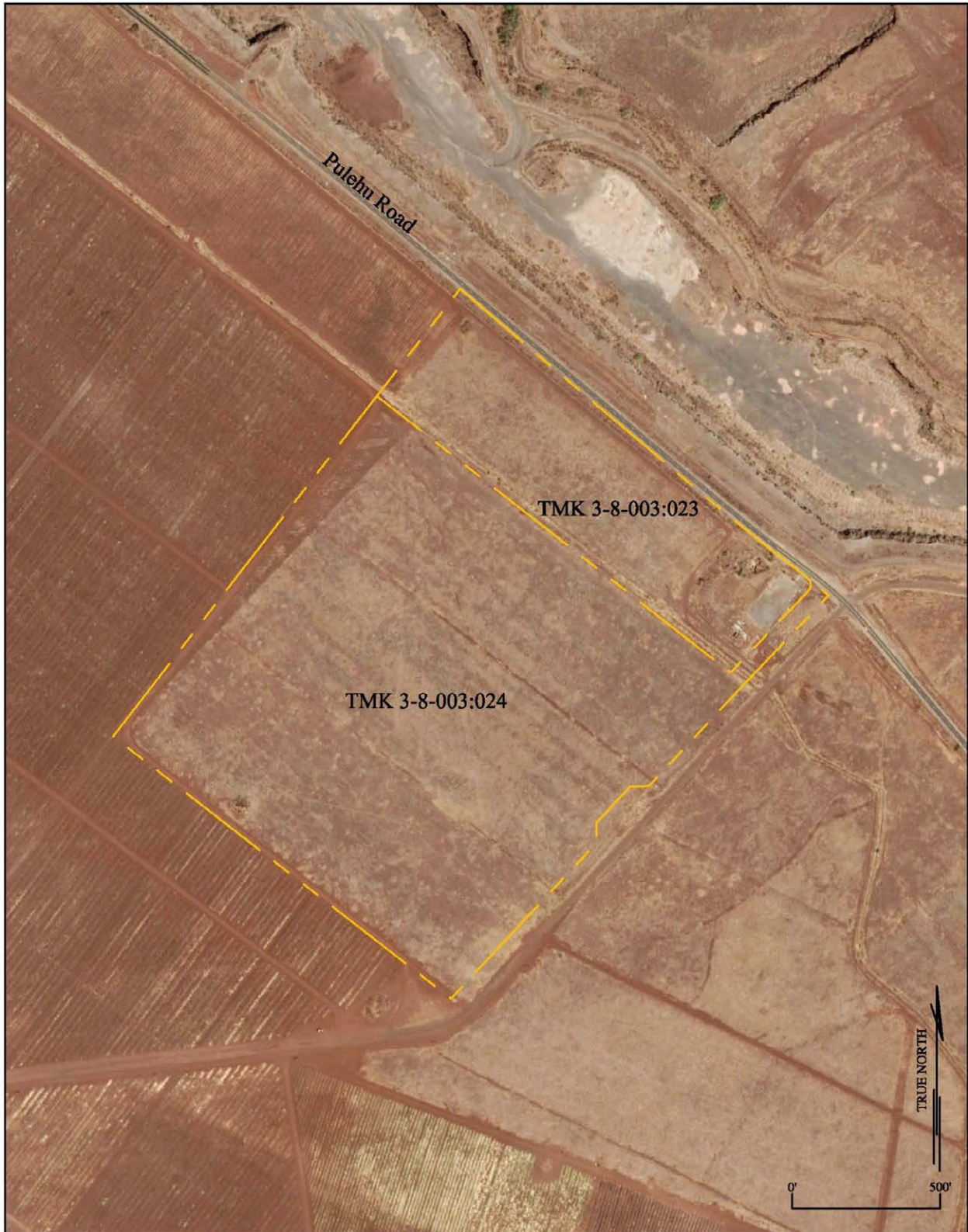


Source: Planning Solutions, Inc.

**Figure 2-2: Zoning Map**



**Figure 2-3: Aerial Photograph of Existing Site Conditions**



Source: Planning Solutions, Inc., from Google Earth, photo dated July 2022.

**Figure 2-4: Ground-Level Photographs of Existing Site Conditions**



*a. Photograph from the eastern corner of the site toward the center of the site.*      *b. Photograph from the northern corner of the site toward the center of the site.*



*c. Photograph from the western corner of the site toward the center of the site.*      *d. Photograph from the western corner of the site toward the center of the site.*

Source: Planning Solutions, Inc.; all photos taken on October 19, 2022.

**2.1.1 PREVIOUSLY APPROVED USE OF THE SUBJECT SITE**

Beginning in the late 1980s, Maui Electric began to consider potential locations for expanding firm electrical generation, the subject site was among those considered, and was selected as the preferred location for a new generating station in the mid-1990s. On March 8, 1997, an EIS Preparation Notice for the “Waena Power Generating Station” was published, followed by a Draft EIS on August 8, 1997, and a Final EIS on November 23, 1997. In 1998, the LUC as part of Docket A97-722 moved the subject site from the Agricultural District to the Urban District. The LUC amendment Decision and Order contained 17 conditions. In 2000, the County of Maui and Maui Electric Company, Ltd., now doing business as Hawaiian Electric, agreed to a Unilateral Agreement and Declaration for Conditional Zoning (UA) for the subject site and recorded it with the Bureau of Conveyances. The UA contained conditions that incorporated many of the condition from the LUC Order and Decision.

These actions approved the use of the subject site as a generating station. As disclosed in the Final EIS, the Waena Generating Station was to consist of a 232 MW electrical generating station on 65.7 acres of land located along Pulehu Road and Waiko Road in central Maui. The station was to be built in four 58 MW phases, with each phase consisting of a dual-train combined-cycle generating unit. The County of Maui UA conditions require that: (i) no more than 32.5 acres of the site could be used for conventional fossil fuel burning energy production and ancillary facilities, and fossil fuel burning energy production in that area could not exceed 66 MW; and (ii) the remaining 33.2 acres could only be used for alternative energy (i.e., research, demonstration, and/or production projects) and ancillary facilities.

As energy demand evolved and other projects were developed, Maui Electric delayed development of the Waena Generating Station.

### **2.1.2 OTHER ONGOING AND PROPOSED PROJECTS AT THE SUBJECT SITE**

Hawaiian Electric transmission lines run along Pulehu Road, and Hawaiian Electric owns the subject site; consequently, it is an attractive site for a wide range of projects. Hawaiian Electric is currently developing a switchyard on a roughly 3 acre portion of TMK (2) 3-8-003:023, which is a portion of the subject site. Such a switchyard allows for generation projects to be connected to the grid and is a necessary ancillary facility to both fossil fuels burning energy production and alternative energy production.

Hawaiian Electric has proposed to develop a 40 MW/160 MW-hour battery energy storage system (BESS) project on a roughly 1.8 acre portion of the subject site.<sup>5</sup> That proposal is unrelated to the Waena Generating Station discussed in this document; the PUC is considering the BESS proposal in the context of other proposals submitted for variable generation and energy storage on Maui.

The switchyard, proposed BESS, and proposed Waena Generating Station projects are independent, are not dependent upon on the other projects, and each can proceed with or without the other. There is ample space at the project site for these three ongoing or proposed projects. In fact, a substantial portion of the subject site would remain unutilized, and available for future projects, if all the ongoing and proposed developments, including the project proposed in this document, come to fruition.

## **2.2 PROPOSED WAENA GENERATING STATION DESCRIPTION**

The proposed Waena Generating Station consists of a roughly 40 MW generating station. At the core of the generating station would be a group of Tier 4 engines<sup>6</sup> that Hawaiian Electric proposes to operate exclusively using biodiesel (B100). Hawaiian Electric recognizes that, if this project is implemented, it may be directed to use fossil fuel or may be required to use fossil fuel in the unlikely event that biodiesel is unavailable for extended periods of time over the projected 30-year

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<sup>5</sup> A fully charged 40 MW/160 MW-hour BESS could provide up to 40 MW of power to the grid over a period of 4 hours; if it provided less power to the grid, it could do so for a longer period.

<sup>6</sup> A Tier 4 engine is one that meets the strictest EPA emissions requirement for off-highway diesel engines. Those standards regulate the amount of particulate matter (PM), or black soot, and nitrogen oxides (NOx) that can be emitted from an off-highway diesel engine; the standards reduced the emission of those pollutants by 99% compared to 1996 levels. In addition, the engines are planned to include Selective Catalytic Reduction (SCR) to achieve even lower emissions.



life of the units. Therefore, Hawaiian Electric is seeking permits that would allow it to operate the units with biodiesel or ultra-low sulfur diesel under exigent circumstances, such as emergency situations and economic considerations. After 2044, the units would only burn biodiesel because they would have to comply with the state law that requires 100% renewable energy by 2045. The generating station would also include fuel storage, emissions controls, a control center, and other ancillary equipment necessary to produce power and feed it into the island-wide grid via the Waena Switchyard. It would be capable of providing firm, dispatchable electrical power to Maui’s electrical grid 24 hours a day, 7 days a week. The proposed project would occupy approximately 11 acres of the project site.

The project components would be constructed and maintained as needed and/or per manufacturer’s recommendations. Maintenance would be conducted, as necessary, over the estimated 30-year life of the project to ensure generation availability. When the proposed improvements become obsolete or reach the end of their design life, they would be decommissioned. At that time, the site would be repurposed in a manner consistent with the then-applicable land use plans, policies, and controls.

**2.2.1 PERMITS AND APPROVALS**

The permits and approvals required to implement the proposed Waena Generating Station project are identified in Table 2-2.<sup>7</sup>

**Table 2-2: Permits and Approvals**

<i>Permit or Approval</i>	<i>Issuing Authority</i>
Covered Source Air Quality Permit	State of Hawai‘i Department of Health (HDOH), Clean Air Branch
HRS §6E-42 Historic Preservation Review	State of Hawai‘i, DLNR-State Historic Preservation Division
PUC General Order #7 (approval for project exceeding \$2.5 million in value)	Public Utility Commission
Flammable/Combustible Liquid Fuel Tank Permit	County of Maui, Fire Prevention Bureau
County Grading Permit	County of Maui, Department of Public Works
National Pollutant Discharge Elimination System (NPDES), General Construction Permit	HDOH, Clean Water Branch
Community Noise Permit	HDOH, Indoor and Radiological Health Branch

Source: Compiled by Planning Solutions, Inc.

**2.2.2 PRELIMINARY SCHEDULE**

Hawaiian Electric intends to complete all phases of the proposed Waena Generating Station, including obtaining all required permits and approvals, demolition, and construction as expeditiously as practicable. The major tasks, and their preliminary schedule for completion, are presented in Table 2-3 below.

<sup>7</sup> These permits and approvals are considered ministerial in nature; none of them meet the definition of an “approval” under HEPA, which requires a discretionary consent to proceed prior to implementation.

**Table 2-3: Preliminary Waena Generating Station Schedule**

<i>Task</i>	<i>Estimated Start Date</i>	<i>Estimated Completion Date</i>
Voluntary Environmental Impact Statement	5/2023	2/2026
Permitting, Construction Bidding, and Contractor Selection	9/2022	3/2026
Construction	3/2026	9/2027
Testing/Commissioning	9/2027	12/2027
Operation	12/2027	12/2057

Source: Compiled by Planning Solutions, Inc.

As discussed in the purpose and need section (Section 1.6), the operation date in Table 2-3 is a critical date because the Kahului Power Plant is required to be retired in 2027.

### **2.2.3 ESTIMATED PROJECT BUDGET**

The project budget will be determined once the Stage 3 RFP process for firm, renewable generation has concluded.

### **3 EXISTING ENVIRONMENT OVERVIEW**

This chapter provides an overview of the existing environmental conditions within the proposed project site, and surrounding areas, where appropriate. The information presented is drawn from recent site visits, studies conducted on the site previously, and publicly available government records. Chapter 4 discusses the studies that will be conducted during preparation of the VDEIS to augment the information summarized in this chapter so that probable project impacts can be thoroughly assessed.

#### **3.1 AIR QUALITY**

##### **3.1.1 AIR POLLUTANTS**

Air quality at a given location is a function of both the local meteorology and the amount of air pollutants emitted from sources in the area. Maui's regional air quality is influenced by agriculture, motor vehicles, air traffic, and industrial activity, including power generation; these are sources of particulate matter, carbon monoxide, and hydrocarbon emissions. Significant activities in the immediate area that can affect air quality include the Central Maui Landfill, aggregate operations, and citrus farming.

HDOH monitors fine inhalable particulate matter, with diameters that are generally 2.5 micrometers and smaller (PM 2.5). PM 2.5 are generally a result of fuel combustion such as from motor vehicles, utility generation, and industrial facilities; fine particles can also be formed when gases, such as sulfur dioxide and nitrogen dioxide, are chemically transformed into particles. PM 2.5 is measured at two ambient air quality monitoring stations on Maui, one located in Kīhei and the other in Kahului (Figure 3-1). The results of the monitoring are published annually in the State of Hawai'i Annual Summary Air Quality Data Books (available at: <https://health.hawaii.gov/cab/hawaii-air-quality-data-books/>). The available result of the monitoring performed since 2019 is summarized in Table 3-1.

**Figure 3-1: Location of HDOH Air Monitoring Stations on Maui**



Source: State of Hawai'i Annual Summary 2021 Air Quality Data, Figure 3-2.

**Table 3-1: Summary of Ambient Particulate Matter 2.5, Maui (2019, 2020, and 2021)**

Station	Analyte	Averaging Period	2019 ( $\mu\text{g}/\text{m}^3$ )	2020 ( $\mu\text{g}/\text{m}^3$ )	2021 ( $\mu\text{g}/\text{m}^3$ )	NAAQS ( $\mu\text{g}/\text{m}^3$ )	Percent of Standard
Kīhei	PM 2.5	24-hour*	16.9	7.2	5.7	35	48%
Kīhei	PM 2.5	Annual**	4.1	2.9	2.5	12	34%
Kahului	PM 2.5	24-hour*	7.6	7.1	7.3	35	22%
Kahului	PM 2.5	Annual**	3.4	3.9	3.9	12	33%

Notes: NAAQS/SAAQS = National Ambient Air Quality Standards (there is no State of Hawai'i standard for PM 2.5).

\* = Maximum of 98<sup>th</sup> percentile.

\*\* = Annual mean of all hours.

$\mu\text{g}/\text{m}^3$  = micrograms per cubic meter.

Source: State of Hawai'i Annual Summary of Air Quality Data reports for 2019, 2020, and 2021.

Ambient air quality on Maui and the subject site, as demonstrated by the data summarized in Table 3-1, complies with National Ambient Air Quality Standards. Those standards represent the maximum pollutant levels considered to be acceptable, with an adequate margin of safety, to protect public health and welfare.

### **3.1.2 REGIONAL HAZE**

In 1977, Congress amended the Clean Air Act (CAA) to include a national visibility goal to protect and restore scenic vistas in the nation's national parks and wilderness areas. In 1999, the Environmental Protection Agency issued the Regional Haze Rules (RHR) to establish goals and emission control strategies to make reasonable progress toward improving visibility by reducing haze. The RHR goal is to restore natural visibility conditions to the national parks and wilderness areas by 2064. The presence of Haleakalā National Park on Maui means that sources on Maui may be subject to the RHR. According to the EPA, the primary pollutants that cause regional

haze are particulate matter, nitrogen oxides (NO<sub>x</sub>), sulfur dioxide (SO<sub>2</sub>), and volatile organic compounds. One of the objectives (Section 1.7) of the Waena Generating Station is to make the transition from the sources that are being phased out to meet the requirements in the State of Hawai‘i *Regional Haze State Implementation Plan, Second Planning Period* (HDOH 2022) (SIP). As a result of the SIP and, as discussed therein, boilers K1 through K4 at the Kahului Power Plant will be permanently shut down by 2027, and there it is likely the SIP will be amended to address closure of certain Mā‘alaea units as well.

## **3.2 CLIMATE**

The climate of Maui is relatively uniform, characterized by moderate temperatures (70s and 80s degrees, Fahrenheit), rainy winters, moderately high humidity throughout the year, and east-northeast trade winds occurring over 70 percent of the time. Annual rainfall in the project area is about 20 inches.

## **3.3 TOPOGRAPHY, SOILS, AND GEOLOGY**

Maui was formed by two shield volcanoes, the older West Maui volcano and the younger Haleakalā volcano, which rises 10,025 feet above sea level. The project site is on the northwestern flank of Haleakalā at an elevation of roughly 350 feet. Haleakalā volcano appears to be in a stage of post-erosional eruptions, which are typically characterized by relatively localized cinder cone formation on the flanks of the volcano. The last known eruption was thought to have occurred in 1790 at La Perouse Bay; however, radiocarbon dating of charcoal associated with the eruption indicates that the flow occurred sometime between 1480 and 1600.

The project site is underlain by post-caldera lava flows of the Kula Volcanic Series, which are predominantly composed of the andesitic rock, Hawaiite. These lava flow rocks are near the surface and were quarried on the north side of Pulehu Road adjacent to the subject site. The lava flows at the ground surface in the project area have weathered to form a mantle of clayey and silty soil. The soil has been classified as the Waiakoa Series, silty clay loam occurring on 3 to 7 percent slopes. This soil is generally stony and grades to hard lava flow bedrock within roughly 5 feet of the ground surface. The storm water runoff potential of this soil is slow to medium, and the erosion hazard is slight to medium.

Elevations at the project site range from approximately 312 feet to 366 feet. The average slope from southeast to northwest across the site is about one degree.

## **3.4 NATURAL HAZARDS**

The proposed site is in the portion of Maui considered to have the lowest risk for volcanic hazards from lava flows and ashfall. The area has not been affected by lava flows for at least 20,000 years. Less than one centimeter of ash is expected to fall at an average rate of once per 1,000 years.

Most earthquakes in Hawai‘i occur on Hawai‘i Island. On Maui, the most likely area to experience earthquakes is the region of the most recent volcanic activity, along the southeast side of the east rift zones of Haleakalā, which is on the opposite side of the volcano. The project site is not an area of elevated risk of earthquake damage.

Extreme winds are known to occur on Maui because Haleakalā and West Maui volcanoes tend to channel and increase wind speeds through the central valley between them. Wind speeds during periods of strong trade winds and Kona storms can be higher than other areas due to this effect. Studies done in the 1990s indicate that extreme winds at the site could reach nearly 150 miles per hour should a strong ('Iniki-class) hurricane impact Maui; however, such a storm has not impacted Maui in recorded history.

The project area is not considered to be vulnerable to floods. It is in Flood Zone X, which is an area determined to be outside the 0.2 percent annual chance floodplain.

### 3.5 WATER RESOURCES

The project site is in a relatively dry area, with roughly 20 inches of rainfall a year, concentrated in the winter months. Because most of the precipitation is absorbed by the soil and the underlying volcanic deposits are relatively new, there are few natural surface water features in the area. The nearest gulch is Kalialinui Gulch, which is roughly 1,300 feet to the northeast of the site, across Pulehu Road and beyond the former quarry. The gulch is normally dry, is designated as intermittent, and flows only during and briefly after storm events.

An extensive irrigation system was developed in the region in the past to support sugarcane cultivation. Reservoirs and ditches associated with that system are present in the project area and a ditch crosses the site. The irrigation system components on the site are no longer used.

The project site overlies the Paia Aquifer System, which covers an area of 61 square miles and is part of the Central Maui Hydrologic Sector. The system has an estimated sustainable yield of 8 million gallons per day. Groundwater within the system occurs as basal water, occurring as a lens of less-dense fresh-to-brackish water floating on denser salt water. In general, the basal aquifer has a chloride content higher than 250 milligrams per liter, which is considered non-potable, in all areas of the central isthmus, including coastal areas and up to the Underground Injection Control (UIC) line. The project site is just below the UIC line; the groundwater beneath the site is considered non-potable. There are no drinking or irrigation wells within a mile of the site.

The general direction of groundwater flow in the vicinity of the project site is estimated to be in a northwesterly direction with ultimate movement broadly divergent westward toward the isthmus and northwesterly toward Kahului. At the nearby Central Maui Landfill long-term groundwater monitoring indicates basal groundwater (*i*) occurs at an elevation of roughly 3 feet above sea level and flows to the north-northwest at a hydraulic gradient of  $9.7 \times 10^{-5}$  foot/foot; and (*ii*) has a chloride content of roughly 130 milligrams per liter, except for one well where the chloride content exceeds 250 milligrams per liter. General groundwater movement elsewhere in the Central Maui Hydrologic Section is toward the coast.

The former project discussed in the 1997 Final EIS included the installation of production wells and injection wells. The currently proposed Waena Generation Station would require much less water and does not include the installation of production or injection wells. Therefore, the potential for water resources impacts is substantially reduced.

### **3.6 BIOLOGICAL RESOURCES**

No rare, threatened, or endangered species are known to occur on or visit the project site. There are no designated critical habitat or wildlife preserves within 3.5 miles of the project site.

The project site was a small portion of a sugarcane plantation for decades. Sugarcane agriculture ceased on the site in 2015 and has been fallow since that time. Due to the low annual precipitation at the site, the variety and size of flora that have become established there is limited. Weedy grasses dominate; seed bearing, thorny weeds are also common. In the area that has been out of sugarcane cultivation the longest, which is nearest Pulehu Road, there are also sparse weedy shrubs and trees, including koa haole, castor bean, and kiawe. The only native plants found during previous surveys in the area were ‘ilima and pa‘uohi‘iaka; individuals of those species were located along Pulehu Road near the access road to the Central Maui Landfill. Some of the nearby parcels are now planted with citrus trees with drip irrigation. The citrus plantings are recent, and the trees remain low in stature.

Because the site is dominated by weedy vegetation, it has almost no value as native bird habitat and the fauna at the site consists of introduced species. Those species likely include mongoose, rat, mouse, sparrow, egret, finch, cardinal, myna, dove, and pigeon. During past surveys, the Hawaiian Short-eared Owl (pueo) and Hawaiian hoary bat (‘Ōpe‘ape‘a) were not observed at the site. These two species are not known to frequent the area; it is not their preferred habitat. No habitat conducive to bat roosting exists on the project site. The owl and bat may occasionally visit or fly over the area though. Species of native seabird that nest in the high elevations of Haleakalā may also utilize the air space above the project site.

### **3.7 HISTORIC RESOURCES**

In 1997, Scientific Consultant Services, Inc. (SCS) conducted an archaeological inventory survey (AIS) of the project site. This section draws on that report.

The project site is situated in the Wailuku ahupua‘a, which includes the coastal area of Kahului Bay from Kapukaula to Paukukalo and the northern half of the isthmus between Haleakalā and West Maui volcanoes. The site was used for sugarcane cultivation for over 100 years, which ended in 2015. SCS deemed it unlikely that any historic resources, including archaeological sites, would be present as cane field cultivation often creates plow zones up to four feet below the surface. Indeed, no archaeological resources were identified during the survey.

In 1997, the State Historic Preservation Division (SHPD) agreed that the development of the site as a generating station would have no effect on historic resources. Hawaiian Electric will coordinate with SHPD to confirm that the proposed project would have no effect on historic resources.

### **3.8 CULTURAL RESOURCES**

Given its long history of sugarcane cultivation, the project area is unlikely to be associated with traditional cultural practices for subsistence and religious purposes and does not appear to provide access to other areas used for exercising those practices (i.e., gathering of plant and marine

resources; presence of burials, historic properties, and storied places; documentation of trails, etc.). There is no specific documentation of plant gathering within the project area during traditional Hawaiian times and no ongoing practices related to traditional gathering have been identified and are unlikely given the predominance of non-native vegetation at the site.

### **3.9 VISUAL RESOURCES**

The project site is on the lower slopes of Haleakalā and there is little topographic variation in the region. The site is near other industrial land uses, including the Central Maui Landfill. Despite the fact the site is visible from a large portion of the Wailuku ahupua‘a, the site is not important to or appear as a substantial element in any identified important views, including views identified in the scenic resources section of the heritage resources component of the *Island of Maui General Plan 2030* (County of Maui 2012). No public viewing points or scenic lookouts exist within 4 miles of the project site. The site is visible from Pulehu Road, but it does not stand out from other former sugarcane plantation land along the road or in the region.

### **3.10 NOISE**

Currently, the subject site does not generate any noise other than natural sounds generated by the wind rustling vegetation and the occasional movement of vehicles at the site. Noise generation in the region is predominately vehicles traveling on Pulehu Road, helicopters flying over the area, and activities in the industrial area to the north, which includes the Central Maui Landfill. Noise measures made in 1995 found average sound levels ranging from 54 to 60 dBA. There are no noise sensitive land uses within 3 miles of the subject site.

### **3.11 LAND USE**

The proposed site is owned by Hawaiian Electric. Land use on the proposed site consists of an electrical switchyard in the northeast portion of the site. The majority of site is unused.

The surrounding properties on the south side of Pulehu Road are large, privately-owned, and agriculturally zoned parcels that, like the project parcels, were formerly used for sugarcane production. Some of the nearby areas are now planted with citrus trees and others are fallow. The neighboring parcel on the north side of Pulehu Road is also large, privately-owned, and agriculturally zoned; it was also used for sugarcane production in the past, was a quarry in the 2000s, and is now primarily vacant and fallow. The Central Maui Landfill and related land uses are northwest of the subject site.

The nearest residential or commercial areas to the site are located over 2 miles from the site. There are no known plans to develop commercial or residential uses nearby.

### **3.12 SOCIOECONOMIC ENVIRONMENT**

The population of the island of Maui has been increasing substantially since 1970 and it is forecasted to continue increasing. Population, employment, income, and economic activity growth on the island of Maui has been closely tied to the visitor industry. Other than during the COVID



pandemic (2020 and 2021), visitor days on Maui and their spending has steadily increased. In April 2022, after pandemic travel restrictions had been relaxed, visitor arrivals were higher than they were prior to the pandemic in April 2019, indicating a strong recovery. Visitor days in 2022 will likely be more than 40 percent higher than in 2010.

**Table 3-2: Maui Island Population and Visitor Summary**

<i>Year</i>	<i>Island of Maui Population</i>	<i>Percent Change (%)</i>	<i>Island of Maui Visitor Days</i>	<i>Percent Change (%)</i>	<i>Island of Maui Visitor Expenditures (millions of \$)</i>
1960	35,717	-	-	-	-
1970	38,691	8	-	-	-
1980	62,823	62	-	-	-
1990	91,361	45	13,249,502	-	-
2000	117,644	29	15,305,826	16	-
2010	144,444	23	16,819,519	10	2,807.6
2020	154,100	7	7,553,095	-55	-
2030 (projected)	194,630	26	-	-	-

Notes: Visitor days in 2019 exceeded 24 million, which represented a 43% change from 2010, and visitor expenditures were 5,128.0 millions of \$, an 83% change from 2010. The visitor days and expenditures in 2020 were depressed by the COVID pandemic.

Sources: U.S. Census, Hawai'i Tourism Authority, and Maui Island Plan

The main population centers on Maui are Wailuku-Kahului, Kīhei-Mākena, Upcountry (Makawao-Pukalani-Kula), and Lahaina. The project site is at least 3 miles from any population center. There are a limited number of industrial jobs in the area nearby the project site.

### 3.13 TRANSPORTATION INFRASTRUCTURE

The project site is accessed from Pulehu Road, a two-lane county collector connecting the Upcountry area to Kahului. It is a rural, circuitous road with a posted speed limit of 30 miles per hour. Pulehu Road is used by Upcountry residents as an alternative route to Kahului. The primary Upcountry-Kahului connector is State Route 37, Haleakalā Highway, which is a four-lane highway with shoulders, a median, and a posted speed limit of 45 miles per hour. The nearest intersections to the site are:

- Pulehu Road-Hanson Road intersection. This is a two-way stop intersection with Pulehu Road traffic having to stop. It is roughly 3 miles from the project site, toward Kahului.
- Pulehu Road-Omaopio Road intersection. This is a “Y” intersection where makai-bound Pulehu Road traffic has a stop sign. It is roughly 2.75 miles from the project site, toward Kula.

There are agricultural roadways, known as cane-haul roads, in the region; they are gated private roads. These include Waiko Road (a.k.a. Upper Division Road) on the east side of the project site and Firebreak Road, which is near Hanson Road.

A driveway is present on Pulehu Road to access the Central Maui Landfill roughly 1 mile toward Kahului from the project site.

The likely fuel haul route from Kahului Harbor to the project site would be Hobron Avenue (State Route 32A) to Hana Highway (State Route 36) to Ho'okele Street to Pulehu Road. This route is roughly 4 miles long and passes through Kahului.

### **3.14 COMMUNITY SERVICES**

Community services in the project area are provided as follows:

- Maui Memorial Hospital is the nearest full-service hospital.
- The Maui County Police Department, headquartered at the Wailuku Civic Center, provide crime response services for the Wailuku-Kahului and Upcountry areas.
- The Kahului Station is the nearest fire station to the project site.
- The nearest recreational facility to the project site is Kamali'i Park in Kahului.

All these facilities are located over 3 miles from the site in the Kahului and Wailuku urban areas.

## 4 STUDIES TO BE PERFORMED

During the preparation of the VDEIS for the proposed project, Hawaiian Electric plans to conduct the following studies:

- Air quality and greenhouse gas study. The study will estimate the project's probable (i) emissions of criteria pollutants (those discussed in Section 3.1), air toxins, and greenhouse gases (GHG); (ii) health risks to nearby receptors from hazardous air pollutants using the latest EPA- and state-approved modeling programs; and (iii) evaluate the GHG impacts.
- Traffic study. A traffic engineer will collect data, assess existing conditions, summarize probable project-related trip generation (including fuel delivery), assess future traffic conditions, and recommend off-site roadway and intersection improvements, if appropriate. Specific intersections to be assessed include Pulehu Road and Ho'okele Street, Pulehu Road and Hansen Road, and Pulehu Road and the driveway for Central Maui Landfill.
- Archaeological assessment. A qualified archaeologist will conduct a pedestrian field inspection of the project area to confirm that the AIS performed in 1997 (Section 3.7) identified all historic properties on the subject site. Additional work may be conducted if previously unrecorded historic resources are identified.
- Cultural Impact Assessment (CIA). A CIA will be performed that meets or exceeds applicable guidelines and addresses the Hawai'i Supreme Court's Ka Pa'akai precedent. The effort will include ethnographic work with lineal and cultural descendants with ties to the property or ahupua'a and consultation with other knowledgeable individuals or groups to assess potential impacts to customary and traditional Hawaiian practices or beliefs.
- Biological assessment. The assessment will consist of a one-day inspection of the subject site by a trained biologist. The focus of the assessment will be to examine the site for the presence of native, rare, threatened, or endangered species or habitat that is likely to support them.

Reports summarizing the outcome of these studies and assessments will be appended to future Voluntary EIS document(s) and summarized in the body of future Voluntary EIS document(s).

## 5 RELATIONSHIP TO LAND USE PLANS, POLICIES, AND CONTROLS

Future Voluntary EIS document(s) will include a discussion on the proposed project's consistency with relevant State of Hawai'i and County of Maui land use plans, policies, and controls. This discussion will provide reviewers and decisionmakers with a comprehensive overview of if, and how, the proposed project is consistent with the following:

- *Hawai'i State Plan*, HRS § 226. This is a policy document that was adopted in 1978 and last revised in 1991. It is intended to guide the long-range development of the State.
- *Hawai'i 2050 Sustainability Plan*. This plan was adopted in 2008, has five major goals, and is currently being updated.
- Hawai'i Land Use Law; HRS § 205.
- Coastal Zone Management Program, HRS § 205A.
- Maui County General Plan 2030.
- Maui Island Plan.
- Maui County Zoning Code, MCC Title 19.
- Conditions of the approvals previously provided to Hawaiian Electric for use of the subject site, including: (i) LUC Docket No. A97-722 Decision and Order dated June 22, 1998, and (ii) Unilateral Agreement and Declaration for Conditional Zoning dated June 16, 2000, and filed with the Bureau of Conveyances on June 29, 2000.

## 6 PUBLIC PARTICIPATION AND DISTRIBUTION

### 6.1 PUBLIC PARTICIPATION, VOLUNTARY ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE

Section 1.5 provides details the types of input and comments that are most helpful during the public scoping period. Written public comments should be submitted by July 24, 2023. A public meeting will be held on July 11, 2023, starting at 5:30 p.m. and ending at 7:00 p.m., at the Maui Electric Auditorium, 210 West Kamehameha Avenue, Kahului, HI 96732. The meeting will also be available virtually (visit <https://www.hawaiianelectric.com/community-meetings> for information); however, those wishing to make oral public comments should attend the meeting in person.

### 6.2 VOLUNTARY ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE DISTRIBUTION

As part of Hawaiian Electric’s voluntary environmental disclosure, this document will be provided to appropriate federal, state, and county agencies, organizations, and individuals. A preliminary list of the agencies, organizations and individuals that will be sent this VEISPN is provided in Table 6-1. Additional parties or individuals may be added as the process proceeds.

**Table 6-1: Voluntary Environmental Impact Statement Preparation Notice Distribution List**

Federal Agencies	County of Maui Agencies
Army Corps of Engineers, Honolulu District	Emergency Management Agency
Department of Agriculture	Department of Environmental Management
Department of Commerce	Department of Fire and Public Safety
Department of Homeland Security	Planning Department
Department of Housing and Urban Development	Department of Parks and Recreation
Federal Aviation Administration	Department of Transportation
Federal Highway Administration	Department of Water Supply
Environmental Protection Agency	Police Department
Fish and Wildlife Service	Department of Housing and Human Concerns
	Chief Innovation Officer

Note: Continued on next page.

<b>State Agencies</b>	<b>Elected Officials</b>
Department of Agriculture	U.S. Senator Brian Schatz
Department of Accounting and General Services	U.S. Senator Mazie Hirono
Department of Business, Economic Development, and Tourism (DBEDT)	U.S. Representative Ed Case (D1)
DBEDT, Hawai'i State Energy Office	U.S. Representative Jill Tokuda (D2)
DBEDT, Office of Planning and Sustainable Development	Governor Josh Green
Department of Defense	Lieutenant Governor Sylvia Luke
Department of Education	State Senator Gilbert S.C. Keith-Agaran (D5)
Department of Hawaiian Home Lands	State Senator Angus L.K. McKelvey (D6)
Department of Health (HDOH), Environmental Health Administration	State Senator Lynn DeCoite (D7)
HDOH, Clean Air Branch	State House Representative Justin Woodson (D9)
HDOH, Clean Water Branch	State House Representative Troy N. Hashimoto (D10)
HDOH, Wastewater Branch	State House Representative Terez Amato (D11)
HDOH, Safe Drinking Water Branch	State House Representative Kyle Yamashita (D12)
Department of Human Services	State House Representative Mahina Poepoe (D13)
Department of Labor and Industrial Relations	State House Representative Elle Cochran (D14)
Department of Land and Natural Resources (DLNR), Land Division	Mayor Richard Bissen
DLNR, State Historic Preservation Division	Councilmember Alice L. Lee (Wailuku)
DLNR, Maui Branch	Councilmember Keani Rawlins-Fernandez (Moloka'i)
Department of Transportation	Councilmember Gabe Johnson (Lāna'i)
Office of Hawaiian Affairs	Council Chair Tasha Kama, Chair (Kahului)
Water Resources Research Center	Councilmember Tom Cook (South Maui)
Institute for Astronomy	Councilmember Nohelani U'u-Hodgins (Makawao)
Land Use Commission	Councilmember Tamara Paltin (West Maui)
	Councilmember Shane Sinenci (East Maui)
	Councilmember Yuki Lei Sugimura (Upcountry)
<b>Libraries and Depositories</b>	<b>Individuals and Organizations</b>
Hawai'i State Library Documents Center	Association of Hawaiian Civic Clubs
Kahului Public Library	Kula Community Association
UH Maui College Library	Sierra Club Maui
<b>Media</b>	Maui Tomorrow Foundation, Inc.
Honolulu Star Advertiser	Maui Nui Seabird Recovery Project
Honolulu Civil Beat	Maui Chamber of Commerce
Maui News	Maui Native Hawaiian Chamber of Commerce
<b>Utilities</b>	Aha Moku Council/Ke'eaumoku Kapu
Hawai'i Gas	Maui Filipino Chamber of Commerce
Hawaiian Telcom	

Source: Compiled by Planning Solutions, Inc.

## 7 REFERENCES

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