

From: [Matt Chalker](#)
To: [Planning LPC Testimony](#)
Subject: June 18 2026 Testimony
Date: Monday, June 15, 2026 5:39:07 AM
Attachments: [WSA Testimony LPC 2026-06-18 Item6 PL-SLU-2026-000016.pdf](#)
[WSA Testimony LPC 2026-06-18 Item7 PL-REZ-2026-000096.pdf](#)

Aloha,

Please see the two attached pieces of testimony in opposition to agenda items 6 and 7 for the June 18, 2026 meeting of the Leeward Planning Commission.

Mahalo,

Matt Chalker

**PL-SLU-2026-000016 (Waikoloa Green LLC, State Land Use District
Boundary Amendment, Agricultural to Urban)**

POSITION: OPPOSE unless conditioned on regional egress capacity

Aloha Chair Au and Members of the Leeward Planning Commission,

Wildfire Safety Advocates (WSA) is a Hawai'i 501(c)(3) nonprofit organization formed after the 2021 Mana Road and 2023 Lāhainā Fire to address structural wildfire risks. We submit this testimony in opposition to the requested reclassification of 14.868 acres from Agricultural to Urban, unless and until the record establishes that the regional evacuation infrastructure to serve it exists or can reasonably be assured.

We want to be precise about what we are and are not saying. WSA does not oppose housing, and we do not oppose the eventual appropriate development of this parcel. What we oppose is reclassifying land to the Urban district so that 400 to 431 multiple-family units, and ultimately a development authorizing on the order of 650 to 750 households, can be built mauka of and feeding into a community that today has one functional way out, when the application before you contains no analysis of wildfire or evacuation of any kind.

That omission is the heart of our objection. The applicant's environmental report examines flood hazard (Flood Zone X), tsunami hazard (outside the evacuation zone), volcanic hazard (Lava Zone 8), and unexploded ordnance from the former Waikōloa Maneuver Area. It does not analyze wildfire. It does not analyze evacuation. Yet the applicant's own botanical survey describes the parcel as "completely covered with grasslands," dominated by buffelgrass and fountain grass. That is precisely the flashy, fast-moving fuel that carried the 2021 Mana Road Fire and the 2023 Lāhainā fire. The Hawai'i Attorney General's FSRI Phase 2 report assessed Waikōloa's wildfire risk as marginally higher than that of Lāhainā before its tragedy. To cite hundreds of new households in that fuel bed, in the leeward corridor, and to discuss flood and tsunami while remaining silent on the one hazard that has already forced this community onto the road, is not a complete record. It is the avoidance of the question.

The State Land Use standard you must apply asks whether the area is served by adequate infrastructure and public services that "either exist or can reasonably be provided," and General Plan 2045 directs urban uses only to areas where that is true. Evacuation capacity is the infrastructure that matters most here, and the applicant's own Traffic Impact Analysis Report concedes that it does not exist. The TIAR's conclusion that area roadways will operate acceptably depends on two regional projects that are unbuilt and unfunded.

First, it assumes Daniel K. Inouye Highway Extension is in service by 2035. That corridor has been studied since 1999 and was put on hold in 2018, before any Final Environmental Impact Statement or Record of Decision was ever completed, for lack of funding. HDOT has now reinitiated the project, but according to the Department's own Spring 2026 project information

sheet, environmental review runs through 2028, design and right-of-way through 2035, and construction is scheduled only for 2031 to 2035, a timeline the Department itself marks "subject to change." The project is presently in early scoping with no preferred route yet selected among three alternatives, and those alternatives, as mapped, terminate near the Waikōloa Beach Resort and Queen Ka'ahumanu Highway, makai of and separate from Waikōloa Village. The applicant's own TIAR concedes only that the extension "may" connect to Waikōloa Road. A road that has been a quarter century in the planning, has never reached a Record of Decision, would not be built before the mid-2030s at the earliest, and may not connect to the village at all cannot supply the evacuation capacity this reclassification requires.

Second, and more striking, it assumes a full Waikōloa Village Second Access by 2045, and it ties that assumption directly to a separate developer's private project. In the words of the TIAR itself, "the Nana Kai development is currently funding the construction of a second emergency access," and "Although there are no set plans for when this second full access will be completed, it was assumed that it would be constructed when the Nana Kai development is substantially completed," with the further admission that "The final alignment of the roadway is not known at this time."

That cannot satisfy the Urban district standard. Infrastructure that "can reasonably be provided" must be infrastructure the County can actually rely on, and the County cannot rely on this. The second access is contingent on a separate developer choosing to fully build out an unrelated 1,750-home project; the County has no authority to compel that developer to build it; and even what is funded today is, by the TIAR's own description, an emergency cut rather than the permanent road, with "no set plans" for the upgrade and an alignment that "is not known." A reclassification to Urban may not rest on a facility that no party before this Commission is obligated to construct.

The applicant's own parcel proves the danger of assuming otherwise. This is the location of the former Waikoloa Highlands project, entitled for roughly 400 units, on which, in the applicant's own words, "construction... was never initiated," which is why the State Land Use Commission reverted it to Agricultural in 2019. The land before you is itself evidence that an entitlement in Waikōloa is not a road, a home, or a way out. To reclassify it now by assuming that a different entitlement will become the evacuation route this one never did is to repeat the very error this parcel records.

We know what that corridor does under threat. During the 2021 Mana Road Fire, residents of Waikōloa Village and Waiki'i were evacuated along this one road and experienced one to two hours of bumper-to-bumper traffic. The 2008 South Kohala Community Development Plan identified a permanent second access for Waikōloa Village as a very high priority. Eighteen years later it still does not exist, and this application would add to the load on the single road that does.

We note as well that the reclassification cannot be judged on this parcel alone. The relevant question is cumulative: what does adding this development do to the evacuation capacity of the whole Waikōloa community, alongside the other approved and proposed projects already in the



pipeline. The record does not ask that question, and the Commission should not answer the larger one without it.

WSA respectfully requests that the Commission decline to forward a favorable recommendation on this boundary amendment unless and until the record contains a cumulative, regional evacuation and egress capacity analysis, prepared for the Waikōloa Village and Waikiʻi evacuation shed under single-corridor conditions, demonstrating that this reclassification will not degrade the community's ability to evacuate ahead of a wind-driven fire. Absent that analysis, urbanization of this parcel is premature, and a favorable recommendation would commit the County to growth that its evacuation infrastructure cannot yet carry.

Mahalo for your consideration.

Matt Chalker
Executive Director
Wildfire Safety Advocates

