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January 14, 2025
Ms. Mary Alice Evans, Director
State of Hawai'i
Office of Planning and Sustainable Development
Environmental Review Program
235 South Beretania Street, Room 702
Honolulu, Hawai'i 96813

Subject: The Cove Redevelopment
Final Environmental Impact Statement
Tax Map Key (TMK): (1) 9-1-057:027
Kapolei, Island of O'ahu, Hawai'i

Dear Ms. Evans:

On behalf of the Applicant, Cove Campbell Kobayashi LLC, G70 is submitting the Final Environmental Impact Statement (EIS) for The Cove Redevelopment project located in Kapolei, O'ahu, Hawai'i to the State Office of Planning and Sustainable Development, Environmental Review Program for publication in the January 23, 2025, edition of *The Environmental Notice (TEN)*. In accordance with Hawai'i Administrative Rules (HAR) §11-200.1-5(e)(6)(C), the Final EIS document package has been simultaneously filed with the City and County of Honolulu Department of Planning and Permitting (DPP), the accepting authority, for acceptance pursuant to HAR §11-200.1-28.

This Final EIS consists of two volumes and has been prepared in compliance with the Hawai'i Environmental Impact Statement rules (Hawai'i Revised Statutes §343) and HAR §11-200.1.

Should you have any additional questions, please contact me at (808) 523-5866.

Sincerely,

GROUP 70 INTERNATIONAL, INC., dba G70

A handwritten signature in black ink, appearing to read 'Tracy Camuso'.

Tracy Camuso, AICP
Principal

cc: Ms. Lena Phomsouvanh, DPP

From: webmaster@hawaii.gov
To: [DBEDT OPSD Environmental Review Program](#)
Subject: New online submission for The Environmental Notice
Date: Tuesday, January 14, 2025 12:02:11 PM

Action Name

The Cove Redevelopment

Type of Document/Determination

Final environmental impact statement (FEIS)

HRS §343-5(a) Trigger(s)

- (3) Propose any use within a shoreline area

Judicial district

‘Ewa, O‘ahu

Tax Map Key(s) (TMK(s))

(1) 9-1-057:027

Action type

Applicant

Other required permits and approvals

See Section 1.10.1 of FEIS

Discretionary consent required

Special Management Area Use Permit (Major)

Agency jurisdiction

State of Hawai‘i

Approving agency

City and County of Honolulu Department of Planning and Permitting

Agency contact name

Lena Phomsouvanh

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[Map It](#)

Accepting authority

City and County of Honolulu Department of Planning and Permitting

Applicant

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Is there a consultant for this action?

Yes

Consultant

G70

Consultant contact name

Tracy Camuso

Consultant contact email

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Consultant contact phone

(808) 523-5866

Consultant address

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Honolulu, HI 96813
United States
[Map It](#)

Action summary

The Applicant proposes to redevelop the the approximate 10.85-acre property located adjacent to the coastal resort area of Kapolei, O'ahu. The first major property improvement in over 25 years, the Project includes the replacement

of existing structures with a new performing arts venue and updated lū'au show. Improvements also include ancillary uses, such as restaurants, retail, and cultural/educational programming, creating an authentic Hawaiian community gathering place that honors history, culture, and connection to place.

Attached documents (signed agency letter & EA/EIS)

- [The-Cove-Final-EIS-Vol-1.pdf](#)
- [The-Cove-Final-EIS-Vol-2-Appendices.pdf](#)
- [The_Cove_FEIS_ERP_Publication_Letter.pdf](#)

Shapefile

- The location map for this Final EIS is the same as the location map for the associated Draft EIS.

Action location map

- [ProjectParcel.zip](#)

Authorized individual

Dalton Beauprez

Authorization

- The above named authorized individual hereby certifies that he/she has the authority to make this submission.

The Cove Redevelopment

FINAL ENVIRONMENTAL IMPACT STATEMENT (EIS)

VOLUME I: EIS DOCUMENT

KAPOLEI, ISLAND OF O'AHU, HAWAI'I



APPLICANT:

Cove Campbell Kobayashi LLC

PREPARED BY:



111 S. King Street, Suite 170
Honolulu, Hawai'i 96813

JANUARY 2025

THE COVE REDEVELOPMENT

Kapolei, Island of O‘ahu, Hawai‘i

Tax Map Key: (1) 9-1-057:027

Final Environmental Impact Statement Volume I: EIS Document

Applicant:

Cove Campbell Kobayashi LLC

Prepared By:



111 S. King Street, Suite 170
Honolulu, Hawai‘i 96813

January 2025

This Final Environmental Impact Statement and all ancillary documents were prepared under my direction or supervision, and the information submitted, to the best of my knowledge, fully address document content requirements set forth in Hawai‘i Revised Statutes, Chapter 343 and Hawai‘i Administrative Rules § 11-200.1 Subchapter 10.


Tracy Camuso, AICP
Principal Planner

January 14, 2025

Date

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Volume II: Appendices

A. Comment Letters

A-1: EISPN Comment Letters

A-2: Draft EIS Comment Letters

- B. Cultural Surveys Hawai'i, Inc. ~~2020-2024~~. *Draft Archaeological Inventory Survey Report for The Cove Redevelopment Project, Honouliuli Ahupua'a, 'Ewa District, O'ahu*. Prepared for the James Campbell Company, LLC. ~~February 2020~~ November 2024.
- C. Cultural Surveys Hawai'i, Inc. ~~2022-2024~~. ~~Draft~~ *Cultural Impact Assessment for The Cove Redevelopment Project, Honouliuli Ahupua'a, 'Ewa District, O'ahu*. Prepared for the James Campbell Company, LLC. ~~November 2022~~ November 2024.
- D. Wilson Okamoto Corporation. 2024. *Traffic Impact Report for The Cove Redevelopment*. Prepared for James Campbell Company LLC. ~~March~~ November 2024.
- E. Fehr & Peers. 2024. *Parking Management Plan for The Cove Redevelopment Project*. Prepared for James Campbell Company. ~~May 28, 2024~~ November 18, 2024.
- F. G70. 2024. *The Cove Redevelopment Preliminary Engineering Report*. Prepared for Campbell Hawai'i Investor, LLC. ~~March~~ November 2024.
- G. Commercial Plumbing Inc. 2024. Blackwater System Description Memo. October 4, 2024.
- H. Y. Ebisu & Associates. 2024. *Acoustic Study for The Cove Redevelopment, O'ahu, Hawai'i*. ~~May~~ September 2024.
- I. Environmental Economics, LLC. 2024. *Final Economic Impact Report for the Cove Redevelopment*. ~~May~~ August 2024.

Abbreviations

ADA	Americans with Disabilities Act
AIS	Archaeological Inventory Survey
AMP	Archaeological Monitoring Plan
AVO	Average Vehicle Occupancy
BFE	Base Flood Elevation
BMPs	Best Management Practices
BOD	Biochemical Oxygen Demand
<u>BSCDRP</u>	<u>Burial Site Component of a Data Recovery Plan</u>
<u>BSCPP</u>	<u>Burial Site Component of a Preservation Plan</u>
BWS	Honolulu Board of Water Supply
Campbell Estate	Trustees Under the Will and of the Estate of James Campbell, Deceased
CAB	Clean Air Branch
CAP	Climate Action Plan
CCD	Census County Division
<u>CCK</u>	<u>Cove Campbell Kobayashi LLC</u>
cfs	Cubic feet per second
City	City and County of Honolulu
CIA	Cultural Impact Assessment
CUP	Conditional Use Permit
CSH	Cultural Surveys Hawai'i
CWB	Clean Water Branch
DBEDT	Department of Business, Economic Development, and Tourism, State
DLNR	Department of Land and Natural Resources, State
DOE	Department of Education, State
DOFAW	Division of Forestry and Wildlife
DP	Development Plan
DPP	Department of Planning and Permitting, City
DMAP	Destination Management Plan
DNL	Day-Night Average Sound Level
DRM	Division of Road Maintenance, City DFM
DTS	Department of Transportation Services, City
EA	Environmental Assessment

EIR	Economic Impact Report
EIS	Environmental Impact Statement
EISPN	EIS Preparation Notice
ERP	Environmental Review Program
EV	Electric vehicle
FAA	Federal Aviation Administration
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
FOG	Fats, Oils and Greases
FTE	Full-time equivalent
GHG	Greenhouse gas
Gpd	Gallons per day
Gpm	Gallons per minute
HAR	Hawai'i Administrative Rules
HDOH	Department of Health, State
HFD	Honolulu Fire Department
HI-EMA	Hawai'i Emergency Management Agency, State
HPD	Honolulu Police Department
HRS	Hawai'i Revised Statutes
IMPLAN	Impact Analysis for Planning
ITE	Institute of Transportation Engineers
JCC	James Campbell Company
JRF	Kalaeloa Airport
Kamokila	Alice Kamokilaikawai Campbell
KOCA	Ko Olina Community Association
<u>KOD</u>	<u>Ko Olina Development</u>
KORA	Ko Olina Resort Operators Association
<u>KPK</u>	<u>Ka Pa'akai</u>
LCI	Lanikūhonua Cultural Institute
LID	Low Impact Development
LOS	Level of Service
LTS	Level of Traffic Stress
LUC	Land Use Commission
LUO	Land Use Ordinance

Mph	Miles per hour
MSL	Mean Sea Level
NAAQS	National Ambient Air Quality Standards
NFPA	National Fire Protection Agency
<u>NHO</u>	<u>Native Hawaiian Organization</u>
NMFS	National Marine Fisheries Service
No.	Number
NOAA	National Oceanic and Atmospheric Administration
NPDES	National Pollutant Discharge Elimination System
OCCSR	Office of Climate Change, Sustainability, and Resiliency
OTS	O'ahu Transit Service
PER	Preliminary Engineering Report
PMP	Parking Management Plan
PUC	Primary Urban Center
Q	Runoff Flow
OEQC	Office of Environmental Quality Control, State
Resort	Ko Olina Resort
ROH	Revised Ordinances of Honolulu
ROW	Right-of-Way
Sf	Square feet
SFHA	Special Flood Hazard Area
SHPD	State Historic Preservation Division
SIHP	State Inventory of Historic Places
SLR	Sea level rise
SLR-XA	SLR Exposure Area
SMA	Special Management Area
SSV	Shoreline Setback Variance
State	State of Hawai'i
SDG	Sustainable Development Goals
<u>TAM</u>	<u>Technical Assistance Memorandum</u>
<u>TDM</u>	<u>Traffic Demand Management</u>
TIR	Traffic Impact Report
TMK	Tax Map Key
TNC	Transportation Network Company

UA	Unilateral Agreement
<u>UDP</u>	<u>Urban Design Provisions</u>
UN	United Nations
UPC	Uniform Plumbing Code
USDA	U.S. Department of Agriculture
USFWS	U.S. Fish and Wildlife Service
WUI	Wildland-Urban Interface
XTEZ	Extreme Tsunami Evacuation Zone

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Section 1

Project Summary

Section 1

Project Summary

This section provides an overview of the contents and purpose of the Environmental Impact Statement (EIS) for The Cove Redevelopment project (hereinafter referred to as the “Project,” “The Cove,” or “Proposed Action”). In this section, the Project and its potential impacts, the proposed mitigation measures, as well as Project alternatives, are summarized.

1.1 Project Information Summary

Applicant:	Cove Campbell Kobayashi LLC (<u>CCK</u>) ¹ 1288 Ala Moana Blvd., Suite 201 Honolulu, Hawai‘i 96814 Contact: Matthew Pennaz, Manager Phone: (808) 524-1508 Email: mpennaz@kobayashi-group.com
Accepting Authority:	City and County of Honolulu Department of Planning and Permitting (DPP) 650 South King Street, 7th Floor Honolulu, Hawai‘i, 96813 Contact: Lena Phomsouvanh Phone: (808) 768-8052 Email: lena.phomsouvanh@honolulu.gov
Name of Action:	The Cove Redevelopment ²

¹ The Environmental Impact Statement Preparation Notice (EISPN) published for the Project on June 23, 2021 identified James Campbell Company LLC as the Applicant. Subsequently, a new development partnership, Cove Campbell Kobayashi LLC, was formed to develop the Project. As such, they are now the Applicant and were identified as such in the First Draft Environmental Impact Statement that was published on May 8, 2024.

² The First Draft Environmental Impact Statement (EIS) published on May 8, 2024 referred to the Project as “The Cove at Ko Olina Redevelopment.” The Applicant was subsequently informed that the term “Ko Olina” is a trademarked term and ~~has~~ agreed to cease use of “Ko Olina” as a project descriptor. Accordingly, the name of the Project has been revised to “The Cove Redevelopment.” On May 20, 2024, the State Office of Planning and Sustainable Development, Environmental Review Program was informed of the name change and the intent to publish a this Second Draft EIS with the revised Project name. The Second Draft EIS, identifying the Project as “The Cove Redevelopment” was published on June 8, 2024.

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Project Location: Kapolei, 'Ewa District, O'ahu, Hawai'i
(*Figure 1.1*)

Address: 92-1089 Ali'inui Drive
Kapolei, HI 96707

Tax Map Key (TMK): (1) 9-1-057: 027 (*Figure 1.2*)

Landowner: Campbell Hawaii Investor LLC

Land Area: 10.85 acres (472,757 square feet (sf))

State Land Use District: State Land Use Urban District (*Figure 1.3*)

**City and County of Honolulu Zoning
(Land Use Ordinance (LUO)):** B-1, Neighborhood Business District (*Figure 1.4*)

**'Ewa Development Plan (2013, amended
2020) Land Use Map:** Resort/Recreation Area (*Figure 1.5*)

Exhibit 3.6: Ko Olina Land Use Map: Resort (*Figure 1.6*)

Special Management Area (SMA): Within SMA (*Figure 1.7*)

**Federal Emergency Management Agency
(FEMA) Flood Zone:** D, Area of Undetermined Flood Hazard and VE, Coastal
Flood Zone with Velocity Hazard; Base Flood Elevation
(BFE) Determined (*Figure 1.8*)



Figure 1.1

Project Location Map



Figure 1.2

Tax Map Key (1) 9-1-057:027



Figure 1.3

State Land Use District

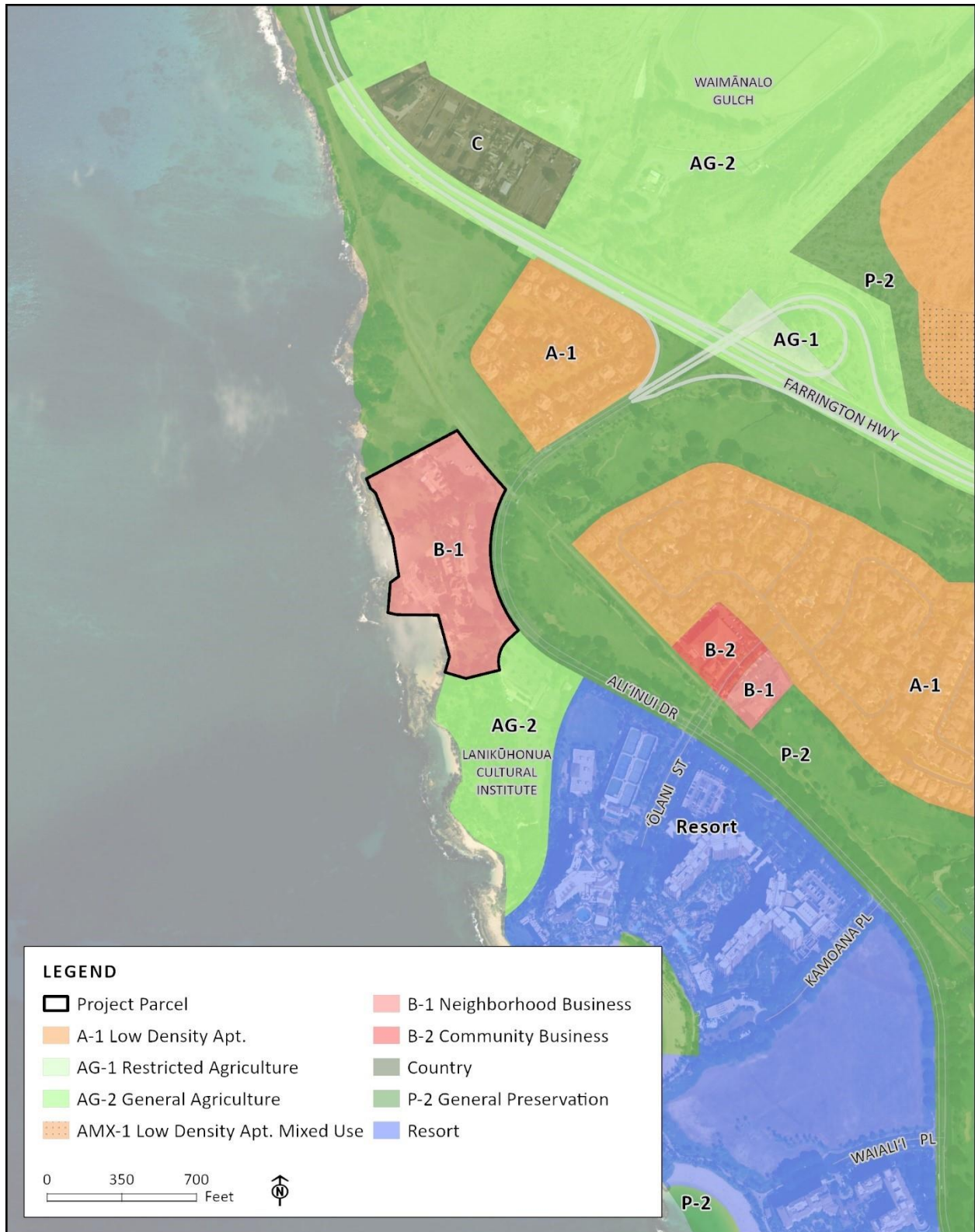


Figure 1.4

City and County of Honolulu Zoning

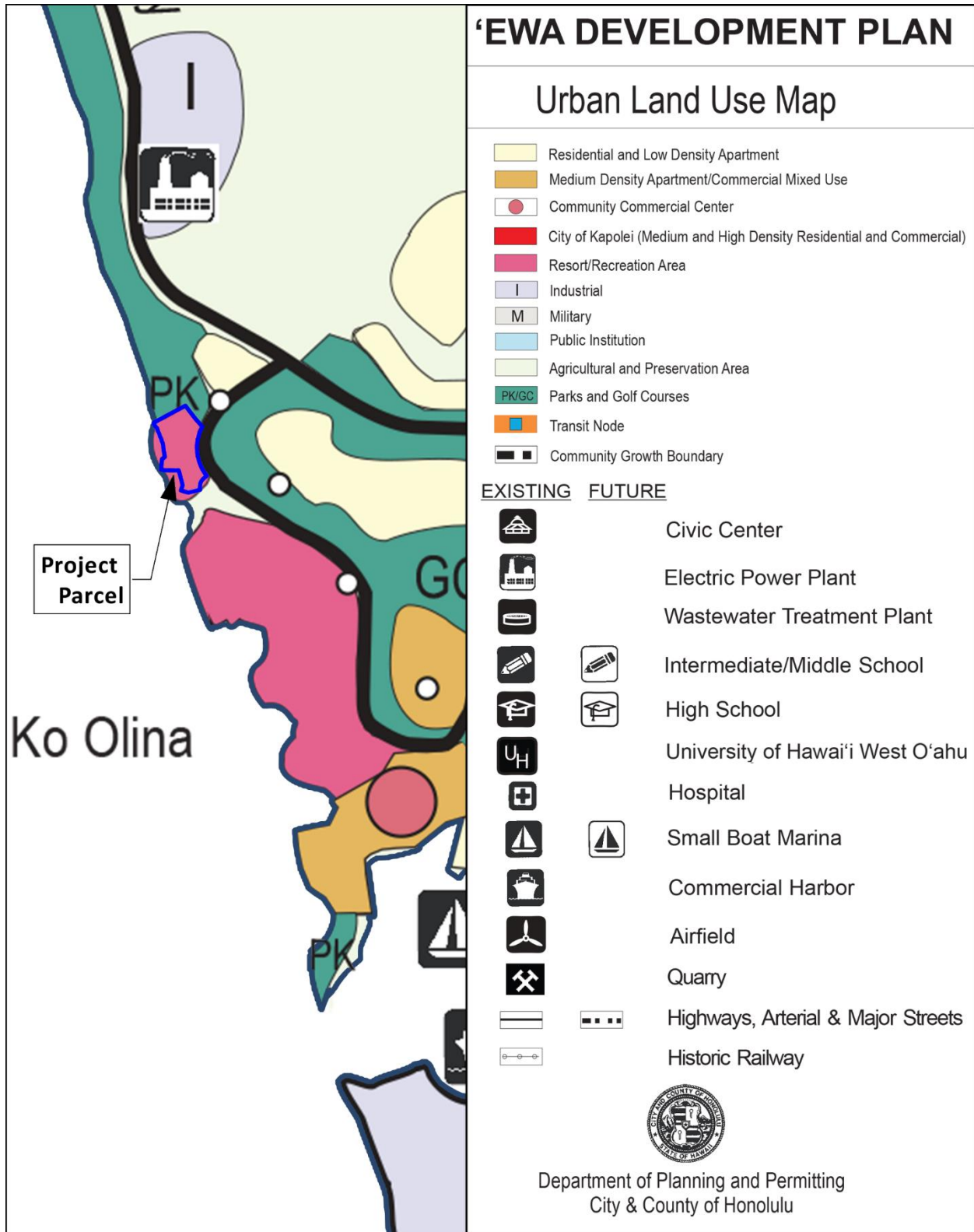


Figure 1.5

‘Ewa Development Plan (2013, amended 2020) Land Use Map

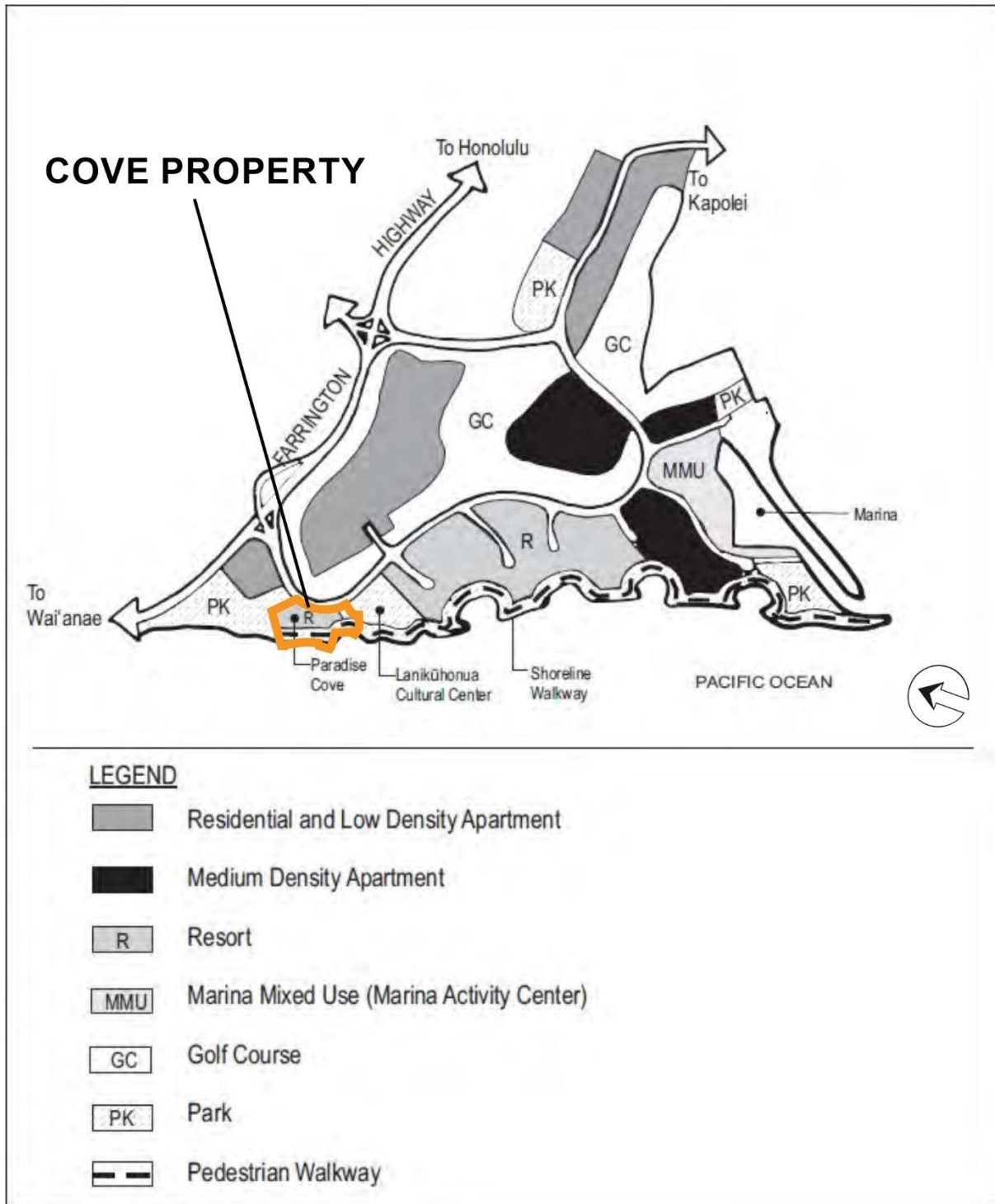


Figure 1.6 'Ewa Development Plan Exhibit 3.6 "Ko Olina Land Use Map" (2013, amended 2020)



Figure 1.76

Special Management Area

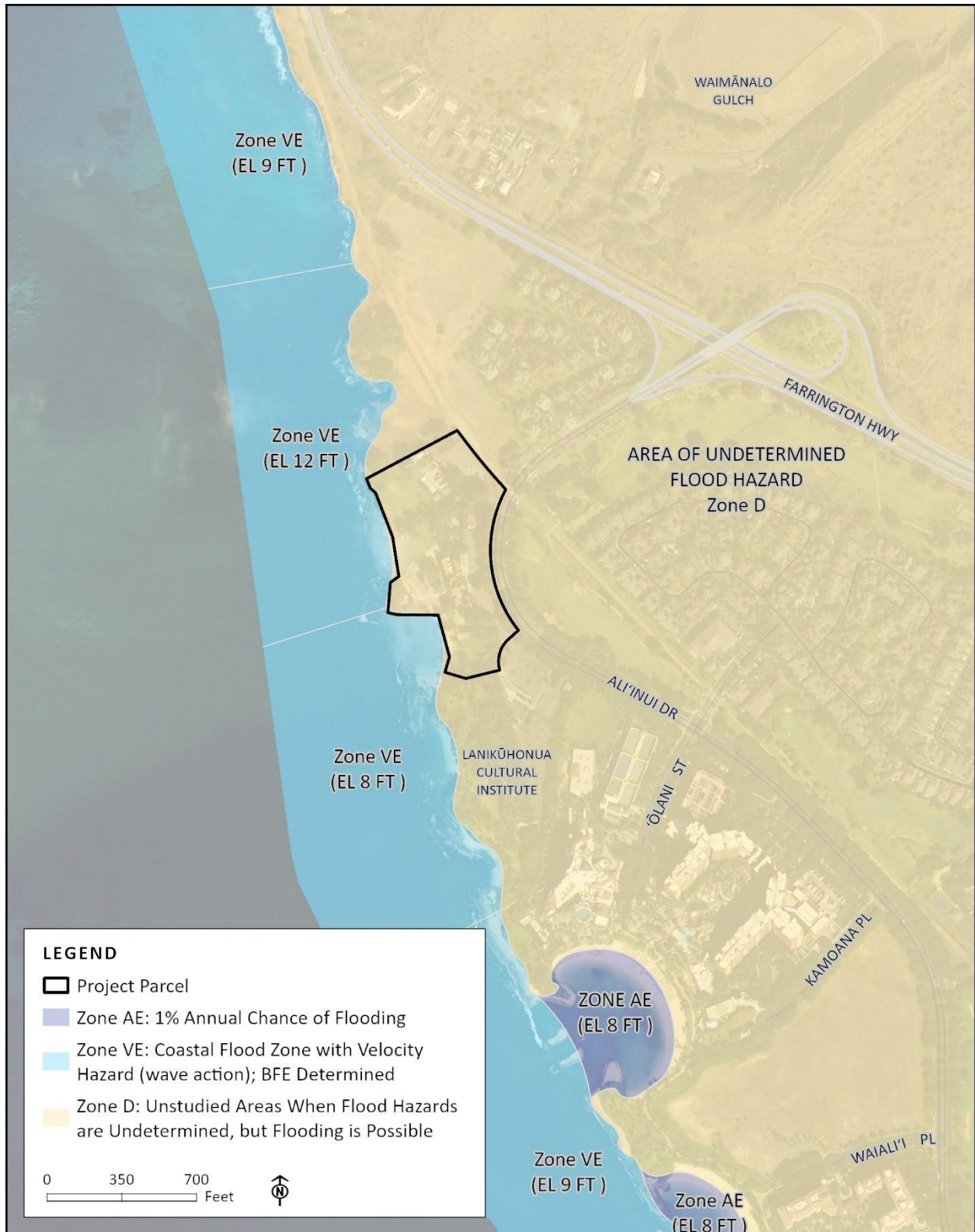


Figure 1.87

FEMA Flood Zone

1.2 Introduction and Background

Cove Campbell Kobayashi LLC (the Applicant) plans to improve the 10.85-acre property identified as (1) 9-1-057:027 (the Cove Property or Project site). The Cove Property is owned by Campbell Hawaii Investor LLC and located between Ali'inui Drive and the shoreline, adjacent to the entrance of the neighboring Ko Olina Resort. The site is currently leased and occupied by several commercial uses comprised of commercial lū'au, wedding, and entertainment operations. PC Services Inc. operates the existing commercial lū'au, Paradise Cove. The lease is anticipated to end in 2025.

Prior to its commercial use, the site was part of the neighboring Lanikūhonua property, which was the residence of Alice Kamokilaikawai Campbell (1884-1971) for over thirty years. Kamokilaikawai Campbell was the daughter of James Campbell (1826-1900), who acquired the properties in 1877 as a part of his purchase of the Honouliuli ahupua'a. Today, the on-site facilities that house the current entertainment business date from the property's last major redevelopment in the early 1990's when it was rezoned and subdivided in recognition of its long-time commercial use.

Use of the Cove Property has been primarily for commercial lū'au, wedding, and entertainment operations since the late 1970's per the approval of a Conditional Use Permit (CUP) by the City and County of Honolulu (City) Department of Planning and Permitting (DPP). The CUP permitted the establishment and operation of a private commercial lū'au as a recreation and amusement facility within the AG-2 General Agricultural District (File No. CUP 79/CUP-15). A Special Management Area (SMA) Use Permit was also approved for the facility, which included a provision for a public beach right-of-way (ROW) through the property (Resolution No. 79-35).

Subsequently, a zone change was approved for the property, which rezoned the site from AG-2, Agricultural to the B-1, Neighborhood Business District. Accordingly, a Unilateral Agreement (UA) for Conditional Zoning was approved on February 13, 1989 (Ordinance No. 89-27) (the UA). The UA imposes conditions on the Cove Property, including limiting commercial activity to restaurants and retail associated with a "Hawaiian Theme Park" and a commercial lū'au operation; limiting lot coverage to 30 percent; and requiring a 40-foot-wide strip along the seaward property boundary to remain free of structures and improvements.

The first major redevelopment of the property occurred in the early 1990s. A Final Environmental Assessment (EA) for Paradise Cove was published in August 1993 to support the SMA and CUP applications for that redevelopment project the Project (1993 Paradise Cove EA). An SMA Use Permit was approved by the Honolulu City Council (Resolution No. 93-318) to allow the redevelopment and expansion of commercial facilities at the property consistent with the site's B-1, Neighborhood Business District zoning designation and the rezoning approval that had been enacted for the Cove Property on February 13, 1989 (Ordinance No. 89-27). The SMA Use Permit approval required that lateral public beach access bordering the west of the Cove Property (the Cove) be provided in perpetuity, and that beach activities be limited to snorkeling, swimming, sunbathing, scuba diving, hukilau events, and other passive activities unless otherwise approved by the Planning Director. The range of permitted activities on the public beach were intended to not unreasonably interfere with or preclude the use of the public beach by the general public. Additionally, the landowner was required to provide no less than five public parking spaces that were for beachgoers, which were to be included in the 15 that are required of the adjacent Lanikūhonua property. A CUP (File No. 93/CUP-2-7 (Type 2)) was also approved for the redevelopment and was subsequently modified in 1999 to add a 1,530-square foot wedding chapel. Minor renovations and additions to existing structures on the site followed in 2006 and 2014. The site includes off-street parking stalls, and additional parking at the adjacent Lanikūhonua facility permitted under a variance and CUP (File No. 94/VAR-70 and 97/CUP1-69).

The redevelopment of the site as The Cove will be the first major improvement of the property in over 25 years. The Applicant plans to revitalize the Cove Property by replacing existing dated structures and programming with The Cove, which will include a new performing arts venue, restaurants, retail, and programming that creates an authentic Hawaiian community gathering place that honors and reflects the history, culture, and connection to place.

The Cove Property and surrounding area is a popular destination in the 'Ewa region of O'ahu with significant history and natural resources. The purpose of the redevelopment is to update the Cove Property into a contemporary, authentic Hawaiian gathering place; expand dining, retail, and entertainment experiences for local kama'āina and visitors; modernize facilities; expand employment opportunities; and support local artisans and makers. A more detailed discussion of the Project purpose and need and the Project objectives is provided in Section 2.0.

1.3 Environmental Review Under Hawai'i Revised Statutes, Chapter 343

This document is prepared in accordance with the requirements of Hawai'i Revised Statutes (HRS), Chapter 343, Hawai'i Environmental Protection Act (HEPA), as amended, and Hawai'i Administrative Rules (HAR), Chapter 11-200.1. The HAR establishes procedures for EIS preparation and processing as administered by the State of Hawai'i (State) Office of Planning and Sustainable Development (OPSD) Environmental Review Program (ERP).

Based on the significance criteria set forth in HAR, Chapter 11-200.1-13, the DPP has determined that the planned improvements and actions have the potential to result in significant impacts to the environment. Therefore, the EIS is prepared to provide an analysis of the potential Project-related impacts and propose mitigation measures.

The environmental review process for this Project was initiated with the publication of the Environmental Impact Statement Preparation Notice (EISPN) in the June 23, 2021 edition of *The Environmental Notice*. The EISPN underwent a 30-day review period from June 23, 2021 through July 23, 2021. Publication of the EISPN was also followed by a virtual EIS Scoping Meeting pursuant to HAR, Chapter 11-200.1-23 held on July 7, 2021. Comments received during the public review period and public scoping meeting are provided in *Appendix A*. Responses to each comment are provided in *Section 7.0*.

The EISPN public comment period and EIS Scoping Meeting solicited guidance on the scope of the studies to be prepared and gathered input on important topics to be covered in the EIS. Additionally, as the last environmental review document prepared for the Cove Property, the 1993 Paradise Cove EA was also considered in the analysis of the preparation of the EIS.

A Draft EIS referring to the Project as "The Cove at Ko Olina Redevelopment" was formally submitted and published by the State OPSD-ERP in the May 8, 2024 edition of *The Environmental Notice*. Following this publication, a 45-day public comment period commenced. The Applicant was subsequently informed by a letter dated May 10, 2024 sent on behalf of Ko Olina Development, LLC and Ko Olina Intangibles, LLC that the geographic descriptor "Ko Olina" was trademarked. Accordingly, the name of the Project ~~has been~~ was revised to "The Cove Redevelopment." Additionally, on May 20, 2024, the State OPSD-ERP was informed of the name change and the intent to publish this the Second Draft EIS.

~~Upon publication of the The Second Draft EIS was subsequently published on June 8, 2024, and the Project will undergo was followed by another 45-day public comment period. A total of 46 agencies, organizations, and individuals provided comments on the Draft EIS (Table 7.1). Copies of each comment letter are provided in Appendix A-2. The substantive comments received during both review periods will be have been addressed, and written responses will be are provided and incorporated into Table 7.3 in Section 7.5 of the Final EIS.~~

1.4 Summary of the Proposed Action

The Applicant plans to redevelop the 10.85-acre property as The Cove. The planned improvements will update the Cove Property to create an authentic Hawaiian community gathering place for kama'āina (local Hawai'i residents) and visitors that honors and reflects the history, culture, and connection to this place. The Project will provide experiences that incorporate Hawaiian themes and cultural activities to support its use as an outdoor amusement facility as defined in the City Land Use Ordinance (LUO) (Revised Ordinances of Honolulu (ROH), Chapter 21). The commercial lū'au will continue to be the focal point of the Cove Property, and redevelopment of the site will include the relocation and construction of a new amphitheater/performing arts venue capable of housing a daily-run entertainment experience focused on perpetuating and honoring Hawaiian culture. The new amphitheater/performing arts venue may accommodate up to 650 guests at one time, a reduction from the existing venue's maximum capacity of 1,200 guests. Ancillary improvements to update and modernize the Cove Property and complement the Hawaiian community gathering place and commercial lū'au will include the addition of restaurants showcasing local cuisine and agricultural products, a "Village Walk" consisting of small-scale retail shops, a marketplace hosting goods including those made in Hawai'i, and attractive, engaging common areas. The existing wedding chapel and support building will remain in place and may be renovated.

The Cove Property will be enhanced with pedestrian pathways, which will improve connectivity and circulation throughout the site. A cultural pavilion and open space gathering areas or lawns are incorporated throughout the site and are intended to host Hawaiian cultural educational or interactive experiences during various hours of the day. Open space areas will preserve views and include lush landscaping to create a relaxed, inviting setting. The site layout will enhance existing views of the ocean for visitors by locating key gathering areas, such as the new amphitheater/performing arts venue and restaurants, along the coast.

In addition to a renewed lū'au show, potential programming associated with the Hawaiian community gathering place and lū'au may include, but not be limited to, pre- and post-show cultural events, cultural arts demonstrations of lei- and kapa-making, canoe/wa'a-related activities, imu demonstrations, commercial activities highlighting the sense of the place, wedding and other event receptions, ~~corporate retreats~~, community events, or coordinated events and programs with the neighboring Lanikūhonua Cultural Institute. The Applicant will continue to explore programming opportunities, including those that highlight relevant community-based and/or cultural organizations consistent with the use of the property as a Hawaiian Theme Park and commercial luau operation.

Redevelopment of the Cove Property will adhere to existing regulations and approvals for the site (e.g., rezoning Ord. 89-27), which limit coverage of the property to no more than 30 percent of the lot, thereby maintaining a natural setting of open space and preserving ocean/makai views. Architectural themes and extensive landscaping and screening will enhance the welcoming feel of the property and create a sense of place. Structures will be set back at least 60 feet from the shoreline (greater than the 40 feet setback established under Ord. 89-27) in order to consider long-term resiliency and the impacts of climate change, the natural and cultural sensitivity of the nearshore areas, and to ensure

open access to the shoreline. Other considerations for the site layout include maintaining the current level of beach access to protect the beach and natural cove/lagoon, which is a valued resource in the area.

A detailed description of the Project is provided in *Section 3.0*.

1.5 Summary of Alternatives Considered to the Proposed Action

HAR, Chapter 11-200.1-24(h) requires that an EIS discuss the alternative of No--Action as well as reasonable alternatives that could attain the objectives of the action.

The EIS assesses viable alternatives to the Proposed Action so that decision-makers and the Applicant may consider all impacts, benefits, and mitigative measures to make an informed decision on the best path forward to meeting the Project goal and objectives, as further discussed in *Section 6.0*. In developing reasonable alternatives for this EIS, the Applicant also considered comments gathered during the consultation and outreach process. As a result, the following four alternatives to the Proposed Action are considered:

- No-Action
- Delayed Action
- Alternative Design
- Alternative Use

Ratings were then developed to evaluate each alternative in terms of satisfying each Project Objective. Additionally, in response to comments received on the Draft EIS, a further analysis of the environmental impacts associated with each alternative has been provided. Notably, each alternative assumes the expiration of the current commercial lease (scheduled to terminate in 2025). Refer to *Section 6.0* for the full evaluation. A summary describing each alternative is provided in the following sections.

1.5.1 No-Action Alternative

The No-Action Alternative would maintain the existing substandard structures in place until expiration of the current commercial lease (~~the lease is anticipated to end~~ scheduled to terminate in 2025), at which point they would be removed consistent with the restoration provision in the lease. This approach would result in a prolonged vacancy of the Cove Property, impeding the realization of site improvements, including the addition of new retail and restaurants and, new activities and programming, enhanced circulation within the site and drainage improvements, and ~~enhanced limiting~~ access to the shoreline area from within the Project site.

Under the No-Action Alternative, other short-term site improvements such as regularly scheduled, minimal landscaping maintenance could continue to be made to prevent debris accumulation and overgrowth. However, this fragmented approach would not achieve an effective, cohesive, and holistic revitalization of the property. ~~to be made within the property to attract visitors. However,~~

Under the No-Action Alternative, the Cove Property would remain vacant and unused, consequently reducing the number of operational entertainment destinations on O'ahu. Historically operating as a Hawaiian-themed outdoor recreation facility and an entertainment venue since the late 1970's, the Cove Property has long been used consistently with its land use designation in the 'Ewa DP. Under the

No-Action Alternative, the Cove Property would not reach its full potential of a world-class retail, entertainment, cultural, and educational destination for locals and visitors, and the existing site would remain vacant, which is inconsistent with the City's vision for the Project area and the wider 'Ewa region.

Additionally, there would be no positive benefit of new employment opportunities, particularly in the 'Ewa region for the construction industry or long-term operational employment in support of the retail, dining, and entertainment uses. Off-site businesses that would have provided additional goods and services to the expanded number of visitors that would otherwise come to the Cove Redevelopment at the Site would also not benefit, ultimately having a negative impact on the economy and community. The No-Action Alternative scores poorly across key evaluation criteria, particularly in optimizing the potential for the site, creating a vibrant community gathering place, and fostering economic growth.

Some commentors on the Second Draft EIS proposed renegotiating the lease and leaving the Cove Property as-is. However, this scenario would conflict with the objectives of the proposed Project and avoid meeting current environmental review standards pursuant to HRS, Chapter 343 and ROH, Chapter 25. For these reasons, the No-Action Alternative was not considered a viable alternative but is nevertheless analyzed in Section 6.0.

1.5.2 Delayed Action Alternative

The Delayed Action Alternative involves postponing construction of the new facilities to a date in the future. Under this scenario, either the existing substandard structures may be removed at the end of the current commercial lease, or they may remain in place until the Applicant proceeds with redevelopment of property at a later date. Under both scenarios, regularly scheduled landscaping maintenance could continue. Commercial operations at the site could continue, though no site improvements would occur. As a result Should the existing structures remain in place, the structural integrity of the ~~existing~~ buildings may deteriorate and could potentially pose a risk to the safety of visitors. The deterioration of existing buildings would be a liability for the Applicant and could result in higher overall costs due to the need for constant repairs.

Improvements to the site will address the need for overdue upgrades and create opportunities to increase available programs and activities on the property. Proposed improvements will also provide a highly desirable experience for both locals and visitors, supporting the projected increase of population in the 'Ewa region and in annual visitors. Under the Delayed Action Alternative, these opportunities would not be realized in a timely manner that would serve the economic needs and benefits of the Kapolei area or the State.

In the long-term, delaying construction to a future date would postpone employment opportunities for locals, ~~reduce local area economic recovery until the redevelopment is actualized,~~ and delay needed government revenues for the State. Construction and material costs would also continue to rise due to inflation, making the redevelopment more difficult to achieve.

Although this alternative avoids the immediate impacts of large-scale construction, delaying the Project would hinder timely delivery of positive and beneficial impacts. While limited commercial operations could continue if the structures remain temporarily in place after the current tenant's lease ends, these activities would not provide the same level of economic or community benefits as a redevelopment. The Delayed Action Alternative scores poorly across key evaluation criteria, particularly in creating a vibrant community gathering place, fostering economic growth, and addressing long-term

resilience of the site. For these reasons, the Delayed Action Alternative is deemed impractical for the Applicant's long-term plans and vision for the Cove Property.

1.5.3 Alternative Design

Under this alternative, existing structures would be demolished and the Project program would be constructed and comprised of structures characterized by increased density and up to 40 feet in height. The lot coverage on the site would reach the maximum of 30 percent allowed under the UA (Ordinance No. 89-27) and zoning, in contrast to the approximately 13.84 percent proposed under the Preferred Alternative. To achieve the maximum building area, setbacks may be minimized on the property, which would result in decreased open space and the creation of larger structures with increased massing. Consequently, planned gathering lawns would be substantially reduced. This expanded building footprint may demand additional parking that could only be accommodated in a multi-level parking structure. The intensified density would contribute to increased adverse impacts related to traffic, noise, GHG emissions, and air quality, and would increase infrastructure demand. Additionally, the introduction of more massive structures would adversely impact viewsheds on the site.

The Alternative Design could include structures within the shoreline setback area, which would require the Applicant to pursue a Shoreline Setback Variance (SSV) approval from the DPP. However, development within the shoreline setback area could pose a safety risk due to vulnerability to flooding and wave action during storms. Furthermore, the placement of structures within this area may result in adverse impacts to natural resources or processes in the coastal zone. Intensified density on and use of the Cove Property may also impact the quality of the near-shore coastal environment in the short-term during construction and during long-term operation.

It is critical that redevelopment of the site is consistent with the particular and unique context of the Cove Property, neighboring resort uses and the wider 'Ewa District. While the Project site is located in an area envisioned by the 'Ewa DP for Resort/Recreation Area uses, an Alternative Design maximizing the allowed building area would not fit the character and setting of the surrounding area and would not set the area apart from other visitor destinations such as Waikīkī. More massive structures would result in adverse impacts to the surrounding visual environment. Most significantly, initial discussions with legacy families and public outreach conducted for the Project indicate a general disapproval of maximized density at the Cove Property, which favors a balanced approach to redevelopment. An Alternative Design that maximizes density would be inconsistent with the Project's purpose to provide an authentic gathering place that honors Native Hawaiian culture and connection to place. By contrast, the 13.84 percent of building area proposed in the Preferred Alternative represents a careful balance between site activation and open space preservation, offering new programming opportunities while respecting the Cove Property's natural beauty and aligning with the guiding policy plans for the site.

The Alternative Design achieves some Project Objectives, such as job creation and support for local businesses. However, it scores poorly on key objectives related to open space preservation, cultural authenticity, and long-term minimization of environmental impacts, which are central to the Project's purpose. For all of these reasons, the Alternative Design was excluded from further consideration.

1.5.4 Alternative Use

Under the UA, permissible commercial activities on the property are limited to restaurants and retail activity associated with a Hawaiian Theme Park and a commercial lū'au operation and a recreation/amusement facility. Use of the Project site for these purposes has been long established since the late 1970s.

The Alternative Use scenario contemplates construction of a resort hotel at the Cove Property, acknowledging that such a use is currently prohibited under the UA. Implementing this alternative which would require an amendment to the existing UA through a Zone Change approval. The Zone Change would seek to rezone the Cove Property from the B-1, Neighborhood Business District to the Resort District. This process would entail a comprehensive review and approval process that would involve the City Planning Commission and City Council and would potentially take up to three years. During this evaluation period, the Cove Property would be vacant and underutilized, causing a delay in redevelopment and deferring the generation of the Project's anticipated benefits.

In analyzing a resort hotel as an alternative, the purpose is to evaluate the range of potential impacts of a higher-density use that is consistent with surrounding properties in the resort area. However, it is understood that such development would differ substantially from the intended character of the Cove Property and would introduce significant environmental and infrastructural demands. Under this alternative, construction of a resort hotel would increase the building footprint, height, and density at the Cove Property. While this development may fit with the surrounding resort uses, a new hotel would result in increased environmental impacts, including increased traffic and noise. Viewsheds would also be adversely impacted by tall hotel towers and open space at the site would be reduced due to the larger building footprint. The level of beach access to the natural cove/lagoon adjacent to Cove Property could become stressed by a higher level of leisurely use by hotel guests. Increased visitor activity at the beach could also impact the quality experience currently enjoyed by local residents. The infrastructure needed for operations of a hotel development would also be substantially greater-higher than required for the Proposed Action.

Overall, the process required to rezone the Cove Property for hotel use would cause substantial delays for redevelopment of the site, thereby impacting economic benefits such as local employment opportunities. Although a resort hotel may generate more sustained job opportunities than the Preferred Alternative, the substantial potential environmental impacts make this alternative less aligned with the Project's objectives. This alternative would result in a considerably more intensive use than continuing commercial activities, resulting in increased environmental impacts to natural resources and increased demand for infrastructure. Construction of a resort at the Cove Property would not align with the expressed desire of the community and purpose of the Project to provide an authentic gathering place that honors Native Hawaiian culture and connection to place, making it inconsistent with the Project's purpose and vision. For these reasons, the Alternative Use was eliminated from further consideration.

1.6 Summary of Impacts and Proposed Mitigation Measures

Resources that may be potentially impacted by the Project in the short- and long-term are identified in *Table 1.1* following this section. The table further identifies mitigation measures proposed to offset potential adverse impacts. In-depth discussion on each resource is provided in *Section 4.0*.

The Project improvements include varying levels of activity ranging from demolition of existing structures, site preparation work, and construction of a new structures and associated utilities. These improvements

will create local short-term construction-related impacts to the environment. Potential short-term adverse impacts primarily relate to soil disturbance; hazardous materials removal/disposal; dust and erosion during demolition and grading; parking and traffic impacts during construction due to the movement of laborers, building materials, equipment and trucks; increased noise during construction; potential drainage and runoff during construction; and, intermittent views of construction activity.

Short-term beneficial impacts related to construction will include construction expenditures and employment, as well as the purchase of services and materials to design and construct the proposed improvements. Over an estimated 24-month construction period, the Project is anticipated to generate or sustain an estimated total of 1,429 jobs (1,386 full-time equivalent (FTE)) of which 900 (873 FTE) would be direct, 152 (148 FTE) indirect, and 377 (366 FTE) induced. During the same period, an estimated total of \$114.4 million in labor income and an estimated total of \$247.0 million in economic output may be generated or sustained from Project construction. Approximately \$10.2 million in State of Hawai'i government revenue and approximately \$3.3 million in City government revenue is estimated to be generated or sustained from Project construction. Short-term adverse economic impacts related to construction include the potential loss of income to the landowner during the construction phase.

Redevelopment of the Cove Property may generate some long-term adverse impacts to the natural and human environment, which will be mitigated to the extent reasonably possible and as required in accordance with law. Potential long-term impacts include effects on the following: drainage and runoff; archaeological, cultural, and historic resources; roadways and traffic; noise; and public infrastructure. Material and economic resources will be irretrievably committed to the various facilities and programs implemented.

The planned redevelopment will provide significant beneficial impacts that outweigh potential adverse effects. The Cove will positively contribute to the relaxed coastal setting of the wider resort area by replacing existing structures and updating current lū'au programming, ensuring that the lū'au is maintained as the focal point of the Cove Property. The Project will also add dynamic ancillary uses such as restaurant and retail options to reinvigorate and revitalize the Cove Property in a manner consistent with its historic and cultural legacy and enhances its existing use as a Hawaiian-themed outdoor recreation facility. New recreational opportunities will be created and residents and visitors will be welcomed to the Cove Property at a wider range of hours. The incorporation of lush landscaping and pedestrian walkways will enhance connectivity and create an open, safe, and cohesive experience within the site and the wider resort area. Open space areas and a cultural pavilion will invite opportunities for cultural education demonstrations and gathering and will activate various areas of the property that may have been previously underutilized. Design of the structures will be inspired by both contemporary and Hawaiian architecture to provide a welcoming and authentic setting.

The Project will provide additional restaurant, retail, and recreational options to the surrounding resort area, enhancing the overall resident and visitor experience. In addition, redevelopment of the Cove Property will generate significant on-going economic and fiscal benefits through increased visitor expenditures, the creation of new jobs to support long-term operations of the Project, and increased State and City revenues (*Section 4.10*). Project operations are anticipated to generate or sustain an estimated 583 (484 FTE) direct jobs on site, in addition to 121 (100 FTE) indirect and 113 (94 FTE) induced jobs, for an estimated total of 817 jobs (678 FTE) annually. Additionally, an estimated total of \$34.5 million in labor income and an estimated total of \$100.0 million in economic output may be generated or sustained from Project operations, annually. Approximately \$4.6 million in State of Hawai'i government revenue and approximately \$2.1 million in City government revenue is estimated to be generated or sustained from Project operations, annually.

Table 1.1: Summary of Impacts and Mitigation Measures

Resources Affected	Potential Short-term Impacts	Potential Long-term Impacts	Mitigation and Best Management Practices (BMPs)	EIS Section
Archaeological, Cultural, and Historic Resources	<ul style="list-style-type: none"> A draft AIS was prepared for the Project, which confirmed two previously-identified historic properties within the Cove Property (SIHP Nos. -03362 and -04968) and identified new portions of SIHP No. -03362. Additionally, the burial preserve for SIHP No. -04968 was designated “CSH 2” during the course of the AIS Construction of the Project may potentially affect two historic properties identified within the Project area (State Inventory of Historic Places (SIHP) No. #s 50-80-12-3362 (-03362) and 50-80-12-4968 (-04968)). 	<ul style="list-style-type: none"> In the long-term, the Project may potentially affect two historic properties (SIHP Nos.#s 50-80-12-3362 and 50-80-12-04968) identified within the Project area. According to comments provided by SHPD during the AIS review process (Project No. 2020PR32795, Doc. No. 2407SCH12 dated August 21, 2024), the Project is not expected to impact SIHP No. 04968 if the burial remains are within a preserve area (CSH 2). The Project-specific effect is “effect, with agreed upon mitigation commitments” pursuant to HAR §13-284-7. 	<ul style="list-style-type: none"> In consultation with the State Historic Preservation Division (SHPD) and cultural descendant <u>and kahu (caretaker) of the adjacent Lanikūhonua Cultural Institute property</u> Ms. Nettie Fernandez Tiffany, Cultural Surveys Hawai’i (CSH) prepared Archaeological Inventory Survey (AIS) that recommends the following mitigation commitments for the Project. <u>The draft AIS is currently in review has been reviewed by SHPD, who provided comments and revisions.</u> Archaeological monitoring (a form of archaeological data recovery) of all ground-disturbing activities across the Project area. On-site archaeological monitoring will be conducted to identify and document any additional exposures of SIHP #Nos -03362 and -04968 and any newly identified historic properties that may be identified during construction. An Archaeological Monitoring Plan (AMP) will be submitted meeting the requirements of HAR §13-279-4 to the SHPD for review and acceptance. <u>Ongoing consultation regarding the specifics for interim and long-term protection measures for SIHP No. -04968 will be outlined in a burial site component of a preservation plan (BSCPP), which will be reviewed and accepted by SHPD. As requested by SHPD, a larger buffer zone than the existing zone is being considered and is presented to recognized lineal and cultural descendants of the area.</u> 	4.1, Appendix B, and Appendix C

Table 1.1: Summary of Impacts and Mitigation Measures

Resources Affected	Potential Short-term Impacts	Potential Long-term Impacts	Mitigation and Best Management Practices (BMPs)	EIS Section
Archaeological, Cultural, and Historic Resources (continued)			<ul style="list-style-type: none"> • <u>It is currently unclear if SIHP #-04968 was recorded with the Bureau of Conveyances. However, the landowner will verify this and, if not, will record the burial preserve area for (SIHP #-04968). The burial preserve area will be recorded with the DLNR Bureau of Conveyances and shall remain in perpetuity to preserve the iwi kūpuna (Native Hawaiian skeletal remains).</u> • <u>In the event that iwi kūpuna and/or cultural finds are encountered during construction, it will be determined if the find is human and, if so determined, the Applicant will comply with HAR §13-300-40 and HRS §6E-43, including completion of a BSCPP or Burial Site Component of a Data Recovery Plan (BSCDRP) (as appropriate, depending on decision to preserve in place or relocate) and filing of the BSCPP or BSCDRP with the DLNR Bureau of Conveyances.</u> • <u>The Cultural Impact Assessment (CIA) recommends the Applicant consult with the Lanikūhonua Cultural Institute during the design process to avoid potential impacts to undisclosed cultural sites and ongoing cultural practices occurring within The Cove Redevelopment Project area. The Applicant will continue to coordinate with the Lanikūhonua Cultural Institute and Ms. Tiffany.</u> • <u>In the long-term, access to the shoreline in the vicinity of the Project area will be maintained for ongoing traditional cultural practices associated with the gathering of aquatic resources such as fish, limu and salt. The current level of beach access and parking will be maintained to protect the beach and natural cove, which is a special natural resource in the area.</u> 	4.1, Appendix B, and Appendix C

Table 1.1: Summary of Impacts and Mitigation Measures

Resources Affected	Potential Short-term Impacts	Potential Long-term Impacts	Mitigation and Best Management Practices (BMPs)	EIS Section
Atmospheric and Meteorological Environment				4.2
• Climate and Rainfall	No adverse impact.	No adverse impact.	No mitigation measures required.	4.2.1
• Air Quality	Construction-related fugitive dust and equipment emissions.	<ul style="list-style-type: none"> • Stationary and mobile sources of emissions slightly increase. • No significant adverse impacts. 	<ul style="list-style-type: none"> • During construction, work activities will be in compliance with Hawai'i Administrative Rules (HAR), Chapter 11-59 and 11-60. • Construction equipment and vehicles shall be maintained in proper working order to reduce air emissions. • Preparation of a construction dust control plan. • Encouragement of active and public transportation. 	4.2.3
• Urban Island Heat Effect	No adverse impact.	<ul style="list-style-type: none"> • The redevelopment and addition of structures may lead to denser concentration of buildings at the site; however, building area on the property is limited to 30 percent of the lot. • Project is not anticipated to exacerbate the urban heat island effect. 	<ul style="list-style-type: none"> • Lot coverage of the Cove Property will remain at 30 percent, preserving the majority of the site for landscaped open space. • Incorporation of Low Impact Development (LID) improvements to the extent practicable. 	4.2.4
Terrestrial and Marine Environment				4.3
• Topography, Geology, and Soil Conditions	Soil erosion as a result of land-disturbing activities.	No adverse impact.	<ul style="list-style-type: none"> • Compliance with the conditions of the City grading permit and applicable provisions of HAR, Sections 11-54 and 11-55. <p>Erosion control measures and Best Management Practices (BMPs) will be employed during construction and may include, but not be limited to, construction phasing, replacing ground cover of the disturbed area, and use of temporary silt fencing, <u>replacing ground cover of the disturbed area,</u> <u>providing adequate water sources at the site, the</u></p>	4.3.1

Table 1.1: Summary of Impacts and Mitigation Measures

Resources Affected	Potential Short-term Impacts	Potential Long-term Impacts	Mitigation and Best Management Practices (BMPs)	EIS Section
			<p><u>use of a stabilized construction ingress/egress, inlet protection, and temporary filter sock perimeter controls.</u></p> <ul style="list-style-type: none"> Following construction all areas of ground disturbance will be stabilized with appropriate materials including the use of vegetative ground cover. Disposal at an approved facility in accordance with Federal, State, and City regulations. 	
<ul style="list-style-type: none"> Surface Waters and Ground Waters 	Potential stormwater runoff during construction.	No adverse impact.	<ul style="list-style-type: none"> During construction, work activities will be in compliance with HAR, Sections 11-54 and 11-55. Discharge pollution prevention measures will be employed in all phases of the Project. See above erosion control measures and BMPs. <u>Construction BMPs may include, but not be limited to, phasing of construction activities, use of temporary silt fencing and screens, replacing ground cover of the disturbed area, providing adequate water sources at the site, the use of a stabilized construction ingress/egress, inlet protection, and temporary filter sock perimeter controls.</u> 	4.3.2
<ul style="list-style-type: none"> Surface Waters and Ground Waters (continued) 			<ul style="list-style-type: none"> <u>Redevelopment of the Cove Property is anticipated to decrease the total stormwater runoff generated on site, representing an improvement from existing conditions. To further mitigate potential stormwater runoff in the long-term, the use of LID measures will be integrated and located where appropriate to treat the runoff generated from the Project site.</u> 	4.3.2
<ul style="list-style-type: none"> Botanical Resources 	<ul style="list-style-type: none"> The movement of plant or soil material between worksites may result in potential impacts native species. 	<ul style="list-style-type: none"> Existing trees or plantings within the Cove Property may be considered for removal due to low species value or poor health. 	<ul style="list-style-type: none"> To mitigate potential impacts during construction, the movement of plant or soil material between worksites will be minimized and equipment, materials, and personnel will be cleaned of excess soil and debris. 	4.3.3

Table 1.1: Summary of Impacts and Mitigation Measures

Resources Affected	Potential Short-term Impacts	Potential Long-term Impacts	Mitigation and Best Management Practices (BMPs)	EIS Section
	<ul style="list-style-type: none"> No significant adverse impacts. 	<ul style="list-style-type: none"> No significant adverse impacts. 	<ul style="list-style-type: none"> Should Federal- or State-listed threatened or endangered plant species be found at the Project site, appropriate avoidance buffers around the plant species would be established during construction. The existing monkeypod and banyan trees in the center of the property will be carefully preserved in place. Other existing healthy trees may be relocated elsewhere on site, as appropriate. An invasive species management plan involving both observation and treatment will be prepared prior to construction to mitigate the spread of the Coconut Rhinoceros beetle (<i>Oryctes rhinoceros</i>). The conceptual landscaping plan will complement the surrounding environment and is expected to include the use of native, Polynesian-introduced, and tropical varieties that provide shade and screening. 	
<ul style="list-style-type: none"> Terrestrial Marine, and Avian Fauna 	<ul style="list-style-type: none"> Potential impact to the Hawaiian hoary bat during the clearing and grubbing phase of construction. Construction activity in the vicinity of beaches can result in sand and sediment compaction, nest destruction, beach erosion, contaminant and nutrient runoff, and an increase in direct and ambient light pollution which may disorient the Hawaiian green sea turtle. There is the potential for the Hawaiian monk seal and the Hawaiian green sea turtle to 	<ul style="list-style-type: none"> Permanent exterior lighting. Though unlikely to nest at the Cove Property, migratory birds, Hawaiian waterbirds, Hawaiian seabirds, and the Hawaiian short-eared owl (pueo) may forage or transit over the Project area at night when flying during their breeding season. There is the potential for the Hawaiian monk seal and the Hawaiian green sea turtle to nest along the adjacent beach/lagoon. 	<ul style="list-style-type: none"> Construction will take place during the daylight hours to the extent possible. Though not anticipated to be required, if nighttime construction is necessary during seabird fledging season, which occurs between September 15 through December 15, a biological monitor may be hired to observe the presence of any avifaunal species during construction or nighttime activity may be halted. If downed or injured fledglings are observed in the construction area, they will be reported for rescue to the Hawai'i Wildlife Center and Hawai'i Marine Animal Response. If a nest of an avifaunal species described above is discovered the Project operator will contact the O'ahu Branch of the DLNR Department of Forestry 	4.3.4

Table 1.1: Summary of Impacts and Mitigation Measures

Resources Affected	Potential Short-term Impacts	Potential Long-term Impacts	Mitigation and Best Management Practices (BMPs)	EIS Section
	<p>nest along the beach/lagoon adjacent to the Cove Property.</p> <ul style="list-style-type: none"> Increased lighting during construction of the proposed Project could pose potential impact to protected seabirds. 	<ul style="list-style-type: none"> No significant adverse impacts. 	<p><u>and Wildlife (DOFAW) and establish a buffer zone around the nest.</u></p> <ul style="list-style-type: none"> Light fixtures throughout The Cove will be designed and installed to be “wildlife friendly” and reduce glare and shield light from migrating and/or nocturnally flying seabirds. Trees will be examined prior to cutting. In the few areas that have trees or shrubs greater than 15 feet (5.6 meters), trees will be removed or trimmed outside of the bat pupping season of June 1 to September 15. <u>Construction BMPs to protect water quality may include, but not be limited to, phasing of construction activities, use of temporary silt fencing and screens, replacing ground cover of the disturbed area, providing adequate water sources at the site, the use of a stabilized construction ingress/egress, inlet protection, and temporary filter sock perimeter controls.</u> 	
<ul style="list-style-type: none"> Terrestrial Marine, and Avian Fauna (continued) 			<ul style="list-style-type: none"> <u>Redevelopment of the Cove Property is anticipated to decrease the total stormwater runoff generated on site, representing an improvement from existing conditions. To further mitigate potential stormwater runoff in the long-term, the use of LID measures will be integrated and located where appropriate into the Project design to treat the runoff generated from the Project site.</u> The use of barbed wire fencing will be prohibited. <u>If applicable, the contractor will ensure that no basking Hawaiian green sea turtles and Hawaiian monk seals are present at the beach prior to or during construction (note that no construction on the beach is anticipated to be required).</u> 	4.3.4

Table 1.1: Summary of Impacts and Mitigation Measures

Resources Affected	Potential Short-term Impacts	Potential Long-term Impacts	Mitigation and Best Management Practices (BMPs)	EIS Section
			<ul style="list-style-type: none"> • <u>Consistent with DLNR-DOFAW recommendations, if a Hawaiian green sea turtle or Hawaiian monk seal is detected within 100 feet of the Project area during construction, nearby activities will cease, if required, until the focal animal has departed the area on its own accord.</u> • <u>If applicable, oOperation of vehicles, including construction-related vehicles, on or near the beach environment will not occur during Hawaiian green sea turtle nesting or hatching season or during Hawaiian monk seal weaning.</u> • <u>If applicable, eExisting native dune vegetation will remain in its current place (note that no existing native dune vegetation is known to occur on the Project site).</u> 	
<ul style="list-style-type: none"> • Terrestrial Marine, and Avian Fauna (continued) 			<ul style="list-style-type: none"> • <u>If applicable, Project-related debris, trash, or equipment will be removed from the beach if not in active use (though, no construction on the adjacent beach is anticipated).</u> • <u>If applicable, †There will be no stockpiling of Project-related materials on or near the beach environment and adjacent vegetated areas (note that no stockpiling of Project-related materials in these areas is anticipated).</u> • <u>Similar to current practice, †if a monk seal is detected on the beach, the NOAA NMFS Marine Wildlife hotline will be contacted immediately and beachgoers will be informed to respect the monk seal and keep a distance of at least 150 feet. Actions to limit predator presence will be implemented, including effective waste management to minimize attraction to trash.</u> 	4.3.4

Table 1.1: Summary of Impacts and Mitigation Measures

Resources Affected	Potential Short-term Impacts	Potential Long-term Impacts	Mitigation and Best Management Practices (BMPs)	EIS Section
Natural Hazards				4.4
<ul style="list-style-type: none"> Hurricane and Tropical Storm 	No adverse impact.	<ul style="list-style-type: none"> Though difficult to predict when these events occur, it is reasonable to expect that future events will occur and may be increasing in frequency due to global climate change. No adverse impact. 	<ul style="list-style-type: none"> New structures will be designed in accordance with State and City building codes, which include specific standards to ensure structures withstand the potential impacts of hurricanes and other natural disasters. Implementation of standard emergency response plan during a natural hazard event. 	4.4.1
<ul style="list-style-type: none"> Earthquake 	No adverse impact.	<ul style="list-style-type: none"> Though difficult to predict when these events occur, it is reasonable to expect that future events will occur and may be increasing in frequency due to global climate change. No adverse impact. 	<ul style="list-style-type: none"> Redevelopment will be in compliance with the International Building Code (IBC) and City standards, including earthquake design provisions. Implementation of standard emergency response plan during a natural hazard event. 	4.4.2
<ul style="list-style-type: none"> Flood Hazards 	No adverse impact.	No adverse impact.	<ul style="list-style-type: none"> The Cove's structures are planned to be elevated eight to 19.5 feet above mean sea level (msl). Open spaces will reduce surface runoff, promote infiltration, manage stormwater, improve water quality, and enhance overall resilience to extreme weather events. LID measures such as such as bioswales, rain gardens, planter boxes, sand filters, or permeable pavement, will be integrated and located where appropriate, where feasible. Implementation of standard emergency response plan during a natural hazard event. 	4.4.3
<ul style="list-style-type: none"> Tsunami Inundation 	No adverse impact.	<ul style="list-style-type: none"> Development within the Tsunami Evacuation Zone. 	<ul style="list-style-type: none"> Implementation of standard emergency response plan during a natural hazard event. 	4.4.4

Table 1.1: Summary of Impacts and Mitigation Measures

Resources Affected	Potential Short-term Impacts	Potential Long-term Impacts	Mitigation and Best Management Practices (BMPs)	EIS Section
<ul style="list-style-type: none"> Wildfire 	No adverse impact.	<ul style="list-style-type: none"> Though difficult to predict when these events occur, it is reasonable to expect that future events will occur and may be increasing in frequency due to global climate change. No adverse impact. 	<ul style="list-style-type: none"> Plans will be prepared in accordance with the Fire Code regulations under the National Fire Protection Agency (NFPA) One to ensure HFD emergency access to the site is adequately provided. A majority of the property will be regularly maintained as landscaped open space areas. Implementation of standard emergency response plan during a natural hazard event. 	4.4.5
<ul style="list-style-type: none"> Wildfire (continued) 			<ul style="list-style-type: none"> <u>As recommended by DLNR DOFAW, the Applicant may coordinate with Hawai'i Wildfire Management Organization on wildfire prevention, if needed.</u> 	4.4.5
<ul style="list-style-type: none"> Climate Change, and Sea Level Rise (SLR) 	No adverse impact.	<ul style="list-style-type: none"> The Cove Property is within the 3.2-foot SLR exposure area (year 2100). The Project site is particularly susceptible to annual high wave flooding. <u>Due to the presence of a natural rocky shelf, which stabilizes the shoreline and protects the adjacent beach, erosion at the Cove Property is not anticipated.</u> 	<ul style="list-style-type: none"> Planned structures will be set back at least 60 feet from the certified shoreline. New structures may be elevated eight to 19.5 feet above msl to proactively consider the potential impacts of SLR. LID may be incorporated to the extent practicable and will be determined as design progresses. 	4.4.6
Hazardous Wastes and Materials	No known hazardous materials on the Cove Property; no adverse impact.	No adverse impact.	No mitigation measures required.	4.5
Public Services				4.6
<ul style="list-style-type: none"> Police Protection 	<ul style="list-style-type: none"> Potential impacts to public safety due to construction activities. 	<ul style="list-style-type: none"> Increase of visitors/de facto service population to the site may require additional resources. 	<ul style="list-style-type: none"> Implementation of construction BMPs, including, but not limited to installation of necessary signs, lights, barricades, and safety equipment. 	4.6.1

Table 1.1: Summary of Impacts and Mitigation Measures

Resources Affected	Potential Short-term Impacts	Potential Long-term Impacts	Mitigation and Best Management Practices (BMPs)	EIS Section
		<ul style="list-style-type: none"> No significant adverse impacts. 	<ul style="list-style-type: none"> Adequate notification made to surrounding businesses and residents prior to activities that may impact pedestrian or vehicular traffic. Coordination with the existing security and HPD will be ongoing to ensure adequate police coverage is provided during construction activities that require police-assisted traffic guidance. The need for additional private security on the property will be evaluated and considered during operation of the Project. 	
<ul style="list-style-type: none"> Fire Protection 	No adverse impact.	<ul style="list-style-type: none"> Increase of visitors/de facto service population to the site may require additional resources. No significant adverse impacts. 	Project plans will undergo review by the Honolulu Fire Department to ensure adherence with Federal, State, and City regulations.	4.6.2
<ul style="list-style-type: none"> Emergency Medical Services & Hospital Services 	No adverse impact.	<ul style="list-style-type: none"> Increase of visitors/de facto service population to the site may require additional resources. No significant adverse impacts. 	Operations at The Cove will incorporate protocols to address emergencies on site while awaiting first responders.	4.6.3
<ul style="list-style-type: none"> Educational Facilities 	No adverse impact.	No adverse impact.	No mitigation required.	4.6.4
<ul style="list-style-type: none"> Libraries 	No adverse impact.	No adverse impact.	No mitigation required.	4.6.5
<ul style="list-style-type: none"> Recreational Resources 	No adverse impact.	No adverse impact.	<ul style="list-style-type: none"> The current level of access and parking for beachgoers will be maintained throughout construction and long-term operation of The Cove. The landowner will continue to maintain the public beach access. 	4.6.6

Table 1.1: Summary of Impacts and Mitigation Measures

Resources Affected	Potential Short-term Impacts	Potential Long-term Impacts	Mitigation and Best Management Practices (BMPs)	EIS Section
Roadways and Circulation				4.7
<ul style="list-style-type: none"> Traffic 	<p>Temporary increase in construction-related traffic, particularly during mobilization and demobilization of the construction area.</p>	<p>No adverse impact. Traffic conditions are generally expected to remain similar to baseline and Construction Year 2027 Without Project conditions.</p>	<ul style="list-style-type: none"> To minimize traffic disruption, BMPs to minimize conflicts with traffic during construction will be implemented as described in the EIS. Based on the analysis of the traffic data, the TIR recommends several BMPs be incorporated into the final Project design, as listed below. A determination on the appropriate measures will be made as the Project progresses. Maintain sufficient sight distance for motorists to safely enter and exit. Provide adequate on-site loading and off-loading service areas and prohibit off-site loading operations. Provide adequate turn-around area for service, delivery, and refuse collection vehicles. Maintain sufficient turning radii at all Project driveways. Provide sufficient turning radii along the internal connections. 	4.7.1, Appendix D
<ul style="list-style-type: none"> Traffic (continued) 			<ul style="list-style-type: none"> If access at the entrances to the parking areas are controlled, provide sufficient storage for entering vehicles at the parking area access controls (i.e., automatic gate, use of personnel, etc.) to ensure that queues do not extend onto the adjacent roadways. The layout and dimensions shall be determined during the design phase. Maintain the existing one-way (southbound) traffic flow along the connection between the northern and southern driveways. Provide sufficient passing areas within the main drop-off/arrival area to accommodate the 	4.7.1, Appendix D

Table 1.1: Summary of Impacts and Mitigation Measures

Resources Affected	Potential Short-term Impacts	Potential Long-term Impacts	Mitigation and Best Management Practices (BMPs)	EIS Section
			<p>anticipated vehicle types and minimize potential conflicts with vehicles accessing the adjacent parking stalls, facilitate through traffic flow and ensure queues do not extend onto the adjacent roadway.</p> <ul style="list-style-type: none"> • Provide adequate wayfinding signs. • Provide adequate space within the bus parking stalls to allow for loading and unloading activities to occur while parking in this area. The exact configurations and dimensions shall be determined during the design phase. • If valet operations are expected to be implemented, consider the location of the parking area designated for valet to minimize potential conflicts with other modes. • <u>Traffic operations during events at the Cove Property will be managed in accordance with a Traffic Management Plan (TMP), which is being prepared for the Project.</u> 	
<ul style="list-style-type: none"> • Traffic (continued) 			<ul style="list-style-type: none"> • <u>In accordance with DPP's recommendations, the TMP may also include Traffic Demand Management (TDM) strategies.</u> • <u>In the event of inclement weather, such as rain, events, including the lū'au, are expected to be canceled in accordance with established standard operating procedures.</u> 	4.7.1, Appendix D
<ul style="list-style-type: none"> • Multi-Modal Facilities 	<ul style="list-style-type: none"> • Construction may require short-term road closures or re-routing of multi-modal facilities. • No significant adverse impacts. 	No significant adverse impacts.	<ul style="list-style-type: none"> • Existing pedestrian, bicycle, and vehicle access/crossings will be maintained with the highest safety measures during construction to the extent practicable. • The surrounding public will be kept informed of potential impacts to surrounding multi-modal facilities, as needed. 	4.7.2, Appendix D

Table 1.1: Summary of Impacts and Mitigation Measures

Resources Affected	Potential Short-term Impacts	Potential Long-term Impacts	Mitigation and Best Management Practices (BMPs)	EIS Section
			<ul style="list-style-type: none"> • In the long term, the TIR recommends the following BMPs be incorporated into the final Project design. A determination on the appropriate measures will be made as the Project progresses. • Provide adequate pedestrian connections to facilitate access between on-and off-site facilities. Pedestrian facilities should be made accessible in conformance with the Americans with Disabilities Act (ADA). • Incorporate on-site pedestrian improvements in the design of the Project. In particular, consideration should be given to ensure adequate access is provided between the designated ADA parking stalls within the staff lot and the uses on-site. These improvements may include marked or raised crosswalks at the internal intersections, bulb outs to reduce pedestrian crossing, and street lighting. 	
<ul style="list-style-type: none"> • Multi-Modal Facilities (continued) 			<ul style="list-style-type: none"> • Provide improved bicycle facilities within the Project boundaries. Appropriate access and lighting should be taken into consideration in the design of these facilities. It should be noted that the Project site plan includes bicycle facilities within the north and southeast ends of the site. • Provide adequate connections to and from the bike parking areas to ensure convenient and safe pedestrian and bicyclist access, as well as connections to the bike lanes along Ali'inui Drive adjacent to the Project site. • Prepare a Parking and Loading Management Plan that includes parking and loading strategies to address potential issues associated with conflicts between modes on site, parking for guests and employees, and loading operations. 	<p>4.7.2, Appendix D</p>

Table 1.1: Summary of Impacts and Mitigation Measures

Resources Affected	Potential Short-term Impacts	Potential Long-term Impacts	Mitigation and Best Management Practices (BMPs)	EIS Section
<ul style="list-style-type: none"> Access and Parking 	No adverse impact.	<ul style="list-style-type: none"> No adverse impact. <u>Estimated peak demand is 475 off-street parking stalls, which exceeds the proposed 396-stall supply.</u> Potential impacts during Project operation if demand outweighs the planned supply. 	<ul style="list-style-type: none"> <u>A valet operator has reviewed the site plan and determined that an additional 50 parking spaces could be added with valet operations, resulting in an increase in total parking supply from 396 to 446 off-street parking stalls.</u> Parking management strategies will be implemented to meet projected demand, and may consist of the following: parking charge, mandatory valet, transportation network company incentives, promotion of other transportation modes, and beach parking management. Management strategies will be finalized as the Project progresses and may be adjusted during operation based on need. 	4.7.3, Appendix E
<ul style="list-style-type: none"> Loading and Delivery 	No adverse impact.	No adverse impact.	No mitigation required.	4.7.4
<ul style="list-style-type: none"> <u>Airports</u> 	<u>No adverse impact.</u>	<ul style="list-style-type: none"> <u>No adverse impact.</u> <u>The Project will include landscaping, which the Federal Aviation Administration (FAA) identifies in the Technical Assistance Memorandum (TAM) for Order 5190.6B (2016) as a potential wildlife attractant.</u> 	<ul style="list-style-type: none"> <u>In order to reduce potential wildlife attractants, landscaping at the site will be regularly maintained and stormwater drainage would be designed to minimize standing water.</u> <u>Actions to limit predator presence, such as including effective waste management and recycling, will be implemented.</u> <u>The Applicant will review the criteria for submittal of a Notice of Proposed Construction or Alteration to the FAA and will submit the form if required.</u> 	<u>4.7.5</u>
Infrastructure and Utilities				4.8, Appendix F
<ul style="list-style-type: none"> Drainage 	Potential stormwater runoff during construction.	<ul style="list-style-type: none"> No adverse impact. The Project is anticipated to decrease <u>total</u> stormwater runoff on the Cove Property. 	<ul style="list-style-type: none"> Compliance with the conditions of the City grading permit and applicable provisions of HAR, Sections 11-54 and 11-55 during construction. <u>Based on preliminary design, the existing parking lots will be reconfigured and an area of asphalt</u> 	4.8.1, Appendix F

Table 1.1: Summary of Impacts and Mitigation Measures

Resources Affected	Potential Short-term Impacts	Potential Long-term Impacts	Mitigation and Best Management Practices (BMPs)	EIS Section
		<u>representing an improvement from existing conditions.</u>	<p><u>pavement will be replaced by landscape planters. Stormwater runoff will be directed to landscape planters throughout the site, which promotes percolation into the ground and filters out contaminants prior to the runoff entering the existing underground drainage systems. Additionally, stormwater quality treatment will be provided by an underground infiltration system and an above-ground retention basin.</u></p> <ul style="list-style-type: none"> LID measures, such as bioswales, rain gardens, planter boxes, sand filters, or permeable pavement, <u>may will be integrated into Project design where feasible where appropriate. Final treatment controls and BMPs will be assessed as design progresses.</u> 	
<ul style="list-style-type: none"> Water Supply 	No adverse impact.	<ul style="list-style-type: none"> <u>Increase in domestic water demand.</u> <u>No significant changes anticipated for non-potable water use from the existing use. need for potable water</u> <u>BWS has verified water availability in its comments on the Draft EIS (Appendix A-2); however, BWS has preliminarily confirmed there is capacity. The final approval of water availability will be confirmed when the building permit application is submitted for approval</u> 	<ul style="list-style-type: none"> The Applicant will continue to consult with BWS. Water conservation measures will be implemented in design of The Cove as required by BWS and may include, but not be limited to the utilization of nonpotable water for irrigation, <u>drought tolerant landscaping</u>, and the use of Water Sense-labeled ultra-low flow water fixtures and toilets. Final construction drawings will be reviewed by BWS. 	4.8.2, Appendix F
<ul style="list-style-type: none"> Wastewater Treatment and Disposal 	No adverse impact.	<p>The Project will increase estimated wastewater flow.</p> <ul style="list-style-type: none"> Ongoing coordination with the City has indicated that the 	<ul style="list-style-type: none"> <u>A Sewer Connection Application for the Project was submitted to the City and approved on November 14, 2024 (File No. 2024/SCA-1132).</u> 	4.8.3, Appendix F, and Appendix G

Table 1.1: Summary of Impacts and Mitigation Measures

Resources Affected	Potential Short-term Impacts	Potential Long-term Impacts	Mitigation and Best Management Practices (BMPs)	EIS Section
		<p>Cove Property must adhere to wastewater flow limitations established in the Engineering Report for the Kapolei Interceptor Sewer (2003, Community Planning, Inc.).</p>	<ul style="list-style-type: none"> The Applicant has coordinated with the City to increase the allocation of sewer capacity for the Cove Property in accordance with the Kapolei Interceptor Sewer Assessment Agreement. As the Project progresses, on-site wastewater infrastructure will be designed to meet the City's Wastewater Design Standards. Mitigation measures such the use of blackwater and other BMPs to minimize wastewater increases may be implemented, as appropriate 	
<ul style="list-style-type: none"> Wastewater Treatment and Disposal (continued) 			<ul style="list-style-type: none"> The Applicant is studying the use of a blackwater system for The Cove intended to recycle water from all onsite plumbing fixtures to R1 level per the requirements of HDOH. The treated R1 water would be reused on-site. To meet the anticipated wastewater demand for the Project, the Applicant is coordinating with the City to update the sewer connection application and allocation of sewer capacity within the master planned tributary area, as allowed under the Kapolei Interceptor Sewer Assessment Agreement. Grease interceptors will be operated and maintained where Fats, Oils, and Greases may occur. 	<p>4.8.3, Appendix F₁ and Appendix G</p>
<ul style="list-style-type: none"> Solid Waste 	<p>No adverse impact.</p>	<p>Increase in solid waste; however, the increase will not have a significant adverse impact to the City.</p>	<ul style="list-style-type: none"> No mitigation required. The Cove may implement operational recycling measures. Educational signage and guidelines may be posted around the Cove Property to encourage visitors to recycle. Recycling may also be encouraged through the use of trash cans with recycling containers. 	<p>4.8.4</p>

Table 1.1: Summary of Impacts and Mitigation Measures

Resources Affected	Potential Short-term Impacts	Potential Long-term Impacts	Mitigation and Best Management Practices (BMPs)	EIS Section
<ul style="list-style-type: none"> Power and Telecommunications 	No adverse impact.	Increase in need for electricity; however, HECO confirmed there is capacity.	Coordination with HECO, Hawaiian Telcom, and Spectrum during the design phase of the Project will be conducted to verify points of connection.	4.8.5
Noise Conditions	Temporary source of noise above ambient levels due to construction activities.	<ul style="list-style-type: none"> The Project may result in a minor increase in noise along Ali'inui Drive; however, the increase is not considered to be significant. 	<ul style="list-style-type: none"> Construction will comply with HAR, Section 11-46. Mufflers will be used on all combustion powered construction vehicles and machinery, and all noise attenuation equipment maintained in good operating condition. 	4.9, Appendix GH
Noise Conditions (continued)		<ul style="list-style-type: none"> Amplified sound from the events at the amphitheater/performing arts venue may spill over to adjacent residential areas. However, with the implementation of mitigation measures, amplified sound is anticipated to remain comparable to existing conditions. 	<ul style="list-style-type: none"> Construction activities and use of heavy equipment would be scheduled as much as possible during daylight hours to avoid disturbing area residents during the evening. Given the reduced buffer distances between the planned amphitheater and Kai Lani at Ko Olina, a three to four dBA reduction of spillover sound levels will be required to mitigate the potential noise impacts. The new amphitheater's sound amplification system is being designed to achieve the three to four dBA reduction while maintaining the existing sound levels of the current lū'au show. The final design of the sound system will be determined as the Project progresses. Sound abatement may be integrated into the new amphitheater/performing arts venue to mitigate potential noise impacts on the surrounding area. 	4.9, Appendix GH
Socio-Economic Conditions	<ul style="list-style-type: none"> Over an estimated 24-month construction period, the Project is anticipated to generate or sustain an estimated total 1,429 jobs (1,386 FTE), of which 900 (873 FTE) would be direct, 152 	<ul style="list-style-type: none"> Once in operation, the Project is anticipated to generate or sustain an estimated total of 817 jobs (678 FTE) annually, of which 583 (484 FTE) would be direct, 121 (100 FTE) indirect, and 113 (94 FTE) induced. 	No mitigation required.	4.10, Appendix HI

Table 1.1: Summary of Impacts and Mitigation Measures

Resources Affected	Potential Short-term Impacts	Potential Long-term Impacts	Mitigation and Best Management Practices (BMPs)	EIS Section
	(148 FTE) indirect, and 377 (366 FTE) induced.	<ul style="list-style-type: none"> Annually, the Project is estimated to generate or sustain a total increase of \$34.5 million in labor income, of which \$20.4 million would be direct, \$7.1 million indirect, and another \$7.0 million induced. 		
Socio-Economic Conditions (continued)	<ul style="list-style-type: none"> An estimated total of \$114.4 million in labor income is estimated to be generated or sustained from construction of the Project, of which \$79.8 million would be direct, \$11.3 million indirect, and \$23.4 million induced. An estimated total of \$247.0 million in economic output may be generated or sustained from Project construction, of which \$135.6 million would be direct, \$35.4 million indirect, and \$75.9 million induced. Approximately \$10.2 million in State of Hawai'i government revenue is estimated to be generated or sustained from Project construction. Approximately \$3.3 million in City government revenue is estimated to be generated or sustained from Project construction. 	<ul style="list-style-type: none"> An estimated annual increase of \$100.0 million in economic output may be generated or sustained from Project operation, of which \$53.8 million would be direct, \$23.4 million indirect, and another \$22.8 million induced. Approximately \$4.6 million in State of Hawai'i government revenue is estimated to be generated or sustained from Project operations, annually. Approximately \$2.1 million in City government revenue is estimated to be generated or sustained during Project operation. 		4.10, Appendix H

Table 1.1: Summary of Impacts and Mitigation Measures

Resources Affected	Potential Short-term Impacts	Potential Long-term Impacts	Mitigation and Best Management Practices (BMPs)	EIS Section
Visual Resources	Temporary visual impacts from the presence construction equipment.	<ul style="list-style-type: none"> • No adverse impacts to public views articulated in the 'Ewa DP. • Potential visual impacts to the surrounding coastal environment. 	<ul style="list-style-type: none"> • Fencing will be used. • Equipment will be confined to work areas. • All construction related equipment will be removed following the completion of work. • Existing landscaping along Ali'inui Drive used for screening, including tall canopy trees and hedges, will remain in place throughout construction and operation. • Open space will be preserved along the shoreline. • In the long term, the Project will enhance the visual environment of the site by replacing the existing structures with The Cove, which will be designed to reflect both contemporary and Hawaiian architecture. • Lush landscaping will be incorporated throughout to enhance the surrounding visual environment, and is expected to consist of native, Polynesian-introduced, or tropical trees, palms, and shrubs of varying sizes. • Structures will not exceed the 40-foot limit for the B-1, Neighborhood Business District. 	4.11

1.7 Summary of Compatibility with Land Use Policies and Plans

For long-range planning purposes the Cove Property is located within the City's 'Ewa Development Plan (DP) area. The Project site is located adjacent to the Ko Olina Resort³ and designated in the 'Ewa DP for Resort/Recreation Area uses (*Figure 1.5*). This designation is consistent with the property's use as an outdoor recreation facility since the late 1970s. The Ko Olina Resort area is envisioned by the City as an integral part of developing the 'Ewa region as the island's "Secondary Urban Center," and therefore serves a unique social and economic function. In the long term, the Project will add approximately 817 total jobs (678 FTE jobs) and generate approximately \$34,495,176 annually in labor income and approximately \$99,952,914 in economic output from the region. The Project will also enhance the surrounding area, which is designated in the City and County of Honolulu General Plan (GP) as one of four "secondary" resort destinations on the island that are part of the City's overall strategy to relieve growth pressure on Waikīkī (DPP, 2020). The Project will provide a new destination and gathering place for residents and visitors that honors and reflects the history, culture, and connection to this place. The Project therefore represents a direct fulfillment of the goals and objectives identified in the 'Ewa DP.

The planned improvements are compatible with and supportive of State and City land use policies, particularly as they relate to the economy and the natural and social environment. The Project is also consistent with and permitted by applicable land use designations. It will contribute a wide range of benefits to public goals, objectives, and policies as established by the State and City, as discussed in detail in *Section 5.0*.

1.8 Unresolved Issues

Below is an identified issue that is actively being addressed, but is currently unresolved:

- **Archaeological, Cultural, and Historic Resources:** *Section 4.1.1* details the findings of the Archaeological Inventory Survey (AIS) conducted for the Project. In summary, two previously identified historic properties were confirmed: State Inventory of Historic Places (SIHP) Site No. SIHP Site No. 50-80-12-3362 (-03362) (coastal wetlands) and 50-80-12-4968 (-04968) (five sets of human skeletal remains identified within a gas line excavation related to the existing development). As a part of the current survey, new portions of SIHP No. -03362 were identified and the burial preserve for SIHP No. -04968 was designated "CSH 2."

SHPD's records for SIHP No. -04968 indicate that consultation with Native Hawaiian Organizations (NHOs), Cultural Surveys Hawai'i (CSH), and representatives from the James Campbell Estate was conducted and that long-term preservation was agreed upon during a meeting held on January 18, 1995. The outcome of the meeting was formalized in a burial agreement (1995 Burial Agreement). In consultation with cultural descendants of the Cove Property, SIHP No. -04968 is currently cordoned off to avoid foot traffic. However, SHPD has no record of a formal preservation plan for SIHP No. -04968. SHPD confirmed that a burial site component of a preservation plan (BSCPP) is required for SIHP No. -04968.

³ The Cove Property is located adjacent to the Ko Olina Resort. The Ko Olina Resort Master Plan does not encompass the Cove Property nor the neighboring Lanikūhonua Cultural Institute property, as they are not subject to the original Ko Olina Declaration of Conditions, Covenants and Restrictions recorded by Campbell Estate in 1986. For planning purposes, the City and County of Honolulu 'Ewa DP (amended 2020), which establishes the long-range vision for the region, identifies the Cove Property within the physical extents of the resort land use area (*Figure 1.6*).

Consultation with the signatories of the 1995 Burial Agreement, as well as, known cultural and lineal descendants of the area has been initiated and is ongoing as of publication of this Final EIS. This consultation is regarding the specifics for the interim and long-term protection measures and will be outlined in the BSCPP document. As requested by SHPD, a buffer zone larger than the existing buffer zone is being considered and will be presented to recognized lineal and cultural descendants of the area for their consideration. Notably, the Project will not involve ground disturbance within the burial preserve and the proposed buffer zone. The results of consultation will be incorporated into the revised draft AIS. The revised draft AIS and BSCPP will be submitted to SHPD via the online HICRIS system (File No. 2020PR32795).

It is currently unclear if SIHP No. -04968 was recorded with the Bureau of Conveyances. However, the landowner will verify this and, if not, will record the burial preserve area (CSH 2) for SIHP No. -04968. The burial preserve area shall remain in perpetuity to preserve the iwi kūpuna.

Additionally, archaeological monitoring of all ground-disturbing activities on the Project site will be conducted. An Archaeological Monitoring Plan (AMP) will be prepared by Cultural Surveys Hawai'i (CSH) and submitted to the State Historic Preservation Division (SHPD) prior to the start of construction. On-site archaeological monitoring will be conducted to identify and document any additional exposures of SIHP Nos. -03362 and -04968 and any newly identified historic properties that may be identified during construction.

- **Shoreline Survey:** A preliminary shoreline survey has been submitted to the State Department of Land and Natural Resources (DLNR) for certification (see further discussion in *Section 1.11.2*). DLNR inspected the site in August 2024, and the survey is currently under review. Further coordination with DLNR is ongoing to address outstanding considerations before finalizing the certification process.

1.9 Agency and Stakeholder Outreach

Consultation with stakeholders began in 2017 to discuss potential uses, approaches, and considerations with the planned redevelopment. Recommendations included the following:

- Creation of an authentic gathering place that attracts both locals and tourists.
- Addition of new restaurants that celebrate local heritage.
- New programming that leverages partnerships with 'Ewa region organizations or showcases local artistic talent.
- The place should celebrate the traditions, beauty, and spirit of ancient Hawai'i in an immersive coastal setting.
- Too much density at the site was seen as undesirable.
- Redevelopment should balance the priority to preserve the natural integrity of the cove/public beach.

Subsequently, the EISPN was published by the ERP in *The Environmental Notice* on June 23, 2021 to notify agencies, organizations, and individuals that a Draft EIS would be prepared for the Project. Publication of the EISPN was followed by a 30-day public comment period to solicit guidance on the scope of the studies to be prepared and to gather input on important topics to be covered in the Draft SEIS. *Table 7.1* lists those agencies, organizations, and individuals that received notification of the

EISPN publication. A total of 18 agencies and individuals provided responses during the public comment period. Those listed in *Table 7.1* ~~will also be~~ were notified of the availability of the is Draft EIS in conjunction with the publication of *The Environmental Notice* and ~~are~~ were invited to provide comments during the 45-day public comment period.

A Draft EIS for the Project was published in the May 8, 2024 edition of TEN. On May 10, 2024 the Applicant was informed that “Ko Olina” is a trademarked name not intended for unauthorized use. An addendum to the Draft EIS was submitted to the OPSD-ERP on May 20, 2024 as a clerical correction to the unintended use of the trademarked term “Ko Olina,” which was originally used as a place name identifier. The Second Draft EIS corrected this clerical error by ceasing to use the phrase “at Ko Olina” as a descriptor for the Project, which was henceforth referred to as “The Cove.” No substantive changes to the Project and Draft EIS were made.

The Second Draft EIS was published by ERP in the June 8, 2024 edition of TEN and was followed by a 45-day public comment period. Comments received during the First Draft EIS and the Second Draft EIS have been considered. A total of 46 agencies, organizations, and individuals provided comments on the Draft EIS (*Table 7.1*). Copies of each comment letter are provided in *Appendix A-2*. A summary of comments received and associated responses is provided in *Table 7.3*, which is organized by major topics.

During the review and consultation process, a varying range of opportunities and considerations were expressed by respondents. Key considerations included the adequacy of the EIS process, compliance with existing zoning and land use agreements under the UA (Ordinance No. 89-27), and the appropriateness of the planned redevelopment program, uses, and design. Questions were raised about potential impacts on archaeological and historic resources, the protection of cultural resources and practices, and biological resources, including flora, fauna, and marine ecosystems. Considerations about compliance with shoreline setback regulations and design to ensure resilience to climate change and SLR were also shared.

Additional feedback focused on the adjacent beach and natural cove, particularly the maintenance of existing public access and the potential increase in beach use as a result of the Project. Comments related to traffic, circulation, parking, and potential impacts on nearby airports were noted. Questions were raised and clarification was provided regarding the capacity and adequacy of existing utility services, including stormwater management, water supply, wastewater treatment, and solid waste management. Noise impacts, potential economic effects on local businesses, and the visual impacts of the Project on the surrounding area were also identified as important considerations.

Further comments from various members of the surrounding community questioned the Project’s consistency with the Ko Olina Resort Master Plan and financial contributions to the adjacent resort. Comments about the alternatives analysis, the effectiveness of the community outreach process, and potential impacts on neighboring communities were also shared. Finally, some comments expressed support for the Project.

In addition to comments provided during the 45-day Draft EIS public comment period, a presentation of the Project was provided to the Makakilo-Kapolei-Honokai Hale Neighborhood Board No. 34 on May 22, 2024. Notification of the presentation was mailed to adjoining property owners on May 15, 2024. Approximately 13 members of the public provided comments both virtually and in person. *Section 7.4* provides a summary of the issues raised during that meeting, many of which were also raised in written comments provided on the Draft EIS. The comments and questions shared at the meeting generally concerned the proposed site layout and program, the effectiveness of the community outreach process, archaeological and historic resources, parking, traffic, potential impacts to the adjacent

beach, biological resources, potential impacts on the neighboring residential community (e.g., light pollution, visual impacts, and noise), and employees of the current lessee (Paradise Cove).

1.10 Anticipated Required Government Permits and Approvals

1.10.1 Summary of Anticipated Approvals

Table 1.2 identifies the major State and City land use permits and approvals that are anticipated to be required for the Project, including site, building, construction, and infrastructure approvals.

Permit or Approval	Approving Authority
Environmental Impact Statement Acceptance	DPP
SMA Use Permit (Major), ROH, Chapter 25	DPP, Honolulu City Council
Shoreline Setback Variance (SSV), ROH, Chapter 26	DPP, Honolulu City Council
Minor Shoreline Structure Permit	DPP
Certified Shoreline Survey	DLNR
Conditional Use Permit (CUP), Major - Amusement Facilities, Outdoor, not Motorized ¹	DPP
HRS Chapter 6E Compliance Historic Resources	DLNR, State Historic Preservation Division (SHPD)
Notice of Proposed Construction or Alteration	Federal Aviation Administration (FAA)
National Pollutant Discharge Elimination System (NPDES) Construction Stormwater Permit	Department of Health, Clean Water Branch
Grading, Grubbing, Trenching and Stockpiling Permits	DPP
Building Permits (Demolition, Buildings, Electrical, Plumbing)	DPP
Plan Review	Honolulu Fire Department
Water Connection Approval	Board of Water Supply
Electrical Connection/Extension	Hawaiian Electric Company

¹ Bill 64 (2023) proposes amendments to ROH, Chapter 21, LUO which would affect the Master Use Table, use development standards, and use definitions. One of the proposed changes includes replacing the category of "Amusement Facilities" with "Recreation, General Outdoor," which will require a Conditional Use Permit (CUP) Major in the B-1, Neighborhood Business District. As a result, the Project would still require a CUP, Major under the amended ordinance.

1.10.2 Required Coastal Area Permit Approvals

The Project site is located adjacent to the coast and within the City’s designated SMA. As such, the Project will require the approval of a new SMA Use Permit to allow development in this area. Additionally, because the Project valuation exceeds \$500,000, an SMA Use Permit (Major) permit will be required. A preliminary shoreline survey has been submitted to the State Department of Land and Natural Resources (DLNR) for certification (*Figure 1.98*). DLNR inspected the site in August 2024 and the survey is currently under review. Further coordination is ongoing to address outstanding considerations before finalizing the certification process.

~~Under the City's current rules, the shoreline setback line runs 40 feet inland from and parallel to the certified shoreline. As a response to predicted SLR and coastal erosion, Ordinance 23-3, which establishes a new shoreline setback line ranging from 60 feet to 130 feet from the certified shoreline, was enacted on March 9, 2023 and effective July 1, 2024. Beginning July 1, 2024, the Under Ord. 23-3 (now codified in ROH Chapter 26) and DPP's implementing regulations, the shoreline setback line will be~~ is established at 60 feet from the shoreline on zoning lots within the Primary Urban Center (PUC). For lots outside of urban Honolulu, the shoreline setback line may range from 60 feet to a maximum of 130 feet inland from the certified shoreline. On lots where historical erosion data has either (1) not been collected for the Hawai'i Shoreline Study, or (2) where the data shows an annual coastal erosion rate of 0, the shoreline setback line will be established at 60 feet inland from the certified shoreline.

As shown in the Hawai'i Shoreline Study online web application, the Project site does not have historical erosion data (SOEST, 2021). As such, pursuant to ROH, Section 26-1.4(a)(3) the shoreline setback line is established at 60 feet inland from the certified shoreline.

As part of the redevelopment, the majority of existing structures will be demolished, including structures within the shoreline setback area. Following demolition, portions of the Cove Property will require grading and filling with native soil and topsoil to establish vegetation and restore the site to its pre-existing condition prior to the commencement of construction. A portion of the existing amphitheater that is planned for demolition is located within the 60-foot shoreline setback. ~~As such, DPP has confirmed that an SSV may be~~ is not required to perform the restoration work. Once the site is restored, there will be no structures located within the shoreline setback area and the land may be used for gathering or as activity lawns.

To provide screening of the property, fencing will be installed at the northern boundary of the Cove Property, a portion of which is within the shoreline setback area. Pursuant to DPP Administrative Rules, Part 2, Chapter 15, a Minor Shoreline Structure Permit may be issued for minor structures within the shoreline area, including open-work (i.e. 50 percent open) metal, wood, or vinyl (or similar synthetic material) fences no more than six feet in height. Accordingly, the Applicant will submit a Minor Shoreline Structure Permit application to DPP concurrently with the submittal of the CUP, Major application. Additionally, portions of the landscaped lawns and pedestrian pathways may be located within the shoreline setback area (Figure 3.3). Pathways may require limited grading and would be comprised of permeable materials such as gravel or crushed coral that would not disturb shoreline processes. The pathways will enhance connectivity throughout the site and complement access to recreational resources. The Applicant will continue to consult with DPP and a final determination on the need for an SSV will be made as the Project progresses.

In alignment with ROH, Chapter 26, planned structures will be set back at least 60 feet from the certified shoreline. The 60-foot setback area will be maintained as open space, preserving the natural shoreline environment and lateral public pedestrian access to the beach.

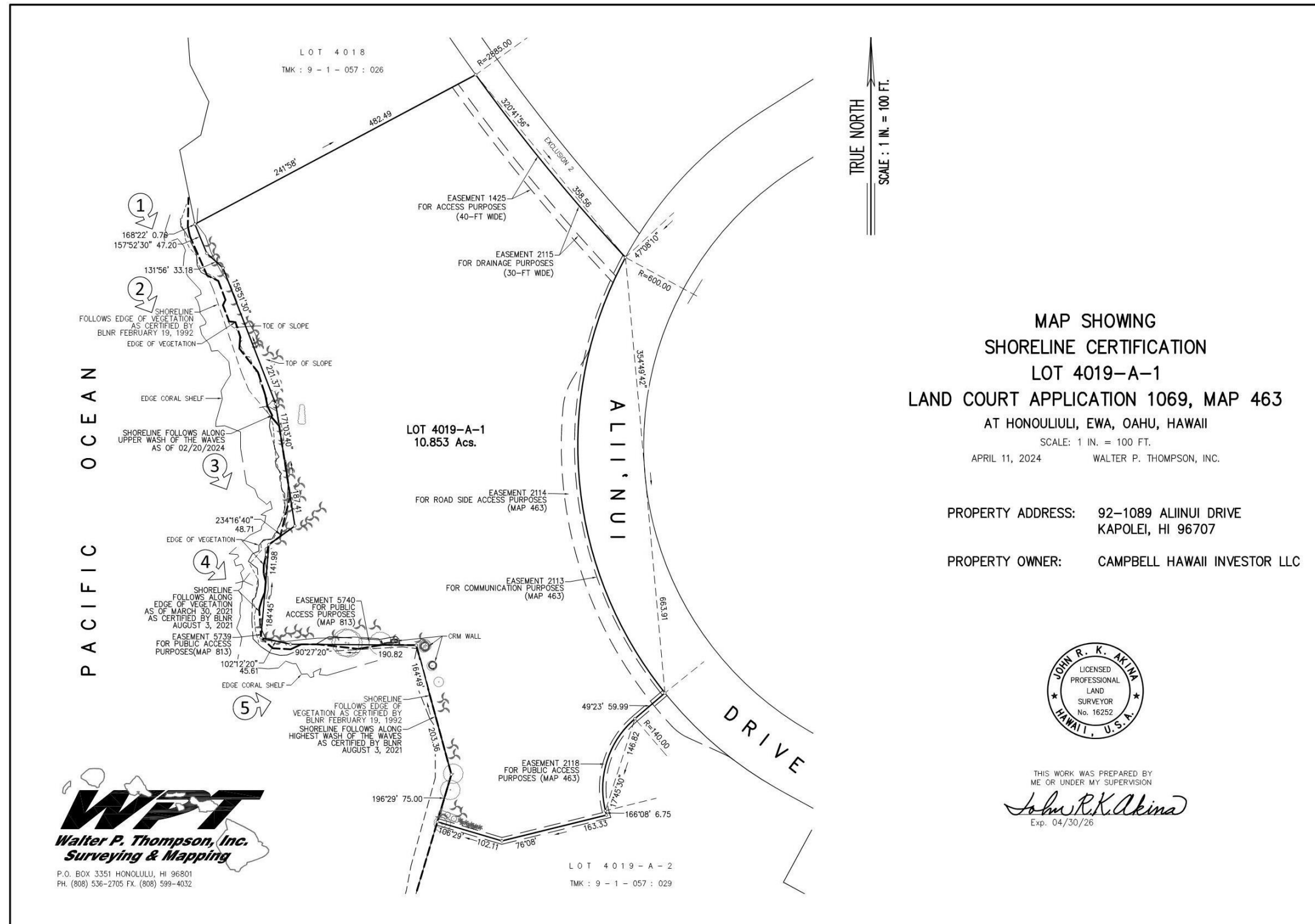


Figure 1.98

Preliminary Shoreline Survey Map (2024)

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Purpose and Need of the Project



Section 2

Purpose and Need of the Project

The following section discusses the regional context of the Project and states the redevelopment's purpose and need. To meet the Project purpose, objectives were established to evaluate alternatives to the Proposed Action. The objectives are stated in this section, and further discussed in *Section 6.0*.

2.1 Regional Context

Honoring the history and connection to place are key to guiding the planned redevelopment at the Cove Property. Situated along the leeward coast of O'ahu in the 'Ewa District, The Cove is a self-contained, premier entertainment venue that covers approximately 10.85 acres of land. Prior to its commercial use, the site was part of the neighboring Lanikūhonua property, which was the residence of Alice Kamokilaikawai Campbell, James Campbell's daughter, for over thirty years. The properties were acquired by James Campbell in 1877 as a part of his purchase of Honouliuli ahupua'a.

Used as an entertainment venue since the late 1970s, the first major redevelopment of the property occurred in the early 1990s. In the last three decades, minor renovations have been made. The current tenant's lease will expire in 2024, and the landowner now has the opportunity to redevelop and refresh the property to offer residents and visitors an authentic and attractive gathering place that honors the history of this place and surrounding natural environment.

The Project site is located adjacent to the physical extents of the Ko Olina Resort master-planned community¹, which is served by four man-made lagoons, a golf course, hotels, condominiums, timeshares, recreation clubs, and two commercial centers. Gathering places and entertainment venues are provided at the hotels and the neighboring LCI. There is currently no property that consolidates a performing arts venue, restaurants, retail, and educational activity programming onto one location designed to provide experiences for local kama'āina and visitors alike throughout the day. Therefore, redevelopment of the Cove Property will complement and enhance existing resort and recreational opportunities within the surrounding area.

Located within the 'Ewa DP area, the Cove Property is designated for Resort/Recreation Area uses. The Cove Property and the surrounding area is envisioned by the City as an integral part of developing the region as the island's "Secondary Urban Center," and therefore serves a unique social and economic function. The area is designated in the City GP as one of four "secondary" resort destinations on the island, which are part of the City's overall strategy to relieve growth pressure on Waikīkī (DPP, 2020). The 'Ewa DP estimates that this area will add approximately 5,500 hotel units by 2035. In

¹ The Cove Property is located adjacent to the Ko Olina Resort area. The Ko Olina Resort Master Plan does not encompass the Cove Property or the neighboring LCI property, as they are not subject to the original Ko Olina Declaration of Conditions, Covenants and Restrictions recorded by Campbell Estate in 1986. For planning purposes, the City and County of Honolulu 'Ewa DP (amended 2020), which establishes the long-range vision for the region, identifies the Cove Property within the physical extents of the resort land use area (*Figure 1.6*).

addition to its designation as a primary resort destination, the area is envisioned as an employment center and waterfront destination for the public. Overall, population in the 'Ewa DP is expected to grow from 68,7000 in 2000 to over 164,000 by 2035, while job growth is estimated to grow from 16,400 non-construction jobs in 2000 to over 87,000 by 2035 (DPP, 2020). Redevelopment of the property will support the region's growing visitor population and local population by providing construction jobs in the short-term, and long-term operational jobs in closer proximity to residents' homes. The growing local population will also be supported with a new gathering place with various dining, retail, and recreational opportunities, enhancing the attractiveness and quality of life in the region.

2.2 Statement of Purpose and Need

The Cove Property reflects the rich legacy of Alice Kamokilaikawai Campbell. As such, the overall Project goal and planned improvements have been refined over several years with input by legacy families. The following goal was established to guide the planning and development of the Project:

Achieve a balanced development that honors the history of these 'Ewa lands and the power of place and Hawaiian culture, while achieving an acceptable financial return by transforming the property into a contemporary, authentic Hawaiian gathering place with unique entertainment, dining, and retail experiences for local kama'āina and visitors alike.

The purpose of the redevelopment is to revitalize the Cove Property by replacing the existing outdated structures and programming with an authentic Hawaiian community gathering place for kama'āina and visitors that honors and reflects the history, culture, and connection to this place. Consistent with the UA (Ordinance No. 89-27), the Project will enhance the property's long-standing use as a Hawaiian Theme Park and commercial lū'au. The commercial lū'au will continue to be the focal point of the Cove Property. To support the lū'au, the Project will provide an exciting and dynamic mix of ancillary uses, including renewed programming, retail, dining, and recreation experiences for the community, and a walkable attraction for visitors within the surrounding area. This redevelopment will support the area's unique social and economic function as the planned Secondary Urban Center. ~~Improvements to the Cove Property are necessary to manage coastal resources, enhance access to the shoreline area, and preserve the natural and cultural environment of the site.~~ Due to its location along the coast, redevelopment will plan for the adaptability and resilience of the property into the future so that it may be enjoyed by generations to come. Improved utilization of the Cove Property will promote access to this place, and revenue generated from The Cove may be redirected to support the Applicant's desired natural and cultural resource management priorities and educational opportunities on the site.

2.3 Project Objectives

In order to accomplish the purpose and goal of the Project, the following redevelopment objectives have been established. The objectives are further used to analyze several Project alternatives described in *Section 6.0*:

Project Objectives

1. Create an authentic community gathering place for locals and visitors that honors and reflects the history, culture, and connection to place.
2. Optimize the potential of the property by activating the site during both the day- and nighttime through restaurants, retail, and dynamic programming.

3. Strengthen the 'Ewa region as the Secondary Urban Center by providing quality jobs to support residents' quality of life, stimulate local spending, and increase revenues to the State's tax base.
4. Indirectly support local businesses through the purchase and sale of goods and services.
5. Plan for the future by implementing sustainable practices and adaptive and resilient design features, and minimizing environmental impacts.
6. Maintain and enhance the quality of the near-shore coastal environment and preserve access to public recreational resources.
7. Retain the natural beauty of the property by enhancing existing open space and landscaping.

As discussed, the Project aims to enhance the property's use as a Hawaiian-themed outdoor recreation facility and create an authentic gathering place and provide updated programming for local kama'āina and visitors that honors and reflects the history, culture, and connection to this place. The Project will strengthen the 'Ewa region as the Secondary Urban Center by providing an estimated 817 total jobs (678 FTE jobs) in the long term. Locating jobs within the region in proximity to residents' homes will reduce commute times, thereby improving overall quality of life.

Design of the planned structures will be adaptative and consider the predicted impacts of SLR, and operation of the Project will implement sustainable practices. Planned structures will not cover more than 30 percent of the property in accordance with the UA, preserving open space and retaining the natural beauty of the Cove Property. Lush landscaping and pedestrian walkways will be provided and coastal views and access will also be preserved and enhanced by the Project.

As a part of this EIS evaluation, ratings were developed to evaluate the Project in terms of satisfying each objective described above. These ratings are used to evaluate the Proposed Action as described in *Section 3.0* and the alternative actions described in *Section 6.0*. See further discussion in *Section 6.0*.

The following *Section 3.0* provides a detailed description of the planned Project.

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Section 3

Proposed Action

Section 3

Proposed Action

This section presents a detailed overview of the Proposed Action, including the Cove Property's historical context, existing conditions, and key Project components. Project components are illustrated by conceptual architectural plans, which would be finalized as planning and design of The Cove progresses. Preliminary plans for open space, landscaping, site access, and off-street parking are also discussed, and the anticipated schedule and estimated construction costs are provided.

3.1 Site History

The Cove is located in the Honouliuli ahupua'a in the moku of the 'Ewa District. At contact, the most populous ahupua'a on the island was the Honouliuli ahupua'a, as it had an abundance of varied resources available for use by early Hawaiians (*Section 4.1*). As a result of the Māhele in 1848, the Project area was granted to Miriam Ke'ahi-Kuni Kekau'ōnohi, one of the wives of Lihiliho (Kamehameha II). Subsequently, James Campbell purchased most of Honouliuli ahupua'a, including the Cove Property, for cattle ranching in 1877. By 1920, the lands of Honouliuli were primarily used for sugarcane cultivation and ranching.

Beginning in 1939, Alice Kamokilaikawai Campbell, daughter of James and Abigail Kuaihelani Maipinepine Campbell, resided adjacent to the Project area in Lanikūhonua for nearly 30 years. Mrs. Campbell, or Kamokila as she was affectionately known, named the area Lanikūhonua which means "where the heavens meet the earth" (Lanikūhonua Cultural Institute, 2019). Throughout her life, Kamokila dedicated Lanikūhonua as a place to celebrate cultural traditions of Hawai'i. Today, the Lanikūhonua Cultural Institute continues to host activities and events to perpetuate Kamokila's legacy and mission of supporting, fostering, and promoting Hawaiian cultural education.

Since the late 1970s, the Cove Property has been primarily used for commercial lū'au, entertainment, and wedding operations. A CUP to establish and operate the private commercial lū'au as a recreation and amusement facility within the AG-2, General Agricultural District was approved by the City DPP in 1979 (File No. CUP 79/CUP-15). An SMA Use Permit was also approved for the facility, which included a provision for a public beach ROW through the property (Resolution No. 79-35).

Subsequently, the site was rezoned from AG-2, General Agricultural District to B-1, Neighborhood Business District and a UA for Conditional Zoning was approved on February 13, 1989 (Ordinance No. 89-27).

The first major redevelopment of the property occurred in the early 1990s. A Final EA for Paradise Cove was published in August 1993 and an SMA Use Permit was subsequently approved by the Honolulu City Council (Resolution 93-318) to allow the redevelopment and expansion of commercial facilities, consistent with the site's B-1, Neighborhood Business District zoning designation. The approval also required that lateral public beach access be provided in perpetuity, and that limitations on beach activities be imposed to preserve the beach. In 1993, a CUP (File No. 93/CUP-2-7 (Type 2)) was completed for the redevelopment and was subsequently modified in 1999 to add a wedding

chapel. Off-street parking located at the adjacent Lanikūhonua facility was also permitted to accommodate the redevelopment (File No. 94/VAR-70 and 97/CUP1-69). Minor renovations and additions to existing structures on the site followed in 2006 and 2014.

The Project site is situated in Kapolei, adjacent to the Ko Olina Resort master-planned community. The Project site and the neighboring Lanikūhonua property were envisioned as a “Hawaiian Cultural Center” adjacent to the resort and were developed and used accordingly.

3.2 Existing Conditions

Located along the leeward coast of O‘ahu in the ‘Ewa District, the 10.85-acre property is identified as TMK (1) 9-1-057:027. The Cove Property is bounded by Ali‘inui Drive to the east, the shoreline/Pacific Ocean to the west, Lanikūhonua Cultural Institute to the south, and a vacant lot planned for a Makaīwa Beach Park to the north (*Figure 1.1*). The Project is situated adjacent to the Ko Olina Resort, which includes various recreation and resort facilities and four man-made lagoons that are provided as ~~Ko Olina~~ public beaches/lagoons. The Ko Olina Center and Station, which includes several casual dining establishments, is the primary commercial center within the Resort.

The Cove Property is a self-contained, premier entertainment venue that currently operates a commercial lū‘au dinner show, which takes place daily from 5:00 p.m. to 9:00 p.m., and can accommodate approximately 1,200 visitors. Attendance averages 500 patrons each weekday evening, with between 700 to 900 guests on the weekends and during peak visitor months. In addition to the lū‘au dinner and show, the services, amenities, and activities include a greeting and photo arrival area and Hawaiian games and arts and crafts demonstrations. Restrooms are provided for guests, and a back of house area supports site operations. A commercial wedding chapel was constructed in the early 1990s, and small weddings occur on the Project site during various hours of the day.

Structures on the site are comprised of portable and intact buildings and modern lū‘au huts that support existing commercial uses. See *Figure 3.1* for an illustration of existing structures on the site. Existing building area at the Cove Property totals approximately 23,476 sf or 4.97 percent of the lot area, which complies with the UA’s limit for lot coverage of 30 percent (141,787 sf).¹

Public use of the natural beach/lagoon adjacent to the Project site is permitted and limited to certain activities pursuant to the SMA Use Permit approved in 1993 (File No. Resolution 93-318). The landowner currently provides and maintains the 10-foot-wide public beach access. Fifteen off-street parking stalls on the adjacent Lanikūhonua site are available exclusively for beach parking use.

A majority of the Cove Property is currently used as open space. The existing landscaping includes coconut trees (*Cocos nucifera*), kiawe (*Prosopis pallid*), beach naupaka (*Scaevola sericea*), mimosa trees (*Albizia julibrissin*), and various native, Polynesian, or tropical shrubs. During commercial lū‘au events, activities, such as Hawaiian games and arts and crafts, are hosted in the open space areas.

¹ Source: DPP File No. 2014/MOD-117(WA) and 2014/MOD-118, issued on March 16, 2015.

Access to the Cove Property is provided at the northeast portion of the site via Ali'inui Drive, which is a privately owned road. The road is a major vehicular artery servicing the surrounding resorts and residential areas and connecting them to the Interstate Highway 1 (H-1) system. Two parking areas are provided on the site, including an employee parking lot at the north of the property and a parking area with loading/unloading zones for buses at the east along the Ali'inui Drive frontage. The Cove Property is also served by 203 off-street parking stalls provided on the adjacent Lanikūhonua site.



Figure 3.1

Aerial View of Existing Property

3.3 Proposed Action

3.3.1 Project Description

The Applicant plans to redevelop the 10.85-acre Cove Property as The Cove in accordance with the UA (Ordinance No. 89-27), which limits the types of commercial activity on the Property to restaurants and retail activity associated with a Hawaiian Theme Park and a commercial lū'au operation. The redevelopment will be contained entirely within the subject parcel. The planned improvements will be the first major enhancement of existing amenities on the property in over 25 years. The intent of the Project is to update the commercial lū'au show and create an authentic Hawaiian outdoor recreation facility and community gathering place for kama'āina (Hawai'i residents) and visitors that honors and reflects history, culture, and connection to place. Revitalization of the Cove Property will provide ancillary uses comprised of a dynamic mix of retail, entertainment, and dining experiences within an immersive coastal setting that authentically honors the property's Hawaiian legacy in a contemporary form. The Cove is envisioned to serve as a major recreational resource, visual amenity, and economic generator for the community.

Several existing dated structures at the site and existing concrete walls within the shoreline setback area will first be demolished (see *Figure 3.2²* following *Section 3.3.7*). Following demolition, the site will be restored to its pre-existing condition before redevelopment commences. Central to the redevelopment is a new amphitheater/performing arts venue capable of housing the daily-run commercial lū'au and other events, as appropriate (see *Figure 3.3³* following *Section 3.3.7*). The commercial lū'au will continue to be the focal point of the Cove Property. Ancillary improvements to update and modernize the Cove Property and complement the Hawaiian community gathering place and commercial lū'au will also be developed, including an improved main arrival area, retail shops hosting goods made in Hawai'i, restaurants and a marketplace showcasing local cuisine and agricultural products, and welcoming and engaging common areas. Retail and dining options will attract visitors and families in the 'Ewa region and across the island looking for a unique experience in a relaxed and beautiful setting. The existing wedding chapel and support building will remain in place and may also be improved. Additionally, a cultural pavilion and open-air activity lawn areas may be included. Potential programming at the pavilion and on the lawns may include pre- and post-lū'au show educational and cultural workshops and/or activities that highlight the sense of place and fit appropriately within the coastal setting (i.e., demonstrations featuring lei-making, kapa-making canoe/wa'a activities, and imu activities) or coordinated events and programs with the neighboring Lanikūhonua Cultural Institute. Planned programming will be supported by back of house areas and restrooms throughout. Finally, existing parking areas located at the north and east portions of the Cove Property will be reconfigured. No improvements are proposed to the parking lot located on the adjacent Lanikūhonua property.

Preliminary design of The Cove ~~may~~ is planned to encompass a total building area of approximately ~~65,413 71,860~~ square feet (sf), which will cover approximately ~~13.84 15.20~~ percent of the 10.85-acre (472,757-sf) lot and ~~complies with~~ is well under the 30 percent lot coverage limit articulated in the UA, which allows for up to 141,827-sf of building area. Design of the structures will be inspired by both contemporary and Hawaiian architecture to provide a welcoming and authentic setting. To enhance the ocean views afforded throughout the Cove Property, open-air structures and pavilions consisting of clean, natural, and textured materials will be constructed. The preliminary program indicates that new structures are planned with heights ranging from approximately 13.0 feet to 36.5 feet, will adhere to the 40-foot height limit of the B-1, Neighborhood Business District, and will be set back at least 60 feet from the shoreline. Existing structures on the Cove Property that are remaining in place (i.e., the chapel and its support building) are approximately 34.8 feet high. Finished floor elevations of the planned structures may range from eight to 19.5 feet above msl. The Cove Property will be enhanced by pockets of open space with lush landscaping, shading, and natural pathways to create an inviting experience that highlights the beauty of the surrounding coastal area.

Construction of the Project will support the economy of the 'Ewa District on O'ahu and the State and City economies. The redevelopment is estimated to create approximately total 1,429 jobs (1,386 FTE) short-term jobs during construction and sustain 817 jobs (678 FTE) annually during operation,

² *Figure 3.2, Demolition Plan*, has been updated in the Final EIS to improve legibility in response to a comment received on the Draft EIS (refer to *Table 7.3, Comment C.1.*).

³ *Figure 3.3, Preliminary Site Plan* has been updated in the Final EIS to improve legibility per a comment received on the Draft EIS (refer to *Table 7.3, Comment C.1.*). Additional changes include revisions to the building numbers to account for the Amphitheater Control Booth (now Building 11), removal of the public restrooms, and minor reconfigurations to the buildings. Final design will be determined as the Project progresses.

positively contributing to economic diversity in the West O‘ahu region.⁴ Locating jobs within the ‘Ewa district will provide opportunities for employees to reduce their commute times, thereby enhancing their quality of life. In the long-term, approximately \$4.6 million in State government revenue and approximately \$2.1 million in City revenue is expected to be generated or sustained per year annually.

Structures on the site will be set back at least 60 feet from the shoreline to consider resilience and adaptation to climate change and its anticipated impacts, including SLR and increased storm events. Elevations of the planned structures may range from eight to 19.5 feet above msl. Existing beach access and parking will be maintained and not expanded to protect the natural cove and lagoon that is considered a valued resource in the area. Additionally, parking management strategies as further discussed in Section 4.7.3 will be implemented so as not to overwhelm the natural resource.

An overall site plan is provided in *Figure 3.3* and summarized in *Table 3.1*.

Table 3.1: Preliminary Program^{1,2}				
Project Component^{3,2}	Approximate Building Area (sf)	Existing Grade (ft above msl)	Approximate Finished Floor Elevation (ft above msl)	Building Height (ft)
Amphitheater/Performing Arts Venue (650 seats) - (Includes Stage Back of House and Support Spaces - Buildings 4, 8, 10, 11, 16, and 17)	<u>11,987</u> 1,680	<u>11.0 to 14.0</u>	11.0 to 13.0	<u>13.0 to 19.3</u>
Total Restaurant (Buildings 1, 5, and 6, and 7)	<u>27,496</u> 30,240	<u>6.0 to 9.0</u>	10.0 to 11.0	<u>26.6 to 36.5</u>
Total Village Walk Retail (Buildings 2, and 3, 4, and 7)	<u>21,500</u> 26,220	<u>8.0 to 12.0</u>	8.0 to 13.0	<u>22.3 to 31.0</u>
Total Existing Chapel (Buildings 10, 12 and 11, 13)	<u>3,585</u> 3,400	<u>14.0 to 17.6</u>	17.0 to 19.5	<u>19.5 to 34.8</u>
Total Back of House Management Support (Building 8, varies)	<u>845</u> 10,320	<u>14.0</u>	15.0	<u>19.3</u>
PRELIMINARY PROGRAM TOTAL:	<u>65,413</u> 71,860 (~ <u>13.84</u> 15.20 percent of lot^{4,3})			
EXISTING PROGRAM TOTAL:	<u>23,476</u>^{5,4} (~4.97 percent of lot^{4,3})			
MAXIMUM BUILDING AREA:	<u>141,827</u> (30.00 percent of lot^{4,3})			

¹ *Table 3.1* reflects updates to the Site Plan, including reduced building area and revisions to the building numbers, and provides additional information with regards to existing grades and building height.

^{2,4} Design will be finalized as the Project progresses.

^{3,2} Refer to *Figure 3.3* for building numbers.

^{4,3} Total Lot Area: 472,757 square feet

^{5,4} Based on Minor Modification No. 2014/MOD-117 (SMA) to File No. 93/SMA-32 and Minor Modification No. 2014/MOD-118 (CUP) to File No. 93/CUP2-7 approved on March 16, 2015.

⁴ Based on the Economic Impact Report prepared by Environment and Economics LLC (*Appendix I*), which is further discussed in *Section 4.10*. The report estimates the creation of approximately 1,429 jobs (1,386 FTE), during construction, of which 900 (873 FTE) would be direct, 152 (148 FTE) indirect, and 377 (366 FTE) induced. Upon operation, the Project is expected to sustain approximately 817 (678 FTE) jobs annually, of which 583 (484 FTE) would be direct, 121 (100 FTE) indirect, and 113 (94 FTE) induced.

The following sections discuss each Project component. Refer to *Figures 3.4 through 3.21*⁵ following *Section 3.3.7*. Preliminary plans are presented in *Figures 3.4 through 3.12*, while preliminary elevations are provided in *Figures 3.13 and 3.14*.

3.3.2 Main Arrival and Entry Points

The main arrival point to The Cove will be located from the parking lot on the east side property, adjacent to Ali'inui Drive (*Figure 3.3*). A second entry intended for visitors of the lū'au show will be provided along the northeast of the property adjacent to the planned cultural pavilion and Village Walk retail area (*Figure 3.4*). The third existing entry point at the north of the Cove Property will be maintained and reserved for visitors utilizing the wedding chapel or other areas for private events.

The main arrival area will welcome guests and create a sense of inspiration and excitement before entering The Cove. Design of the arrival area will celebrate and honor the beauty and spirit of the Hawaiian culture and create a sense of place. Lush vegetation will be integrated to complement the surrounding natural environment and reflect culturally appropriate themes. Landscaping is expected to consist of native, Polynesian-introduced, or tropical trees and shrubs of varying sizes. See *Section 3.3.6* for further details. Natural materials and shading devices, trellises, or canopies may be integrated to enhance the natural, lush setting and create a comfortable experience. The main arrival area will also serve as a wayfinding element on the site, helping visitors easily locate and access the Project.

3.3.3 Amphitheater/Performing Arts Venue and Program

The Cove Property will continue to be used as a Hawaiian-themed outdoor recreation facility and community gathering place, and the commercial lū'au will remain the focal point of the site. Redevelopment of the Cove Property will include replacement of the existing, approximately 1,200-capacity amphitheater with the new, modernized performing arts venue having a reduced maximum capacity of 650 guests (*Figure 3.3*). The new amphitheater/performing arts venue will continue to serve as the heart of the Cove Property and will be a primary attraction at The Cove. The amphitheater/performing arts venue will be relocated at the northwestern corner of the Cove Property, overlooking the coast and providing an immersive oceanside and garden setting. The venue will host a unique all-around guest experience featuring authentic cultural entertainment and contemporary facilities.

Guests of the new performing arts venue will be welcomed through a main arrival portal designed to highlight the facility as a major attraction on the property (*Figure 3.4*). Primary components of the venue preliminarily include an amphitheater, kitchen/service building, bars, box office, and a back of house area. Additionally, restroom facilities will be located in proximity to the venue. The new amphitheater will include an upgraded audio and visual technology system, elevated stage, and tiered outdoor guest seating for guests. Finished floor elevations of the venue may range from 11 to 13 feet above msl (*Figure 3.5*). Landscaping may surround the amphitheater to create separation from other components of the venue. Sound abatement ~~may~~ will be integrated to mitigate potential noise impacts on the surrounding area, as further discussed in Section 4.9.

Design of the new performing arts venue will be flexible to allow activation during the day and night for various types of programs and events. As discussed, the space will be reduced from its current

⁵ The Final EIS consolidates the Preliminary Elevation figures, resulting in a reduction in the number of figures.

maximum capacity of approximately 1,200 visitors at one time to a capacity of 650 visitors at one time. This may reduce the number of visitors present on the Cove Property at one time, minimize potential adverse impacts to resources, and result in a more efficient use of the facility.

The current nightly commercial lū'au show will be renewed to perpetuate and honor the Hawaiian culture and history of place through the traditions of hula and mele. In addition to nightly entertainment, potential programming at the performing arts venue may include wedding and other event receptions, ~~corporate retreats~~, Hawaiian cultural arts and educational programs and demonstrations, community events, and holiday shows. Activation of the Cove Property with a variety of programs and events will create a new community-oriented recreation experience for residents and a walkable attraction for visitors of the surrounding area.

3.3.4 Restaurants

To support the commercial lū'au, the preliminary plan for The Cove Redevelopment includes approximately 27,496 ~~30,240~~ sf of restaurant space across three buildings, each strategically located to optimize coastal and sunset views (*Figure 3.3*). Lū'au attendees will be able to dine or relax at the restaurants prior to or after the show. The restaurant component aims to establish The Cove as a distinctive destination and Hawaiian gathering place in the overall West O'ahu region for residents and visitors. The restaurants will activate the site at various times of the day and may range from casual to fine dining options. The new restaurants will support the economy and community by featuring local culinary talent and prioritizing the use of fresh, Hawai'i-grown produce when possible.

A restaurant designated as Building 1 may be located at the southern portion of the Project site and adjacent to the beach and lagoon (*Figure 3.3*). This restaurant is within the 3.2-foot SLR-XA and will be elevated at approximately 10.5 feet above msl accordingly. Additionally, an outdoor terrace with seating may be included (*Figures 3.6 and 3.7*). A second restaurant (Building 5) may be located adjacent to the new amphitheater/performing arts venue retail space and lawn area (*Figures 3.78 and 3.9*). To the south of Building 5 and overlooking the beach, a restaurant designated as Building 6 is planned to provide a more upscale dining experience. Both restaurants are also within the 3.2-foot SLR-XA and will therefore be elevated approximately 11 and 10 feet above msl, respectively (*Figures 3.8 10 and 3.11*). In addition to the restaurants, a bar area (Building 7) will be provided (*Figure 3.14*).

Each restaurant may include outdoor terrace seating (covered and uncovered) to allow property visitors to enjoy the coastal setting. Open-air structures may allow the use of natural ventilation, thereby reducing the overall energy footprint of The Cove. Landscaping will be incorporated to complement the outdoor seating areas and create a lush, relaxing environment. The overall Project design will include the use of modern and natural materials that will blend with the surrounding area. In order to consider potential estimated future impacts of SLR, each building on the Cove Property is designed to be adaptable and may be elevated between 10 to 11 feet above msl. The restaurants will also be set back 60 feet from the shoreline. The buildings will range in height from approximately 26.6 to 36.5 feet, within the 40-foot height limit required by the UA (Ordinance No. 89-27) (*Figures 3.13 and 3.14*). Each building will be Americans with Disabilities Act (ADA)-accessible and may include areas for accessory uses, such as service areas, kitchens, loading, restrooms, and trash areas.

3.3.5 "Village Walk" Retail and Potential Market/Retail

Ancillary to the commercial lū'au and supporting the Hawaiian Theme Park, The Cove Redevelopment may provide approximately 21,500 ~~26,220~~ sf of retail area consisting of distinct buildings (Buildings 2, and 3, ~~4 and 7~~ in *Figure 3.3*) in the center of the property. Referred to throughout this EIS as the "Village Walk," this area may feature curated small-scale shops (Building 2, *Figures 3.9 12 and 3.13*).

and a market (Building 3, *Figures 3.10-14 and 3.15*), and show related retail (Building 4, *Figures 3.16 and 3.17*) showcasing a selection of goods, including those made in Hawai'i, fostering an authentic connection between people and place and supporting the local economy. Selected retailers may focus on quality local or seasonal goods. The Village Walk will provide lū'au attendees an attractive and dynamic space to relax and shop before or after the shows. Retail options will attract guests and families in the 'Ewa region looking for a distinctive shopping experience in a tranquil and authentic setting.

The area will be connected by a pedestrian pathway, and will seamlessly integrate with the surrounding restaurants, lawn areas, and the cultural pavilion with performance stage. Planned buildings may be composed of modern and natural materials, reflective of contemporary Hawaiian architecture. The relaxing setting will be enhanced by lush landscaping, shade canopies, and outdoor seating, creating an inviting gathering place for visitors of the property. Planned structures will range in height from approximately 22.3 to 31.0 feet and will adhere to the 40-foot building height limit of the B-1, Neighborhood Business District (Figure 3.13). Additionally, the structures may be elevated eight to 13 feet above msl to proactively consider the impacts of SLR.

3.3.6 Existing Wedding Chapel and Support Building

As part of the redevelopment of the Cove Property, the wedding chapel and support building located at the north of the property, which were originally constructed in 1999 and encompass approximately 3,585 sf of building area, will remain in place, and the designated arrival area will be maintained (*Figures 3.3 and 3.11 8, and 3.19*). The chapel and support building will continue to be used for special events of up to 50 people. The Cove will provide a cohesive event experience and wedding chapel users will be able to benefit from the new improvements on the site, including the amphitheater or restaurants that may be used for receptions and the pathways and open spaces that may be used for photo opportunities. Lush landscaping will be incorporated around the chapel area to create a sense of privacy. Exterior improvements to the existing wedding chapel may also be undertaken as part of the planned Project. However, the existing heights of 19.5 and 34.8 feet would be maintained (Figure 3.14).

3.3.7 Service (Back of House and Administration)

Operation of The Cove will be supported by a Service (Back of House and Administration Building) located at the north of the property (see Building 8, Figure-s 3.12-3.20 and 3.21). The building may include areas for amphitheater/entertainment venue storage, dressing rooms, commercial kitchen, security office, and administrative office. The building is estimated to have a height of approximately 19.3 feet, adhering to the 40-foot height limit of the B-1, Neighborhood Business District (Figure 3.14).



Figure 3.2

Existing Conditions - Demolition Plan

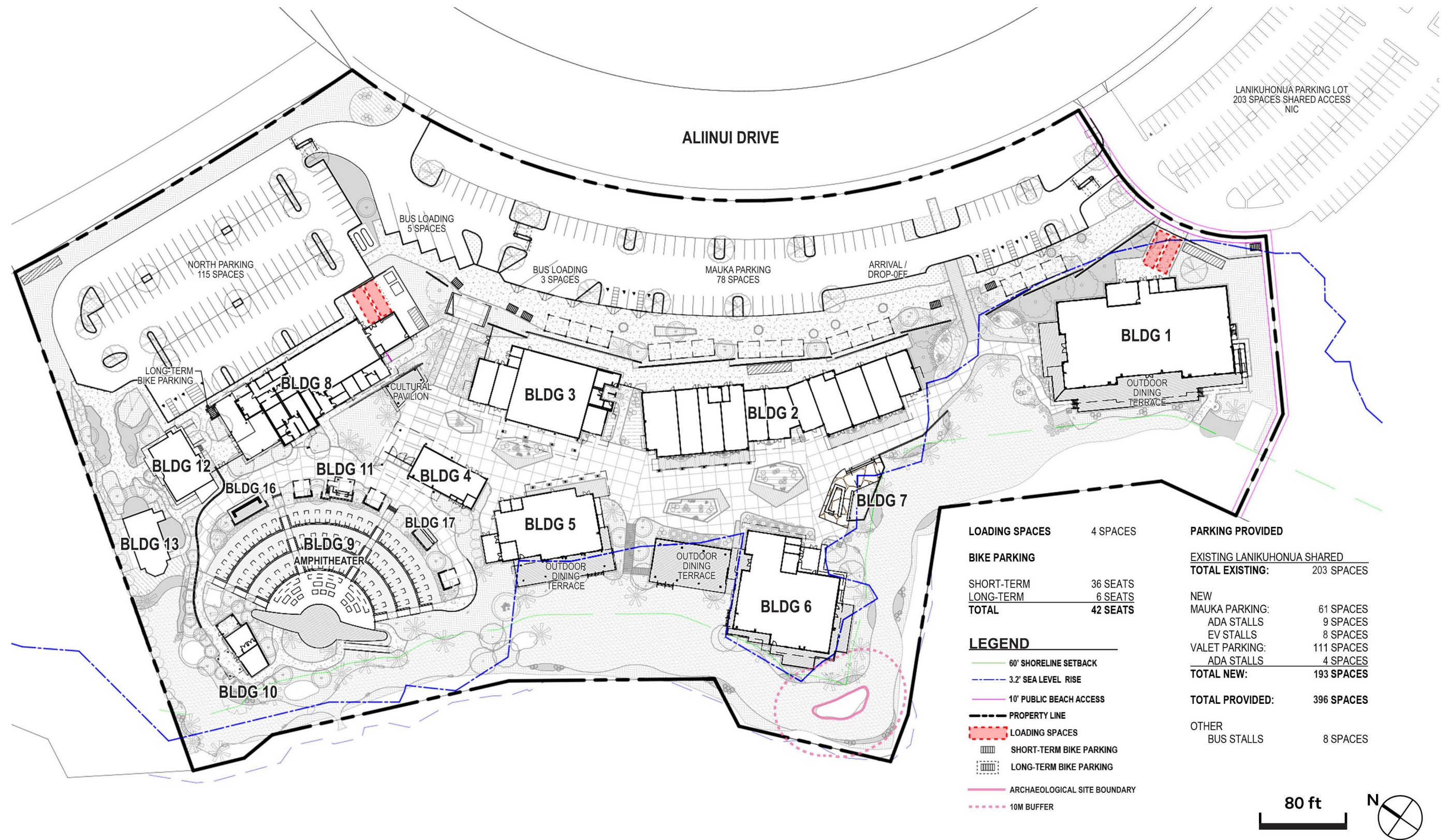


Figure 3.3

Preliminary Site Plan

SHOW ARRIVAL ENTRY

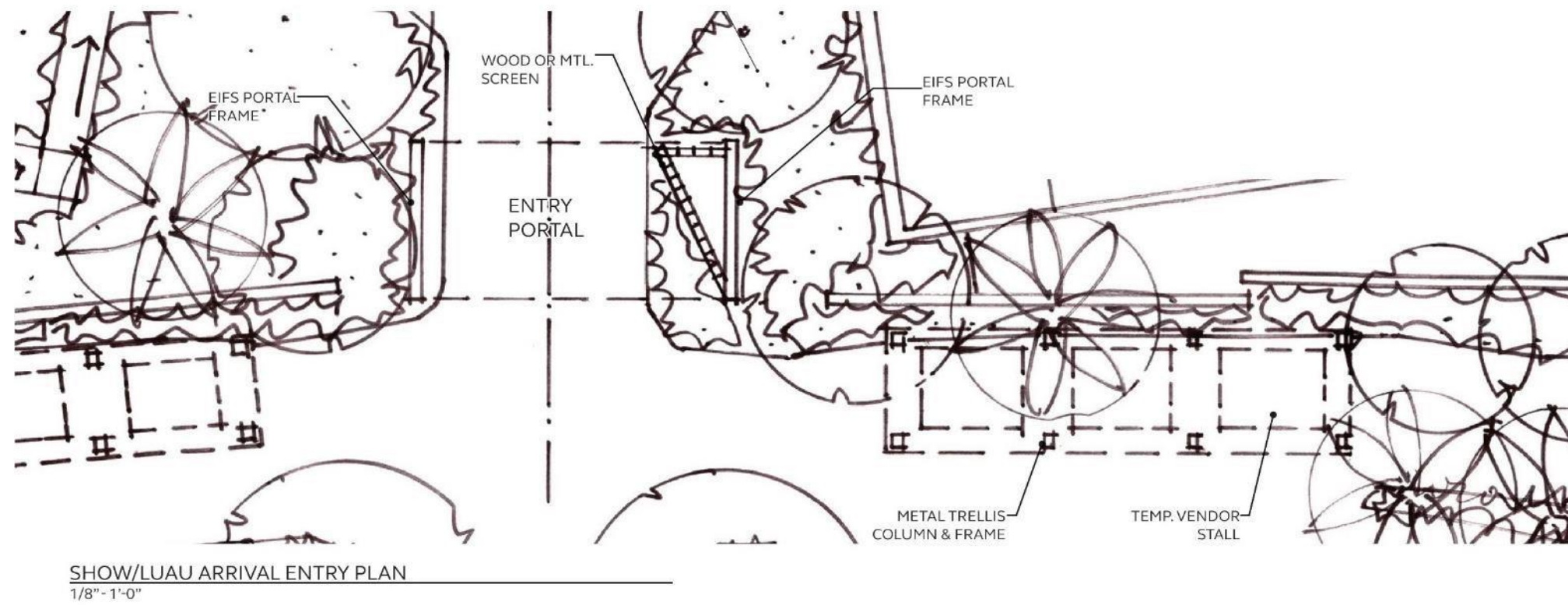
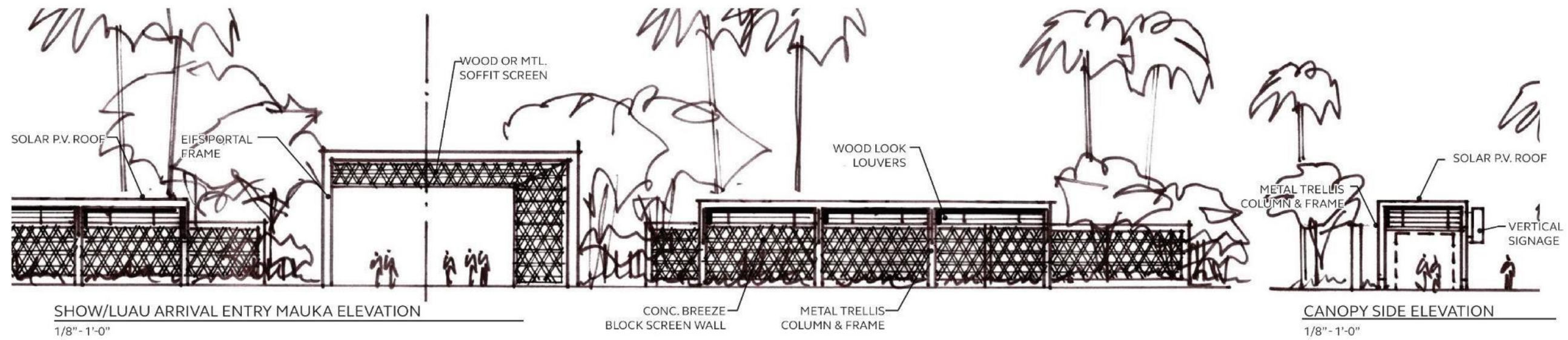


Figure 3.4

Amphitheater/Performing Arts Venue Arrival Entry – Preliminary Elevation and Plan View

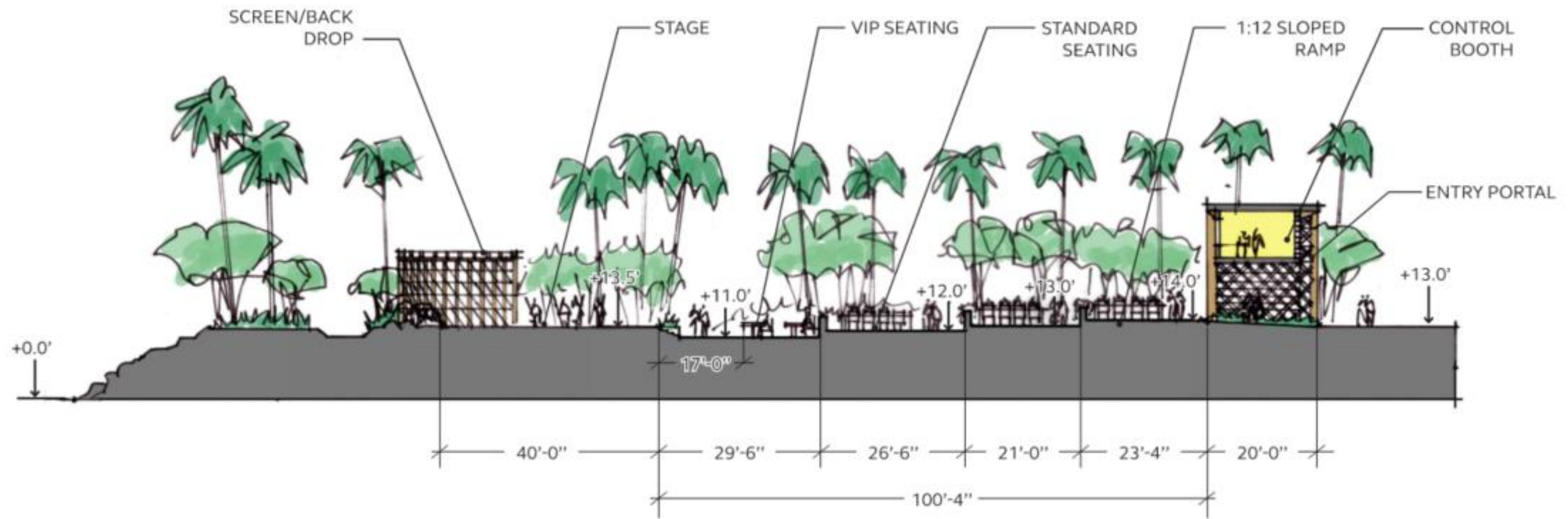


Figure 3.5

Amphitheater/Performing Arts Venue – Preliminary Section View

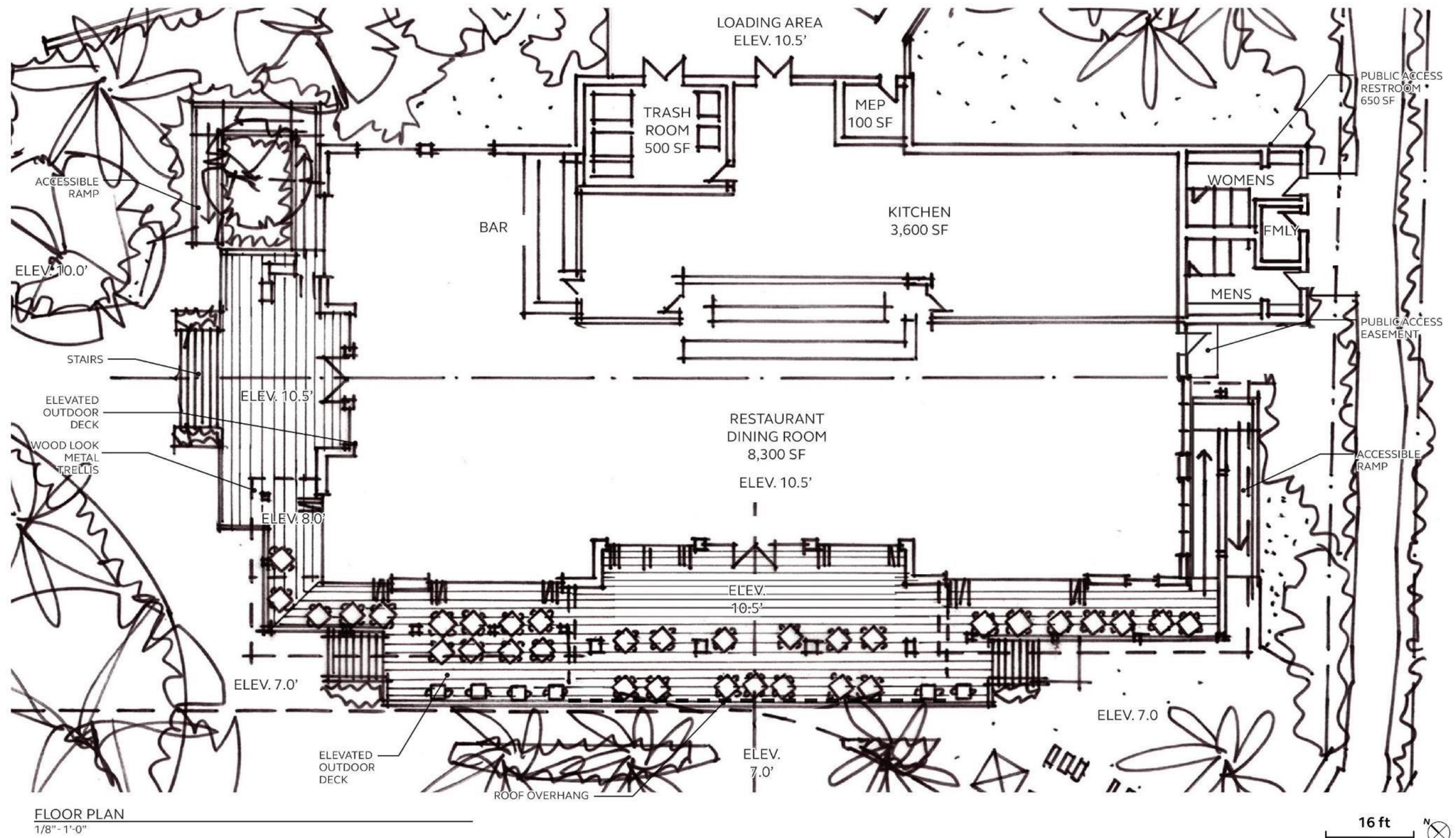
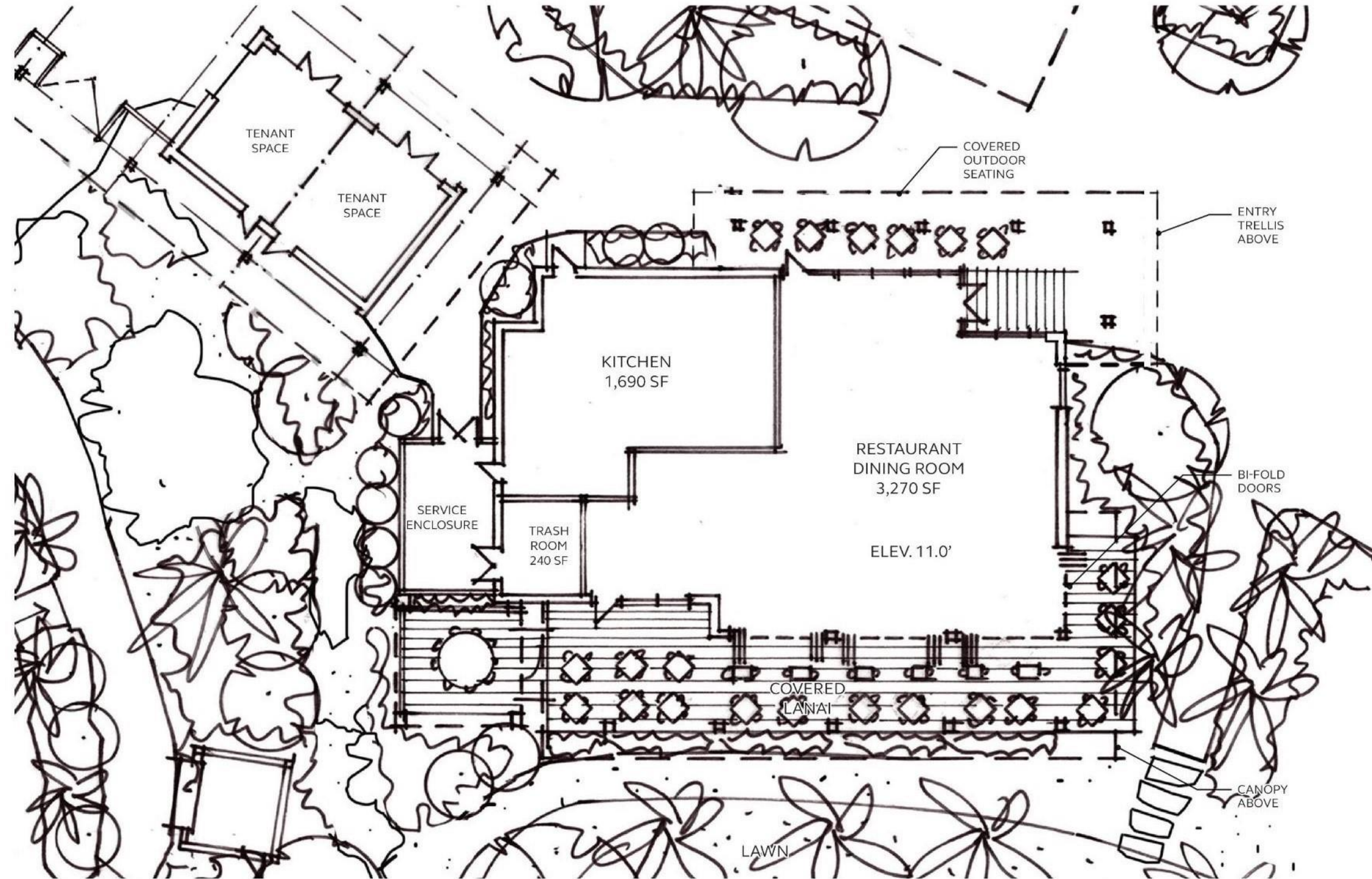


Figure 3.6

Restaurant Building 1 - Preliminary Plan



FLOOR PLAN
1/8" = 1'-0"



Figure 3.7

Restaurant Building 5 - Preliminary Plan

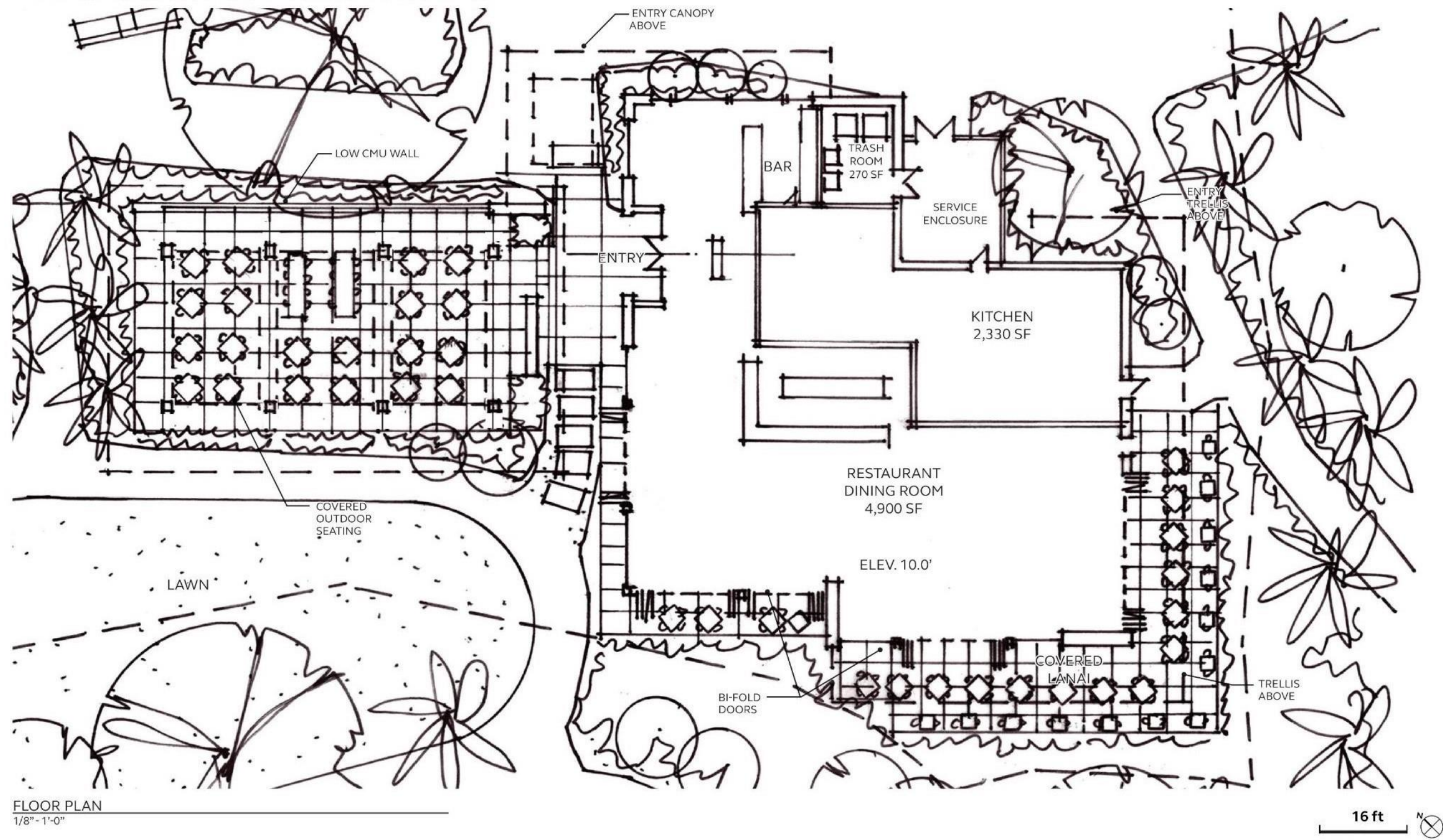


Figure 3.8

Restaurant Building 6- Preliminary Plan

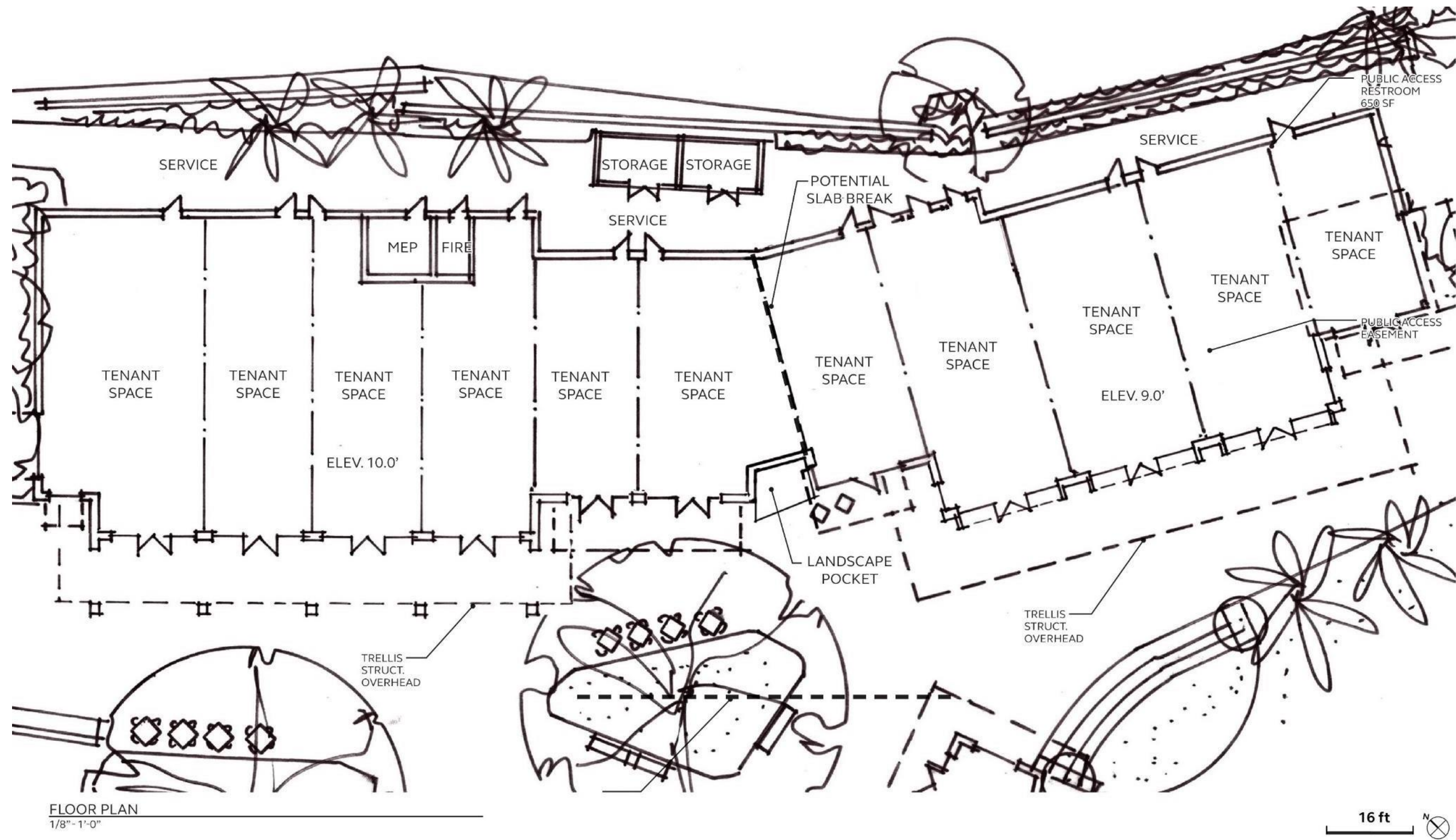


Figure 3.9

Retail Building 2 – Preliminary Plan

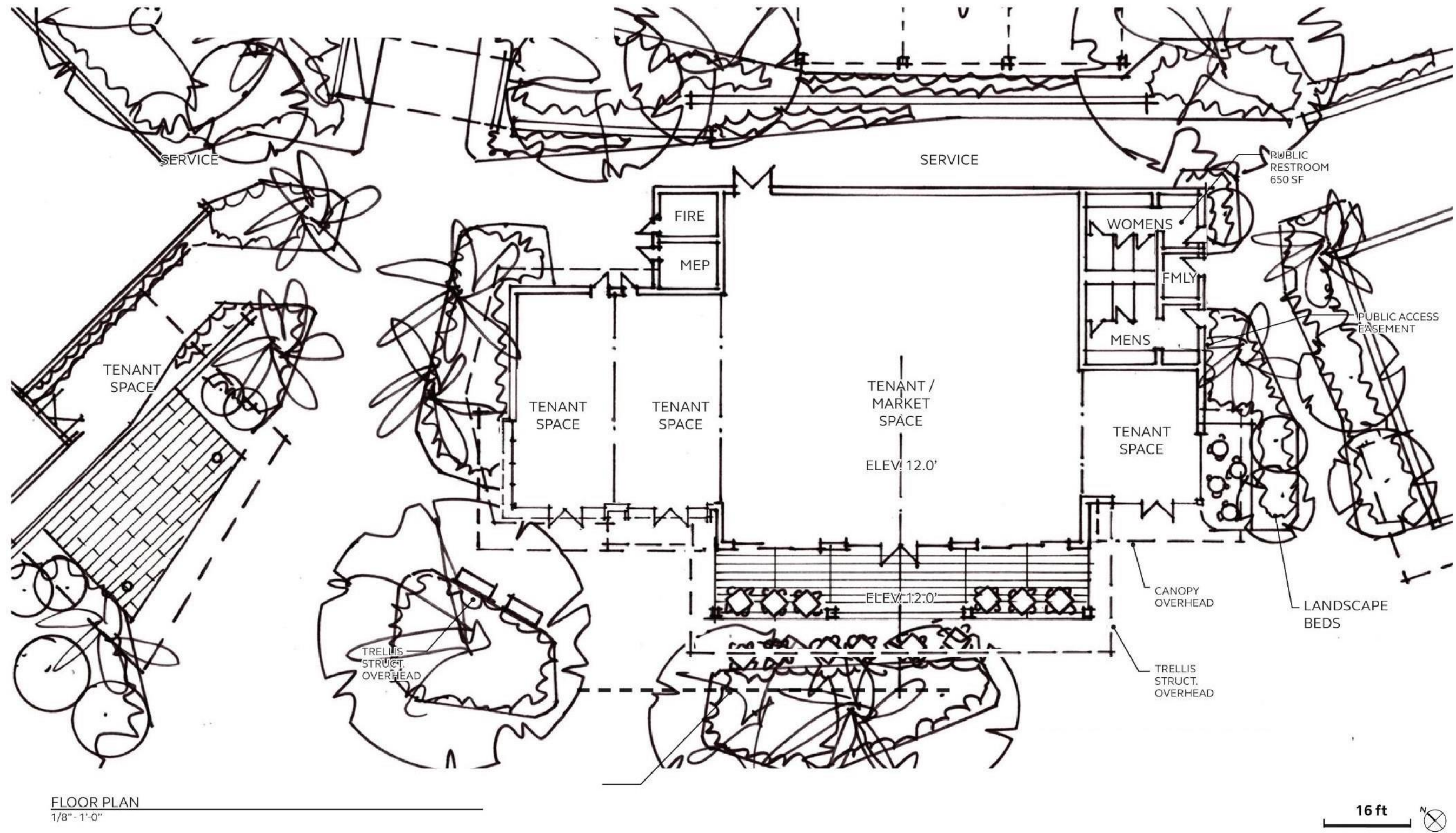
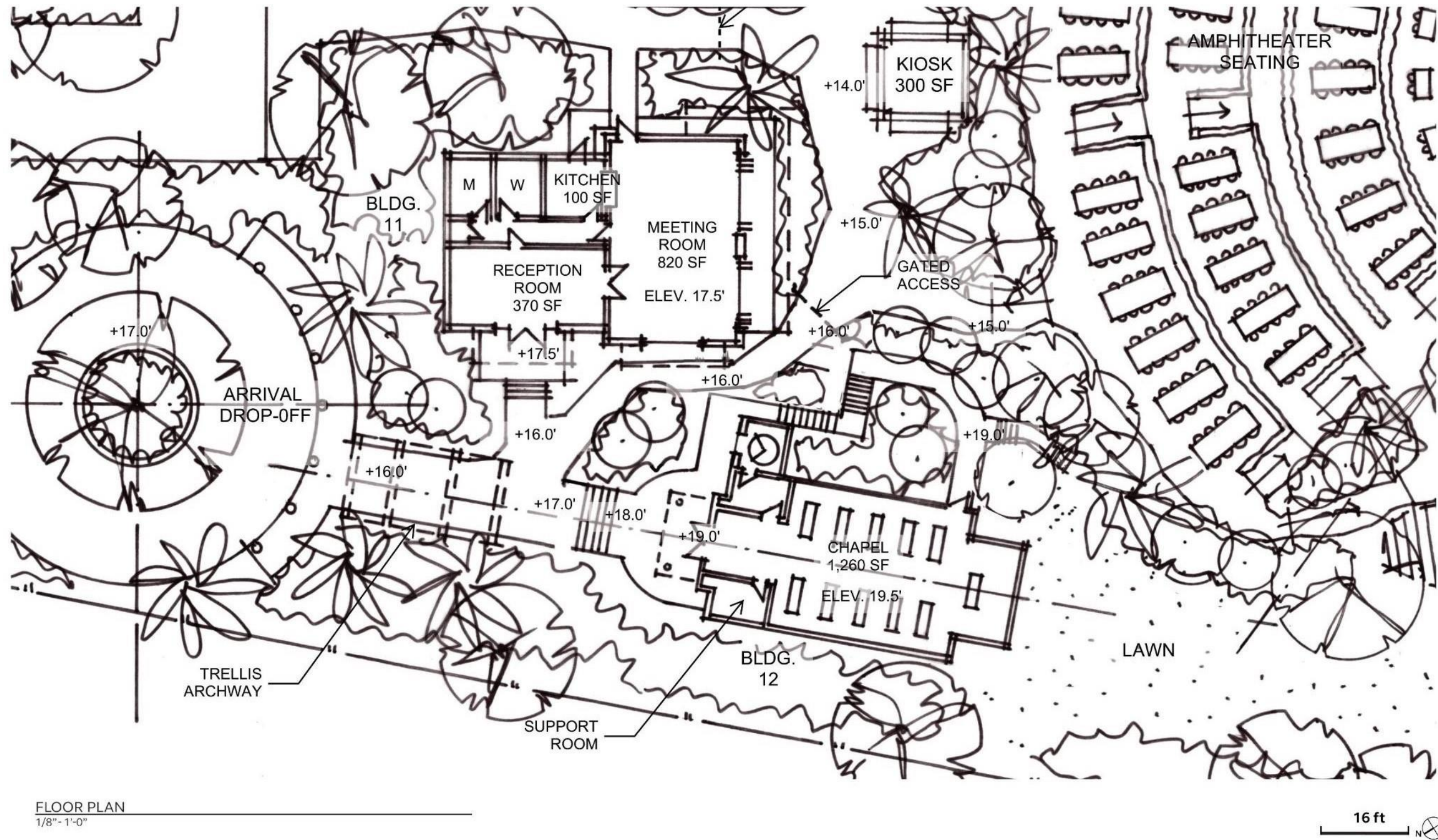


Figure 3.10

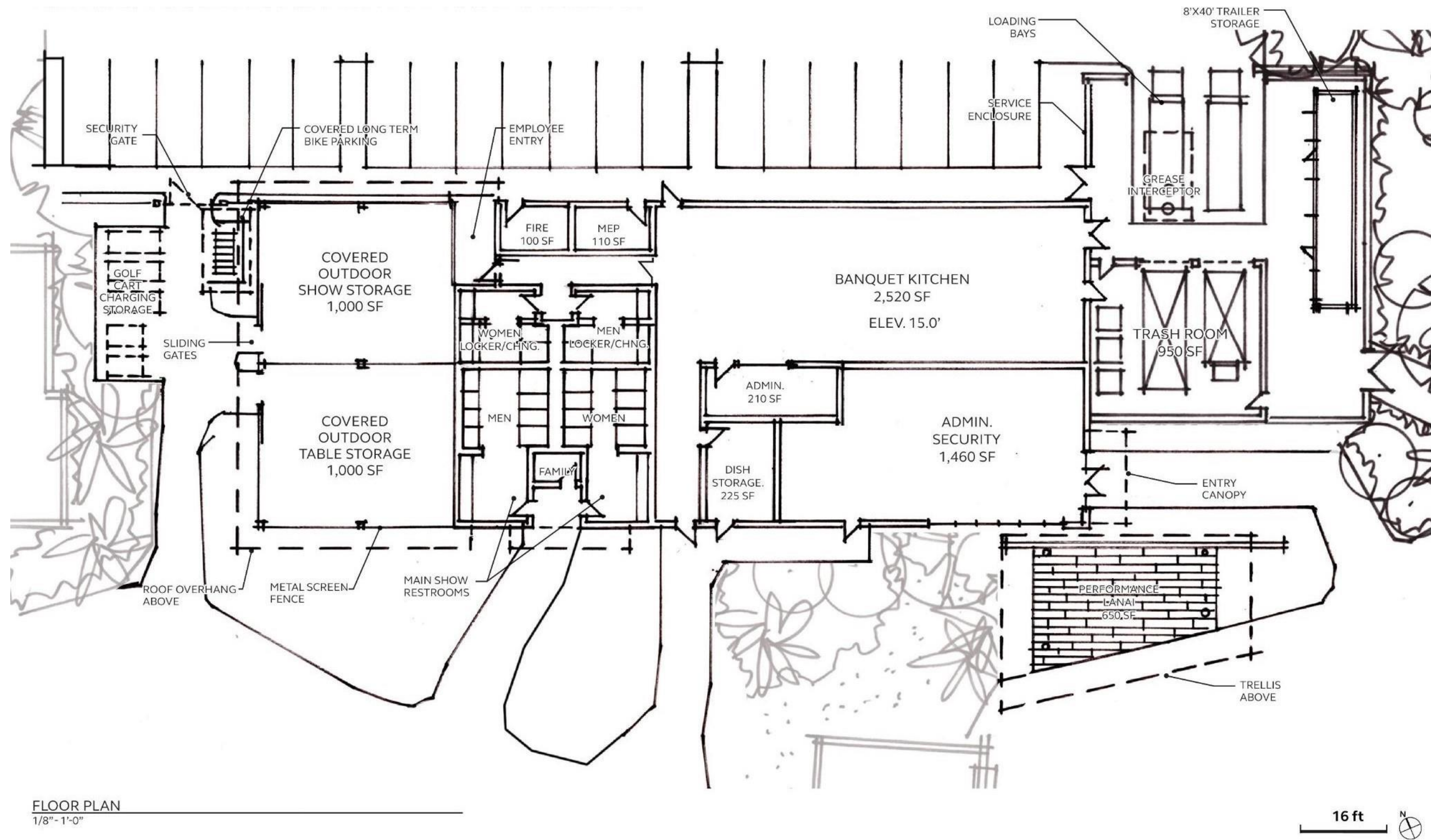
Retail Building 3, Market- Preliminary Plan



FLOOR PLAN
1/8" = 1'-0"

Figure 3.11

Existing Wedding Chapel and Support Building (Buildings 1210 and 1311) - Preliminary Plan



FLOOR PLAN
 1/8" = 1'-0"

Figure 3.12

Back of House Administration and Kitchen Building 8 – Preliminary Plan



Figure 3.13

Preliminary Elevations: Buildings 1, 2, 3, 4, and 5



Figure 3.14

Preliminary Elevations: Buildings 6, 8, 10, 12, and 13

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3.3.8 Open Space, Beach Access, and Connectivity

The Project will adhere to the 30 percent lot coverage limit required by the UA (Ordinance No. 89-27), preserving the majority of the site for open space (Table 3.1). A cultural pavilion with stage and open air activity lawn areas will be integrated throughout the Cove Property, serving as multifunctional spaces for programming, community gathering, or relaxing (Figure 3.3). Potential programming may include pre- and post-show educational and cultural workshops and/or activities that highlight the sense of place and fit appropriately within the coastal setting or coordinated events and programs with the neighboring Lanikūhonua Cultural Institute.

Open areas will be incorporated throughout to preserve views and create a relaxed setting. The site layout will enhance existing views of the ocean for visitors by locating key gathering areas, such as the amphitheater/performing arts venue and restaurants, along the coast. Structures will be set back at least 60 feet from the shoreline, which will maintain lateral public beach access and ocean views from the shoreline.

The Cove Redevelopment does not propose activities that will interfere with public use of the adjacent beach, including commercial activities, such as weddings or renting beach chairs or umbrellas. An access easement for “public access purposes” was created in 1989 and has remained in place at the Cove Property ever since. A formalized grant of access to the City consistent with the 1993 SMA Use Permit approval (Resolution 93-318) is in progress. Maintenance of the access easement, such as regularly scheduled trash pick-up, is conducted by the current tenant of the Cove Property. The existing public beach access along the southern end of the property will remain in place and will continue to be maintained as part of the Project by the landowner. Similar to current practice, regular responsible maintenance of the Project site will be conducted daily to avoid potential spillover onto the beach. In addition, restrooms within The Cove will be available for public use, representing a significant improvement over existing conditions.

Pedestrian pathways will be integrated throughout to provide improved connection and circulation throughout the Cove Property. Walkways will be enhanced by lighting, landscaping, wayfinding, and other themed design elements. Improvements at the Cove Property will create an inviting pedestrian experience, thereby enhancing openness and connectivity within the wider area to public beaches and adjacent hotels, timeshares, and condos. Guests will be able to take advantage of the Project’s close proximity and utilize non-vehicular modes of transportation to access the site such as walking, thus mitigating potential impacts to traffic and aligning with State and City sustainable mobility practices.

3.3.9 Landscaping

Existing landscaping at the site consists of planted and potted trees, shrubs, and flowers of native, Polynesian-introduced, or tropical variety, including coconut trees, kiawe trees, mimosa trees, and beach naupaka. The center of the Cove Property features existing significant trees, including a large monkeypod and Chinese banyan tree. In addition to being valued for their age, these trees serve as key site landmarks for wayfinding across the property. Significant trees will be retained on site to the extent practicable.

Landscaping will play a significant role in expressing culturally resonant themes and experiences throughout The Cove Redevelopment. Special attention will be given to the selection and utilization of native, Polynesian-introduced, and tropical plants, fostering a connection to the surrounding environment and legacy of the Cove Property. See Figure 3.15 22 for a preliminary landscape plan and Figures 3.16 23 and 3.17 24 for a preliminary plant palette.

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Figure 3.1522

Preliminary Landscape Plan

native

ALAHEE

HALA

MANELE

KAMANĪ

KOU

KUKUI

ULU

MILO

adapted

CASSIA SHOWER TREE

PUAKENIKENI

FIDDLE LEAF

YELLOW PLUMERIA

THORNLESS KIAWE

SILVER BUTTONWOOD

MONKEYPOD

suggested plant palette

overstory trees

the cove redevelopment | 05.24.2024

Figure 3.1623

Suggested Plan Palette – Overstory Trees

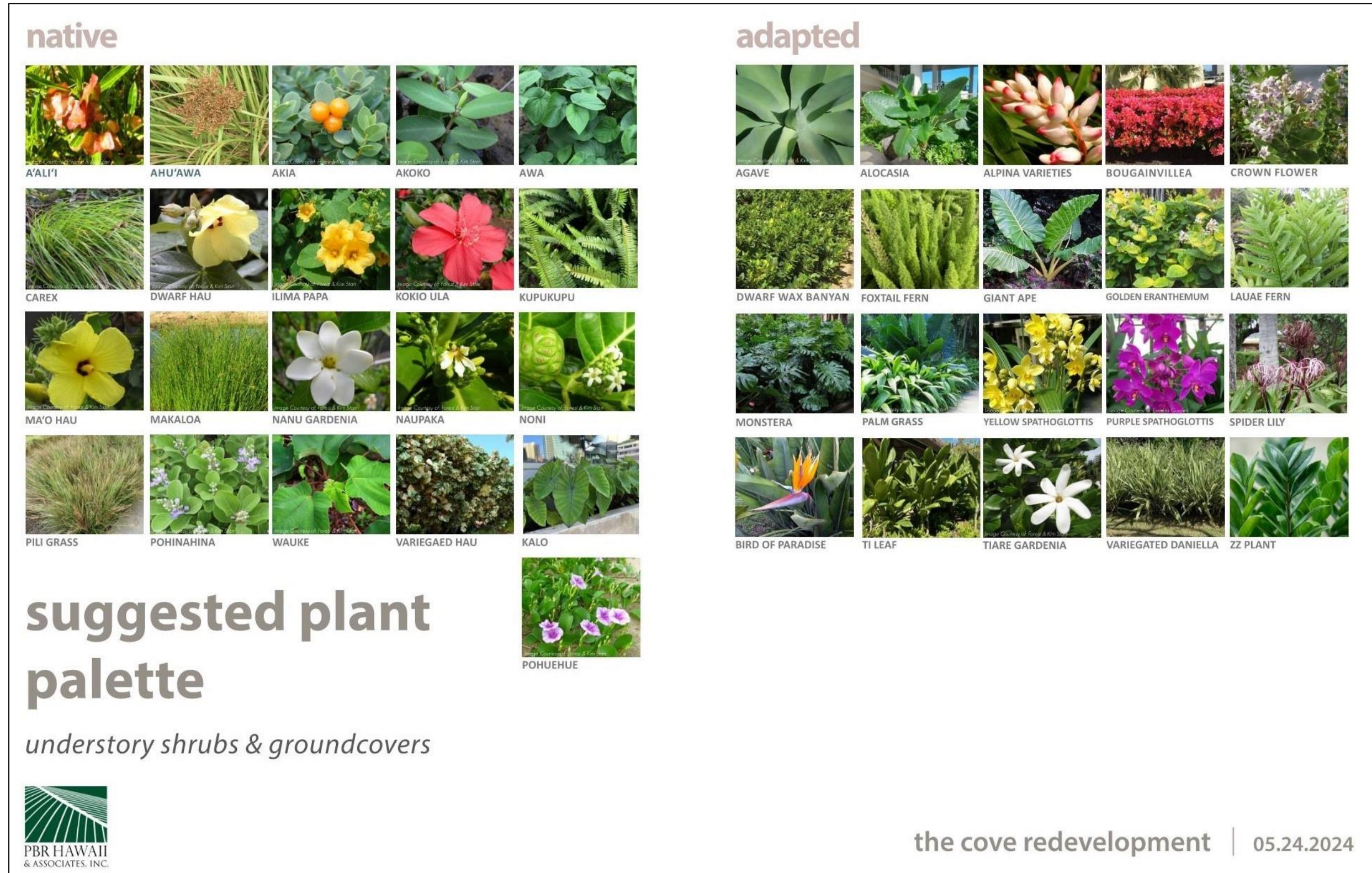


Figure 3.1724

Suggested Plan Palette – Understory Shrubs and Groundcovers

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The palette features small, medium, and large native, Polynesian-introduced, and tropical canopy trees that provide shade and screening and are accented by understory foliage and groundcover consistent with the surrounding environment. Selected native plants and trees include a'ali'i (*Dodonaea viscosa*), 'ākia (*Wikstroemia uva-ursi*), naupaka (*Scaevola taccada*), pohinahina (*Vitex rotundifolia*), 'ilima (*Sida fallax*), and ma'o (*Gossypium tomentosum*), alahe'e (*Psydrax odoratum*), hala (*Pandanus tectorius*), 'ulu (*Artocarpus altilis*), kukui (*Aleurites moluccanus*), and milo (*Thespesia populnea*). As a water conservation measure, plant materials were selected based on drought tolerance and ability to survive in the hot and dry coastal environment of the 'Ewa region.

The two existing significant trees will be preserved in place. Other existing healthy trees may be relocated elsewhere on site, as appropriate. An invasive species management plan involving both observation and treatment will be prepared prior to construction to mitigate the spread of the Coconut Rhinoceros beetle. Landscaping will be intentionally designed to complement new structures, open space areas, pedestrian walkways, and outdoor seating thereby enhancing the overall atmosphere and visual environment of the property. The existing trees along Ali'inui Drive will remain in place and continue to screen the Cove Property. Screening will also be provided throughout the site to delineate program areas, enhance privacy, and mitigate potential noise within the site.

3.3.10 Site Access, Off-street Parking, and Loading

3.3.10.1 Site Access

Access to the Cove Property is facilitated via two driveways along Ali'inui Drive. A one-way driveway at the north end of the site is designated for incoming traffic to the Cove Property. Vehicles may also exit the site via a driveway situated at the south end of the property. A one-way driveway connection within the Cove Property facilitates direct circulation to the adjoining Lanikūhonua site. The planned redevelopment will maintain this existing traffic pattern at the Cove Property.

3.3.10.2 Off-street Parking

Off-street parking for the Cove Property is currently accommodated within two on-site parking lots and supplemented by one adjacent off-site parking area located on the Lanikūhonua property. Parking on the north end of the property is designated for employees and wedding chapel guests only, while parking on the east/mauka portion of the site consists of parking for guests and passenger buses. Land use entitlements for the Cove Property dating back to the early 1990s document 151 vehicle stalls and 30 bus stalls on the north and east parking lots. The adjacent off-site parking lot on the Lanikūhonua property includes 412 parking stalls used by visitors of Lanikūhonua, the Cove Property, and public beachgoers. Of the 412 parking stalls, 203 are included in an easement tied specifically to the Cove Property (DPP File Nos. 94/VAR-70 and 97/CUP1-69). Therefore, a total of 354 vehicle stalls and 30 bus stalls are documented as serving the Cove Property. During a survey conducted for the Parking Management Plan (PMP), it was observed that the existing number of parking stalls in use has changed over time due to typical resurfacing and restriping maintenance. See *Section 4.7.3* for further discussion.

Pursuant to ROH, Section 21-6.20, there are no off-street parking stall requirements for the Project due to its location within the 'Ewa DP area. With the planned redevelopment, the north parking lot will be reconfigured to accommodate approximately ~~413~~ 115 vehicle stalls. Valet operations may occur at this lot to allow for improved circulation on site and may reduce conflicts along Ali'inui Drive. The existing east/mauka parking lot along the Ali'inui Drive street frontage will be reconfigured to reduce the number of existing bus parking stalls to eight and increase the number of standard vehicle stalls to approximately 78 ~~90~~. The adjacent off-site parking lot will continue to be shared with Lanikūhonua

and utilized by guests and employees of The Cove, and no improvements are planned. In total, approximately 396 ~~406~~ parking stalls will serve The Cove Redevelopment (*Table 3.2*).

Table 3.2: Off-street Parking Summary		
Location	Parking Required¹	Parking Provided
Off-site (Lanikūhonua Parcel)	<u>0</u> 203	203
Reconfigured on Property		
Staff <u>North</u> Parking Lot (includes valet)	0	<u>115</u> 90
Visitor <u>Mauka</u> Parking Lot (Ali'inui Drive frontage)	0	<u>78</u> 113
TOTAL VEHICULAR STALLS PROVIDED:		<u>396</u> 406
BUS PARKING PROVIDED:		<u>8</u>

¹ Per Bill 2 (2020), off-street parking is no longer required in the 'Ewa Development Plan Area (ROH, Section 21-6.20(a)). ~~This standard is used as a reference only.~~

² The Cove Property holds the right to utilize 203 parking stalls on the adjacent Lanikūhonua property (DPP File Nos. 94/VAR-70 and 97/CUP1-69). This arrangement is a granted easement and is not mandated as a requirement.

3.3.10.3 Off-street Loading

To support the planned activities, four loading areas have been designated at the north and southeast of the Cove (*Figure 3.3*). The loading areas will meet requirements articulated in the LUO and will include loading stalls designated for large commercial vehicles (12 feet by 35 feet) and stalls designated for smaller vehicles (8.5 feet by 19 feet).

Delivery management strategies, including enforcement of parking restrictions and management of loading/unloading times, use of additional attendants or security, and the development of a delivery schedule program may be employed to alleviate congestion in specific loading areas.

3.3.10.4 Bicycle Parking

The Cove will offer an accessible destination for visitors of the surrounding resort, and access to the property via non-motorized modes will be encouraged by providing enhanced connectivity, pedestrian pathways, and bicycle parking. For visitors outside of the resort area, the number of visitors utilizing non-motorized modes of transportation such as bicycling is expected to be lower due to various factors, including the quality of bicycle facilities on the roads in the vicinity of the Project site. See *Section 4.7.2* for further discussion.

According to Section 21-6.40 of the LUO, commercial uses on the property may require 36 short-term bike parking spaces and seven long-term bike parking spaces (based on an on-site estimated off-street parking stall count of 203 stalls and a maximum building area of 65,413 ~~71,860~~ sf). The Cove will provide bicycle parking storage adequate to serve the site, and final counts will be determined during the land use entitlements phase of the Project. Bike parking on the site may be designated on the northern, eastern, and southeastern portions of the site, in proximity to The Cove's entry points (*Figure 3.3*). Elements such as lighting and wayfinding may be provided to enhance the attractiveness and safety of the bike parking facilities. Final design of the facilities will be determined as design progresses.

3.4 Compliance with the Unilateral Agreement (Ordinance No. 89-27)

As part of the zone change approved for the Cove Property, a UA for Conditional Zoning was approved on February 13, 1989 (Ordinance No. 89-27). The UA imposes conditions on the Cove Property, including limiting commercial activity to restaurants and retail associated with a “Hawaiian Theme Park” and a commercial lū’au operation; limiting lot coverage to 30 percent; and requiring a 40-foot-wide strip along the seaward property boundary to remain free of structures and improvements. The Project complies with the conditions of the UA, as follows:

1. Declarant will limit the type of commercial activity on the Property to restaurants and retail activity associated with a Hawaiian Theme Park and a commercial lū’au operation.

Discussion: Since the 1970s, the Cove Property has been primarily used as an outdoor recreation facility comprised of a private commercial lū’au, wedding, and entertainment operations. Recognizing the long-standing use of the Cove Property, the Project proposes to maintain the commercial lū’au as the focal point of the site. In alignment with a Hawaiian Theme Park, the Project will create an authentic Hawaiian outdoor recreation facility and community gathering place for kama’āina (Hawai’i residents) and visitors that honors and reflects history, culture, and connection to place. Ancillary improvements include an improved main arrival area, retail shops hosting goods made in Hawai’i, restaurants and a marketplace showcasing local cuisine and agricultural products, and welcoming and engaging common areas.

Additionally, a cultural pavilion and open-air activity lawn areas are planned to be included. Potential programming at the pavilion and on the lawns may include pre- and post-lū’au show educational and cultural workshops and/or activities that highlight the sense of place and fit appropriately within the coastal setting (i.e., demonstrations featuring lei-making, kapa-making canoe/wa’a activities, and imu activities) or coordinated events and programs with the neighboring Lanikūhonua Cultural Institute. The existing wedding chapel and support building will remain in place and may also be improved.

2. Declarant will limit lot coverage of the Property thirty percent (30%).

Discussion: The Cove Property encompasses approximately 472,757 sf of lot area. Under the 30 percent lot coverage limit, the maximum allowable building area on the parcel is approximately 141,827 sf. The planned Cove Redevelopment will consist of approximately 65,413 sf of building area, representing approximately 13.84 percent of the 472,757-sf parcel, well below the 30 percent lot coverage limit (Figure 3.18).

3. Declarant will develop the Property consistent with the adopted urban design provisions and considerations for Ko Olina (West Beach) to include a 40 foot wide strip along the seaward property boundary which shall be open and free of structures and improvements.

Discussion: The Cove Property currently provides a 40-foot-wide strip along the seaward property boundary in accordance with Condition No. 3 of the UA. In addition, the planned redevelopment is subject to the City’s updated shoreline setback articulated in ROH, Chapter 26 and its implementing regulations, which requires a 60-foot shoreline setback for the Cove Property. The Project will therefore maintain a 60-foot shoreline setback area, which will remain open and free of structures.

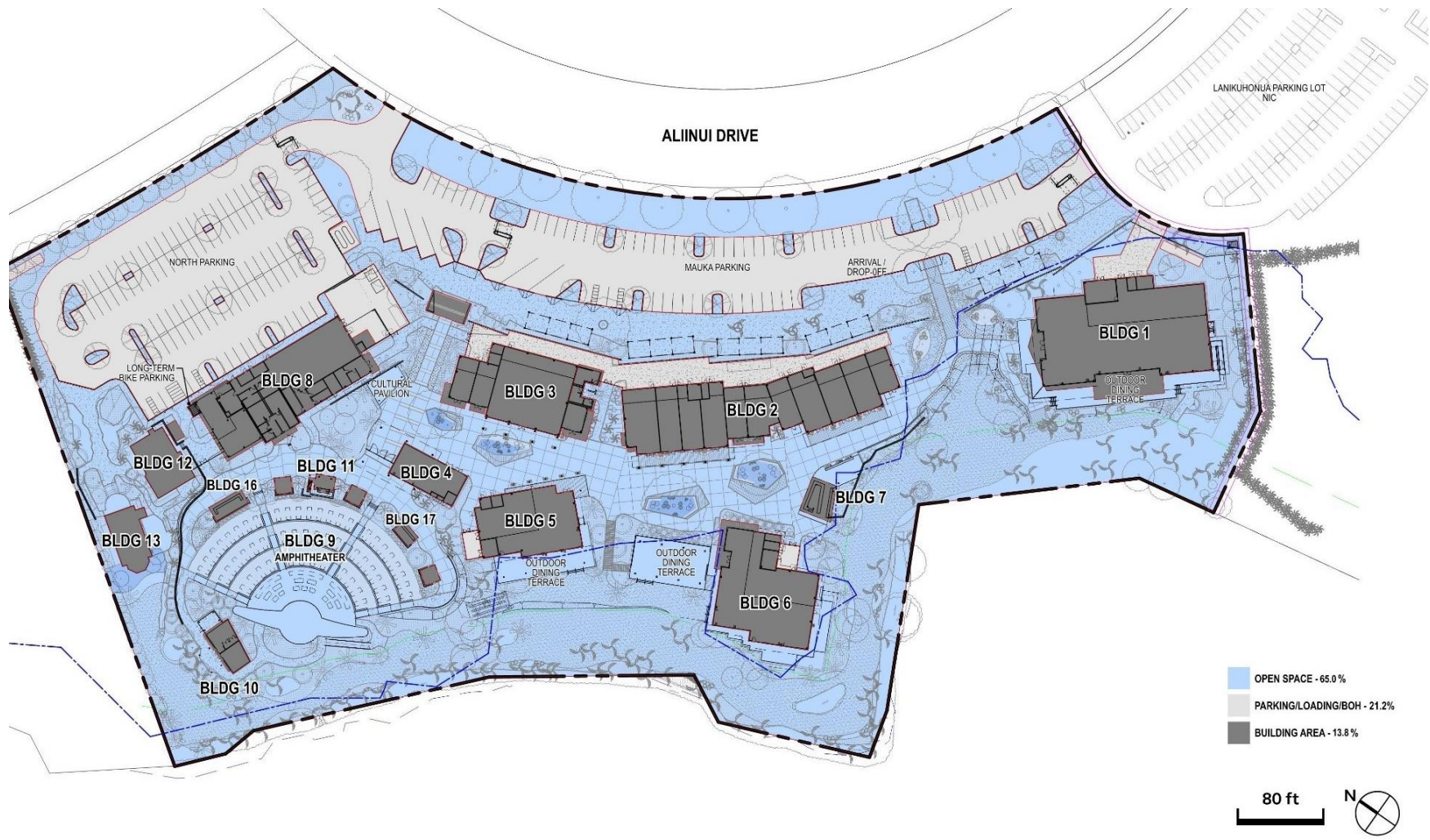


Figure 3.18

Preliminary Site Plan: Building Area

Commercial use of the Cove Property predates any adopted urban design provisions, and the Project site has been and in connection with the Cove Redevelopment Project will continue to be consistent with such provisions. A detailed analysis of the Project's consistency is provided in Section 5.3.3.

4. Declarant will, at its cost, connect to the Ko Olina public sewer system immediately upon its completion in 1989 and provide written notification to the Department of Land Utilization that the connection has been made.

Discussion: Connection to the Ko Olina public sewer system was accomplished in 1990. Notification to the Department of Land Utilization (now the DPP) was subsequently provided as part of the Existing Use Permit for the current use on the site (File No. 90/CUP2-5).

3.5 Anticipated Development Schedule

Redevelopment of the property is expected to commence upon receipt of necessary permits and approvals. It is anticipated that 24 months will be required for construction. Improvements are planned to start as early as 2025 and may be completed by 2027, subject to market conditions.

Construction activities are expected to occur in the following general phases: demolition, site preparation (clearing and grading), excavation, foundation installation, structure construction, grading, installation of interior finishes and fittings, architectural coatings, and landscaping. A timeline will be provided for the Project at the appropriate time, and will include anticipated dates for building permits, demolition/construction, occupancy, submittal of the TMP and updates to the findings of the TIR, as applicable.

3.6 Estimated Construction Cost

Planning and construction of the Project is estimated to cost \$135.6 million.

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**Environmental Setting,
Potential Impacts, and
Recommended Mitigation Measures**



Section 4

Environmental Setting, Potential Impacts, and Recommended Mitigation Measures

This section describes the existing environmental conditions and discusses potential impacts of the Proposed Action. Strategies to minimize impacts and to mitigate any significant impacts are identified.

4.1 Archaeological, Cultural, and Historic Resources

4.1.1 Archaeological Resources

As a privately funded project on private land, the planned Project is subject to historic preservation review by the Department of Land and Natural Resources (DLNR), State Historic Preservation Division (SHPD) pursuant to HRS, Section 6E-42 and HAR, Section 13-284. In consultation with SHPD and cultural descendant Ms. Nettie Fernandez Tiffany, CSH prepared a draft AIS (*Appendix B*) for the Project. The following section summarizes the findings of the draft AIS.

Fieldwork for the draft AIS was conducted between October 21 and November 12, 2019. The draft AIS was subsequently prepared and submitted to SHPD for initial review in March 2020. Revisions to the draft AIS were requested by SHPD on November 27, 2022. During the Draft EIS public comment period, SHPD reviewed the draft AIS and provided an additional list of requested revisions (*Appendix A-2*). The Applicant and CSH met with SHPD in July 2024 to discuss the comments, specifically with regards to the proposed mitigation commitments, and provided responses to each comment in *Table 7.3*. Accordingly, revisions to the draft AIS were made and are presented in the following *Section 4.1.1* and the updated draft AIS is provided in *Appendix B*. Notably, consultation for the draft AIS and a forthcoming burial site component of a preservation plan (BSCPP) is underway. The results of consultation will be incorporated into a further revised draft AIS and BSCPP to be submitted to SHPD. AIS is currently awaiting review and concurrence by SHPD (Log No. 2020.00688).

Existing Conditions

Historical Context

The Project site is located within the ahupua'a of Honouliuli and along the leeward coast of O'ahu. Honouliuli ahupua'a had tremendous and varied resources available for use by early Hawaiians, including twelve miles of coastline with continuous shallow fringing reef, which offered rich marine resources; waters of the West Loch that offered extensive fisheries and frontage suitable for development of fishponds; rich, level, alluvial soils with plentiful water for irrigation in the 'Ewa plain; a broad limestone plain which included sinkholes that offered a nesting home for a large population

of avifauna and may have been one of the early attractions for human settlement; and, an extensive upland forest zone extending as much as 12 miles inland from the edge of the coastal plain.

At contact, the most populous ahupua'a on the island was Honouliuli. Between 1848 and 1853, a series of epidemics contributed to population decline and consolidation of the remaining population in the town of Honouliuli. As a result of the Māhele in 1848, 43,250 acres within the ahupua'a, including the Project area, was granted to Miriam Ke'ahi-Kuni Kekau'ōnohi, one of the wives of Lihiliho (Kamehameha II). James Campbell purchased most of the Honouliuli Ahupua'a, including the Project area, for cattle ranching in 1877. In 1889, Campbell leased his property to Benjamin Dillingham, who subsequently formed the Oahu Railway and Land Company (OR&L). To attract business to the railroad system, Dillingham leased all land below 200 feet of elevation to William Castle, who in turn subletted the area to the Ewa Plantation Company for sugarcane production. By 1920, the lands of Honouliuli were primarily used for sugarcane cultivation and ranching.

In 1939, Alice Kamokilaikawai Campbell, daughter of James and Abigail Kuaihelani Maipinepine Campbell, resided in Lanikūhonua, adjacent to the Project site, for nearly 30 years. Mrs. Campbell named the area Lanikūhonua which means "where the heavens meet the earth" (Lanikūhonua Cultural Institute 2019).

Major land changes came to western Honouliuli when the U.S. military began development of coastal, foothill, and upland areas for military installations including the Barbers Point Military Reservation, Camp Malakole Military Reservation, and Gilbert Military Reservation. Barbers Point Naval Air Station, in operation from 1942 to the 1990s, was the largest and most significant base in the area.

The OR&L railroad alignment runs northeast/northwest of the Project site. Passenger totals on the OR&L railroad line increased throughout the first half of the twentieth century, and reached an all-time high of 2,642,516 passengers in 1943. Throughout World War II, the railway served a critical function in transporting military personnel and equipment. However, the development of an improved road system and increasing numbers of cars on the island led to a decline in passengers. Operations outside Honolulu eventually ceased in 1947, and in 1950, the U.S. Navy acquired the track from Pearl Harbor to Nānākuli. The entire OR&L alignment was eventually transferred to the State by 1968. In 1970, the Hawaiian Railway Society was established to preserve and restore portions of the OR&L railroad, including the portion in the vicinity of the Project site, which is now used to conduct historical tours.

In 1979, use of the Cove Property for commercial lū'au, wedding, and entertainment operations was established when a CUP was approved by the City DPP. In the mid-1980s, the area adjacent to the Cove Property was purchased by a private developer, who envisioned the development of a resort community. Initially conceptualized as "West Beach," construction of the resort included four man-made lagoons, a golf course, luxury condominiums, and a hotel. Following a period of stalled development due to the Japanese investment bubble, the resort was eventually repurchased and construction resumed. The area is now formally known as the Ko Olina Resort.

Previous Archaeological Studies

As summarized in *Table 4.1*, six previous studies have been conducted within the Project site. Across the six studies, two historic properties listed on the State Inventory of Historic Places (SIHP) were identified. SIHP Site No. 50-80-12-3362 (-Q3362) was identified during an AIS conducted by Glidden et al. for West Beach in 1987. Site -Q3362 consists of two features, including Feature 1, coastal backwater marshland (within the southern portion of the Project site) and Feature 2, a habitation area (outside the Project site). SIHP Site No. 50-80-12-4968 (-Q4968) consists of approximately ~~six~~ five

sets of human skeletal remains located in the western portion of the Project area west of the existing lū'au stage. See (Figure 4.1) for previously identified archaeological sites in the vicinity of the Project site.

Table 4.1: Previous Archaeological Studies Conducted at the Project Site				
Reference	Study Year	Type of Study	SIHP Site No. 50-80-12-	Results
Komori and Dye	1979	Archaeological Testing	No SIHP assigned (<u>SIHP number has been requested</u>)	Salt pans located in the western portion, outside project area
Davis and Haun	1987	Inventory Survey	-03362	Identified <u>SIHP No. Site 3662</u>
Davis	2000	Data Recovery	-03362	Identified two features within Site -03362 Feature 1: Coastal backwater marshland with no apparent cultural function prior to the 19th century cultivation Feature 2: Cultural deposit indicative of habitation, outside project area
Glidden et al.	1993	Data Recovery <u>Excavations</u>	-03362	Identified coastal wetlands and <u>SIHP No. Site -03362</u>
Jourdane	1995	Burial Documentation of <u>Inadvertent Discovery of Human Remains</u>	-04968	Discovery of <u>1 one human burial within a gas line excavation</u>
Hammatt	1995	<u>Response to Burial Documentation</u> <u>Inadvertent Discovery of Human Remains</u>	-04968	Documented an additional <u>5 four human burials within a gas line excavation</u>

Current AIS Archaeological Testing

Survey fieldwork conducted for the current AIS took place between October 21 and November 12, 2019 and consisted of a pedestrian survey of the entire parcel, GPS data collection, and subsurface testing of 16 test excavations. Subsurface testing locations were selected based on previous studies' testing locations, documentation of known historic properties within the Project site, and consultation with SHPD and cultural descendant Ms. Nettie Fernandez Tiffany (Aunty Nettie).

The majority of the Project area appears to be moderately disturbed from multiple phases of land altering activities including the plantation, ranching, and the development of the existing lū'au area. The northern portion of the Project area is significantly shallower in comparison to the central and southern portions of the project area revealing the undulating coral shelf in these areas. Due to the undulating coral shelf, it is possible that multiple underground caverns exist throughout the western portion of the Project site. The southeast portion of the Project site is evidenced by pre- to post-Contact activity associated with coastal wetlands (SIHP No. -03662) utilized as subsequent habitation, agriculture, and water control area. Based on locally procured sand fills near the western shoreline portion of the current project area and known human burials (SIHP No. -04968) in these areas, it is likely these areas may contain cultural deposits including human skeletal remains.

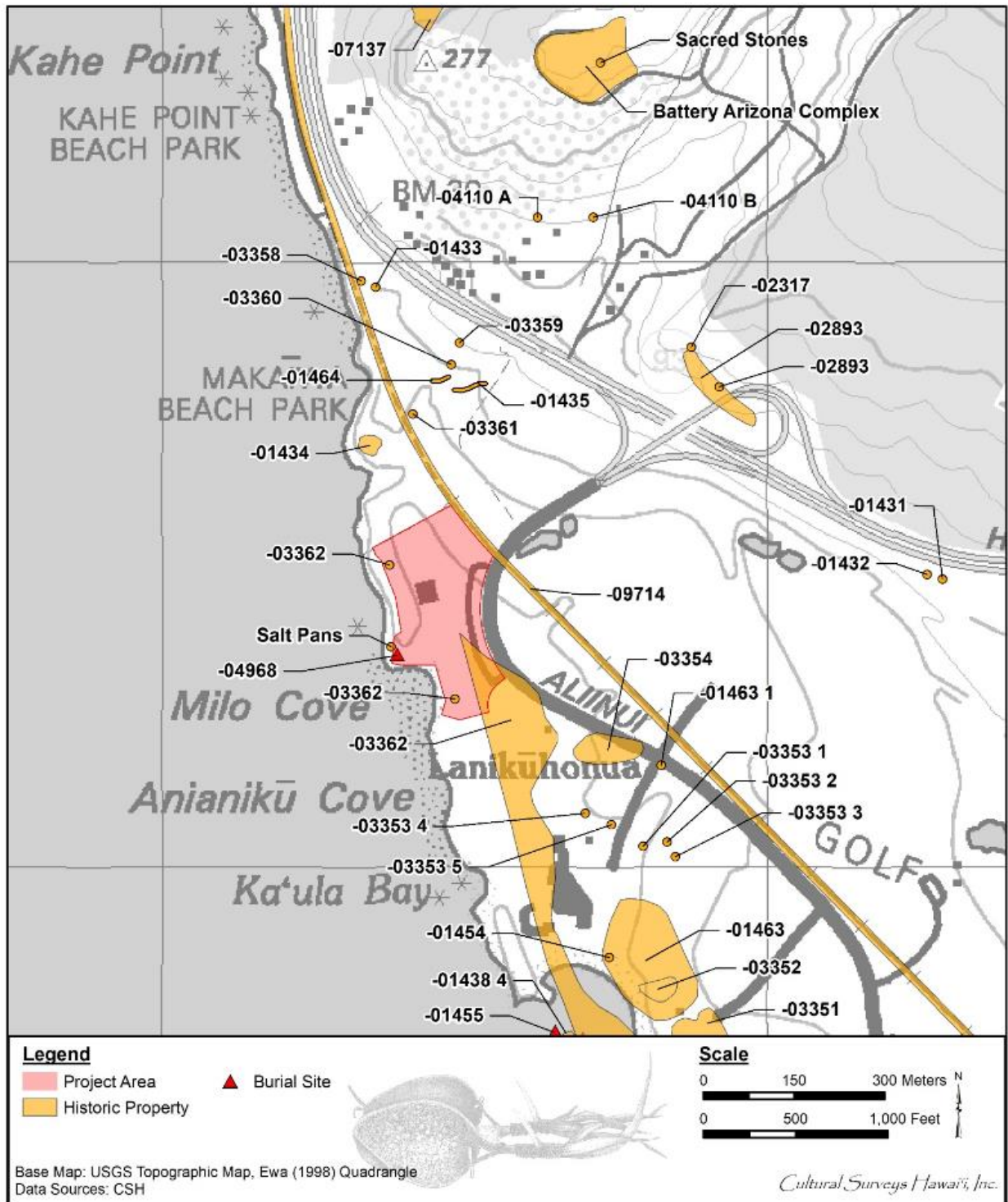


Figure 4.1 Previously Identified Archaeological Sites Within and in the Vicinity of the Project Area (Cultural Surveys Hawai'i, 2020)

During the current AIS survey, the two previously identified historic properties were confirmed and new portions of SIHP No. -03362 were identified. Additionally, the burial preserve for SIHP No. -04968 was designated “CSH 2” during the course of the AIS (*Figure 4.21*).

1. **Coastal wetlands (SIHP Site No. -03362):** The coastal wetlands were identified in the southern portion of the Project area within three excavations. They appear to be present at or very near the water table and were naturally deposited and formed on top of marine, primarily lagoonal, deposits and/or the coral shelf. Test excavations indicate the coastal wetlands were capped by fill deposits associated with a combination of construction by the Ewa Plantation Company and of the existing entertainment venue. Consistent with previous studies, SIHP Site No. -03362 contains two features and no associated artifacts (only feature 1 is located within the Cove Property). It has been described as coastal backwater marshland with no apparent cultural function prior to nineteenth century cultivation. Due to the potential to further understand the types of agricultural and aquacultural practices utilized and determine the boundaries of the coastal wetlands, the property is assessed as significant per HAR, §13-284-6 under Criteria “d” (have yielded, or is likely to yield information important for research on prehistory or history). The property also retains integrity of location and materials.
2. **Human skeletal remains (SHIP Site No. -04968):** Previously identified in 1995 and subsequently preserved, SIHP Site No. -04968 consists of approximately six five sets of human skeletal remains (Burials 1 through 5, features 1 through 5) located in the western portion of the Project area west of the existing Paradise Cove lū‘au stage. The burials were identified in January 1995 during the excavation of a trench for the installation of gas lines to support Paradise Cove and were documented by Jourdane (1995) and Hammatt (1995). ~~One previously identified historic property is within the current project area but was not identified during the test excavations conducted for the AIS.~~

“CSH 2” is the burial preserve and relocation area for Burials 1 through 5. CSH 2 encompasses an area of approximately 752.85 sf. In consultation with the landowner and recognized cultural descendants, SHPD determinations included both preservation in place and reinterment at the original site of respective discovery within the existing burial preserve area on the Cove Property. Temporary curation measures and reinternment activities for SIHP # -04968, Burials 1 through 5 are unknown, however, *kahu* Nettie Fernandez Tiffany has acknowledged that all burials were reinterred in the same area, west of the existing lū‘au stage. The existing burial preserve area is currently covered with landscaped naupaka brush. The area seaward/makai of the burial preserve area is a maintained flat, grassy landscaped area extending to the shoreline. Entrance to the burial preserve area on either side (north-south) makai of the existing lū‘au stage is cordoned off with rope and wooden poles to deter pedestrian access.

SHIP Site No. -04968 is assessed as significant per HAR, §13-284-6 under significance Criteria d (have yielded, or is likely to yield information important for research on prehistory or history) and e (have an important value to the Native Hawaiian people or to another ethnic group of the state due to its associations with cultural practices once carried out, or still carried out, at the property or due to associations with traditional beliefs, events or oral accounts these associations being important to the group’s history and cultural identity). The historic properties within the Project site and their significance/~~eligibility~~ assessments and mitigation recommendations are summarized in *Table 4.2*.

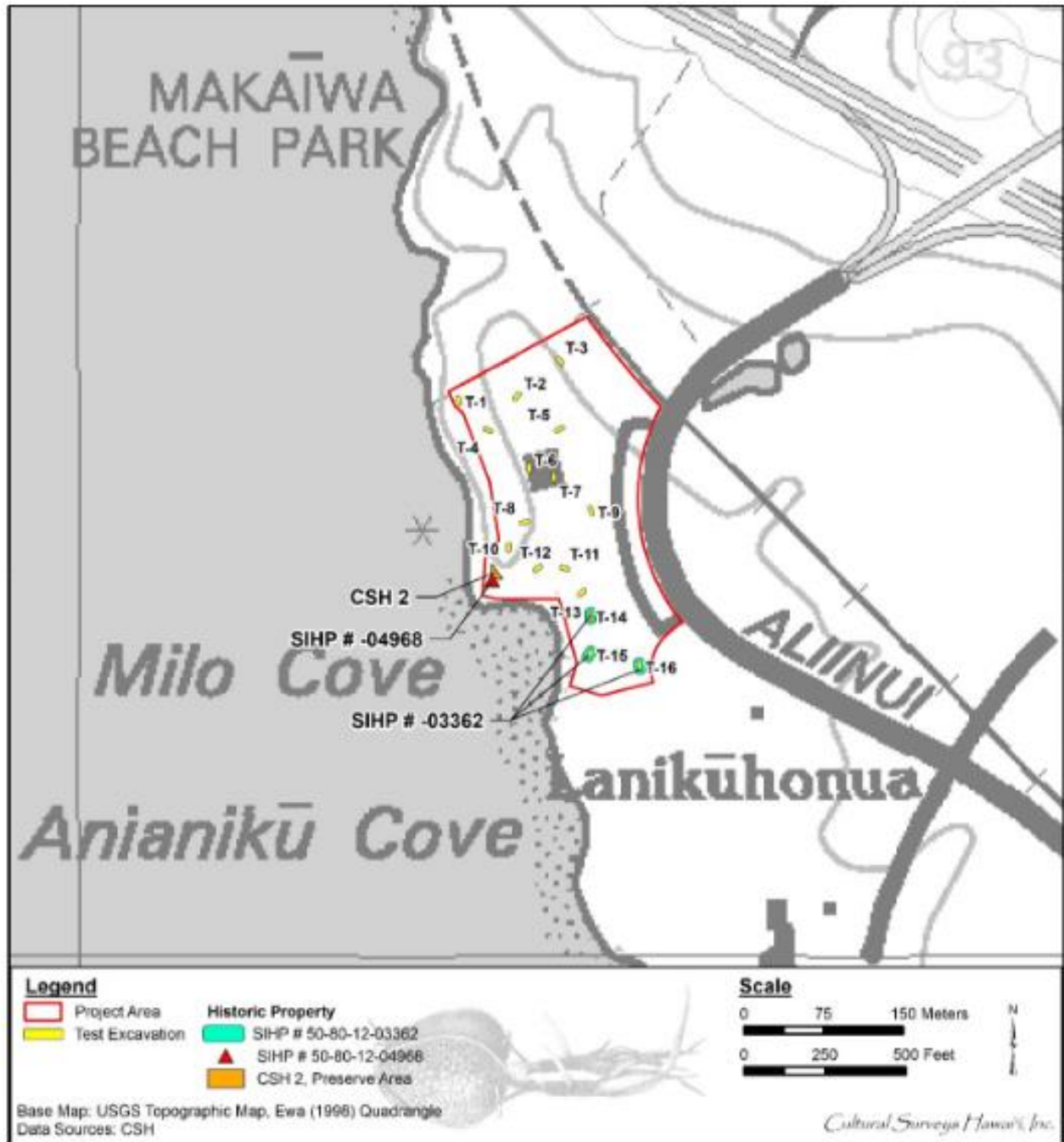


Figure 4.2 Test Excavations, Known Historic Properties (SIHP Nos. -03362 and 04968), and CSH 2 Identified During the Current AIS (Cultural Surveys Hawai'i, 2024)

Table 4.2: Confirmed Historic Properties Within the Project Site

SIHP No.	Test Excavation	Formal Type/Description	Integrity (at time exposed)							Significance	Mitigation Recommendation
			Location	Design	Setting	Materials	Workmanship	Feeling	Association		
-Q3362	T-14 through T-16	Coastal wetlands	Y	N	N	Y	N	N	N	d	Archaeological monitoring
-Q4968	N/A	Five sets of Human skeletal remains (identified within a gas line excavation)	Y	Y	N	Y	N	N	N	d and ge	Continued-p Preservation in perpetuity via a BSCPP filed with the DLNR Bureau of Conveyances

Results of Cultural Consultation

Consultation efforts were conducted in preparation for the current AIS and for the Project’s BSCPP. This effort included consultation with cultural descendant Nettie Fernandez Tiffany (Aunty Nettie), SHPD, as well as consultation required under HAR, §13-284(6)(c) and HAR §13-276-5(g).

The AIS testing strategy was based on consultation with the SHPD and cultural descendant Aunty Nettie. The AIS test excavations were placed targeting those areas and within areas not previously investigated. The remainder of the test excavations were placed for representative distribution. Some trenches were reoriented based on known subsurface utilities via the maintenance crew and concerns from Aunty Nettie. The eastern portion of the Project site included specific instruction from Aunty Nettie regarding proximity to known human burials in the near vicinity.

The Applicant conducted a site visit with Aunty Nettie on February 14, 2023, to discuss the existing burial preserve area (CSH 2) for SIHP # -04968 and potential interim and permanent buffer zones. Aunty Nettie expressed her preference of no excavations to occur in the existing buffer and preserve area, as well as to keep an existing hau tree(s) near the preserve area and a nearby kiawe tree in their current location. She also mentioned that the burials in the preserve area (SIHP # -04968) were preserved in place under her advisory. When asked about future landscaping, her stated preference is to leave the area “as is” with the naupaka, for it to be remain discrete with no signage, and to remain cordoned off to avoid foot traffic.

On July 3, 2024, the Applicant met with SHPD history and culture branch burial sites specialist Regina Hilo to discuss SIHP No. -04968. On July 5, 2024, CSH and the Applicant met with SHPD archaeology branch chief Dr. Susan Lebo and O’ahu archaeologist Samantha Hemenway to discuss SHPD’s comment regarding an appropriate buffer zone and path forward for the SIHP No. -04968 burials. SHPD’s records for SIHP No. -04968 indicate that consultation with Native Hawaiian Organizations (NHOs), CSH, and representatives from the James Campbell Estate was conducted and that long-term preservation was agreed upon during a meeting held on January 18, 1995. The outcome of the meeting was formalized in a burial agreement (1995 Burial Agreement) (see Appendix A of Appendix B). However, SHPD has no record of a preservation plan for SIHP No. -04968. On July 5, 2024, SHPD confirmed that a BSCPP is required for SIHP No. -04968.

Potential Impacts and Mitigation Measures

Based on testing, the majority of the Project area appears to be moderately disturbed from multiple phases of land altering activities including the plantation, ranching, and the development of the existing lū'au area. Based on a review of previous archaeological studies conducted within and in the vicinity of the current Project site, there is a moderate probability of encountering traditional Hawaiian, early post-contact Hawaiian, or Historic Period deposits during project-related activity.

Under State historic preservation review legislation, one of two project effect determinations must be established: 1) "No historic properties affected," where a project will have no effect on significant historic properties; or 2) "Effect, with agreed upon mitigation commitments," where a project will affect one or more significant historic properties, and the effects will potentially be harmful. However, the agreed upon mitigation commitments involving one or more forms of mitigation will reasonably and acceptably mitigate any harmful effects (HAR, §13-284-7).

Two previously-identified historic properties within the Project area (SIHP Nos. -03362 and -04968) were reconfirmed during the AIS. The Project has the potential to affect the two historic properties identified within the Project area. This is due to the potential for encountering additional exposures and/or features of these historic properties that may be present.

~~With implementation of the agreed upon mitigation, burial site component of a preservation plan (BSCPP), the Project is not expected to impact SIHP No. -04968 (five burials)~~

~~According to comments provided by SHPD during the AIS review process (Project No. 2020PR32795, Doc. No. 2407SCH12 dated August 21, 2024), the Project is not expected to impact SIHP No. -04968 if the burial remains are within a preserve area (CSH 2). As such, the results of the AIS supports a project effect determination of is "Effect, with agreed upon mitigation commitments" pursuant to HAR, §13-284-7. The recommended mitigation measures discussed below will reduce the Project's potential effect on significant historic properties.~~

If a project will have an "effect" (impact) on significant historic properties, then a mitigation commitment proposing the form of mitigation to be undertaken for each significant historic property shall be submitted for SHPD review and acceptance. Mitigation may occur in the following five forms: A) Preservation, B) Architectural Recordation, C) Archaeological Data Recovery (which includes archaeological monitoring), D) Historical Data Recovery, and E) Ethnographic Documentation (HAR, ~~§Section~~ 13-284-8).

The AIS proposes the following agreed upon mitigation commitments, which consist of archaeological monitoring (a form of data recovery) and preservation through avoidance:

- Archaeological monitoring (a form of archaeological data recovery) of all ground-disturbing activities for the entire Project area. On-site archaeological monitoring will be conducted to identify and document any additional exposures of SIHP No. -03362 and SIHP No. -04968 and any newly identified historic properties that may be identified during construction. An Archaeological Monitoring Plan (AMP) will be submitted meeting the requirements of HAR, §13-279-4 to the SHPD for review and acceptance.
- SHPD's records for SIHP No. -04968 indicate that consultation with NHOs, CSH, and representatives from the James Campbell Estate was conducted and that long-term preservation was agreed upon in a meeting held on January 18, 1995. This was formalized in the 1995 Burial Agreement. SHPD has no record of a preservation plan for SIHP No. -04968. On July 5, 2024, SHPD confirmed that a BSCPP is required for SIHP No. -04968.

Consultation with the signatories of the 1995 Burial Agreement, as well as known cultural and lineal descendants of the area has been initiated and is ongoing as of publication of this Final EIS. This consultation is regarding the specifics for the interim and long-term protection measures and will be outlined in the BSCPP document. As requested by SHPD, a buffer zone larger than the existing buffer zone is being considered and will be presented to recognized lineal and cultural descendants for their consideration.

A letter to the Office of Hawaiian Affairs (OHA) was sent on 19 June 2024 in compliance with HAR, §13-284-6(c) requiring consultation for historic properties that may be significant. OHA responded to CSH on July 8, 2024 with comments. On July 15, 2024, OHA was informed of SHPD's guidance regarding a BSCPP for SIHP No. -04968. OHA will have the opportunity to review and provide comments to the BSCPP.

The results of consultation will be incorporated into the BSCPP.

It is currently unclear if SIHP No. -04968 was recorded with the Bureau of Conveyances. However, the landowner will verify, and, if it is not, will record the burial preserve area (CSH 2) for SIHP No. -04968 with the Bureau of Conveyances. The burial preserve area (SIHP No.—4968) shall remain in perpetuity to preserve the iwi kūpuna (Native Hawaiian skeletal remains).

~~The results and recommendations within the AIS are currently in review and awaiting concurrence from SHPD (Log No. 2020.00688).~~

4.1.2 Cultural Impact Assessment

A Cultural Impact Assessment (CIA) was prepared by CSH to analyze the impact of the Project on cultural practices and features associated with the Project site and the greater Honouliuli Ahupua'a. Background research and consultation were conducted to support the CIA, which is included as Appendix C. The CIA was subsequently updated to compile relevant information from the CIA into a new section titled Ka Pa'akai Analysis. The following section summarizes the findings of the CIA.

Existing Conditions

CIA Consultation

Beginning in June 2021, an effort was made to contact and consult with ~~80 Native Hawaiian Organizations (NHOs)~~, agencies, and community members including descendants of the area in order to identify individuals with cultural expertise and/or knowledge of the ahupua'a of Honouliuli. Of the ~~80 NHOs, agencies, and community members~~ contacted, 13 responded. Of the 13 respondents, in-person, virtual, phone, or written consultation was conducted with the following five participants: Nettie Fernandez Tiffany (kahu (caretaker) of Lanikūhonua Cultural Institute), William Aila, Jr. (prior chair of Hawaiian Homes Commission, Director of Department of Hawaiian Homelands), Kūhiō Lewis (Chief Executive Officer for the Council for Native Hawaiian Advancement), Tracie Ka'ōnohilani Farias Lopes (Kumu Hula (hula teacher) for Ka Lā 'Ōnohi Mai O Ha'eha'e and Instructor at Hawai'i Pacific University), and R. Keawe Lopes (Kumu Hula of Ka Lā 'Ōnohi Mai O Ha'eha'e and Director of the Kawaihuelani Center for Hawaiian Language at the University of Hawai'i at Mānoa).

Based on the results of community consultation and background research conducted as part of this CIA, traditional cultural practices that occur in the vicinity of the Project and wider Honouliuli ahupua'a include gathering of plant and aquatic resources, religious rituals, and burial practices. The

maintenance of access to the ocean for marine resources and recreational activities, such as fishing, diving, and swimming, was identified by several interviewees as being particularly important. In the ahupua'a of Honouliuli, cultural sites of particular importance include trails, plains, and temples.

Hula is an important cultural practice currently occurring on site through the nightly evening show. Two of the interviewees are kumu hula that have trained and performed at both Lanikūhonua and Paradise Cove throughout the last 17 years and created the current show to authentically celebrate and share Hawaiian culture. One of the purposes of the existing entertainment venue and the planned Project is to continue to perpetuate Hawaiian culture through the traditional art of hula. Further discussion is provided in the following subsections.

Traditional and Historic Land Uses

Honouliuli is the largest ahupua'a in the moku (district) of 'Ewa. The literal translation of Honouliuli is "dark water," "dark bay," or "blue harbor," and thus is named for the waters of Pearl Harbor which marks the eastern boundary of the ahupua'a. Another source translates Honouliuli as "the blue bays or inlets." Honouliuli appears in the "Mo'olelo of Lepeamoā," the chicken-girl of Pālama, where Honouliuli is the name of the husband of the chiefess Kapālama, and grandfather of Lepeamoā. Honouliuli has traditionally been generally described as hot and dry. Evidence for drought-like conditions is further supported by the relative lack of traditional rain names associated with the Honouliuli Ahupua'a. The Nāulu rain is the only known rain associated with Honouliuli. Due to the lack of rainwater, freshwater resources were accessed via a karstic system.

In traditional Hawaiian times, the areas of exposed coral (Pleistocene limestone) outcrop were undoubtedly more extensive. According to McAllister (1933), holes and pits in the coral were generally accessed for water, while larger pits, often containing soil, were used for cultivation. McAllister additionally remarked that at the time of his 1930s survey, mai'a (banana; *Musaceae*) and kō (sugarcane; *Saccharum officinarum*) were being cultivated within the pit caves (sinkholes).

The traditional ka'ao (legends) associated with the area tell the story of the akua (godly) brothers, Kāne and Kanaloa. It was their supernatural feat of hurling pōhaku (stone) across the island that determined the boundaries of moku or land divisions. Additional mo'olelo (stories) speak of Hi'iaka and her travels across the plains of 'Ewa. In particular, the wahi pana (storied place) of Kaupe'a is described. Kamakau describes Kaupe'a as a wide plain where a grove of wiliwili (*Erythrina sandwicensis*) stands. This plain is an "ao kuewa", or a realm belonging to homeless souls. During consultation for the CIA, Mr. Lewis noted that in traditional times, the area was "where spirits would roam." In general, the kama'āina of both the Honouliuli ahupua'a and 'Ewa district made a point to avoid this place.

Pu'u o Kapolei, a prominent hill located on the 'Ewa coastal plain, was the primary landmark for travelers on the trail running from Pearl Harbor to Wai'anae. A heiau (pre-Christian place of worship) was once on the summit of the hill; however, by the time of McAllister's survey of O'ahu, it had been destroyed. The hill was also used as a point of solar reference or as a place for celestial observations of the winter solstice and summer solstice. A ceremony at a heiau on Pu'u o Kapolei provides a vantage point to capture the sun setting directly behind Pu'u Pālailai, a peak farther west in the Wai'anae range. A coinciding ceremony at Kūpalaha Heiau in Waikīkī captures the same essence as the sun sets behind Pu'u o Kapolei.

John Papa 'Ī'i, a historian and attendant to Kamehameha I, describes a network of leeward O'ahu trails that in later historic times encircled and crossed the Wai'anae Range, allowing passage from West Loch to the Honouliuli lowlands, past Pu'u o Kapolei and Waimānalo Gulch to the Wai'anae coast and

onward, along the shoreline of O‘ahu. Following ʻĪʻĪ’s description, a portion of this trail network would have passed close to the present Farrington Highway alignment, north of the Cove Property.

In early historic times, the population of Honouliuli was concentrated at the western edge of West Loch in the vicinity of Kapapahu Point. This area was clearly a major focus of population due to the abundance of marine resources in close proximity to a wide expanse of well-irrigated bottomland suitable for wetland taro cultivation.

Following the Māhele of 1848, 96 individual land claims were made in the ahupua‘a of Honouliuli, with 72 claims being registered and awarded by King Kamehameha III to maka‘āinana (commoners). The 72 Kuleana (individual parcels) awards were almost all made adjacent to Honouliuli Gulch, which contained fishponds, lo‘i (irrigated taro field), kula (pasture/field), and house lots. Beginning with the time of Western Contact, Hawaiian populations were introduced to many virulent western diseases which began to decimate the native populations. In 1832, a missionary census of Honouliuli recorded the population as 1,026. Within four years the population was down to 870. Between 1848 and 1853, a series of epidemics of measles, influenza, and whooping cough often decimated whole villages.

With the increasing foreign interests on O‘ahu Island during the last half of the nineteenth century, an array of agricultural enterprises was attempted. In 1871, John Coney rented the lands of Honouliuli to James Dowsett and John Meek, who used the land for cattle grazing. In 1877, James Campbell purchased most of Honouliuli ahupua‘a.

Major land use changes came to western Honouliuli when the U.S. military began development in the area. Military installations were constructed both near the coast and in the foothills and upland areas. Barbers Point Military Reservation (formerly Battery Barbers Point from 1937–1944) at Kalaeloa (Barbers Point Beach) was used, beginning in 1921, as a training area for firing 155-millimeter (mm) caliber guns (Payette 2003).

Also in the vicinity were Camp Malakole Military Reservation (formerly Honouliuli Military Reservation), used from 1939, and Gilbert Military Reservation, used from 1922–1944. Fort Barrette (also known as the Kapolei Military Reservation and Battery Hatch) atop Pu‘u o Kapolei was in use from 1931–1948 for housing four 3-inch anti-aircraft batteries. In the 1950s, the site was used as a Nike missile base. Palailai Military Reservation was built in 1921 atop Pu‘u Pāilailai in Makakilo and housed Battery Palailai and Fire Control Station B.

Beginning in 1939, Alice Kamokilaikawai Campbell, daughter of James and Abigail Kuaihelani Maipinepine Campbell, resided in Lanikūhonua, adjacent to the Cove Property for nearly 30 years. Mrs. Campbell named the area Lanikūhonua which means “where the heavens meet the earth.” Cultural descendant, Nettie Fernandez Tiffany, current kahu (caretaker) of the Lanikūhonua Institute, stated that her mother, Leilani Fernandez, was a close friend of Alice Campbell. Mrs. Fernandez owned a beach home within the current Project area and was the previous caretaker of the Campbell Estate property.

In 1979, use of the Cove Property for commercial lū‘au, wedding, and entertainment operations was established when a CUP was approved by the City DPP. In the mid-1980s, the area adjacent to the Cove Property was purchased by a private developer, who envisioned the development of a resort community. Initially conceptualized as “West Beach,” construction of the resort included four man-made lagoons, a golf course, luxury condominiums, and a hotel. Following a period of stalled development due to the Japanese investment bubble, the resort was eventually repurchased and construction resumed. The area is now formally known as the Ko Olina Resort.

Traditional Cultural Practices

The ahupua'a of Honouliuli hosted a variety of traditional Hawaiian cultural practices that were carried out and continue to be recognized and perpetuated by people today. Although the Honouliuli ahupua'a is known to lack rainfall, the 'Ewa karstic system located below the surface provided water and nutrient-rich sediment to sustain farming and plantation operations throughout the 'Ewa region. The maka'ainana living within the ahupua'a of Honouliuli would access the freshwater via pit caves or sinkholes. Historically, the kalo, kī, and noni were cultivated in the ahupua'a of Honouliuli. McAllister documented how the maka'ainana adapted to conditions in Honouliuli writing that the kama'aina of the ahupua'a utilized the soil on the floor of caves for cultivation and noted that both mai'a and kō were cultivated in pits.

Honouliuli also contained reefs, farmed fishponds, and freshwater springs for native Hawaiians to fish. Notably, the lochs of Pearl Harbor were ideal for the construction of fishponds and fish traps. The abundance of ocean resources would sustain and supplement native Hawaiians with ocean-based proteins. During a tour of the Lanikūhonua Cultural Institute, kahu Nettie Tiffany pointed out Anianikū and Kō'ula fishponds which are located west of the project area.

Religious practices including prayers, chants, and ho'oponopono or the practice of reconciliation of others did occur at the project area and within the surrounding vicinity. Additionally, through community consultation, Mr. Aila mentioned an unimproved Kuahu (altar) is located west of Lanikūhonua, beyond the housing but within the County Park. The Kuahu, he believes, is a fishing shrine where fishermen used to leave ho'okupu (offerings); he also noted that "Uau Kani (Wedge tail shearwater)" nest in the area surrounding the altar.

Ka Pa'akai Analysis

In Ka Pa'akai O Ka 'Aina v. Land Use Comm'n, 94 Hawai'i 31, 7 P.3d 1068 (2000), the Hawai'i Supreme Court articulated an analytical framework to assist state agencies in balancing the State's obligation to protect traditional and customary practices against private property (as well as competing public) interests, by requiring specific findings and conclusions about:

1. The identity and scope of 'valued cultural, historical, or natural resources' in the relevant area, including the extent to which traditional and customary native Hawaiian rights are exercised in relevant area;
2. The extent to which those resources—including traditional and customary native Hawaiian rights—will be affected or impaired by the proposed action; and
3. The feasible action, if any, to be taken by the [agency] to reasonably protect native Hawaiian rights if they are found to exist.

Based on information gathered from the cultural and historical background, and community consultation for this Project, there are various traditional cultural practices and resources to consider. As such, the CIA was updated to more clearly articulate this analysis (Section 9 of Appendix C).

1. Valued Cultural, Historical, or Natural Resources in the Project Area

During consultation, Ms. Tiffany pointed out various native vegetation that are present at the adjacent Lanikūhonua property. Ms. Tiffany, Mr. Lewis, and Mrs. Lopes discussed marine resources in the vicinity of the Project area. Ms. Tiffany pointed out the Anianikū and Kō'ula fishponds, which are located west of the Project area.

Mr. Lewis mentioned that people swim, dive, and spear fish at Milo Cove just north of the Cove Property. Mrs. Lopes stated that her 'ohana has "actively fished the reefs along the coast and enjoyed manini, weke, kala, maiko, he'e and 'ō'io from Keaulana, Kalaniana'ole Beach Park, Ulehawa, Pu'uohulu-Kai, and Mā'ili."

Mr. Lewis, Ms. Tiffany, Mr. Aila Jr., and Mrs. Lopes discussed the spiritual significance of the area. Mr. Lewis mentioned that in traditional times, the area was "where spirits would roam." He also mentioned the Makahiki season begins in Kapolei with ceremonies, dancing, and games and continues across all the other islands. Ms. Tiffany noted that religious practices did occur on the Project area and within the surrounding vicinity. Mr. Aila Jr. mentioned there is a kuahu (altar) where fishermen left ho'okupu (offerings) located "to the west of Lanikūhonua just beyond the housing but within the County Park that is unimproved." Mrs. Lopes was "water baptized as an adult" in the "ocean and shoreline of Nānākuli and the proposed area of revitalization in Ko Olina." She also brought her daughters to Anianikū (a fishpond located west of the Project area) to conduct ceremonies dedicating them to Ke Akua. She noted that these ceremonies bound them spiritually to this place.

Mr. and Mrs. Lopes have trained and performed hula at both Lanikūhonua and Paradise Cove over the last 17 years. Their halau, Ka Lā 'Ōnohi Mai O Ha'eha'e, had their very first meeting at Lanikūhonua. Mrs. Lopes' kumu O'Brian set aside "time for Kapu kai or ceremonial preparations in the ocean for his dancers to meditate, spiritually cleanse and pray before important hula and life events." She emphasized that "these experiences are so important to us as practitioners."

Mr. and Mrs. Lopes stressed the importance of maintaining access to the ocean so her 'ohana, her hālau, and other cultural practitioners may continue their practices. She suggested "creating a formal agreement between practitioners, the estate and the proposed kahu mālama [caretaker] of the area to allow our people to conduct our training and formal ceremonies there as our way of reconnecting to our sources of strength and healing taught to us by our kumu and kūpuna."

Mrs. Lopes mentioned "two hula mounds" at the Ocean Garden that "provide natural staging for entertainment, a space for the daily educational activities and possibly hula ceremonial gatherings and presentations." Mrs. Lopes supports keeping the "two hula mounds" at the Ocean Garden in their "current location and condition." She emphasized that, "They will continue to be special and very useful areas if preserved."

Five burials (SIHP No. -04968) were documented during previous archaeological studies (Jourdane 1995, Hammatt 1995) conducted within the Cove Property. Based on associated artifacts, at least two of these burials were post-Contact. Ms. Tiffany and Mrs. Lopes mentioned that burial remains have been previously identified within the Project area and discussed the probability of disturbing other burials not previously identified during construction and development of the proposed Project.

2. The Extent to which Traditional and Customary Native Hawaiian Resources will be Affected by the Proposed Action

Community members expressed concerns regarding restrictions to access to the shoreline in the vicinity of the area for the gathering of aquatic resources and traditional cultural practices associated with religious activities and hula.

3. Feasible Action, if any, to be taken to Reasonably Protect Native Hawaiian Rights

See the following section for proposed mitigation measures.

Potential Impacts and Mitigation Measures

During outreach with cultural descendants of the area, it was shared that there is potential for burials to be found on site.

As part of the KPK Analysis, the Applicant has identified “the feasible action, if any, to be taken to reasonably protect Native Hawaiian rights.” The following mitigation measures are proposed:

- CSH recommends the Applicant consult with the Lanikūhonua Cultural Institute during the design process to avoid potential impacts to undisclosed cultural sites and ongoing cultural practices occurring within The Cove Redevelopment Project area. The Applicant continues to coordinate with the Lanikūhonua and ~~Nettie Fernandez~~ Ms. Tiffany.
- In the long-term, CSH recommends that access to the shoreline in the vicinity of the Project area be maintained for ongoing traditional cultural practices associated with the gathering of aquatic resources such as fish, limu and salt. One consulted party recommended that the Project make the ocean more easily accessible. Two others suggested “creating a formal agreement between practitioners, the estate and the proposed kahu mālama [caretaker] of the area to allow our people to conduct our training and formal ceremonies there as our way of reconnecting to our sources of strength and healing taught to us by our kumu and kūpuna.”
- Interviewees emphasized the importance of programming that is available for all ages to experience and that authentically celebrates Hawaiian culture, honors a sense of place, and upholds the legacy of the Cove Property. Suggestions provided include revitalizing the existing daily lū‘au show to foster creativity while remaining rooted in Hawaiian values, integrating traditional elements of mele and hula. Other recommendations involve the inclusion of traditional Hawaiian games such as spear throwing or ‘ulu maika (ancient Hawaiian game suggesting bowling), showcasing Hawai‘i-based products or goods by Hawaiian artisans, enabling businesses to exhibit various traditional art practices beyond poi-pounding or tapa-making), allowing use of the new structures for community events, and actively contributing to the growth of the regional economy.
- Ms. Tiffany stated that all work conducted for the Project should be done with pono and workers need to be maka‘ala. She pointed out that it is the intentions and actions of people that guide a reaction from the spirits. If any disturbance of iwi kūpuna should occur, both Native Hawaiian and legal protocols need to be followed.

Project construction workers and all other personnel involved in the construction and related activities of the Project ~~should~~ will be informed of the possibility of inadvertent cultural finds, including human remains. In the event that any potential historic properties are identified during construction activities, all activities will cease and the SHPD will be notified pursuant to HAR ~~§Chapter~~ 13-280-3. In the event that iwi kūpuna are identified, all earth-moving activities in the area will stop, the area will be cordoned off, and the SHPD and Honolulu Police Department (HPD) will be notified pursuant to HAR ~~§Chapter~~ 13-300-40. In addition, in the event of an inadvertent discovery of human remains, the completion of a burial treatment plan, in compliance with HAR, ~~§Chapter~~ 13-300 and HRS, ~~§Chapter~~ 6E-43, is recommended.

- In the event that iwi kūpuna and/or cultural finds are encountered during construction, ~~Project proponents should consult with cultural and lineal descendants of the area to develop a~~

reinterment plan and cultural preservation plan for proper cultural protocol, curation, and long-term maintenance it will be determined if the find is human and, if so determined, the Applicant will comply with HAR §13-300-40 and HRS §6E-43, including completion of a BSCPP or Burial Site Component of a Data Recovery Plan (BSCDRP) (as appropriate, depending on decision to preserve in place or relocate) and filing of the BSCPP or BSCDRP with the DLNR Bureau of Conveyances.

With the implementation of mitigation measures as noted, The Cove is not anticipated to adversely impact cultural beliefs, practices, and resources in the Project area. Additionally, the Applicant remains committed to honoring the history, culture and connection to place through the planned programming at the new amphitheater/performing arts venue and cultural pavilion and the design of structures. Design of The Cove will be inspired by Hawaiian architecture in a contemporary form, providing a beautiful, authentic, and modern setting at the property.

4.2 Atmospheric and Meteorological Environment

4.2.1 Climate and Rainfall

Existing Conditions

Hawai'i is comprised of several islands with diverse topography but is generally classified as mountainous. These factors contribute to a mixture of climate regimes that exist within the island chain. Diverse climates can exist within relatively short distances on the same island due to topographical effects on wind direction and speed and rainfall patterns. O'ahu is the third-largest of the Hawaiian Islands and is characterized by two primary mountain ranges. The Ko'olau Range, at an average elevation of 2,000 feet, parallels the northeastern coast, while the Wai'anae Mountains, at a somewhat higher in elevation, parallels the west coast.

Typically, the climate on the island of O'ahu is heavily influenced by the terrain and trade winds, which generally flow from the northeast to the southwest, although its average frequency varies from 80 to 90 percent during the summer to only 50 percent in January. Lighter southeasterly winds prevail in the cooler winter months, with occasional strong wind events from winter storms. Wind speeds typically vary between about 5 and 15 miles per hour (mph) providing relatively good ventilation. The Project is located on the southwest coast of O'ahu. The climate in the Project area may be characterized as semi-tropical and influenced by Hawai'i's geographic location southwest of the Pacific High Region.

The Hawaiian Islands experience small diurnal and seasonal variations in ambient temperature. Average temperatures in the Project area are generally moderate, averaging approximately 75 degrees Fahrenheit (Giambelluca et. al, 2014). Rainfall is often variable, and the Project area averages approximately 22 inches of rainfall annually (Giambelluca et. al, 2013). In comparison to other areas on the island of O'ahu, the west/southwest portions of the island where the Project is located typically receive less rainfall. Thunderstorms are infrequent and usually mild.

Potential Impacts and Mitigation Measures

In Hawai'i, the annual and daily variation of temperature depends to a large degree on the elevation above sea level, the distance inland, and exposure to the trade winds. The Project would not affect climatic conditions; therefore, no mitigation measures are required. Activities related to the redevelopment of The Cove may result in minimal greenhouse gas emissions (GHGs), which are known to warm global climate. A predicted inevitable outcome of global warming that may impact Hawai'i,

including the Cove Property, is SLR. As such, the Applicant is committed to proactively planning and designing The Cove to be resilient and consider the anticipated impacts of higher ocean levels.

To mitigate the potential impacts related to increased flooding, new structures will be elevated above the 3.2-foot SLR-XA. Elevations will range from eight to 19.5 feet above msl (*Table 3.1*). The preliminary site plan is designed to be flexible in order to allow the Applicant to apply potential mitigation measures in the future.

Additional adaptation strategies will be integrated into the design to mitigate the effects of climate change and SLR, including the addition of landscaping and installation of LID, where feasible. In general, utility connections in new buildings are also vulnerable to the effects of SLR. As such, water utility infrastructure or equipment that could be damaged from flooding at the Cove Property may be located at higher elevations, as appropriate. These design elements will be finalized as the Project progresses.

The existing rocky shoreline fronting the northwest of the Project site will continue to protect the Cove Property from the predicted impacts of SLR. The shoreline setback area will be maintained as open space, providing a gradual transition to the shoreline area and a natural buffer to mitigate potential impacts related to flooding. In compliance with the UA, redevelopment of the Cove Property will limit lot coverage to 30 percent and the majority of the site will be preserved for open space and permeable surface areas which will mitigate potential flooding.

4.2.2 Air Quality

Existing Conditions

The ambient air quality in an area can be characterized in terms of whether it complies with National Ambient Air Quality Standards (NAAQS) and State Ambient Air Quality Standards (SAAQS), where applicable. The Clean Air Act requires the U.S. Environmental Protection Agency (EPA) to set national standards for emissions that are considered harmful to public health and the environment (criteria pollutants). The seven criteria pollutants are: carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), lead (Pb), ozone (O₃) and particulate matter (PM₁₀ and PM_{2.5}).

GHGs are compounds in the Earth's atmosphere which play a critical role in determining temperature near the Earth's surface. GHGs include carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), and several chlorofluorocarbons. GHGs are commonly quantified in the equivalent mass of CO₂, denoted CO₂e, which takes into account the global warming potential of each individual GHG compound.

The State Department of Health's (HDOH), Clean Air Branch (CAB) has been monitoring ambient air quality in the State of Hawai'i since 1957. The network is comprised of 14 monitoring stations on the islands of O'ahu, Kaua'i, Maui, and Hawai'i. The purpose of the network is to measure ambient air concentrations of the criteria pollutants previously described. The HDOH Air Monitoring Station nearest to the Cove Property is located at the Kapolei Air Station. Based on air monitoring data, Hawai'i is currently classified as attainment for all Federal and State standards.

Present air quality in the vicinity of the Project is primarily affected by air pollutants from motor vehicles, typical of urbanized environments. Natural sources of air pollution emissions that could affect the Project area at times but cannot be quantified very accurately include the ocean (sea spray), plants (aero-allergens), wind-blown dust, or distant volcanoes on Hawai'i Island.

Potential Impacts and Mitigation Measures

Short-term, intermittent air quality impacts of the project are related to construction activities, including demolition of existing structures, site preparation, grading, structure construction, paving, and architectural coatings. Construction would generate emissions of the criteria pollutants as well as GHGs. To mitigate emissions and GHGs generated with short-term construction for the redevelopment of The Cove, contractors may minimize simultaneous operation of multiple construction units, instruct drivers operating construction delivery vehicles to turn their engines off when loading/unloading, employ electrical or natural-gas powered construction equipment where feasible, and provide electrical hookups on-site for the use of hand tools.

Emissions from Project construction are anticipated to be minimal due to the relatively small scale and low intensity of construction activities. Emissions from construction activities will be temporary.

Construction of the Project will comply with provisions of HAR, Title 11, Chapter 60.1-33, Fugitive Dust. To mitigate potential impacts to air quality during construction, a dust control management plan will be prepared and Best Management Practices (BMPs) will be implemented. Construction BMPs will include, but not be limited to, replacing ground cover of the disturbed area, providing adequate water sources at the site, and reducing speed on unpaved roads. BMPs recommended by HDOH CAB that may be implemented during construction include, but may not be limited to, phasing of construction, locating potential dust-generating equipment in areas of the least impact, minimizing airborne and visible fugitive dust from shoulders and access roads, and controlling airborne and visible fugitive dust from debris being hauled away from the project site (*Appendix A-1*).

The primary air quality considerations related to the redevelopment of The Cove include potential generation of emissions from on-site area and stationary sources and mobile sources. The Project will activate the site at various hours and operations may increase emissions. However, the quantity of emissions is not anticipated to be large enough to result in significant adverse impacts to surrounding air quality. Electric vehicle (EV) charging consistent with City requirements may be provided on-site. It is anticipated that many visitors will be guests of the surrounding resort area or of the public beaches; as such, most visitors may utilize different modes of transportation, such as walking, which will help to reduce mobile sources of emissions at the site.

4.2.3 Urban Heat Island Effect

Existing Conditions

"Urban heat islands" occur when cities replace natural land cover with dense concentrations of pavement, buildings, and other surfaces that absorb and retain heat, and therefore experience much warmer temperatures than surrounding areas (EPA, n.d.). This effect may result in increased energy demand and consumption, elevated levels of air pollutants and GHGs, compromised human health and comfort, and impaired water quality. Climate change will likely lead to more frequent, severe, and longer heat waves during summer months, exacerbating the urban heat island effect. Areas that are more vulnerable to the urban heat island effect include those that are highly urbanized, have limited vegetation and open space, including impervious surfaces, lack nearby water bodies, or include activities that generate heat, such as vehicular traffic or industrial uses.

As O'ahu's Secondary Urban Center, the 'Ewa region is a rapidly growing area. The increase in urbanization coupled with dry climate conditions make the area susceptible to the urban heat island effect. According to the O'ahu Community Heat Map, the Project area experiences average afternoon temperatures between 97.5 to 99.6 degrees Fahrenheit (*Figure 4.23*). In contrast, morning

temperatures range between 80.4 to 81.2 degrees Fahrenheit and evening temperatures primarily range between 88.5 to 91.0 degrees Fahrenheit.

Potential Impacts and Mitigation Measures

As stipulated in the UA, lot coverage of the Cove Property will remain at 30 percent, preserving the majority of the site for landscaped open space which will mitigate the potential impacts of urban heat island effect. As shown in *Figure 3.2215*, lush landscaping elements, permeable surfaces, and water features may be integrated throughout the Cove Property, helping to reduce surface temperatures. Landscaping at the site is expected to consist of native, Polynesian-introduced, or tropical trees, palms, shrubs, and ground cover of varying sizes. Design of the structures may include features such as shading devices to help lower temperatures in outdoor spaces.

4.3 Terrestrial Environment

4.3.1 Topography, Geology and Soil Conditions

Existing Conditions

The geological formation of the Hawaiian archipelago is the result of volcanism. Each island protrusion from the ocean is the summit of a volcanic mountain rising from the ocean floor. The geologic creation of O'ahu is a result of the Earth's crust, comprised of irregular rigid segments, known as plates, moving over a hot spot of upwelling lava, which has remained relatively stationary for many millions of years. The plate under which O'ahu lies is known as the Pacific plate, which has slowly moved over this span of time towards the northwest. O'ahu was created through several stages of activity emanating from two volcanic domes. Through various stages of eruptions, erosion and land movement, the volcanic forms became what are known today as the Wai'anae and Ko'olau mountain ranges (Macdonald, 1983).

The Cove Property is situated on relatively flat land with topography ranging from approximately 19 feet above msl at the north end to ~~approximately five feet above msl at the southern end~~ shoreline (*Figure 4.34*). The average overall slope is approximately four percent. The northern portion of the site slopes south at approximately two percent, while the southern portion of the property has a slope of approximately one percent in the same direction. Along the west of the site, an exposed rocky coral shelf and natural cove front the property. The Cove Property contains no unique physical characteristics or topographic constraints.

According to the U.S Department of Agriculture (USDA), Natural Resources Conservation Service (NRCS) (formerly the Soil Conservation Service) publication, *Soil Survey of the Islands of Kauai, O'ahu, Maui, Molokai, and Lanai, State of Hawai'i, 1972*, the Project area consists of the following three soil types: Keaau Clay, 0 to 2 percent slopes (KmA); Keaau Clay, saline, 0 to 2 percent slopes (KmbA); and, coral outcrop (CR), which is along the beach/shoreline (*Figure 4.54*).

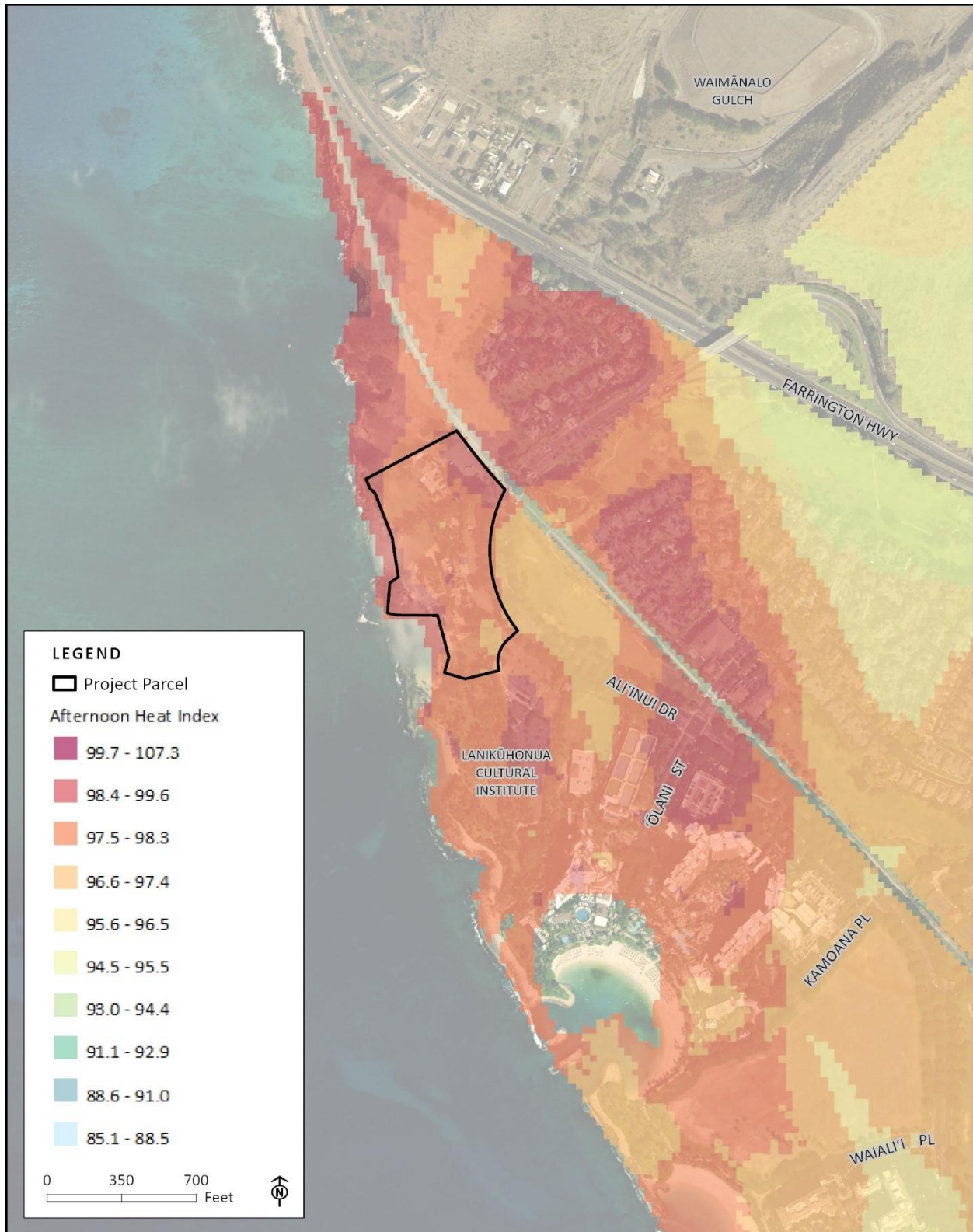


Figure 4.32

Community Heat Map (Average Afternoon Temperatures)



Figure 4.43

Topography (5-foot Contours)

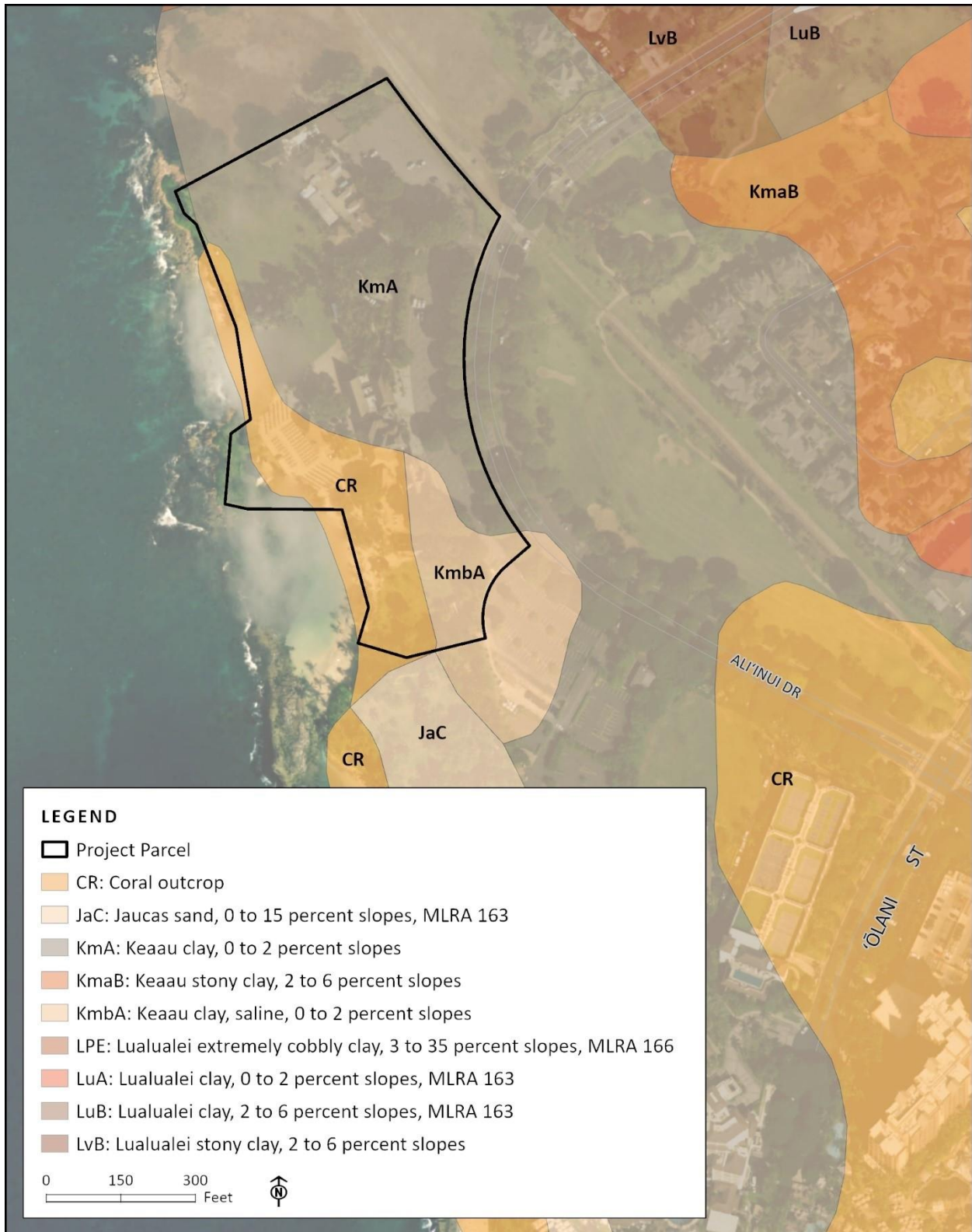


Figure 4.54

Soils

The Keaau Series consists of poorly drained soils on the coastal plains on the island of O‘ahu. These soils developed in alluvium deposited over reef limestone or consolidated coral sand. They are nearly level and gently sloping. This soil series was historically used for sugarcane and pasture. Within the Keaau Series, KmA soils typically occur on lowlands on the coastal plains. This soil is characterized by slow permeability, slow runoff, and an erosion hazard is no more than slight. KmbA soils have a similar profile to KmA soils except in that it is strongly affected by salts. KmbA soils typically occur in depressions adjacent to the ocean or in pockets within the limestone areas where seepage water evaporates.

Soils classified as CR consist of coral or cemented calcareous sand on the island of O‘ahu. Small areas of coral outcrop are exposed on the ocean shore, on the coastal plains, and at the foot of the uplands. This soil is characterized by an excessive drainage class, low runoff, and rare flooding. This soil was historically used for military installations, quarries, and urban development.

Potential Impacts and Mitigation Measures

Construction of The Cove will involve land disturbing activities that may result in soil erosion, such as clearing and grubbing, grading, excavation, and infilling of soil. During construction, soil erosion will be minimized through compliance with the City’s grading ordinance, and the applicable provisions of the HDOH Water Quality Standards (HAR, Section 11-54) and Water Pollution Control requirements (HAR, Section 11-55). Standard BMPs will be employed to minimize impacts and will be detailed in subsequent construction plans. BMPs may include, but not be limited to, phasing of construction activities, replacing ground cover of the disturbed area, providing adequate water sources at the site, the use of a stabilized construction ingress/egress, inlet protection, temporary filter sock perimeter controls, and the use of temporary silt fencing and screens. A National Pollutant Discharge Elimination System (NPDES) general permit coverage authorizing discharges of storm water associated with construction activities will be obtained from the DOH, Environmental Management Division, Clean Water Branch. Following construction, all areas of ground disturbance will be stabilized with appropriate materials including the use of vegetative ground cover. As discussed in more detail in Section 4.3.2, Upon completion of construction, the topography of the site will be improved to retain storm water runoff and reduce the total amount of runoff from the Project site.

4.3.2 Surface Waters and Groundwater

Existing Conditions

Surface Waters

There are no naturally occurring sources of surface water present near or within the Cove Property. The Project site is developed with several structures and either landscaped or paved with asphalt or concrete surfaces. Test excavations conducted for the AIS determined that coastal wetlands were once present at the site and have been capped by fill deposits from previous usage and development. The nearest surface water is the adjacent public beach/cove, which is classified as a Class A marine embayment by HDOH. According to HAR, Section 11-54, Class A waters are to be protected for recreational purposes and aesthetic enjoyment and these waters shall not act as receiving waters for waste discharged into these waters shall ~~which has~~ not received a high degree of treatment or control.

Groundwater

The DLNR Commission on Water Resource Management (CWRM) has defined seven major groundwater areas on O'ahu, primarily on the basis of geologic or hydrologic differences, which are further subdivided by shallower internal barriers to ground water flow. The entire Project area overlies the Makaiwa Aquifer System Area within the Pearl Harbor Aquifer Sector. The Pearl Harbor Aquifer Sector Area has a total sustainable yield of ~~165~~ 166 million gallons per day (gpd) and provides the largest amount of potable water on O'ahu. According to the 'Ewa Watershed Management Plan (2017), the Makaiwa Aquifer System Area has an undetermined sustainable yield.

~~The Pearl Harbor Aquifer Sector Area is identified as a Ground Water Management Area. Water management areas are defined by the State Water Code (HRS, Chapter 174C) as "a geographic area which has been designated...as requiring management of the ground or surface water resource, or both." Under such designation, any "withdrawal, diversion, impoundment, or consumptive use of water," with the exception of domestic consumption of water by individual users and catchment systems must first be permitted by the CWRM.~~

Excavation during construction may require dewatering, which would be managed following the conditions of approval for an ~~an~~ National Pollutant Discharge Elimination System (NPDES) Construction Dewatering permit from the HDOH, Clean Water Branch (CWB). The NPDES permit conditions will be administered in association with City permits for excavation and grading.

Potential Impacts and Mitigation Measures

Potential short-term impacts to surface waters are related to construction activities, which are temporary in nature. Stormwater runoff will be minimized through compliance with HDOH and City regulations. Additionally, standard BMPs as discussed in *Section 4.8.1* will be employed to minimize impacts and will be detailed in subsequent construction plans. BMPs may include, but not be limited to, phasing of construction activities, ~~use of~~ temporary silt fencing and screens, replacing ground cover of the disturbed area, providing adequate water sources at the site, the use of a stabilized construction ingress/egress, inlet protection, and temporary filter sock perimeter controls. With the implementation of BMPs, potential short-term impacts will be mitigated.

Redevelopment of the Cove Property is anticipated to decrease the total stormwater runoff generated on site, representing an improvement from existing conditions (Section 4.8.1). To further mitigate potential stormwater runoff in the long-term, the use of LID measures, such as bioswales, rain gardens, planter boxes, sand filters, or permeable pavement, ~~may be integrated~~ will be integrated and located where appropriate into the Project design to treat the runoff generated from the Project site, reduce direct outflow from the site and mitigate peak flows, ~~as feasible,~~ and Measures will comply with the City's Rules Relating to Water Quality, which are in place to protect water quality. Final treatment controls and BMPs will be assessed as the design phase continues. Additionally, source control BMPs, such as covering trash areas ~~routing stormwater from paved areas to landscaped areas,~~ may be included to prevent pollution of stormwater.

The redevelopment of The Cove will continue to utilize and operate the Project site similar to its existing use. Accordingly, the redevelopment of The Cove is not expected to significantly impact groundwater quantity or quality within, or down-gradient from the site. Construction BMPs will be implemented to reduce significant impacts to the coastal environment. The landscaping plan for the redevelopment of The Cove includes xeriscaping techniques, such as the use of drought tolerant plants, to support the conservation of groundwater resources.

It is also noted that DLNR-CWRM, the agency responsible for administering the State Water Code (HRS Chapter 174C), whereby all waters in the State are held in trust for the benefit of the citizens of the State, has recommended conservation and resource protection measures that are consistent with Applicant's proposed mitigation measures for managing stormwater runoff, reducing demand on freshwater resources, and minimizing impacts to area hydrology such as the use of water-efficient features and fixtures (which are also recommended by BWS) and the use of BMPs for stormwater runoff management (see Section 4.8.1 for further discussion). CWRM also recommends the use of reclaimed water for non-potable water needs. The Applicant is studying the use of a blackwater system for The Cove, which would be intended to recycle water from all onsite plumbing fixtures to R1 level per the requirements of HDOH (see Section 4.8.3). Similarly, as recommended by CWRM, the Project is expected to integrate several landscape conservation BMPs noted in the Landscape Industry Council of Hawai'i's memo wherever practicable, including the use of LID measures, and the integration of native, Polynesian-introduced, or tropical trees, shrubs, and ground cover, as well as the use of plant materials selected based on drought tolerance.

4.3.3 Botanical Resources

Existing Conditions

Vegetation at the Cove Property is characterized by native or tropical landscaping that is maintained throughout the year. Existing landscaping complements the current uses and provides effective screening while creating a relaxing atmosphere. Coconut trees (*cocos nucifera*) provide the primary landscaping through the Project site. A large monkeypod (*Samanea sama*) tree and a Chinese banyan (*Ficus macrocarpa*) are centrally located near the stage. The trees are over 30 years old and considered valuable to the character of the site. A smaller monkeypod tree is also located nearby. Other trees identified on-site include kamani (*Terminalia catappa*), milo (*Thespesia populnea*), hau (*Hibiscus tiliaceus*), plumeria hybrids, areca palm (*Dypsis lutescens*), kou (*Cordia subcordata*), mango (*Mangifera indica*), Otaheite gooseberry (*Phyllanthus acidus*), octopus or rubber tree (*Schefflera actinophylla*), and be-still-tree (*Cascabela thevetia*).

Common shrubs and smaller landscaping material planted around foundations and pathways including laua'e fern (*Phymatosorus scolopendria*), croton cultivars (*Codiaeum variegatum*), Tahitian gardenia or tiare (*Gardenia taitensis*), dwarf date palm (*Phoenix roebelinii*), hibiscus hybrids, bougainvillea hybrids, etc.

The major grass cover throughout the Cove Property is Bermuda grass or manienie (*Cynodon dactylon*), with smaller patches of swollen finger grass (*Chloris barbata*) and wire grass (*Eleusine indica*). Common herbaceous species include false mallow (*Malvastrum coromandelianum*) and prostrate spurge (*Chamaesyce prostrata*).

Areas not covered by vegetation consist of sand, bare soil, or weedy patches of vegetation. Among the more common species are buffel grass (*Cenchrus ciliaris*), spiny amaranth or pakai kuku (*Amaranthus spinosus*), swollen finger grass, wild bittermelon (*Momordica charantia*), Guinea grass (*Panicum maximum*), koa-haole (*Leucanea leucocephala*), castor bean (*Ricinus communis*), and bristly foxtail (*Setaria verticillata*).

The U.S. Fish and Wildlife Services (USFWS) has advised that the following federally-listed Endangered plant species could occur in the Project vicinity: pu'uka'a (*Cyperus trachysanthos*), dwarf naupaka (*Scaevola coriacea*), and 'ōhai (*Sesbania tomentosa*) (Appendix A-1).

Potential Impacts and Mitigation Measures

Landscaping will play a valuable role in expressing culturally resonant themes and experiences throughout The Cove Redevelopment. Existing trees or other vegetation may be relocated or removed or when needed for protection of public health, as appropriate. The existing monkeypod and banyan trees in the center of the property will be carefully preserved in place, honoring the history of the site. Other existing healthy trees may be relocated elsewhere on site, as appropriate.

Prior to construction, an invasive species management plan involving both observation and treatment will be prepared to mitigate the spread of the Coconut Rhinoceros beetle. During construction, should Federal- or State-listed threatened or endangered plant species be found at the Project site, appropriate avoidance buffers around the plant species would be established during construction. The movement of plant or soil material between worksites will be minimized to reduce the potential impacts that invasive fungal pathogens (e.g., Rapid 'Ohi'a Death), vertebrate, and invertebrate pests (e.g., Little Fire Ants, Coconut Rhinoceros Beetles), or invasive plant parts could have on native species. Equipment, materials, and personnel will be cleaned of excess soil and debris to minimize the risk of spreading invasive species. Gear that may contain soil, such as work boots and vehicles, will be thoroughly cleaned to prevent the spread of harmful fungal pathogens. If further consultation with the DLNR Department of Forestry and Wildlife (DOFAW) and O'ahu Invasive Species Committee is needed, the Applicant will coordinate as appropriate.

A preliminary landscape plan was prepared by PBR Hawai'i and Associates (*Figure 3.2215*). A palette of small, medium, and large native, Polynesian-introduced, and tropical canopy trees that provide shade and screening is preliminarily selected and accented by understory foliage and groundcover consistent with the surrounding environment. Lush landscaping will be incorporated throughout and will accent pedestrian pathways, enhance open space areas, and complement the proposed structures. Overall, vegetation at the completed Project Site is anticipated to be significantly greater than currently exists.

As shown in *Figure 3.2215*, the existing monkeypod and banyan trees will be preserved, and the Cove Property will be landscaped with plants that complement the surrounding coastal environment. As appropriate, the selection and use of native plants will be encouraged to express an authenticity of this Hawaiian place, and may include species shown in *Figures 3.2316* and *3.2417*. Selected native plants include 'ākia (*Wikstroemia uva-ursi*), naupaka (*Scaevola taccada*), pohinahina (*Vitex rotundifolia*), pohuehue (*Ipomoea pes-caprae* subsp. *Brasiliensis*), 'ilima (*Sida fallax*), a'ali'i (*Dodonaea viscosa*) and ma'o (*Gossypium tomentosum*).

The current landscape plan also includes valuable Polynesian-introduced plant material, including ti (*Cordyline fruticosa*), crown flower (*Calotropis gigantea*), bird of paradise (*Strelitzia*), ~~manila palm (*Adonidia Merrillii*)~~, Singapore plumeria (*Plumeria obtusa*), and bougainvillea (*Bougainvillea glabra*). Polynesian-introduced plants help symbolize the significance of the initial Polynesian plant introduction and are integral components of the landscape plan for The Cove.

As a water conservation measure, plant materials were selected based on drought tolerance and ability to survive in the hot and dry coastal environment of the 'Ewa region. Plants that may be used include 'ilima (*Sida fallax*), kupukupu (*Nephrolepis cordifolia*), autograph tree (*Clusia rosea*), and laua'e (*Phymatosorus scolopendria*).

4.3.4 Terrestrial Fauna, Avifauna, and Marine Fauna

Existing Conditions

Mammalian Fauna

Existing terrestrial fauna at the Cove Property primarily consists of introduced, alien species common to urbanized resort and residential environments, and may include the Small Indian Mongoose (*Herpestes auropunctatus*), cats (*Felis catus*), dogs (*Canis familiaris*), rats (*Rattus spp.*) and mice (*Mus domesticus*).

The USFWS advised that the Federal- and State-listed Endangered 'ōpe'ape'a, or Hawaiian hoary bat, (*Lasiurus semotus*) may occur in the Project vicinity (Appendix A-1). 'Ōpe'ape'a typically roost in trees and crevices in habitats such as forests, riparian zones, and open areas such as grasslands or meadows at various altitudes. Given the developed character of the site, it is unlikely that the 'ōpe'ape'a occurs on the Cove Property.

Marine Fauna

Given the Cove Property's adjacency to the coast, the Federal- and State-listed threatened honu, or green sea turtle (*Chelonia mydas*) and the Federal- and State-listed endangered Hawaiian monk seal (*Monachus schauinsland*) may also occur in the vicinity. Both species are recognized as indigenous to Hawai'i. Honu are most often found in shallow, protected or semi-protected, water around coral reefs and coastal areas, and may nest on sandy beaches across the Hawaiian islands, typically from May through September. The Hawaiian monk seal spends approximately one-third of its time resting on land at sandy beaches, tidepools, or rocky intertidal areas.

Avifauna

In general, bird life in the Project area is modest in diversity and consists of introduced species such as the common mynah (*Acridotheres tristis*), cardinal (*Cardinalis cardinalis*), chestnut mannikin (*Lonchura malacca*), common pigeon (*Columba livia*), zebra dove (*Geopelia striata*), house finch (*Carpodacus mexicanus*), red-vented bulbul (*Pycnonotus cafer*), house sparrow (*Passer demesticus*), and rice bird (*Padda oryzivora*). These common birds are abundance and found throughout the urban resort and residential areas of O'ahu.

The manu-o-kū or white tern (*Gygis alba rothschildi*) are also known to occur in the Project vicinity and regularly fly above the Project area in small numbers. The manu-o-kū is a State-recognized indigenous seabird that is found on many Pacific islands and atolls. Prior to 1959, white terns were not known to breed in the main Hawaiian Islands and were found to be rare on O'ahu. In the last two decades, they have been increasing in numbers and spreading across O'ahu. They can now be seen regularly in greater Honolulu, and have successfully adapted to an urban environment. Manu-o-kū carry no special Federal status; however, they are listed by the State as threatened. Additionally, the manu-o-kū is listed as protected species under the 50 Code of Federal Regulations, 10.13, Migratory Bird Treaty Act.

A previous survey of the Cove Property conducted in the early 1990s identified two indigenous migratory birds foraging at the exposed rocky shelf along the coastline adjacent to the west of the site. The recorded observations revealed a limited population, with only four individuals of these bird species positively identified in the Cove Property. The 'akekeke, or ruddy turnstone (*Arenaria interpres*), is a small shorebird that typically spends winters on the shorelines, rocky areas, and coastal habitats of the Hawaiian islands. The 'ūlili, or wandering tattler (*Heteroscelus incanus*), also spends

its winters in the Hawaiian Islands, and typically forage in intertidal habitats such as coral reefs. Both birds are recognized by the State as indigenous; however, neither bird is Federally nor State-listed as threatened or endangered.

The USFWS advised that the following Federal- and State-listed endangered seabirds could occur in the vicinity of the Cove Property: 'akē'akē, or Band-rumped storm-petrel (*Oceanodroma castro*), 'ua'u, or Hawaiian petrel (*Pterodroma sandwichensis*), and 'a'o, or Newell's shearwater (*Puffinus auricularis newelli*) (*Appendix A-1*). It is unlikely that seabirds nest at the Cove Property due to potential disturbance from regularly-occurring human activities.

Coastal wetlands which provide habitats for endangered Hawaiian waterbirds such as the ae'o or Hawaiian stilt (*Himantopus mexicanus knudseni*), 'alae ke'oke'o or Hawaiian coot (*Fulica alai*), 'alae 'ula or common moorhen (*Gallinula chloropus sandwichensis*) or Hawaiian duck (*Anas wyvilliana*) are not present at the Cove Property and no Hawaiian waterbirds are known to occur at or in the vicinity of the site. Previous archaeological surveys conducted at the Cove Property have found that coastal wetlands were historically present at the site; however, the wetlands have been capped by fill deposits related to previous uses and development (*Section 4.1.1*).

Finally, DOFAW has advised that the State-listed endangered pueo or Hawaiian Short-eared owl (*Asio flammeus sandwichensis*) may potentially occur in the Project vicinity. Pueo are most active during dawn and dusk twilights and occupy a variety of habitats, including wet and dry forests, but are most common in open habitats such as grasslands, shrublands, and montane parklands, including urban areas and those actively managed for conservation. However, due to the lack of suitable habitat on the Cove Property, it is unlikely that Pueo nest or forage at the site.

Critical Habitat

There is no Federally-designated Critical Habitat on the Cove Property.

The USFWS and the National Oceanic and Atmospheric Administration (NOAA) National Marine Fisheries Service (NMFS) are proposing to designate critical habitat for the threatened green sea turtle across the U.S., including portions of the Pacific Ocean and some beaches surrounding the islands of Hawai'i (Federal Docket Number FWS-R4-ES-2022-0164, July 19, 2023). The proposed critical habitat designation ~~is~~ has undergone public comment and is awaiting final approval. Proposed critical habitat for the green sea turtle is identified within the beach/natural cove adjacent to the Project site. The Project does not involve work within or on the beach, and will not result in adverse modification of existing or proposed critical habitat.

Marine Ecosystems

The marine ecosystem of the adjacent beach/ natural cove provides habitat, food sources, and shelter for a diverse array of marine species, including fish, invertebrates, and other organisms. Corals common in Hawaiian waters, such as *Pocillopora* species, contribute to the reef's structural complexity, which supports local biodiversity. The reef functions as a nursery and feeding ground, supporting various life stages of marine species, from juvenile fish to invertebrates, which are critical to local food webs. During the public comment period, Kuleana Coral Restoration has indicated that it conducts active monitoring and coral restoration in this area.

Potential Impacts and Mitigation Measures

Mammalian Fauna

Generally, impacts to the Hawaiian hoary bat may occur during the clearing and grubbing phase of construction. In the unlikely event that the Hawaiian hoary bat is present, trimming or removal of foliage and/or trees on the Project site may temporarily displace individual bats using trees for roosting. During the pupping season, females carrying pups may be less able to rapidly vacate a roost site while vegetation is being cleared. Additionally, adult female bats sometimes leave their pups in the roost tree while they forage, and small pups may be unable to flee a tree that is being felled. However, given the urbanized setting and existing uses at the Project site, it is unlikely the Cove Property provides a suitable habitat for the Hawaiian hoary bat. Mitigation measures to minimize the potential for short- and long-term impacts to the Hawaiian hoary bat include the following:

- Clearing and grubbing of woody vegetation taller than 15 feet would be planned to occur outside of the bat pupping season between June 1 and September 15.
- Barbed wire will not be utilized for fencing.

Marine Fauna and Ecosystems

Broader pressures from climate change, including ocean warming and acidification, have contributed to coral bleaching in some areas of Hawai'i. While local monitoring and management efforts are in place, the reef remains vulnerable to both natural and human-related impacts. During construction and operation, there is potential for coastal runoff and sedimentation to sheet flow into the ocean, potentially impacting water quality by introducing pollutants and increasing nutrient levels which could impact marine ecosystems. This may include impacts to marine habitats for coral reef and green sea turtles and nearshore waters where Hawaiian monk seals may forage. To minimize potential impacts to water quality, the following mitigation measures will be implemented:

- Erosion control BMPs to mitigate potential contaminant and nutrient runoff will comply with the State, County and Federal regulations during all phases of construction. An NPDES general permit authorizing discharges of storm water associated with construction activities will be required for the Project from the HDOH. Construction BMPS may include, but not be limited to, phasing of construction activities, temporary silt fencing and screens, replacing ground cover of the disturbed area, providing adequate water sources at the site, stabilized construction ingress/egress, inlet protection, and temporary filter sock perimeter controls.
- The Project is designed to integrate long-term stormwater management strategies and implementation of water quality treatment measures, providing a benefit to downstream environments compared to the existing conditions. LID measures such as bioswales, rain gardens, planter boxes, sand filters, and permeable pavement will be integrated and located where appropriate to reduce direct stormwater outflow from the site and to mitigate peak flows. Based on preliminary design, runoff will be directed to landscape planters throughout the site, which promotes percolation into the ground and filters out contaminants prior to the runoff entering the existing underground drainage systems. Additionally, storm water quality treatment will be provided by an underground infiltration system and an above-ground retention basin.

There is potential for the Hawaiian green sea turtle to nest along the beach and natural cove adjacent to the Cove Property. Although not anticipated, construction activity on or in the vicinity of beaches can result in sand and sediment compaction, nest destruction, beach erosion, contaminant and

nutrient runoff, and an increase in direct and ambient light pollution which may disorient terrestrial fauna. Mitigation measures to minimize the potential for short- and long-term impacts to the Hawaiian green sea turtle may include the following, if applicable:

- Consistent with DLNR-DOFAW recommendations, if a Hawaiian green sea turtle is detected within 100 feet of the Project area during construction, nearby activities will cease, if required, until the focal animal has departed the area on its own accord;
- If applicable, Operation of vehicles, including construction-related vehicles, on or near the beach environment will not occur during nesting or hatching season (May through December) (though no construction-related vehicles are expected to occur on the beach during construction);
- If nighttime work is required, associated lights shall be shielded downward (however, no nighttime work is anticipated);
- If applicable, Existing native dune vegetation will remain in its current place (note that no existing native dune vegetation is known to occur on the Project site);
- If applicable, Project-related debris, trash, or equipment will be removed from the beach if not in active use (though, no construction on the adjacent beach is anticipated);
- If applicable, There will be no stockpiling of Project-related materials on or near the beach environment and adjacent vegetated areas (note that no stockpiling of Project-related materials in these areas is anticipated);
- If applicable, The contractor will ensure that no basking sea turtles are present at the beach prior to or during construction on the portions of the Project site adjacent to the beach; and,
- Consistent with U.S. Fish and Wildlife Service recommendations, Design of lighting on buildings on or near the beach will be “wildlife friendly” and fully shielded to minimize and avoid disorientation to sea turtles.

As discussed, there is the potential for the Hawaiian monk seal to ~~nest~~ occur or haul on onshore along the beach/~~lagoon~~ adjacent to the Cove Property. Mitigation measures to minimize potential impacts to the Hawaiian monk seal may include the following:

- Consistent with DLNR-DOFAW recommendations, if a Hawaiian monk seal is detected within 100 feet of the Project area during construction, nearby activities will cease and will not continue until the focal animal has departed the area on its own accord;
- If applicable, Operation of vehicles, including construction-related vehicles, will not occur on or near the beach environment during weaning (end of spring) (though no construction-related vehicles are expected to occur on the beach during construction);
- If nighttime work is required, associated lights shall be shielded downward (however, no nighttime work is anticipated);
- If applicable Existing native dune vegetation will remain in its current place (note that no existing native dune vegetation is known to occur on the Project site);
- If applicable, The contractor will ensure that no basking Hawaiian monk seals are present at the beach prior to or during construction on the portions of the Project site adjacent to the beach; and,
- If applicable, Project-related debris, trash, or equipment will be removed from the beach if not in active use (though, no construction on the adjacent beach is anticipated);

- If applicable, ~~There~~ will be no stockpiling of Project-related materials on or near the beach environment and adjacent vegetated areas on the portions of the Project site adjacent to the beach;
- Design of lighting on buildings on or near the beach will be “wildlife friendly” and fully shielded to minimize and avoid disorientation to monk seals; and,
- Similar to current practice, ~~if~~ a monk seal is detected on the beach, the NOAA NMFS Marine Wildlife hotline will be contacted immediately by Project employees and beachgoers will be informed to respect the monk seal and keep a distance of at least 150 feet.

Avifauna

Though unlikely to nest at the Cove Property, migratory birds (manu-o-kū, ‘akekeke, and ‘ūlili), Hawaiian waterbirds (ae’o, ‘alae ke’oke’o, and ‘alae ‘ula), ~~and~~ Hawaiian seabirds (‘akē‘akē, ‘ua‘u, and ‘a‘o), and the Hawaiian short-eared owl (pueo) may forage or transit over the Project area at night when flying during their breeding season. The greatest impact known to affect avifauna is the use of outdoor lighting which causes disorientation, fallout, injury, or mortality. Mitigation measures to minimize the potential for short- and long-term impacts to avifaunal resources include the following:

- Construction will take place during the daylight hours to the extent possible;
- Though not anticipated to be required, ~~if~~ nighttime construction is necessary during seabird fledging season, which occurs between September 15 through December 15, a biological monitor may be hired to observe the presence of any avifaunal species during construction or nighttime activity may be halted;
- Though not anticipated to be required, ~~if~~ night-time construction activity or equipment maintenance is required, all associated lights shall be shielded downward. When large flood/work lights are used, they shall be placed on poles that are high enough to allow the lights to be pointed directly at the ground;
- In the long-term, exterior facility lighting will be “wildlife friendly” and shall be shielded downward to reduce the potential for interactions of nocturnally flying seabirds with external lights and manmade structures;
- If a nest of an avifaunal species described above is discovered during construction, work will cease within a minimum radius of 100 feet of the nest for a minimum of 60 days, if applicable. If a nest with chicks is discovered, work will cease for 30 days. These standard guidelines are intended to protect chicks, and may be shortened if monitoring is conducted often enough to note when chicks have fledged (usually five to nine weeks after hatching);
- If a previously undiscovered nest is found after work begins or a downed seabird is found during the duration of construction, work will cease within a minimum radius of 100 feet of the nest, and USFWS will be contacted within 24 hours; ~~and~~;
- If downed or injured fledglings are observed in the construction area, they will be reported for rescue to the Hawai‘i Wildlife Center and Hawai‘i Marine Animal Response, as recommended by DAR;
- If a nest of an avifaunal species described above is discovered at any point, the Project operator will contact the O‘ahu Branch of DOFAW at (808) 973-9778 and establish a buffer zone around the nest; and,
- Information about seabird fallout and the hazards light pollution may pose to avian species and other wildlife will be provided to staff working on the site prior to the initiation of work.

- There are no coastal wetlands which may potentially provide a habitat for endangered Hawaiian waterbirds on the Project site. To ensure short-term construction activity does not attract waterbirds, contractors will avoid creating puddles or other standing bodies waters. Additionally, trash and food scraps will be immediately discarded in order to avoid attracting waterbirds to the site. If a waterbird is identified at the site, work within 100 feet of the waterbird will cease until the waterbird has left. If a waterbird nest is found at the site, the USFWS will be contacted and work within 100 feet of the nest will cease until further guidance is provided.
- There are no wet or dry forests, grasslands, shrublands, or montane parklands which may potentially provide a habitat for endangered pueo on the Project site. However, should pueo nest or forage on the Project site during construction, non-native mammals such as mongoose, cats, dogs, and ungulates would be removed from the nesting area. Habitat alterations and disturbance would be minimized during pueo breeding season. Pueo nest on the ground and, in general, year-round.
- As recommended by DOFAW, before potentially disturbing activity like clearing vegetation, a qualified biologist may conduct surveys during crepuscular hours and walk line transects through the area to detect any active pueo nests, if required. If a pueo nest is discovered, DOFAW staff would be contacted and a minimum buffer distance of 100 meters (approximately 328 feet) from the nest would be established until chicks are capable of flight.
- To minimize potential impacts to vulnerable birds from nonnative predators such as cats, rodents, and mongooses, the Applicant will plan to incorporate actions to limit predator presence, including effective waste management to minimize attraction to trash.

4.4 Natural Hazards

4.4.1 Hurricane and Tropical Storm

Existing Conditions

In Hawai'i, northeast tradewinds predominate throughout most of the year and generally range in velocity between 10 and 20 mph with tradewinds of 40 to 60 mph periodically occurring. When wind speeds exceed 74 mph, the storms are characterized as hurricanes. Hurricanes are also characterized by widespread heavy rains in excess of six inches, which may result in destructive flooding.

Hurricanes are classified according to "Category" according to wind speeds as follows: Category 1 hurricanes have wind speeds between 74 to 95 mph; Category 2 hurricanes have winds between 96 to 110 mph; Category 3 (major) have wind speeds of 111 to 129 mph; Category 4 (major) have wind speeds from 130 to 156 mph; and, Category 5 hurricanes have wind speeds exceeding 157 mph (State of Hawai'i Emergency Management Agency (HI-EMA), 2018). Category 1 and 2 storms are still dangerous and require preventative measures.

The weather associated with hurricanes and tropical storms can lead to storm surge, which is a rise of water generated by a storm, over and above the predicted astronomical tides. Storm surge occurs when water is pushed toward the shoreline by the force of winds from the storm (HI-EMA, 2018). Coastal areas are particularly vulnerable to storm surge due to extreme flooding caused by the rise in water level.

NOAA depicts storm surge flooding vulnerability for hurricane-prone coastal areas in the U.S., including Hawai'i, through its National Storm Surge Hazard maps. Data shows that the site could be vulnerable in Category 3 or 4 hurricane events (NOAA, 2018). The State of Hawai'i is located in the Central Pacific basin where hurricane season runs from June 1 to November 30 (HI-EMA, 2018).

Hurricanes occasionally approach the Hawaiian Islands, but rarely reach the islands with hurricane force wind speeds. Records show that strong windstorms have struck all major Hawaiian Islands. The first recognized hurricane in Hawaiian waters was Hurricane Hiki, a Category 4 storm that hit in August 1950. Since that time, five hurricanes have caused serious damage in Hawai'i: Nina (1957), Dot (1959), 'Iwa (1982), Estelle (1986), and 'Iniki (1992). The island of O'ahu has not experienced a hurricane or tropical storm make direct landfall in modern history. However, the island has been subject to indirect effects when storms pass close to the islands, such as heavy rain, strong winds, and storm surge. On O'ahu, several storms have resulted in activation of the Emergency Operations Center between 2012 and 2017 (HI-EMA, 2018). Tropical Storm Iselle (2014) brought heavy rains and strong winds which resulted in downed trees and wires, and widespread power outages. The most recent storm to activate the EOC was Hurricane Douglas in 2020, which was the closest passing Pacific hurricane to the island of O'ahu on record.

Potential Impacts and Mitigation Measures

It is difficult to predict when hurricane events may arise, but it is reasonable to expect that future events will occur and may be increasing in frequency due to global climate change. While the entire State is susceptible to the adverse impacts of hurricanes, coastal areas experience increased vulnerability due to the combined forces of high winds and tidal surge. Inland areas, especially those in the 1 percent and 0.2 percent annual chance flood areas designated by Federal Emergency Management Agency (FEMA), are at risk due to heavy rains and flooding caused by storms. The Project site is, however, no more or less vulnerable than the rest of O'ahu to the destructive winds and torrential rains associated with hurricanes.

The National Weather Service provides guidance and issues a hurricane watch or warning when a storm is expected to make landfall. In the event of a hurricane or tropical storm, The Cove will implement standard operating procedures to help protect the safety of visitors and staff. New structures will be designed in accordance with State and City building codes, which include specific standards to ensure structures withstand the potential impacts of hurricanes and other natural disasters.

4.4.2 Earthquake

Existing Conditions

The majority of earthquakes in Hawai'i are related to volcanic activity, particularly to the movement of magma beneath Kīlauea and Mauna Loa on the island of Hawai'i. Other earthquakes are the result of exerted pressures released by magma that never reaches the surface. The U.S. Geological Survey (USGS) conducted a probabilistic seismic hazards assessment for the State of Hawai'i in 1997. From this assessment, seismic zones were re-assigned for each county. The entire City and County of Honolulu lies in a seismic zone designated as Zone 2A.

Under the International Building Code (IBC) seismic provisions, a Zone 2A area could experience seismic activity between .075 and .10 of the earth's gravitational acceleration (g-force). In comparison, Hawai'i Island is classified as the highest seismic rating of Zone 4 due to its ongoing volcanic activity. This indicates that the island could experience severe seismic activity between .30 and .40 g-forces.

The last significant earthquake to hit Hawai'i occurred in 2006, when a magnitude 6.7 earthquake struck Hawai'i Island in the morning. The earthquake was felt and affected by neighboring islands, including O'ahu, leaving many regions of the island without running water and power for the day.

Potential Impacts and Mitigation Measures

Seismic hazards are usually associated with causing damage including landslides, ground cracks, rock falls, and tsunamis. With a seismic zone rating of Zone 2A per the USGS, an earthquake is expected to cause only minor damage in the project area. Redevelopment at the Cove Property will be in compliance with the IBC and City standards, including earthquake design provisions. Long-term operation of The Cove may incorporate standard operating procedures for employees and visitors.

4.4.3 Flood Hazards

Existing Conditions

Based on the 2011 FEMA Flood Insurance Rate Maps (FIRM), the majority of the Cove Property is within Zone D, which indicates unstudied areas where flood hazards are undetermined, but flooding is possible. A small portion of the Project site adjacent to the beach and natural cove is within Zone VE (*Figure 1.78*). Zone VE is defined as a coastal flood zone with velocity hazard (wave action). The base flood elevation (BFE) for Flood Zone VE is 12 feet. Zone VE is considered a Coastal High Hazard Area subject to high velocity wave action from storms or seismic sources, and is considered a Special Flood Hazard Area (SFHA) in the City and County of Honolulu where flood insurance is mandatory.

Potential Impacts and Mitigation Measures

No structures will be constructed within the portion of the Project site that is located with Flood Zone VE. To mitigate potential impacts related to flooding, planned structures will be set back at least 60 feet from the shoreline. The nearshore portion of the Project site will be maintained as open space to provide a natural buffer, while the areas along the coastline will be landscaped and therefore function as a vegetated buffer. The Cove's structures are planned to be elevated eight to 19.5 feet above msl to proactively consider the potential impacts of SLR that may occur in the future, including flooding.

Landscaped, permeable open space will be integrated throughout to mitigate potential flooding and the urban heat island effect. The open spaces will reduce surface runoff, promote infiltration, manage stormwater, improve water quality, and enhance overall resilience to extreme weather events. LID measures ~~may~~ will be integrated where feasible appropriate to promote infiltration of surface stormwater runoff and lengthen the time of concentration of surface and coastal water runoff. The site will be graded to allow stormwater runoff and potential coastal flooding to flow through the site.

Long-term operation of The Cove may incorporate standard operating procedures for employees and visitors. In the event that evacuation from the site is required, the nearest assigned emergency public shelter is located at Barbers Point Elementary School.

4.4.4 Tsunami Inundation

Existing Conditions

The sudden displacement of the ocean floor (earthquakes), landslides, or volcanism can generate tsunamis, which are a series of waves that can reach speeds of up to 600 mph. Upon reaching a coastline, a tsunami can become a wall of water reaching heights of 30 feet or more and capable of moving inland several hundred feet. Known major tsunami events in Hawai'i include the areas of East Hawai'i (1946, 1960, 1975) and North Shore O'ahu (1952, 1957).

The City classifies tsunami evacuation zones into the following three designations: Tsunami Evacuation Zone, where evacuation is required for any tsunami warning; Extreme Tsunami Evacuation Zone (XTEZ), where additional areas must be evacuated only during an extreme tsunami event generated from earthquakes of Magnitude 9 or higher on the Richter scale; and, safe areas that are anticipated to be outside of the inundated areas. According to the City Department of Emergency Management Tsunami Evacuation Zone maps, the Cove Property is located within Tsunami Evacuation Zone (*Figure 4.56*). Therefore, there is potential for the Project site to become affected by a major tsunami, if such an event were to occur.

Potential Impacts and Mitigation Measures

The actual impacts of tsunamis upon a particular area cannot be estimated beyond the possibility of the area sustaining heavy damage. The capacity of a structure to withstand the effects of a tsunami is dependent upon several factors including the size and speed of the wave as it is transformed while approaching the shore, the type of structure, the site design and orientation of the structure and its surroundings, and the amount of debris that is swept in the movement of the wave.

The City has an emergency operations plan for evacuating areas potentially affected by a tsunami. Inland shelters have been identified, with the closest shelter to The Cove being located at Barbers Point Elementary School. Tsunami Warning signals from the State Civil Defense sirens will be audible during a tsunami event, which will serve to alert visitors to safety instructions. In the event of a Tsunami Warning, standard procedures to evacuate visitors and personnel to higher ground will be employed.

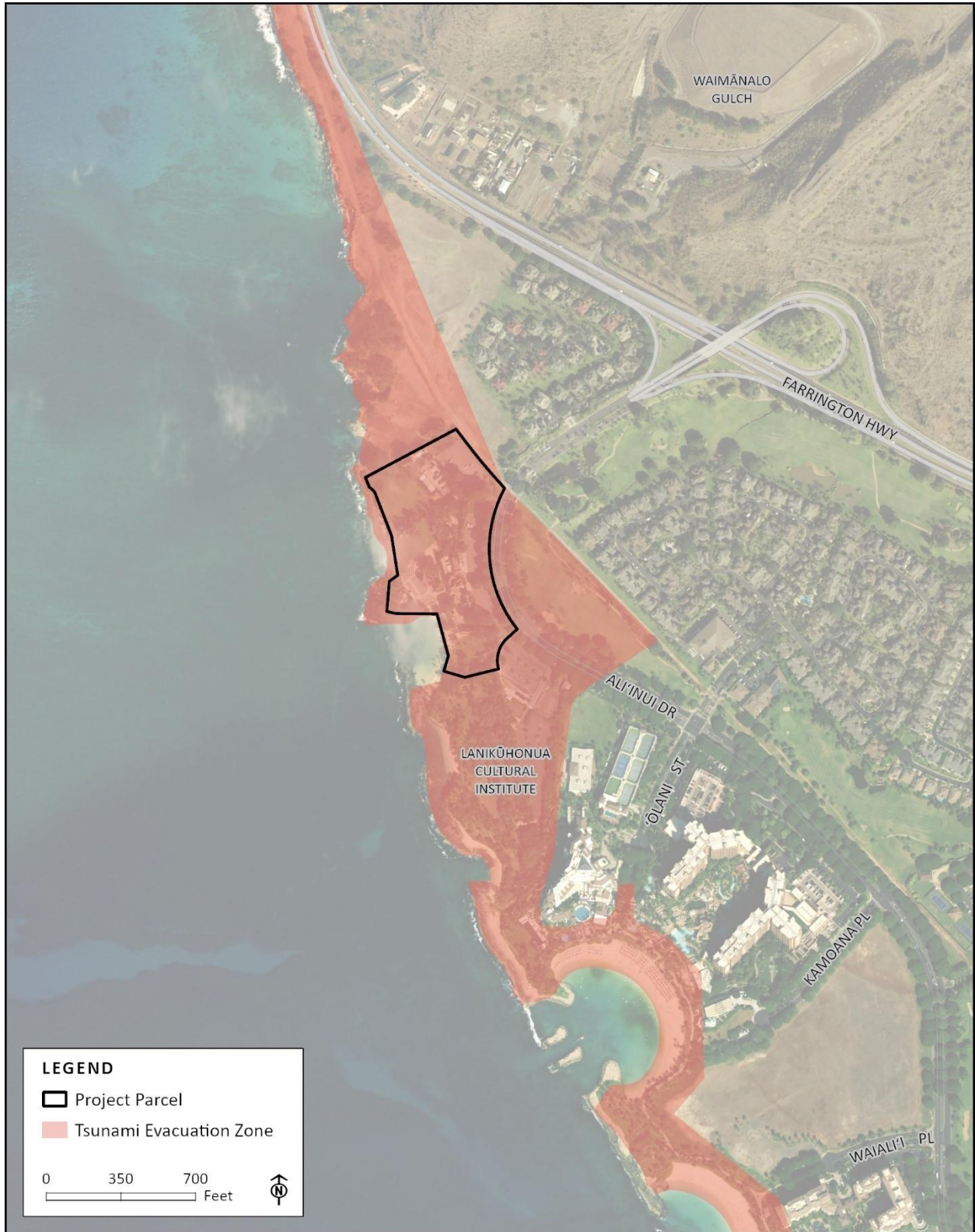


Figure 4.65

Tsunami Evacuation Zone

4.4.5 Wildfire

Existing Conditions

The Hawaiian Islands are vulnerable to wildland fires, especially during the summer months or during periods of prolonged drought and/or high winds. Areas where wildland (trees and brush) border urbanized areas, referred to as the wildland-urban interface (WUI), are known to be in greater risk for wildfire. Overgrown vegetation in proximity to homes, pockets of open space within subdivisions, and the presence of non-native, high fire-intensity plants around developed areas are known to potentially increase the likelihood of a wildfire. The majority of wildfires are human-caused but may also occur naturally.

In compliance with guidelines developed by the National Association of State Foresters, the DLNR DOFAW identified at-risk WUI communities throughout Hawai'i and rated each community's risk from wildland fires. The Project site is situated in the 'Ewa region of O'ahu, which is characterized by a history of wildfire spread, rough terrain, warm temperatures, strong winds, persistent droughts, and a large percentage of highly ignitable invasive grasses. According to DOFAW's risk rating of wildland fires, the Cove Property is considered "High Risk" for wildfires (*Figure 4.67*) and falls within the Zone 5 area (Honolulu Fire Department (HFD) or Federal Primary Response/DOFAW Co-op Response with Administrative Approval Upon Hawai'i Emergency Management Request).

In 2016, the *Community Wildfire Protection Plan for Western O'ahu* was developed by the Hawai'i Wildfire Management Organization in partnership with agencies, entities, community members, and individuals with interest or jurisdiction in West O'ahu to protect, assess, and provide mitigation priorities to reduce risks of wildfire spread in an area that has historically been impacted by wildfires. The National Cohesive Wildland Fire Management Strategy encourages communities to develop a dynamic approach to planning, responding, and recovering from wildfires, and provides a framework to develop a focused area-specific plan. The *Community Wildfire Protection Plan for Western O'ahu* is broken down into three categories in conformance to the National Framework and includes resilient landscapes, fire-adapted communities, and safe and effective wildfire response. The plan identifies the importance of restoring, protecting, and maintaining landscapes in West O'ahu; the need to build fire awareness and readiness within the community; and, recommends next steps to improve the area's access to resources including personnel, water infrastructure and availability, and firefighting access to the area.



Figure 4.76

Wildfire Risk Rating

Proposed Impacts and Mitigation Measures

As the design for the redevelopment of The Cove progress, plans will be prepared in accordance with the Fire Code regulations under the National Fire Protection Agency (NFPA) One to ensure HFD emergency access to the site is adequately provided. A majority of the property will be maintained as landscaped open space areas.

Landscaping on the Cove Property will be regularly maintained to ensure that combustible vegetation is removed and to reduce the risk of potential wildfire hazard. The preliminary plant palette for the Cove Property was selected based on drought tolerance and ability to survive in the hot and dry coastal environment of the area, and is expected to consist of native, Polynesian-introduced, or tropical trees, palms, and shrubs of varying sizes (*Figures 3.2316 and 3.2417*). Design of the planned structures may include the use of fire-resistant building materials.

In the event of a wildfire during operation of The Cove, a standard operating procedures for employees and visitors would be employed and HFD would be the primary responder. On-site fire protection is further discussed in *Section 4.6.2*.

As recommended by DLNR DOFAW, the Applicant may coordinate with Hawai'i Wildfire Management Organization on wildfire prevention, if needed. When engaging in activities that have a high risk of starting a wildfire (i.e., welding in grass), the work area would be wet down before starting the task and throughout as needed, a fire extinguisher will be on hand, and a spotter may be present to watch for fire starts in the event that vision is impaired.

4.4.6 Climate Change and Sea Level Rise

Existing Conditions

The ocean is the largest solar energy collector on Earth. Not only does water cover more than 70 percent of our planet's surface, but it can also absorb large amounts of heat without large increases in temperature. The ability to store and release heat over long periods of time gives the ocean a central role in stabilizing the Earth's climate system.

GHG emissions are a driving factor behind the increase in global temperature and SLR. Increased amounts of GHG are preventing heat radiated from the Earth's surface from escaping into space as easily as it has in the past. Most of the excess atmospheric heat is passed back to the ocean, resulting in significantly increasing upper ocean temperatures over the past two decades.

Presently, the warming of ocean water is raising global sea level due to the expansion of ocean water as it warms. Land-based ice, such as glaciers and ice sheets, are also greatly affected by global warming. These reserves of ice are located in places like Greenland and Antarctica. Typically, they experience melt during the warmer months of the year and the ice is replenished in colder months. However, with the average year-round global temperatures rising, ice caps and glaciers are experiencing a disproportionate amount of melting at an accelerated rate.

SLR is an inevitable outcome of global warming that will continue through centuries even if human-generated GHG emissions were eliminated today. Rising ocean levels will increasingly threaten natural ecosystems and human structures near coastlines around the world.

The Intergovernmental Panel on Climate Change (IPCC) Fifth Assessment Report (AR5) provides projections of global mean SLR for four cases representing the climate response to GHG emission levels from different socioeconomic scenarios, referred to as Representative Concentration Pathways (RCPs). The RCPs describe possible climate futures based on how much GHGs are emitted. The “business as usual” (RCP8.5) scenario predicts a rise of 0.5 feet in 2030, 1.1 feet in 2050, 2.0 feet in 2075, and 3.2 feet in 2100. The RCP8.5 scenario is regarded as the most likely scenario and is used as the basis for modeling coastal hazards in the 2017 *Hawai‘i Sea Level Rise Vulnerability and Adaptation Report*. This report was published by the Hawai‘i Climate Commission and provides the first state-wide assessment for documenting Hawai‘i’s vulnerability to SLR. The report recommends planning for up to 3.2 feet of SLR by the year 2100 with potential increased adjustments based on new data and improved modeling.

Following this guidance issued by the State, under the Mayor’s Directive 18-2 (2018), it is recommended that the City utilize the 3.2-foot Sea Level Rise Exposure Area (SLR-XA) model in the planning and design of projects to minimize risks from climate change and SLR. The Mayor’s Directive references the “Sea Level Rise II – Guidance Document,” which was last updated by the City Climate Change Commission on July 29, 2022. The updated document recommends that the City set as a planning and policy benchmark the interagency “Intermediate” SLR scenario (1.16 m, 3.8 ft by 2100), as modeled for the Honolulu Tide Station, as the minimum scenario for all planning and design, and that the City continue to utilize the 3.2 ft SLR-XA until updated SLR-XA map data is available.

The Hawai‘i Sea Level Rise Viewer SLR-XA model developed by the Pacific Islands Ocean Observing System (PacIOOS) at the UH of Ocean and Earth Science and Technology (SOEST) models the potential impacts of SLR on future passive flooding, annual high wave flooding, and coastal erosion. The model indicates that the nearshore portion of the Cove Property is located within the 3.2-foot SLR-XA and therefore potentially subject to the combined effects of SLR (*Figure 4.78*).

Passive Flooding

As sea level rises, it exerts upward pressure on the lens of freshwater beneath the land surface, which causes the groundwater table to rise. Passive flooding occurs when groundwater percolates out of the ground in low-lying areas or ocean water overflows through storm drains. Passive flooding is exacerbated by rainfall as it prevents drainage and, as such, runoff and marine waters combine to produce larger impacts.

According to the PacIOOS SLR-XA model, the Project site is not anticipated to experience flooding due to the projected 3.2-foot rise in sea level by 2100 and the associated rise in shallow groundwater levels (*Figure 4.89*). However, a portion of the beach and natural cove adjacent to the Cove Property is predicted to experience increased flooding with 3.2 feet of SLR.

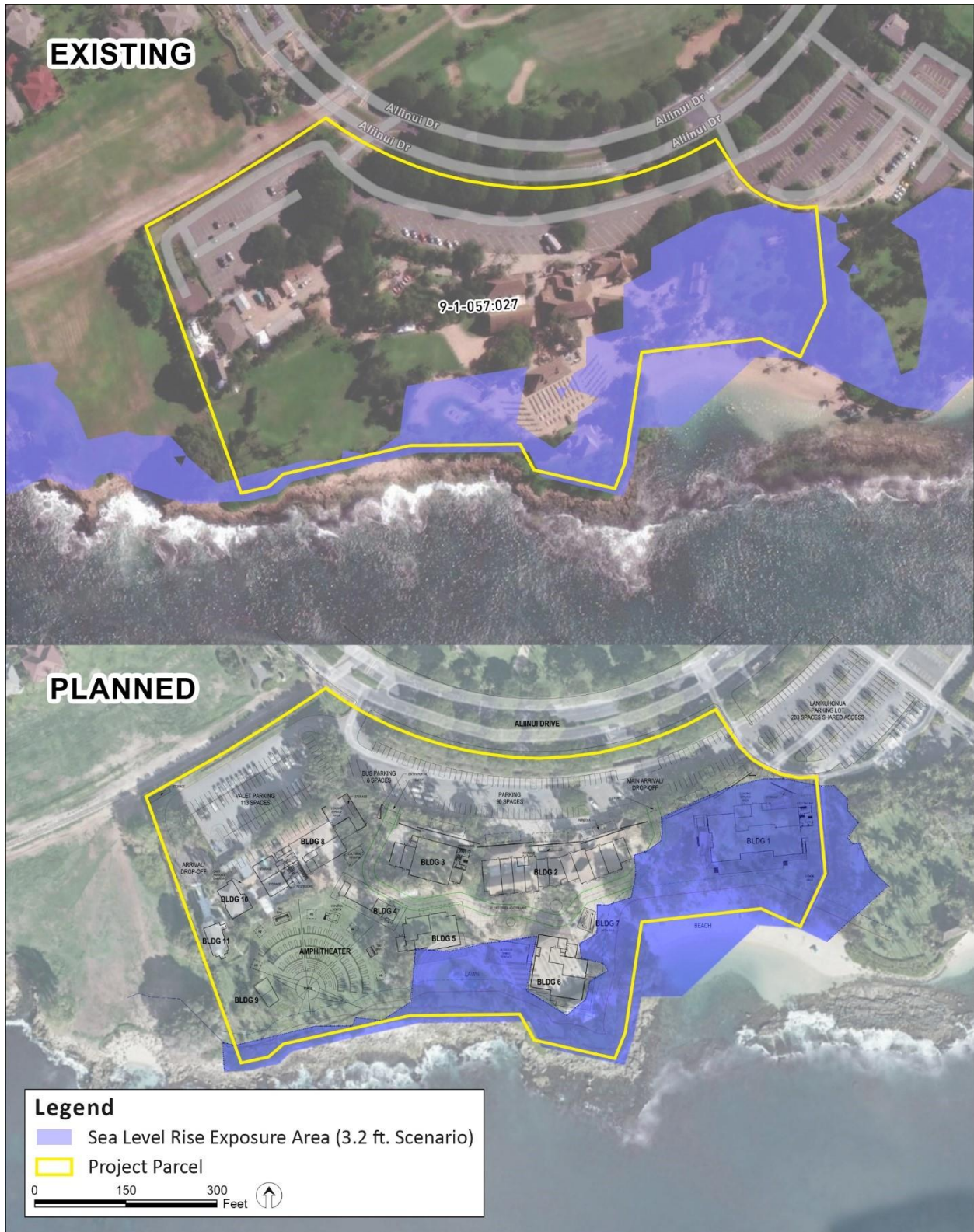


Figure 4.87

3.2-foot Sea Level Rise Exposure Area (2100)



Figure 4.98

Passive Flooding (3.2 feet of Sea Level Rise by 2100)

Annual High Wave Flooding and Coastal Erosion

In addition to passive flooding, SLR allows more wave energy to reach the shoreline. This results in higher wave runup and overtopping of the beach berm that may cause flooding along the nearshore portion of the project site.

According to the PacIOOS SLR-XA model, the south/southwestern portion of the Cove Property, which is adjacent to the beach and natural cove, may experience flooding from annual high wave events (Figure 4.910).

Coastal Erosion

Coastal erosion is the process by which local SLR, strong wave action, and coastal flooding wear down or carry away rocks, soils, and sands along the coast. Erosion threatens the integrity of structures and infrastructure located along the coast. Moreover, beach loss results in a variety of negative economic, social, cultural, and environmental impacts.

The SLR-XA model does not anticipate that the Project site will experience coastal erosion as a result of 3.2 feet of SLR by 2100 (Figure 4.~~10~~11). As described the Atlas of Natural Hazards in the Hawaiian Coastal Zone (Fletcher et. Al, 2002), the artificial coves of Ko Olina provide sandy beaches along an otherwise rocky shoreline. Characteristic of the original shoreline of the west side of O'ahu, the Cove Property's shoreline is characterized by a natural rocky shelf with a pocket of sand providing a natural beach (Figure 3.1). Due to the presence of a natural rocky shelf, which stabilizes the shoreline and protects the adjacent beach, erosion at the Cove Property is not anticipated.

Potential Impacts and Mitigation Measures

SLR is an inevitable part of the Hawai'i's future, and, as such, the Applicant is committed to proactively implementing adaptive and resilient design features and minimizing environmental impacts at the Cove Property. Located adjacent to a beach and natural cove, the Cove Property is anticipated to be impacted by flooding, particularly annual high wave flooding, with an expected 3.2 feet of SLR. As such, redevelopment of the site for The Cove will be designed to ensure ongoing successful, safe, and sustainable operations at the site for the foreseeable future.

The planned redevelopment will result in an approximately ~~15.2~~ 13.84 percent of lot coverage, adhering to the 30 percent lot coverage limit articulated in the UA. Landscaped, permeable open space will be integrated throughout to mitigate potential flooding and the urban heat island effect. The open spaces will reduce surface runoff, promote infiltration, manage stormwater, improve water quality, and enhance overall resilience to extreme weather events. LID measures ~~may~~ will be integrated where ~~feasible~~ appropriate to promote infiltration of surface stormwater runoff and lengthen the time of concentration of surface and coastal water runoff. The site will be graded to allow runoff and potential coastal flooding to flow through the site.

Planned structures at The Cove will be set back at least 60 feet from the shoreline of the beach and may be elevated eight to 19.5 feet above msl to proactively consider the potential impacts of SLR. The 60-foot setback area will be maintained as open space, providing a natural buffer to mitigate potential flooding. Areas along the coastline will be vegetated, and therefore also function as a vegetated buffer.

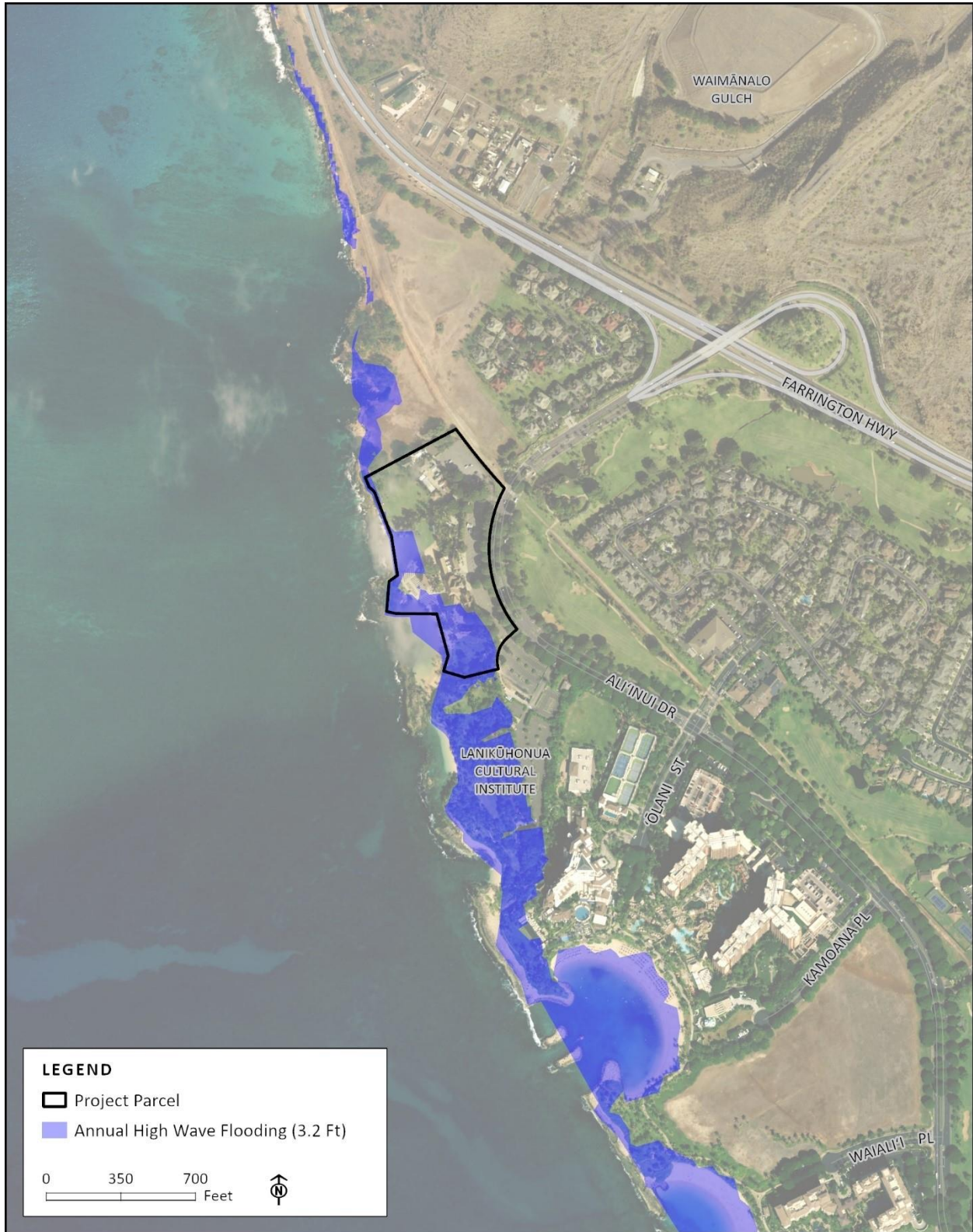


Figure 4.109

Annual High Wave Flooding (3.2 feet of Sea Level Rise by 2100)

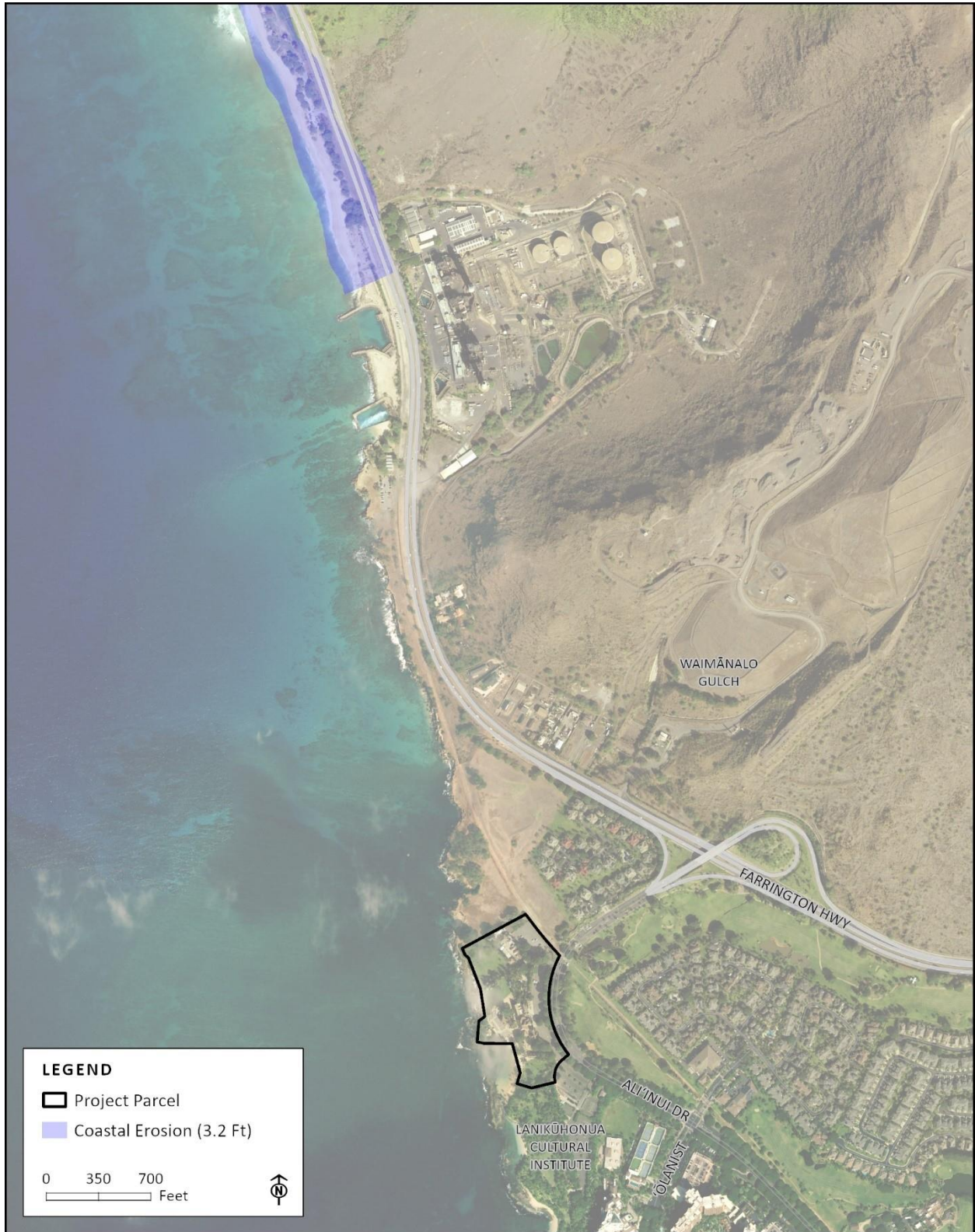


Figure 4.1110

Coastal Erosion (3.2 feet of Sea Level Rise by 2100)

The Project also supports non-motorized transportation, such as walking or biking, which is expected to mitigate additional GHG emissions. Visitors of The Cove will be able to take advantage of the surrounding resort area's high density of activities and attractions and pedestrian-friendly environment as an alternative to utilizing private vehicles. Parking facilities will include electric vehicle (EV) charging and bicycle storage in compliance with the LUO.

4.5 Hazardous Materials

Existing Conditions

The HDOH Solid and Hazardous Waste Branch regulates the generation, treatment, storage, and disposal of hazardous waste. The HDOH Hazard Evaluation and Emergency Response (HEER) office provides leadership, support, and partnership in preventing, planning for, responding to, and enforcing environmental laws relating to the release or threats of releases of hazardous substances. Site-specific facilities, sites or areas in which HEER has investigated or may investigate are tracked in HEER's online system for public records. According to the public record, no reported spills or releases have occurred within the Cove Property.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) information systems database, commonly referred to as the "Superfund" program, tracks the location of identified abandoned hazardous waste sites. No such sites exist within the Cove Property.

Recognized environmental conditions (RECs) refer to the presence or likely presence of any hazardous substance or petroleum product in, on, or at a property due to any release to the environment; under conditions indicative of a release to the environment; or, under conditions that pose a material threat of a future release to the environment. The EPA has banned the use of lead-containing paint; however, buildings constructed prior to 1978 may still include lead-containing paint. The EPA also issued a final rule banning most asbestos-containing products in 1989. Although it is not anticipated that the existing structures contain asbestos building products, this material was commonly used for insulation, fireproofing, and sound absorption prior to the 1980s. Finally, due to the age of the existing buildings, there is potential that pesticides may have been applied for termite control beneath the slab foundations. This is not considered to be a REC, but should be considered at the time buildings are demolished.

Potential Impacts and Mitigation Measures

The last major redevelopment of the Cove Property occurred in the 1990s; as such, the presence of RECs is unlikely. If hazardous materials are identified during demolition and construction, materials will be handled appropriately in accordance with Federal, State, and City regulations. The existing structures will be inspected prior to demolition for asbestos, lead-based paint, fluorescent lights and ballasts, and other indoor environmental quality concerns. Should asbestos be identified on site, the Applicant will coordinate with the HDOH Asbestos Abatement Office of the Noise, Radiation and Indoor Air Quality Branch prior to demolition, and work with contractors who are specifically trained in abatement of asbestos containing materials to safely remove these hazardous materials and limit potential exposure.

In the long-term, development of the Project will remove potential hazardous materials from the site, resulting in a safer environment. No mitigation measures are proposed.

4.6 Public Services

4.6.1 Police Protection

Existing Conditions

The Project area is within HPD's Wai'anae District 8, which consists of 20 beats (Beats 850 through 879). The Cove Property is within District 8, Beat 865, and is served by the Kapolei District station located on Kamokila Boulevard. In 2022, there were 3,950 reported offenses throughout District 8, down from 4,580 reported offenses in 2021 (HPD, 2022). The majority of the offenses were related to larceny (2,586 offenses).

Potential Impacts and Mitigation Measures

During construction, the Applicant will implement BMPs to mitigate potential impacts to the public safety of the surrounding environment. BMPs may include, but not be limited to, the following, as recommended by HPD:

- Necessary signs, lights, barricades, and other safety equipment must be installed and maintained by the contractor during construction.
- Adequate notification be made to business and residents in the area prior to deliveries or possible road closures, as any impacts to pedestrian and/or vehicular traffic may lead to complaints.
- Coordination between existing security and HPD will be ongoing to ensure adequate police coverage is provided during construction activities that require police-assisted traffic guidance.

The Project will include ancillary retail, restaurant, and gathering opportunities for residents and visitors to the Cove Property, and may therefore increase the de facto on-site population during operating hours. However, increased demand for police services in the area is not anticipated. During operation of The Cove, additional private security on the property will be evaluated and considered, as needed.

4.6.2 Fire Protection

Existing Conditions

The Project site is within the Fourth Battalion area designated by HFD. The region is served by eight fire stations, including the following:

- Station 12: The Waipahu Fire Station is located along Leonui Street, approximately ten miles east of the Project site.
- Station 24: The 'Ewa Beach Fire Station is located at the corner of Keone'ula Boulevard and Kaileolea Drive, approximately nine miles east of the Project site.
- Station 26: The Wai'anae Fire Station is located along Farrington Highway, approximately 12 miles north of the Project site.
- Station 26: The Wai'anae Fire Station is located along Farrington Highway, approximately 12 miles north of the Project site.

- **Station 28:** The Nānākuli Fire Station is located along Nānākuli Avenue, approximately four miles north of the Project site.
- **Station 35:** The Makakilo Fire Station is located along Makakilo Drive, approximately six miles north of the Project site.
- **Station 40:** The Kapolei Fire Station is located at Lauwiliwili Street, approximately four miles east of the Project site.
- **Station 42:** The Waikele Fire Station is located at the corner of Lumiana Street and Lumiana Place, approximately 11 miles northeast of the Project site.
- **Station 43:** The East Kapolei Fire Station is located at the corner of Kapolei Parkway and Kinoki Street, approximately six miles east of the Project site.

First response for medical and fire emergencies at the Cove Property and the surrounding area is provided by HFD Kapolei Station 40. The other stations would respond in the event that additional support is needed for first response or alarm fire. Additionally, HFD works with the City Emergency Medical Services (EMS) to provide first response to emergencies.

The Project site is served by three off-site fire hydrants along Ali'inui Drive and an 8-inch diameter pipe near the north end of the site, which feeds building sprinkler systems and four on-site fire hydrants.

Potential Impacts and Mitigation Measures

The Cove may increase the de facto service population at the site, which may impact the need for fire protection services. Coordination with BWS and HFD will be ongoing to ensure that the water supply provided on-site is capable of meeting required fire flow for fire protection needs. The BWS confirmed that the existing potable water system is adequate to provide off-site fire protection (*Appendix A-1*). See *Section 4.8.2* for further discussion regarding fire water service. To ensure the provision of adequate fire apparatus access per the requirements of the NFPA One fire code, construction drawings will be submitted to HFD for review. Additionally, new structures will be adequately equipped with fire protection equipment to ensure safety.

4.6.3 Emergency Medical Services & Hospital Services

Existing Conditions

EMS provides pre-hospital emergency medical care and emergency ambulance service on O'ahu. The City has 21 ambulance units under three districts. The Project site is within EMS District 1 and is covered by an EMS unit at the Nānākuli Fire Station No. 28. Each EMS ambulance unit is designated as an advanced life support unit, guaranteeing staffing by at least one paramedic.

Paramedics work closely with other emergency first responders, including the U.S. Coast Guard, HFD, and the City Ocean Safety and Lifeguard Services Division (OS). OS is the primary first responder to emergencies arising on the beach and in nearshore waters, and is divided into five operational districts. The Project site is within the OS' Leeward Coast operational district; however, the beach/natural cove adjacent to the Cove Property is not currently monitored by OS lifeguards.

The Queen's Medical Center (QMC) West is the primary emergency healthcare facility servicing the Project area. The QMC West is located approximately ten miles east of the site on Fort Weaver Road. An Adventist Health Castle (AHC) Urgent Care clinic is located in Kapolei, approximately four miles east

of the Project site. AHC Urgent Care clinics provide convenient, patient-focused care for children and adults seeking an emergency room for minor injuries, non-acute illnesses, and medical services that require immediate attention.

Potential Impacts and Mitigation Measures

Short-term impacts to emergency medical and hospital services are not anticipated and no mitigation measures are required. Long-term operation of The Cove may increase the de facto service population at the site, which may impact the need for emergency medical services. Operations at The Cove will incorporate protocols to address emergencies on site while awaiting first responders.

4.6.4 Educational Facilities

Existing Conditions

The Project area is within the State Department of Education's (DOE) Leeward O'ahu School District. The Leeward O'ahu School District is comprised of the Pearl City-Waipahu, Campbell-Kapolei, and Nānākuli-Wai'anae Complex Area. The Project area is served by schools within the Campbell-Kapolei Complex Area. The State DOE public schools closest to the Cove Property include Barbers Point Elementary, Makakilo Elementary, Ho'okele Elementary, Kapolei Middle, and Kapolei High School.

Potential Impacts and Mitigation Measures

The Project does not involve the construction of residential units at the Cove Property; therefore adverse impacts to educational facilities near the site are not anticipated. No mitigation measures are proposed.

4.6.5 Libraries

Existing Conditions

The State public libraries closest to The Cove include the Kapolei Public Library and the Nānākuli Public Library.

Potential Impacts and Mitigation Measures

The Cove is not expected to affect existing library facilities near the Project site; therefore, no mitigation measures are proposed.

4.6.6 Recreation

Existing Conditions

Public parks provide open space and a natural outdoor environment for both residents of Hawai'i and visitors to enjoy. The Cove Property is adjacent to a frequently used public beach/natural cove. The beach is served by approximately ~~153~~ public parking stalls at the adjacent Lanikūhonua property. A 10-foot-wide public beach access maintained by the landowner is currently provided along the south end of the property (*Figure 3.15*).

Additionally, the surrounding area is characterized by various recreational opportunities, including Lanikūhonua Public Beach, four Ko Olina Lagoons, and Ko Olina Beach Park. A continuous public walkway is provided along the Ko Olina Resort's shoreline to connect the ~~resort's beaches~~ lagoons, providing enhanced connectivity and a comfortable pedestrian experience that is characteristic of a resort environment.

Other public parks in proximity to the Cove Property include Kamokila Community Park, Kalaeloa Beach, Barbers Point Beach Park, Kahe Point Beach Park, Hawaiian Electric Beach Park, and Tracks Beach Park.

In addition to public parks, the Cove Property is in close proximity to private recreational opportunities offered throughout the surrounding privately-owned resort area, including the Ko Olina Marina and the Ko Olina Golf Club course.

Potential Impacts and Mitigation Measures

The redevelopment of The Cove will not affect existing public park facilities; therefore, no mitigation is recommended. To protect the adjacent beach and natural cove, the current level of access and parking for beachgoers will be maintained throughout construction and long-term operation of The Cove. In the long-term, safe lateral access to the shoreline will be maintained. Additionally, the ~~landowner~~ Project will continue to maintain the public beach access.

The Project will provide uses on site related to a Hawaiian Theme Park and commercial lū'au, which may not result in a proportional increase in beach usage. The redevelopment includes ancillary amenities such as dining options, retail, and event space. These amenities are intended to attract visitors to the Cove Property itself, potentially reducing the direct pressure on the beach.

Currently, access to the Cove Property is only provided to those attending the lū'au show. The Cove is designed to allow access to the property to serve a diverse range of users, including local residents and families, as well as visitors. The Cove will enhance existing recreational opportunities on the property and the wider area by providing on-site programming opportunities and open space in a contemporary and authentic Hawaiian setting. Lush landscaping will be integrated throughout the Cove Property to create an immersive and relaxing experience. Landscaping will be intentionally designed to complement new structures, open space areas, pedestrian pathways, and outdoor seating throughout The Cove, enhancing the overall atmosphere and visual environment of the property. Pedestrian pathways will be incorporated throughout the Cove Property to foster connectivity throughout the site and to the adjacent beach ~~and resort area~~. Signage will be posted across the property to direct visitors to various uses on the site. Educational signage and guidelines may be posted around the property to encourage thoughtful care for the site and the surrounding environment.

4.7 Roadways and Circulation

A Traffic Impact Report (TIR) was prepared in March 2024 by Wilson Okamoto Corporation to identify and assess potential traffic impacts resulting from the construction and operation of The Cove (*Appendix D*). Additionally, a Parking Management Plan (PMP) was prepared by Fehr & Peers to identify and assess potential parking strategies that can be implemented with the redevelopment of The Cove (*Appendix E*). A summary of the TIR and PMP are provided below.

4.7.1 Traffic

Existing Conditions

The existing entertainment venue is located adjacent to the Ko Olina Resort area. Existing vehicular access to the Ko Olina Resort is via Ali'inui Drive. Ali'inui Drive is a predominately four-lane, two-way divided private roadway generally oriented in the north-south direction. Access to the Project site is provided via the northern one-way driveway along Ali'inui Drive. Southeast of the Project site, Ali'inui Drive intersects Olani Street. Olani Street is a four-lane, two-way private roadway generally oriented in the east-west direction that provides access to the adjacent commercial and residential uses to the east and the Four Seasons Resort O'ahu at Ko Olina to the west. The intersection of Ali'inui Drive and Olani Street is a signalized intersection. The northbound and southbound approaches of Ali'inui Drive include an exclusive left-turn lane, a through lane, and a shared through and right-turn lane. The eastbound and westbound approaches of Olani Street include a shared left-turn and through lane and a shared through and right turn lane.

Further south of the intersection with Olani Street, Ali'inui Drive intersects Kamoana Place. The intersection of Ali'inui Drive and Kamoana Drive is an unsignalized T-intersection. Kamoana Place is a four-lane, two-way private roadway generally oriented in the east-west direction, providing access to the Aulani Resort and a public beach parking lot. The northbound approach of Ali'inui Drive includes an exclusive left-turn lane and two through lanes while the southbound approach has a through lane and a shared through and right-lane. The westbound approach to Kamoana Place from Ali'inui Drive includes a stop-controlled exclusive left-turn and right-turn lanes.

The TIR studied the following two intersections, and based its analysis on the Project site's general morning (AM) and afternoon (PM) peak traffic hours of 6:00 to 9:00 AM and 3:00 to 6:00 PM:

1. Ali'inui Drive and Olani Street
2. Ali'inui Drive and Kamoana Place

Figure 4.1211 shows baseline lane configurations at the three study intersections.

Traffic data used for the purpose of analysis is based on manual turning movement counts collected at the two intersections in September 2018. In addition, screen line traffic volumes were also collected along Ali'inui Drive just north of the resort's main entrance. These counts were subsequently supplemented by manual turning movement counts collected in November 2023 at the intersection of Ali'inui Drive and Olani Street to verify counts from 2018 and assess traffic volumes in the vicinity after the COVID pandemic, which resulted in decreased traffic volumes and changes to travel patterns. However, a comparison of the traffic data taken from Years 2018 and 2023 shows that traffic volumes collected in 2023 were generally less than those collected in 2018. In addition, given the Project's proximity to the Ko Olina Resort and the target marketing audience for the proposed uses, hotel occupancy data collected by the State Department of Business, Economic Development and Tourism was also assessed to compare hotel occupancy between Years 2018 and 2023, the years when the traffic data was collected. The data from DBEDT are aggregated based on location (i.e. Waikiki, other Oahu) and type (i.e. midscale, upscale, luxury). For the purpose of this assessment, occupancy rates for Waikiki, Other O'ahu, and Upscale hotel categories were considered. The assessment indicates that in general, occupancy rates for all the categories considered are also less in 2023 than in 2018. As such, for the purpose of the TIR, the Year 2018 traffic data was used to represent baseline Year 2023 conditions for a conservative assessment.

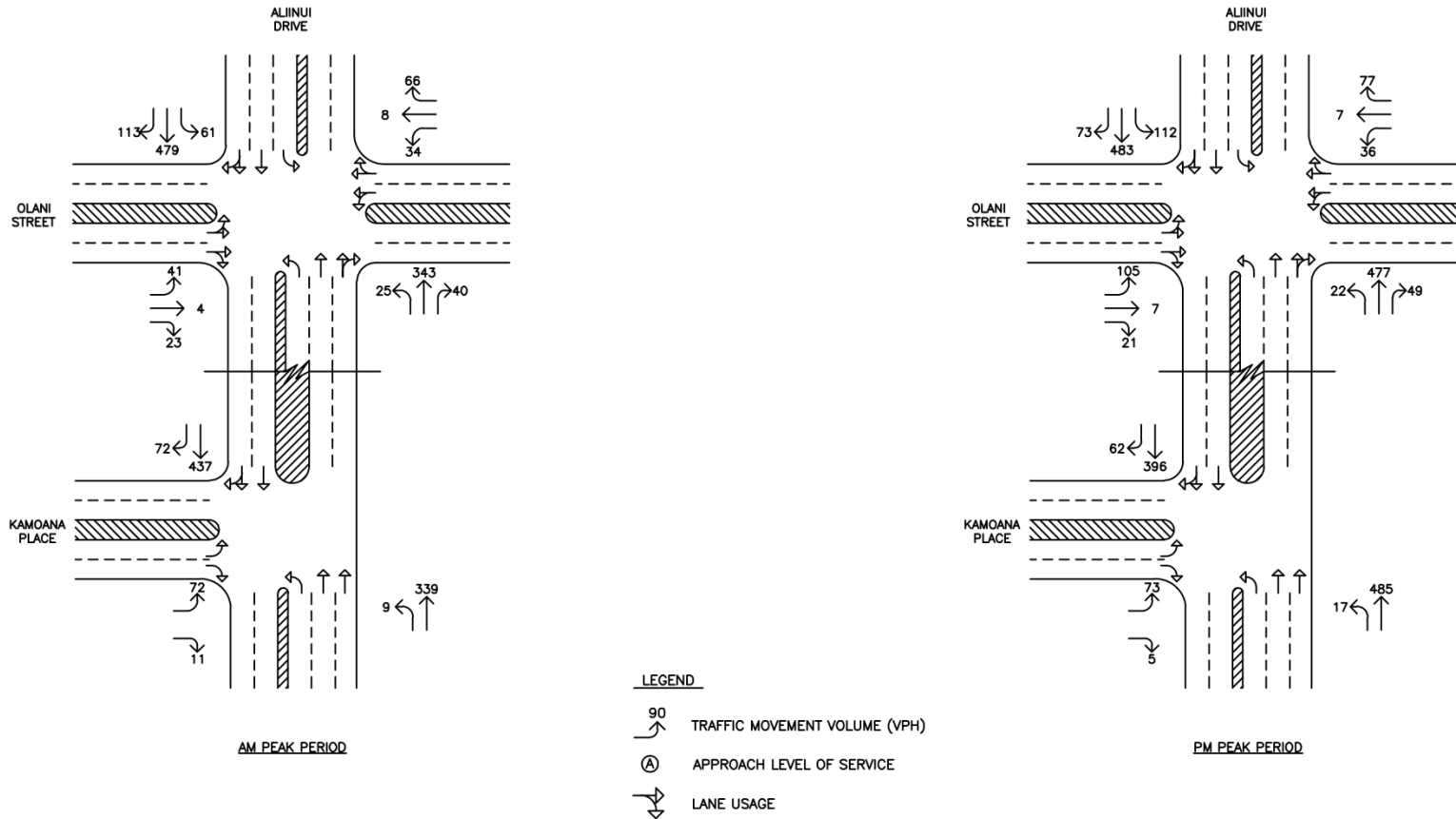


Figure 4.1211

Baseline Peak Hour Traffic Volumes and Lane Configurations

Level of Service (LOS) is a qualitative measure describing the condition of traffic flow, ranging from ideal or free-flow traffic operating conditions at LOS A to unacceptable or potentially congested traffic operating conditions at LOS F. The City recognizes LOS D as the minimum acceptable LOS for its intersections in most urban areas. In the vicinity of the Project area, study intersections operate at LOS C or above.

Table 4.3 summarizes existing LOS and vehicle counts for each study intersection during the AM and PM peak hours. At the intersection with Olani Street, Ali'inui Drive carries 408 vehicles northbound and 653 vehicles southbound during the AM peak period. During the PM peak period, traffic volumes are higher with 548 vehicles traveling northbound and 668 vehicles travelling southbound. The northbound and southbound approaches operate at LOS B during both peak periods. Olani Street carries 68 vehicles eastbound and 108 vehicles westbound during the AM peak period. During the PM peak period, traffic volumes are higher with 132 vehicles traveling eastbound and 120 vehicles traveling westbound. The eastbound and westbound approaches operate at LOS A during the AM peak period and LOS B during the PM peak period.

Study Intersection		Existing LOS		Peak Period Traffic Volume	
		AM	PM	AM	PM
1. Ali'inui Drive and Olani Street	Ali'inui Drive & Olani Street Intersection	NB: B SB: B	NB: B SB: B	NB: 408 SB: 653	NB: 548 SB: 668
	Olani Street Approach	EB: A WB: A	EB: B WB: B	EB: 68 WB: 108	EB: 132 WB: 120
2. Ali'inui Drive and Kamoana Place Intersection	Ali'inui Drive & Kamoana Place Intersection	NB: A SB: A	NB: A SB: A	NB: 348 SB: 509	NB: 502 SB: 458
	Kamoana Place Approach	EB: C	EB: C	EB: 83	EB: 78

Abbreviations:

NB: Northbound SB: Southbound EB: Eastbound WB: Westbound

¹ Year 2018 were assumed to represent Year 2023 baseline conditions for a conservative assessment. Refer to the TIR for more details on the study methodology.

At the intersection of Kamoana Place, Ali'inui Drive carries 348 northbound vehicles and 509 southbound vehicles during the AM peak period. During the PM peak period, the overall traffic volume is greater with 502 vehicles travelling northbound and 458 vehicles travelling southbound. The northbound left-turn lane operates at LOS A during both peak periods. The Kamoana Place approach of the intersection carries 83 vehicles during the AM peak period and 78 vehicles during the PM peak period. The eastbound approach operates at LOS C during both peak periods.

Further north of the Project site near the Ko Olina Resort entrance, Ali'inui Drive carries 480 vehicles northbound and 687 vehicles southbound during the AM peak period. During the PM peak period, traffic volumes are higher with 715 vehicles travelling northbound and 729 vehicles traveling southbound.

Potential Impacts and Mitigation Measures

Construction

Redevelopment of the Cove Property is expected to commence upon receipt of necessary permits and approvals. It is anticipated that 24 months will be required for construction. Improvements are planned to start as early as 2025 and may be completed by 2027, subject to market conditions. Short-term traffic impacts from construction activities are anticipated during this duration as the result of the following: increases in truck traffic associated with removal and redistribution of excavation spoil or with imported fill materials and delivery of construction materials and increases in automobile traffic associated with construction workers travelling to and from the site. Standard BMPs to minimize conflicts with traffic during construction include, but are not limited to, the following:

- Designate parking areas for construction-related vehicles and construction workers, and ensure no parking, queueing, or staging of construction-related vehicles occur outside of the designated construction area.
- Monitor ingress and egress of Project areas to allow safe passage of pedestrians and ensure effectiveness of management strategies along construction areas.
- Construction materials and equipment should be transferred to/from the Project site during off-peak traffic hours to minimize any potential disruption to traffic on adjacent streets.
- Maintain existing pedestrian, bicycle, and vehicle access/crossings with the highest safety measures during construction.
- Implement BMP controls at the construction site to prevent dirt and debris from being carried off-site onto the surrounding roadways.
- Document existing roadway conditions prior to the start of construction and repair any damages as result of the construction of the proposed Project. Ensure repairs meet American with Disabilities Act (ADA) requirements.
- Obtain a street usage permit from the appropriate agency for any construction-related work that may require the temporary lane closures along the adjacent roadways.

Operation

The methodology used to generate anticipated trips from Project operation is based upon generally accepted techniques developed by the Institute of Transportation Engineers (ITE) and published in "Trip Generation, 10th Edition," 2017. ITE trip generation rates are developed empirically by correlating vehicle trip generation data with various land use characteristics such as the number of vehicle trips generated per 1,000 square feet of development. Notably, the average nightly attendance for the lū'au at the existing entertainment venue during field investigations were approximately the same as the anticipated reduced capacity as the new venue. As such, trips associated with the lū'au show are assumed to be captured within the collected traffic data and additional trips associated are not anticipated with the planned modifications to the venue.

The trip generation methodology also accounts for multi-modal trips made utilizing non-motorized modes such as walking and biking, as well as trips made using transit. Field observations indicate that a significant portion of the patrons of the existing restaurant and commercial uses near the Project site elect to walk to/from their destinations due to the close proximity to adjacent hotels, limited parking in the vicinity, and pedestrian friendly infrastructure along Ali'inui Drive to facilitate these trips. Given the close proximity and compatible uses planned for the proposed Project, a significant portion

of the additional site-generated trips are similarly expected to be made via non-motorized modes (i.e., walking) to/from adjacent uses. As such, the additional trips generated by the proposed Project were adjusted to account for visitors who are expected to access the Project site via non-motorized modes.

Cumulative AM and PM peak hour traffic conditions in Year 2027 (the Project’s estimated completion year) both with and without the Project is summarized in *Table 4.4*. Under Year 2027 Without Project conditions, traffic operations are expected to remain similar to baseline conditions. Along Ali’iunui Drive, the approaches at the intersection with Olani Street are expected to continue operating at LOS B during the AM peak period and LOS B during the PM peak period. At the intersection with Kamoana Place, traffic operations on the eastbound approach are expected to continue operating at LOC C or better during both peak periods, while the northbound left-turn lane along Ali’iunui Drive is expected to continue operating at LOS A or better during both peak periods. North of the Project site along Ali’iunui Drive, minimal ambient growth in traffic is anticipated and as such, traffic operations are also expected to remain similar to baseline conditions.

Under Year 2027 With Project conditions, traffic operations are generally expected to remain similar to baseline and Without Project conditions. Along Ali’iunui Drive the approaches at the intersection with Olani Street are expected to continue operating at LOS B or better during both peak periods, whereas those at the intersection with Kamoana Place are expected to continue operating at LOS C or better during both periods. As previously discussed, a portion of trips are assumed to travel to/from areas external to the resort via Ali’iunui Drive north of the Project site. With the addition of site-generated trips as a result of the proposed redevelopment, traffic volumes along Ali’iunui Drive north of the Project site are expected to increase by approximately one percent or less during the AM peak period and three percent or less during the PM peak period. These increases in the total traffic volumes are generally within the range of daily fluctuations along the surrounding roadways and represent a minimal increase in the overall traffic volumes. As such, traffic operations along Ali’iunui Drive near the Project driveways are also expected to remain similar to Without Project conditions. See *Table 4.4*.

Table 4.4: Baseline and Projected Year 2027 (Without and With Project) LOS Traffic Operating Conditions							
Study Intersection	Approach/ Critical Movement	AM			PM		
		Baseline	Year 2027		Baseline	Year 2027	
			W/o Project	W/ Project		W/o Project	W/ Project
1. Ali’iunui Drive/Olani Street	Eastbound	A	A	B	B	B	B
	Westbound	A	A	B	B	B	B
	Northbound	B	B	B	B	B	B
	Southbound	B	B	B	B	B	B
2. Ali’iunui Drive/Kamoana Place	Eastbound	C	C	C	C	C	C
	Northbound (LT*)	A	A	A	A	A	A

*LT = Left Turn

Based on the analysis of the traffic data, the TIR recommends the following traffic-related BMPs be incorporated into the final Project design. A determination on the appropriate measures will be made as the Project progresses.

- Maintain sufficient sight distance for motorists to safely enter and exit all Project driveways.
- Provide adequate on-site loading and off-loading service areas and prohibit off-site loading operations.
- Provide adequate turn-around area for service, delivery, and refuse collection vehicles to maneuver on the Project site to avoid vehicle-reversing maneuvers onto public roadways.
- Maintain sufficient turning radii at all Project driveways to avoid vehicle encroachments to oncoming traffic lanes.
- Provide sufficient turning radii along the internal connections to accommodate the anticipated vehicle types for the planned uses.
- If access at the entrances to the parking areas are controlled, provide sufficient storage for entering vehicles at the parking area access controls (i.e., automatic gate, use of personnel, etc.) to ensure that queues do not extend onto the adjacent roadways. The layout and dimensions shall be determined during the design phase.
- Maintain the existing one-way (southbound) traffic flow along the connection between the northern and southern driveways.
- Provide sufficient passing areas within the main drop-off/arrival area to accommodate the anticipated vehicle types and minimize potential conflicts with vehicles accessing the adjacent parking stalls, facilitate through traffic flow and ensure queues do not extend onto the adjacent roadway.
- Provide adequate wayfinding signs to direct visitors to their intended destinations.
- Provide adequate space within the bus parking stalls to allow for loading and unloading activities to occur while parking in this area. The exact configurations and dimensions shall be determined during the design phase.
- If valet operations are expected to be implemented, consider the location of the parking area designated for valet to minimize potential conflicts with other modes.
- In accordance with direction given by DPP, traffic operations during events at the Cove Property will be managed in accordance with a Traffic Management Plan (TMP), which is being prepared for the Project.
- In accordance with direction given by DPP, the TMP will also include Traffic Demand Management (TDM) strategies, which may include, but not be limited to, carpooling and ride sharing programs, transit, bicycle and pedestrian incentives and other similar measures.
- In the event of inclement weather, such as rain, the lū'au is expected to be canceled in accordance with standard procedures followed by similar lū'au venues.

Upon completion of construction in 2027, the redevelopment of The Cove is not anticipated to adversely affect traffic operations in the vicinity of the Project area. Traffic operations in the vicinity of the Project area are generally expected to remain similar to baseline and Without Project conditions. The new amphitheater/performing arts venue is expected to house lū'au events similar to existing uses with a maximum capacity similar to the average nightly attendance of the current lū'au show. As such the new amphitheater/performing arts venue is not anticipated to generate additional new trips

to the Project site. In addition, synergy between the existing and proposed uses within the surrounding area is anticipated, with a significant portion of trips associated with the ancillary restaurant and retail uses expected to be made via non-motorized modes given the availability of improved pedestrian facilities in the vicinity of the Project area. Although traffic operations are generally expected to remain similar to Without Project conditions, the TIR recommends preparation of a parking and loading management plan to identify management strategies to address potential issues with parking and loading operations. Accordingly, a PMP has been prepared and is discussed in Section 4.7.3. In addition, since a high portion of trips to the Project site is expected to be made via non-motorized modes, consideration should also be given to incorporating pedestrian and bicycle improvements to increase pedestrian visibility while traversing the Project site. With the implementation of the aforementioned recommendations, the proposed Project is not expected to have a significant impact on the surrounding roadway network.

4.7.2 Multi-Modal Facilities

Existing Conditions

Pedestrian Facilities

The Cove Property is located adjacent to a master-planned resort and residential community that includes a network of improved pedestrian facilities that facilitate access between the various destinations within the resort. These pedestrian facilities are generally comprised of sidewalks, shared-use paths, crosswalks, and curb ramps with overhead lighting, canopy trees, and other landscaping treatments that enhance the overall pedestrian environment.

Pedestrian facilities along Ali'inui Drive are predominantly located on the west side of the roadway except in the vicinity of Olani Street where commercial and restaurant uses are located. In the vicinity of the Project site along Ali'inui Drive, continuous improved (paved) sidewalks are provided along the west side of the roadway with wide, landscaped strips that serve as a buffer between the pedestrian zone of the walkway and vehicle travel way, and trees that provide intermittent shade. In addition, overhead street lighting is provided along both sides of the roadway to increase pedestrian comfort during the evening hours. The nearest pedestrian crossing from the Cove Property is located at the intersection of Ali'inui Drive and Olani Street. At this location, pedestrian crossings are facilitated by marked crosswalk, curb ramps, and a traffic signal system.

Along Olani Street and Kamoana Place, similar continuous improved sidewalks buffered by landscaping strips that are provided to facilitate access to the adjacent hotel and commercial uses. Trees and other landscaping treatments increase the attractiveness of these facilities and enhance the overall pedestrian experience. *Figure 4.1213* shows the pedestrian network throughout the surrounding area.

Bicycle Facilities

Within the surrounding area, existing bicycle facilities include bike lanes along both sides of Ali'inui Drive between the Ko Olina Resort entrance and the southern terminus of Ali'inui Drive (*Figure 4.1314*). Pavement markings along this roadway indicate that gold carts are also permitted to use this lane. Outside of the resort area, there are currently limited bicycle facilities along Farrington Highway with bicyclists observed utilizing the shoulder areas of the highway.



Figure 4.1312

Major Pedestrian Facilities



Figure 4.1413

Existing and Proposed Bicycle Facilities

Bicycle Level of Traffic Stress (LTS) is a metric used to classify a roadway segment or intersection based on the amount of traffic stress imposed on cyclists using variables such as street width, prevailing vehicle speed, and average daily traffic volumes. LTS ranges from 1 to 4, with LTS 1 characterized by the lowest speed and volume traffic to LTS 4 characterized by higher speed traffic or close proximity to high-speed traffic.

In the vicinity of the Project area near the on-and off-ramps to Ali'inui Drive, Farrington Highway is rated LTS 4 due to the lack of dedicated bicycle facilities resulting in bicyclists being in close proximity with high-speed traffic. Along Ali'inui Drive, the roadway segment between Farrington Highway and the resort entrance is rated LTS 3 due to the lack of dedicated bike facilities and multilane configuration of this roadway segment. South of the Ko Olina Resort entrance, Ali'inui Drive improves to LTS 2 due to the provision of bike lanes along both sides of the roadway.

Public Transit Facilities

Transit service in the vicinity of the Cove Property is currently limited to routes along Farrington Highway. The nearest bus stop is located along the eastbound direction of the roadway approximately 2,000 feet or approximately less than half a mile from the Cove Property. That bus stop is served by TheBus, which is operated by the O'ahu Transit Service (OTS) for the City. To verify the existing quality of service for the transit facility in the Project vicinity, an assessment of these facilities was conducted.

The transit facility along this segment of Farrington Highway is rated at LOS A since it is served by several local and express bus routes with headways of 30 minutes or less. However, it should be noted that there are limited improved pedestrian facilities to and from this bus stop with minimal transit amenities provided. *Figure 4.1415* depicts the existing transit facility and LOS in the vicinity of the Cove Property.

Potential Impacts and Mitigation Measures

Pedestrian Facilities

Construction of the Project is not anticipated to affect existing pedestrian facilities. However, if it is determined construction will require the temporary closure or blockage of a pedestrian facility serving the Cove Property, a contractor may monitor ingress and egress of Project area to allow safe passage of pedestrians. Construction is anticipated to be completed on-site and contractors will employ the highest safety measures to maintain existing pedestrian facilities.

A significant portion of trips associated with the ancillary restaurant and retail uses are expected to be made via non-motorized modes. To support the use of non-motorized modes of transportation to and from the Project site, the existing pedestrian facilities on the Project site will be improved to create an open, safe, and cohesive venue at The Cove. Additionally, the existing pedestrian facility along Ali'inui Drive will continue to serve as a pedestrian accessway to and from the Cove Property.



Figure 4.1514

Existing Transit Facilities

Bicycle Facilities

Existing pedestrian, bicycle, and vehicle access/crossings will be maintained with the highest safety measures during construction to the extent practicable. In the long-term, guests staying in the surrounding area will be able to take advantage of the high density of attractions in close proximity, which encourages active transportation modes such as cycling. Additionally, as part of the improvements at The Cove, bicycle parking may be designated on the northern, eastern, and southeastern portions of the site, in proximity to The Cove's entry points (Figure 3.3). According to Section 21-6.40 of the LUO, commercial uses on the property may require 36 short-term bike parking spaces and seven long-term bike parking spaces (based on an on-site estimated off-street parking stall count of 203 stalls and a maximum building area of 71,860 sf). The Cove will provide bicycle parking storage adequate to serve the site, and final counts will be determined during the land use entitlements phase of the Project. Elements such as lighting and wayfinding may be provided to enhance the attractiveness and safety of the bike parking facilities. Final design of the facilities will be determined as design progresses.

There are plans by the City to improve bike facilities in the vicinity of the Project area (Figure 4.1314). These improvements are included in the *O'ahu Bike Plan* published by the City DTS, most recently updated in 2019. These include the provision of bike lanes along Ali'inui Drive between the Ko Olina Resort entrance and Farrington Highway and conversion of the existing bike lanes along Ali'inui Drive south of the main entrance to buffered bike lanes. Additionally, north of the Project site, a new shared-use pathway is planned to run alongside the heritage railway route with shoulder bikeways proposed along Farrington Highway from Piliokahi Avenue to Kalaeloa Boulevard. Although the addition of these facilities is expected to increase the availability of bicycle facilities and may reduce the level of traffic stress for bicyclists within the Project vicinity, the timeline for these improvements is not known at this time.

Public Transit Facilities

Project plans will be coordinated with and submitted to the DTS to minimize impacts to public transit services. During construction, the Applicant will keep the surrounding community and industry groups informed of potential impacts to surrounding multi-modal facilities as needed. No long-term impact to public transit facilities is anticipated.

Additional Best Management Practices

In addition to the above, the TIR recommends the following BMPs related to alternative modes of transportation. A determination on the appropriate measures will be made as the Project progresses.

- Provide adequate wayfinding signs to direct visitors to their intended destinations. Provide adequate pedestrian connections to facilitate access between on-and off-site facilities. Pedestrian facilities should be made accessible in conformance with the ADA.
- Incorporate on-site pedestrian improvements in the design of the Project. In particular, consideration should be given to ensure adequate access is provided between the designated ADA parking stalls within the staff lot and the uses on-site. These improvements may include marked or raised crosswalks at the internal intersections, bulb outs to reduce pedestrian crossing, and street lighting.
- ~~Consider the possibility of coordinating a shuttle service to/from the Cove with the neighboring resort properties to increase mobility, encourage the use of alternate modes of travel, and minimize internal trips. Currently, no shuttle service is provided within the neighboring resort~~

~~properties. Should one be provided in the future, the Parking Management Plan (Appendix E) recommends that the Project site accommodate a shuttle, which may involve dedication of a specific curb space and waiting area for passenger loading and unloading. Future implementation would require further coordination.~~

- Provide improved bicycle facilities within the Project boundaries. Appropriate access and lighting should be taken into consideration in the design of these facilities. It should be noted that the Project site plan includes bicycle facilities within the north and southeast ends of the site.
- Provide adequate connections to and from the bike parking areas to ensure convenient and safe pedestrian and bicyclist access, as well as connections to the bike lanes along Ali'inui Drive adjacent to the project site.
- Prepare a Parking and Loading Management Plan that includes parking and loading strategies to address potential issues associated with conflicts between modes on site, parking for guests and employees, and loading operations.

4.7.3 Access and Parking

A Parking Management Plan (PMP) memorandum was prepared by Fehr & Peers in October 2023 to assess the current parking conditions at the site, estimate the Project's parking demand, and propose strategies to manage parking on-site (*Appendix E*). Following the publication of the Second Draft EIS, the PMP was updated to reflect the Project's reduced building area (Section 3.3.1) and further study of the potential implementation of valet parking.

Existing Conditions

Access

The Project site's access is facilitated through two driveways along Ali'inui Drive. A one-way driveway at the north end is designated for incoming traffic to the Cove Property. Vehicles may exit the site via a driveway situated at the south end of the property. Additionally, a one-way driveway connection within the Cove Property facilitates direct circulation to the adjoining Lanikūhonua site.

Parking

Parking for the Cove Property is currently accommodated within two on-site parking lots and supplemented by one adjacent off-site parking area located on the Lanikūhonua property (referred to in the PMP as Lots 1, 2, and 3) (*Figure 4.1516*). Parking on the north end of the property (Lot 1) is designated for employees and chapel guests only, while parking on the east portion of the site (Lot 2) consists of parking for guests and passenger buses. Land use entitlements for the Cove Property dating back to the early 1990s document 151 vehicle stalls and 30 bus stalls on the north and east parking lots. Additionally, 203 vehicle stalls are ~~provided~~ documented on the neighboring Lanikūhonua property (Lot 3) pursuant to a Conditional Use Permit – Minor for joint use of parking and loading facilities (DPP File Nos. 94/VAR-70 and 97/CUP1-69). Therefore, a total of 354 vehicle stalls and 30 bus stalls are documented as serving the Cove Property.

However, during a survey conducted for the PMP, it was observed that the existing number of parking stalls in use has changed over time due to typical resurfacing and restriping maintenance. See Table 4.5 for a summary of existing parking serving the Cove Property. Overall, 279-281 private vehicle stalls and 19 bus stalls are currently used by the Cove Property. These figures do not include the 15 beach access stalls located on the Lanikūhonua property (see “Beach Parking” designated on Figure 4.16).

Given its location within the ‘Ewa DP area and its zoning, the Cove Property is no longer subject to minimum parking requirements articulated in Section 21-6 of the LUO. However, it can be helpful context to understand the parking supply that would typically be required for a project such as what is proposed at the Cove Property. If typical LUO parking standards were applicable to the Project, a total of 244 parking stalls would be required.

While not included in the Project site, the PMP noted that 15 vehicle stalls are provided on the Lanikūhonua property for public beachgoers (Lot 4) and 199 guest vehicle stalls are provided on the Lanikūhonua lot for its guests (Figure 4.16)(Lot 5).



Figure 4.1615: Parking Management Plan – Study Lots

Table 4.5: Existing Cove Property Parking					
Parking Lot Area	Standard Spaces	ADA Spaces	Reserved Spaces	Private Vehicle Spaces	Bus Spaces
Existing Cove Property					
Lot 1	60	6	0	66	0
Chapel	10	0	0	0	0
Lot 2	0	2	18	20	19
Lot 3	193	2	0	193 195	0
Lots 1, 2, & 3 Total:	253¹	10	18	279 281	19
<u>Source: Fehr & Peers.</u>					
<u>Notes: Existing property parking supply was counted in June 2023 and reflects the available number of parking spaces in use.</u>					
¹ Excludes 10 chapel spaces.					

Lanikūhonua Property					
Lot 4 (Beach parking)	13	2	0	15	0
Lot 5	199	0	0	199	0
Lots 4 & 5 Total:	212	2	0	214	0
TOTAL:	465	12	18	493	19

Parking Demand

To provide a baseline for the PMP, counts were conducted on the site during lū'au operations on the typically busy days of Friday and Saturday. The results of parking counts show the total demand for vehicle parking in Lots 1 through 3 on a Friday ranged from a low of 34 percent occupancy at 3:00 PM to a maximum of 97 percent occupancy at 6:00 PM. The demand reduced to 10 percent of full capacity at 10:00 PM when the lū'au show finished. The results during the Saturday show were similar, with slightly lower values of 22 percent occupancy at 3:00 PM, 94 percent occupancy at 6:00 PM, and 4 percent occupancy at 10:00 PM. The vehicles remaining in the lot at 10:00 PM were assumed to be employees in Lots 1 and 2.

Lot 1 includes 10 vehicle stalls designated for the Crystal Chapel, and the demand and supply for these spaces are excluded from the PMP's overall demand calculation. The demand in these spaces was up to three vehicles on Friday and up to seven vehicles on Saturday. Peak bus parking demand within Lot 2 was five and six coaches on Friday and Saturday, respectively, within the 19 bus stalls provided in this lot.

Designated beachgoer parking in Lot 4 was full (100 percent capacity) from 3:00 PM through 5:00 PM or 6:00 PM on both days, but dropped to less than 50 percent occupancy by 8:00 PM. Occupancy of the lot reached 0 percent by 10:00 PM on both Friday and Saturday.

~~No event was held at Lanikūhonua on Friday night, but parking stall occupancy in Lot 5 during an event on Saturday night ranged from a low of 21 percent at 11:00 PM to a peak demand of 46 percent at 6:00 PM.~~

During field observations, the average vehicle occupancy (AVO) of private vehicles parking within Lots 1, 2, and 3 was determined to be approximately 3.2 persons per vehicle. The AVO of buses was determined to be 45.5 persons per bus.

Given that vehicular parking for the lū'au is free and cars are not required to stop as they enter the site, traffic congestion was very limited. Most vehicles experienced little or no delay as they entered the site, and the dispersed arrival pattern also contributed to the minimal congestion.

Potential Impacts and Mitigation Measures

Access and Parking

The existing driveways along Ali'inui Drive will continue to provide access to the Project site. Additionally, the existing parking lots (Lots 1, 2, and 3) will be reconfigured to provide approximately ~~406~~ 396 vehicle stalls and eight bus stalls (Table 3.2). Vehicle stalls will be available for both employee and guest use. The existing beach parking on Lot 4 will remain in place. As noted, there are no minimum parking requirements in the 'Ewa DP area.

Anticipated Parking Demand

A shared parking analysis was conducted to assess the Project's anticipated parking demand based on the planned program; determine if the demand can be accommodated by the proposed supply of ~~406~~ 396 vehicle stalls; and, propose parking management strategies if needed. See *Appendix E* for the full report. The analysis is based on methodologies and assumptions provided in *Shared Parking, 3rd Edition* (Urban Land Institute, 2020) and existing data obtained at the site. The shared parking methodology establishes the base parking rate, parking demand reductions, and hourly/monthly demand patterns for each land use. The overall parking demand is calculated by considering the parking demand patterns and parking demand reductions (potential for non-automobile modes and internal capture) for each component of the Project being analyzed. The estimated parking demand reduction accounts for factors such as trip internalization (i.e., the number of trips moving between land uses on the mixed use site) and modal split (i.e., guests arriving to the property using non-vehicular modes of transportation such as walking, biking, getting dropped off, or taking transit).

After calculating the initial parking demand estimates, reductions in demand or increases in parking supply were considered to determine the final parking supply that would be needed to adequately serve the Project. These adjustments include the following parking management strategies:

- Increasing the parking supply by requiring valet operations on the entire Project site all day for an introductory period of at least two months and then review parking operations to determine if valet usage can be reduced to peak times if needed.
- Reducing parking demand by charging for parking or implementing maximum time limits
- Reduce parking demand by incentivizing the use of transportation network companies (TNCs) such as Uber and Lyft.

Without parking management strategies, peak parking demand at the Project during the assumed peak month of attendance (December, due to uptick in visitor travel) is estimated to be ~~440~~ 475 spaces and is projected to occur on a Friday at 6:00 PM and 7:00 PM. Demand would not be expected to drop below the proposed parking supply level (~~406~~ 396 vehicle stalls) until sometime between 9:00 PM and 10:00 PM. See *Figure 4.16-17*. For the parking demand to not exceed the parking supply, a combination of parking supply increases and parking demand decreases would need to lower the existing parking difference by approximately 19 percent.

In connection with the preparation of the PMP update (September 2024), a valet operator reviewed the Project site plan and determined that an additional 50 parking spaces could be added with valet operations within the driveway aisles across the entire site. The use of valet parking is considered a parking management tool to increase the overall parking supply. The addition of 50 parking spaces with valet usage would increase total parking supply to 446 parking spaces.

For the Project to accommodate parking demand within the available area on Lots 1, 2, and 3, a combination of strategies will be needed to increase the parking supply and reduce the demand. This reduction will need to equate to ~~13~~ 7 percent of ~~440~~ 475 such that the demand at the peak time of 7:00 PM on a Friday will not exceed the proposed ~~406~~ 446 vehicle stall parking supply. *Figure 4.17-18* illustrates the commensurate reduction in demand by hour that will be required to accommodate the demand on site within the available supply. The strategies to accomplish this reduction are described in the following subsection.

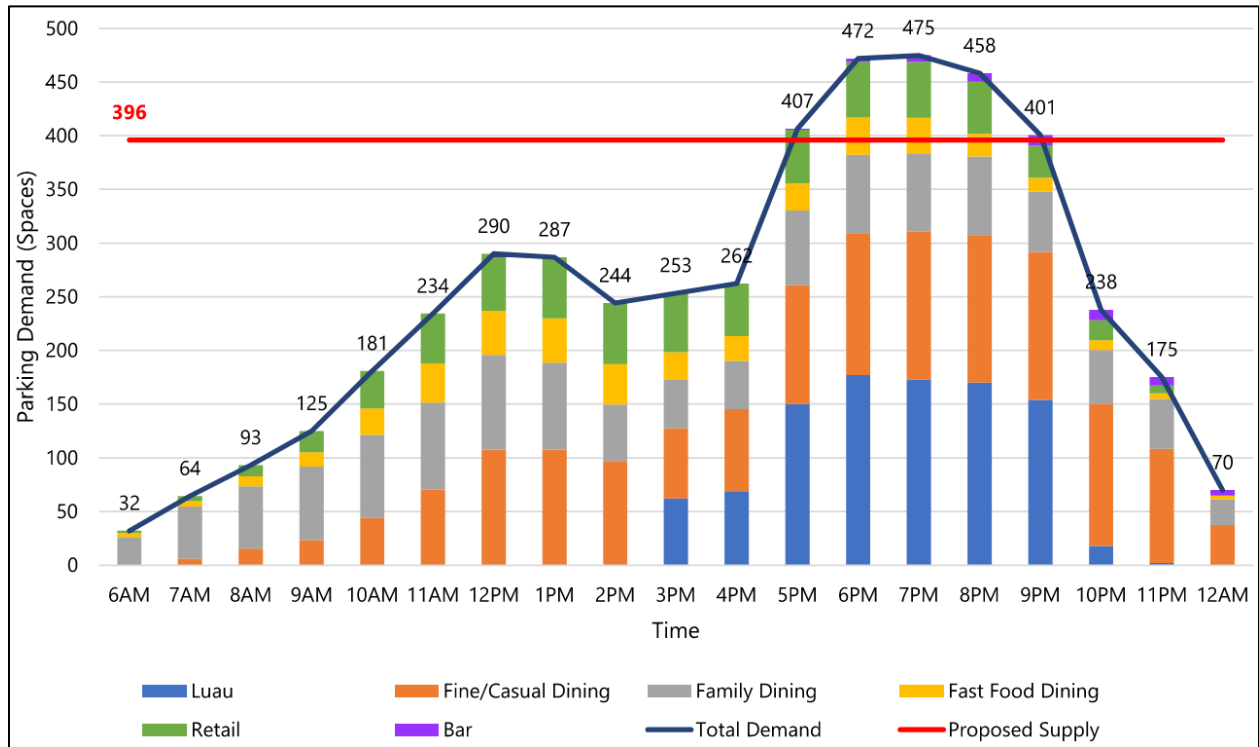


Figure 4.1716: Projected Friday Parking Demand (without Management Strategies)

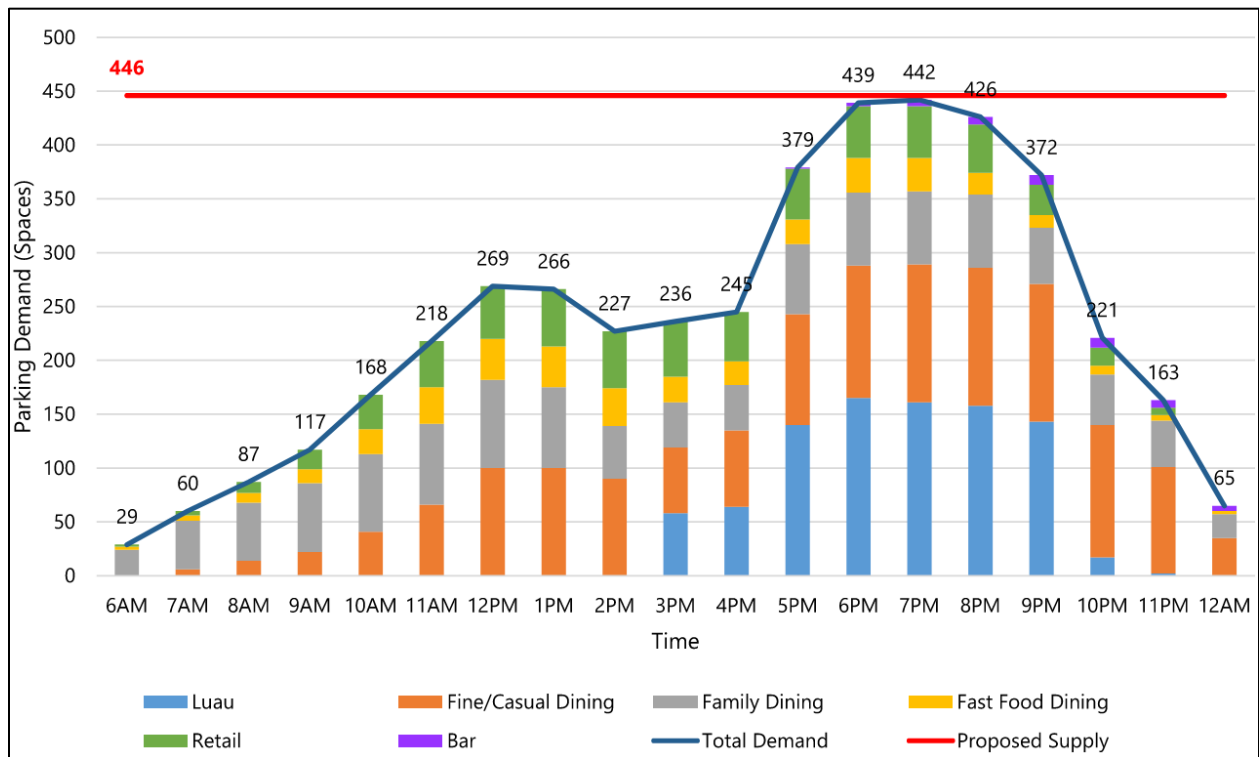


Figure 4.1817: Projected Friday Parking Demand (with Management Strategies)

Recommended Parking Management Strategies and Mitigation

The PMP recommends the following parking management strategies in order to accommodate the Project's estimated peak parking demand:

- **Mandatory Valet Parking:** Operating valet parking will require visitors to drop off their vehicle with an attendant and allow for more efficient parking within Lots 1 through 3. Visitors will be given a ticket associated with their vehicle that the attendant will use to identify the appropriate vehicle when the visitor is ready to depart the site. As previously noted, a valet operator has determined that an additional 50 parking spaces could be added with valet operations within the driveway aisles, resulting in a total parking supply of 446 parking spaces.

Due to the unique nature of the Project location, operations, and parking layout, the ability to increase parking supply can be a significant parking management strategy. To that end, the PMP recommends that valet parking be implemented for the site during all hours of operation for an introductory period of at least two months. After the two-month period has ended, the parking operations of the entire Project site should be reviewed to determine appropriate reductions in valet usage that will still ensure that parking demand is satisfied.

In coordination with charging for self-parking (discussed below), valet parking should be charged to users as a measure to potentially reduce the overall parking demand. While the cost for valet usage will need to be determined based on market factors, a tiered pricing model with variation in price dependent on time of day or length of stay could be considered.

While the operations of the valet program will be at the discretion of the valet operator, employee vehicles should be parked in spaces located furthest from the valet stand given their low turnover rate and desire to have customer parking more accessible. Parking charges for employee spaces are at the discretion of the site operator but will likely be a reduced price given the lack of parking alternatives.

- **Charging for Parking:** A critical strategy to manage parking demand is to charge users an hourly fee. This strategy is currently in use at The Ko Olina Center on Olani Street east of the Project site. The current fee at that shopping area is \$2.50 per hour. The amount of the hourly fee can be adjusted to manage demand, such that an initial fee of \$2.50, for example, can be increased to \$3.50 or \$5.00 if demand exceeds available capacity. Charging for parking allows for cost recovery of a valet service and can also serve as an additional revenue source for the Project.

In addition, the rate per hour can be also adjusted to ensure that vehicles are not parked for an excessive amount of time. For example, the cost for each of the first two hours to park may be fixed at \$2.50 per hour, but the price for the third hour could be increased to \$7.50 or a level that will incentivize visitors to leave the site within a two-hour period. This benefits the site by increasing space availability for other visitors and helps to manage the number of people that may park at the site and solely visit the adjacent beach.

- **Lū'au Parking Management:** While the current lū'au parking is free, to better manage future parking it is expected that show attendees arriving via private passenger vehicle will also be charged for parking. To better prepare for potential lū'au parking demand, parking could be sold at the time of ticket purchase. This early parking purchase could provide a parking operator with an understanding of how much lū'au parking could be expected on a given day and allow them to determine if or how much valet parking or other parking management strategies may be necessary.

While the lū'au attendance will be reduced with development of the Project, bus operations will continue. The current bus operations provide one-way to various hotels on O'ahu at a price of \$35 per person. To increase lū'au bus usage, and potentially reduce overall Project parking demand, the PMP recommends reviewing the bus pricing to see if a reduction in the price per person is possible. The decrease in bus pricing along with charging for parking on-site could result in a reduction in parking demand for the lū'au, which reduces overall parking demand.

- **Incentivizing Transportation Network Company (TNC) Use:** Some visitors from nearby resorts and other origins including Kapolei and Makakilo are expected to use Transportation Network Companies (TNCs) such as Uber and Lyft to access and depart the Project site. While this activity does increase the amount of vehicle traffic, it also has the benefit of reducing parking demand at the site. If other strategies are not effective in managing the demand, the PMP recommends creating incentives to encourage the use TNCs by visitors. This could take the form of a visitor showing a digital receipt for a TNC ride and receiving a coupon for use at one of the restaurants or retail establishments. In addition, the ~~PMP TNC~~ recommends a dedicated curb space for TNC loading and unloading to avoid conflicting with valet parking activities.
- **Promoting Other Modes of Transportation:** Incentivizing the use of other modes of transportation such as transit/shuttle vehicles, bicycles, and walking would reduce parking demand. While the estimated parking demand calculations already consider some parking demand reductions due to non-automobile modes of transportation, encouragement of these types of transportation options through providing secure bicycle parking and sidewalk enhancements on the Project site could result in visitors choosing not to utilize a vehicle. The planned program will include secure short- and long-term bicycle consistent with LUO requirements. The pedestrian environment along Ali'inui Drive is considered comfortable with wide sidewalks, overhead street lighting, and shade trees.
- **Beach Parking Management:** ~~It is expected that f~~ Free beach parking will remain with development of the Project. Management of the beach parking will need to be considered with the anticipated increase in parking activity occurring at the site. Should beach parking continue to be operated as-is (e.g., with no restrictions on time limits or cost), there is potential for the misuse of those stalls to visit the commercial components of the Project.

To mitigate the concern of beach parking misuse, time limits may be considered to limit the amount of time vehicles can be parked. The limiting of parking time could dissuade beach visitors from visiting the Project commercial components before or after their beach visits. In addition, the beach parking supply could be incorporated within the total parking supply of the Project and managed under a ticketed system by the valet program. Beach visitors would be required to see the valet attendant to get a beach parking permit to utilize one of the existing 15 parking spaces. When beach visitors leave then those parking spaces become available for another visitor who has contacted the Project valet.

- **Chapel Parking Management:** Wedding events at the existing chapel are typically 50 attendees or less and occur in set blocks of time that end by 4:30 PM. Weddings hosted after this time are limited to Monday through Thursday operations. Therefore, wedding events at the chapel do not typically coincide with the peak demand lū'au shows. The parking supply is therefore anticipated to accommodate wedding events during non-peak demand lū'au shows. However, if needed, parking management strategies such as valet usage would be considered.

The anticipated parking demand was estimated by using industry best practices and available information. A determination on the parking management strategies to be implemented will be made as the Project progresses. As the PMP notes, parking demand at the Project site will depend on the attractiveness popularity of the establishments and visitor experiences. As such, demand may change based on a variety of factors. The benefit of applying the recommended strategies is that they provide a series of levers that can manage demand through parking charge modifications and supply management. It is anticipated that the Applicant will need to adjust the parking program after the introductory valet period and throughout the Project operations to achieve a balance between demand and visitor satisfaction. As operation of the Project progresses, the Applicant reserves the flexibility to make adjustments to this strategy as needed. Additionally, because of the lack of on-street parking and access restrictions in the adjacent resort area, spillover into adjacent neighborhoods is not feasible given the security of gated communities and surrounding properties. With the implementation of parking management strategies, Project parking demand is expected to be accommodated within the proposed parking supply.

4.7.4 Loading and Delivery

Existing Conditions

As discussed in Section 3.3.10.3, ROH, Section 21-6 establishes off-street loading requirements and standards based on proposed uses. Existing loading at the site is provided at the north and southeast of the Property.

Potential Impacts and Mitigation Measures

To support the planned activities, loading areas have been designated at the north and southeast of the Cove (Figure 3.3). The loading areas will meet requirements articulated in the LUO, and will include four loading stalls designated for large commercial vehicles (12 feet by 35 feet) and stalls designated for smaller vehicles (8.5 feet by 19 feet).

Delivery management strategies, including enforcement of parking restrictions and management of loading/unloading times, use of additional attendants or security, and the development of a delivery schedule program may be employed to alleviate congestion in specific loading areas.

4.7.5 Airports

Existing Conditions

The Cove Property is located approximately 3.42 miles northwest of the Kalaeloa Airport (JRF). The airport has been owned and operated by the O'ahu District of the State Airports System since July 1, 1999 as a general aviation reliever airport for Daniel K. Inouye International Airport. Users of the airport are the U.S. Coast Guard, Hawai'i Community College Flight Program, Hawai'i National Guard and the general aviation community.

Potential Impacts and Mitigation Measures

As recommended by the State of Hawai'i Department of Transportation (HDOT) – Airports, the Applicant will review the Technical Assistance Memorandum (TAM) for Federal Aviation Administration Order 5190.6B (2016) for guidance as part the detailed design of the Project.

The Project does not include activities that may cause a glint/glare hazard or an aerial obstruction to existing flight paths. However, the Project will include landscaping, which the TAM identifies as a potential wildlife attractant. In order to reduce potential wildlife attractants on site, landscaping at the site will be regularly maintained and stormwater drainage would be designed to minimize standing water, which could attract waterfowl. The Applicant will also plan to incorporate actions to limit predator presence, including effective waste management and recycling, to minimize attraction to trash. According to HDOT – Airports, the Project is approximately 18,190 feet from the end of Runway 29 at JRF. FAA regulation requires the submittal of FAA Form 7460-1 Notice of Proposed Construction or Alteration pursuant to the Code of Federal Regulations, Title 14, Part 77.9 if the construction or alteration is within 20,000 feet of a public use of military airport which exceeds a 100:1 surface from any point on the runway of each airport with its longest runway more than 3,200 feet. The Applicant will review the criteria for submittal and will submit the Notice of Proposed Construction or Alteration if required.

4.8 Infrastructure and Utilities

A Preliminary Engineering Report (PER) was prepared by G70 for the Project (*Appendix F*). The report verifies existing utilities, including drainage, water supply, wastewater treatment and disposal, solid waste, electricity and telecommunications, and gas. The PER discusses potential impacts of the Project and proposes mitigation measures. A summary of the report is provided below.

4.8.1 Drainage

Existing Conditions

Generally, stormwater runoff from the existing parking lot along the north of the site and the parking lot along Ali'inui Drive is collected by two existing catch basins, and routed into the Ali'inui Drive storm drainage system. Stormwater runoff from the remainder of the Cove Property generally sheet flows overland into the ocean. Existing runoff flows (Q) were calculated using the Rational Method as described in the City's "Storm Drainage Standards" (August 2017) and are tabulated in *Table 4.6*.

Tributary Area	Discharge Point	C Value	1₁₀ (in/hour)	Area (acres)	Flow, Q (cubic feet per second)
1	Catch Basin	0.80	5.35	1.82	7.75
2	Drain Inlet	0.60	4.90	1.82	5.36
3	Catch Basin	0.81	5.14	1.58	6.59
4	Ocean	0.60	4.25	4.36	11.12
5	Adjacent property	0.60	4.83	0.90	2.61
Total Existing Condition Runoff					33.43

Source: City and County of Honolulu, Storm Drainage Standards, 2017

Potential Impacts and Mitigation Measures

The existing topography will be altered for construction of the planned improvements, and a grading permit will be required. Construction of The Cove will comply with the City’s drainage and stormwater quality standards. BMPs will be incorporated ~~where practical and feasible~~, and may include, but not be limited to, phasing of construction activities, replacing ground cover of the disturbed area, providing adequate water sources at the site, the use of a stabilized construction ingress/egress, inlet protection, temporary filter sock perimeter controls, and the use of temporary silt fencing and screens. ~~An National Pollutant Discharge Elimination System (NPDES) general permit authorizing discharges of stormwater associated with construction activities will be obtained from the HDOH CWB.~~

As shown in *Table 4.7*, redevelopment of the Cove Property will require improvements to existing drainage conditions and is therefore anticipated to decrease the total stormwater runoff generated on site from 33.43 cubic feet per second (cfs) to 26.26 cfs, representing an improvement from existing conditions. Stormwater runoff will be properly treated on site in accordance with applicable State and City rules and standards, including the City’s Rules Relating to Water Quality.

Table 4.7 Proposed Hydrology Conditions					
Tributary Area	Discharge Point	C Value	1 ₁₀ (inch/hour)	Area (acres)	Flow, Q (cubic feet per second)
1	Catch Basin	0.76	5.19	1.15	4.64
2	Catch Basin	0.59	5.14	1.58	6.59
3	Ocean	0.48	4.06	7.76	22.05
Total Future Condition Runoff					26.26

Source: City and County of Honolulu, Storm Drainage Standards, 2017

The conceptual drainage plan defines three approximately sized drainage areas. Runoff from the two impervious parking lots on the Cove Property will continue to be collected by the existing catch basins and discharged into the storm drainage system in Ali’i Drive. Stormwater runoff from the remainder of the site will sheet flow to the ocean. See *Figure 4.18* ~~19~~ for the grading and drainage plan.

Figure 4.19 ~~20~~ illustrates potential LID measures that may be incorporated throughout the Project site ~~to mitigate a potential increase in stormwater runoff.~~ The Project will maximize the use of pervious and landscaped areas within the Cove Property. LID measures such as bioswales, rain gardens, planter boxes, sand filters, and permeable pavement will be ~~considered~~ integrated and located where appropriate to reduce direct stormwater outflow from the site and to mitigate peak flows. Based on preliminary information, ~~infiltration may be suitable for the site if a permeable coral layer is reached.~~ design, the existing parking lots will be reconfigured and an area of asphalt pavement will be replaced by landscape planters. Stormwater runoff will be directed to landscape planters throughout the site, which promotes percolation into the ground and filters out contaminants prior to the runoff entering the existing underground drainage systems. Additionally, stormwater quality treatment will be provided by an underground infiltration system and an above-ground retention basin.

Final treatment controls and BMPs will be assessed as the design phase continues. Overall, the Project’s stormwater management strategies and implementation of water quality treatment measures will provide a benefit to downstream environments compared to the existing conditions.

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Figure 4.1918

Grading and Drainage Plan



Figure 4.2019

BMPs Proposed Throughout the Site - Conceptual

4.8.2 Water Supply

Existing Conditions

The Cove Property receives potable water service from a 12-inch diameter water main owned by the BWS and situated along Ali'inui Drive. The two primary distribution channels include a two-inch diameter lateral, which services the northern portion of the Cove Property. The second lateral has a diameter of 2-1/2 inches and conveys water to the southern portion of the Project site.

According to BWS, there are five water meters that currently serve the Cove Property. † According to BWS records the existing average daily water demand at the site is 13,500 gpd. (Table 4.8).

Meter Number	Meter Size; Type	P/ID number	Average Daily Flow (gallons per day)
1. 98060120	1.5-inch; Domestic	3330060983	4,500
2. 94070086	2-inch; Domestic	7204026459	9,000
3. 02600954	1.5-inch; Irrigation	1626490277	--
4. 13060163	1.5-inch; Irrigation	3793213808	--
5. 3746624	8-inch; Fire	7627677333	--
Total Water Demand			13,500

Fire protection for the Cove Property is currently provided via three off-site fire hydrants along Ali'inui Drive and an eight-inch diameter pipe near the north end of the site that feeds building sprinkler systems and four on-site fire hydrants.

Potential Impacts and Mitigation Measures

Water Availability

Following the publication of the EISPN, the Applicant coordinated with BWS to further clarify water system requirements for the Project.¹ BWS verified water availability in a letter dated July 28, 2021, 2024 commenting on the Draft EIS, confirming their system could accommodate the Project's anticipated water needs (Appendix A-2). At the time of this letter, BWS understood that water would need to be coordinated with the Ko Olina Community Association. However, further coordination with BWS following the EISPN publication has clarified that the Project may seek review and approval directly from the agency. The final approval of water availability will be determined confirmed when the building permit application is submitted for approvals.

¹ In its comments on the EISPN, BWS verified water availability in a letter dated July 28, 2021. At the time of this letter, BWS initially understood that non-potable water would need to be coordinated with the Ko Olina Community Association. However, further coordination with BWS following the EISPN publication clarified that the Project may seek review and approval directly from the agency. This understanding is reflected in BWS' most recent comments on the Draft EIS.

~~Recent correspondence with BWS in 2023 regarding the availability of non-potable water stated that plans for a new non-potable well source for the area has advanced. Given this commitment and progress, BWS has indicated that they may review and approve building permits for the planned non-potable uses needed for the Project. A letter from BWS confirming this condition was requested by G70 in late 2023 and is currently pending.~~

Since the projected non-potable water demand for the Project is expected to remain consistent with that of the existing development, the need for an additional non-potable water resource is not anticipated at this time. However, BWS has indicated that water conservation measures are still required for non-potable irrigation systems. The Applicant is also studying the use of a blackwater system for The Cove intended to recycle water from all onsite plumbing fixtures to R1 level per the requirements of HDOH. This water would be used for various approved purposes, including irrigation. Further discussion is provided in Section 4.8.3.

Water Demand

The Project's projected water demand is described in *Table 4.9*. As illustrated below, the total domestic water demand is 79,567 gpd with the maximum daily flow being 1119,350 gpd. Water usage at the Cove Property is anticipated to increase by approximately 66,067 gpd with the planned redevelopment. ~~Non-potable or irrigation water demand is not anticipated to increase significantly from the existing conditions. There are no significant changes anticipated in regard to the proposed non-potable water use from the existing use.~~

The existing 1-1/2-inch and two-inch meters have rated maximum flows of 100 and 160 gallons per minute (gpm), respectively. As the design of the Project continues to progress, water meter capacity will be verified and the Applicant will continue to consult with BWS. Water meters ~~may~~ will likely be upsized to adequately service The Cove.

Fire Protection

The Water System Standards requires a fire flow of 2,000 gpm for two hours for commercial developments, with hydrants spaced not less than 250 feet apart. Due to the general similarity between the character and use of the existing development to the planned Project, it is anticipated that off-site and on-site fire protection is adequate to accommodate The Cove and on-site fire protection improvements are not needed. In its comments on the Draft EIS, BWS confirmed that their potable system could accommodate the Project's anticipated water needs, including those for fire protection. The final approval of water availability will be confirmed when the building permit application is submitted for approval. Additionally, adequate emergency vehicle access will be provided on site. HFD will verify the location of on-site fire hydrants as the Project continues to progress. Final construction drawings will be reviewed and approved by both BWS and HFD.

Table 4.9: Proposed Water Demand						
Use Description	Demand Rate		Area, sf	Qty	Units	Potable Demand, gpd
	Qty	Units				
PERFORMING ARTS VENUE/RETAIL/ASSOCIATED ACTIVITIES						
Makai Amphitheater	3,000	gpd/acre	17,000	0.39	acre	1,171
Pre-show area	3,000	gpd/acre	30,000	0.69	acre	2,066
Pre-show bars	3,000	gpd/acre	600	0.01	acre	41
Event Kitchen/Back of House	3,000	gpd/acre	9,120	0.21	acre	628
RETAIL & ASSOCIATED ACTIVITIES						
Buildings 2, 3, 4, and 7	3,000	gpd/acre	26,200	0.60	acre	1,806
RESTAURANTS						
Building 5	60	gpd/seat	6,240	213	seat	12,780
Building 6	60	gpd/seat	9,000	363	seat	21,780
Building 1	60	gpd/seat	15,000	610	seat	36,600
COMMON AREAS						
Building 8 - Management Office Support	3,000	gpd/acre	2,800	0.07	acre	198
Entry Portal	3,000	gpd/acre	1,400	0.03	acre	96
Public Restrooms at Lagoon Use	6	gpd/capita	300	400	capita	2,400
Total Water Flow, Gallons per Day (gpd) =						79,567
Max Daily Flow, Gallons per Day (gpd) =						119,350

Notes:

- The water demand for restaurant and food and beverage (F&B) retail was estimated based on HAR, 11-62 Wastewater Systems, Appendix D, Table I: 50 gpd/seat plus 20 percent = 60 gpd/seat.
- Dry retail water consumption is based on BWS standards of 3,000 gpd/acre = 69 gpd/1000 sf.

4.8.3 Wastewater Treatment and Disposal

Existing Conditions

The Cove Property is served by two eight-inch diameter sewer laterals connected to an eight-inch diameter municipal wastewater collection system main within Ali'inui Drive. An additional eight-inch diameter sewer main exits the site through the southeast boundary and to the adjacent Lanikūhonua property. The sewer mains convey wastewater to the West Beach Resort No. 1 Pump Station. This pump station is within the Ko 'Olina Resort and is owned by the City. The current capacities of the West Beach Resort No. 1 Pump Station are unknown. This pump station conveys wastewater to the City Honouliuli Wastewater Treatment Plant.

According to the *Engineering Report for the Kapolei Interceptor Sewer* completed by Community Planning, Inc. in 2003 (2003 Report), parcels within the Kapolei region, including the Cove Property, were assigned wastewater flow capacities based on each parcel’s size and land use. Flows already established from existing Cove Property sewer master plans at the time were also considered and tabulated in this report. Per the 2003 Report, the Cove Property parcel was assigned a wastewater flow limitation of 25,000 gpd based on a 1,000 total capita at 25 gallons per day flow rate.

Discussions with the City in 2024 indicated that wastewater generated from the planned Project would need to be within the flow allocation established in 2003 (25,000 gpd), and that a City Sewer Connection Application would be approved if flow rates met this. The Applicant has coordinated with the City to increase the allocation of sewer capacity for the Cove Property within the master planned tributary area. In accordance with the Kapolei Interceptor Sewer Assessment Agreement, Kapolei Properties LLC, an affiliate of the James Campbell Company LLC, exercised its assignment right under the agreement to reassign 52,000 gpd of unused and unneeded sewer allocation from Kapolei Harborside (TMK (1) 9-1-014: 085) to the Cove Property. Combined with the existing allocation of 25,000 gpd, the updated sewer allocation for The Cove now totals 77,000 gpd. Subsequently, a Sewer Connection Application for the Project was submitted to the City and approved on November 14, 2024 (File No. 2024/SCA-1132). Existing wastewater flow at the Project site has been estimated based on the total water demand reported by BWS (13,500 gpd). It is assumed that the wastewater flow is 80 percent of that water demand, and is therefore 10,800 gpd (Table 4.10).

Table 4.10: Existing Wastewater Flow				
Description	Unit	Unit of Measurement	Average Water (gpd)	Average Wastewater (gpd)
EXISTING USE				
Meter 98060120 (1-1/2" domestic)	1.00	LS	4,500	3,600
Meter 94070086 (2" domestic)	1.00	LS	9,000	7,200
Total Wastewater Flow				10,800 gpd

Potential Impacts and Mitigation Measures

Wastewater projections for anticipated building uses, floor areas, seat count, number of employees and patron counts are summarized in Table 4.11. The future wastewater flow is estimated to be 64,715 ~~72,765~~ gpd, an increase of approximately 53,915 ~~61,965~~ gpd from existing conditions (10,800 gpd). Wastewater from the Project will continue to be disposed of via the two existing sewer laterals.

Table 4.11: Proposed Wastewater Flow							
Building Name	Area, sf	Employees	Customers	Wastewater Generation Rate		Wastewater Flow	
				Per Empl.	Per Cust.	Empl.	Cust.
PERFORMING ARTS VENUE/RETAIL/ASSOCIATED ACTIVITIES							
Makai Amphitheater	17,000	43	480	20	5	860	3,250
Pre-show area	30,000	75	0	20	10	1,50	0
Pre-show bars	600	2	0	20	10	40	0
Event Kitchen/Back of House	9,120	23	0	20	10	460	0
RETAIL & ASSOCIATED ACTIVITIES							
Buildings 2, 3, 4, and 7	26,220	66	213	20	5	1,320	1,065
RESTAURANTS							
Building 5	6,240	16	208	20	50	320	10,400
Building 6	9,000	23	300	20	50	460	15,000
Building 1	15,000	38	610	20	50	760	25,000
COMMON AREAS							
Building 8 – Management Office Support	2,880	7	6	20	10	140	60
Entry Portal	1,400	4	0	20	10	80	0
Public Restroom Use	300	0	400	20	10	0	4,000
Total wastewater flow (gpd) =							64,715

Load factors for estimating flow rates taken from Table I of HAR 11-62, Appendix D. Flow rates used to calculate wastewater flow:

- 20 gpd/employee,
- 50 gpd /seat in restaurants (a single seating is assumed),
- 5 gpd /person for retail customers,
- 5 gpd /person for theater space,
- 1 employee per 400 square feet (slightly higher than the minimum numbers listed for the Building Code occupancy) and
- 30 sf/seat restaurant seat density, equal to the customer load.

Based on the tabulated values above, the future wastewater flow is estimated at 64,715 gpd. This is an increase of approximately 53,915 gpd from existing flow rates, and exceeds the 25,000 gpd wastewater flow cap established in the 2003 Report, within the 77,000 gpd of sewer capacity allotted for the Cove Property. A Sewer Connection Application for the Project was approved on November 14, 2024 (File No. 2024/SCA-1132).

To meet the anticipated wastewater demand for the Project, the Applicant is coordinating with the City to update the sewer connection application and allocation of sewer capacity within the master planned tributary area, as allowed under the Kapolei Interceptor Sewer Assessment Agreement.

Additionally, the following design features ~~are options~~ may be considered to reduce the projected wastewater demand flows, including, but not limited to:

- ~~Implement black water and gray water systems (gray water system could account for up to 50% of the total wastewater generation)~~ The Applicant is studying the use of a blackwater system for The Cove, which would be intended to recycle water from all onsite plumbing fixtures to R1 level per the requirements of HDOH (Appendix G). The R1 water would be reused on site to flush toilets, urinals and irrigation per 2021 United Plumbing Code, Chapter 16. A proposed blackwater system for The Cove would collect wastewater from toilets, sinks, urinals, and kitchen waste (post-grease interceptor) and process it through a multi-step treatment system. The treated R1 water would be reused through a distinct piping system. The system would be designed to process and recycle an estimated 60,000 gallons of blackwater daily. The determination of use and final design of a blackwater system will be determined as the Project progresses.
- Consider restaurant occupancy rate factor (current assumption is a conservative 100 percent restaurant occupancy rate)
- Establish restaurant dining times (breakfast, lunch, & dinner versus lunch & dinner only)
- Reduce restaurant seat density factor (increase square footage per seat)
- Reduce restaurant size
- Consider low flow fixtures to reduce wastewater generation rates (reduction rates as low as 40 percent)

It is also noted that DLNR-CWRM, the agency responsible for administering the State Water Code (HRS Chapter 174C), whereby all waters in the State are held in trust for the benefit of the citizens of the State, has recommended conservation and resource protection measures that are consistent with Applicant's proposed options for reducing wastewater demand flows, such as:

- The use of reclaimed water or non-potable water needs, including, but not limited to, recycled water. As discussed above, the Applicant is studying the use of a blackwater system for The Cove, which would be intended to recycle water for reuse on site to flush toilets, urinals and irrigation. The determination of use and final design of a blackwater system will be determined as the Project progresses.

Additionally, the Uniform Plumbing Code (UPC) and the City Interim Plumbing Code require grease interceptors at establishments where grease may be introduced into the drainage or sewage system. The introduction of Fats, Oils and Greases (FOG) into a sewer system can lead to detrimental effects arising from higher Biochemical Oxygen Demand (BOD) levels in wastewater effluent; increased odor complaints due to decomposition of accumulated grease; and, sewage spills caused by clogged pipes, pumps or disposal fields. These potential impacts can be mitigated by installing grease interceptors that utilize settling chambers and baffled pipe connections to separate FOG from wastewater before it enters the sewer system. Grease interceptors will be operated and maintained where FOG is anticipated to be generated, such as where kitchens are planned. The grease interceptors are anticipated to effectively separate FOG from wastewater before it enters the sewer system; no additional mitigation measures are proposed.

4.8.4 Solid Waste

Existing Conditions

Solid waste is currently handled by a private contractor and taken to either the City's H-POWER waste-to-energy facility, which processes up to 3,000 tons of the island's refuse; the City's Waimānalo Gulch landfill; or, various recycling services around O'ahu.

Potential Impacts and Mitigation Measures

In the short-term, solid waste will be generated from demolition and construction activities. The construction contractor will be responsible for the disposal of construction debris and solid waste generated, including hazardous materials, to an acceptable waste disposal facility in accordance with Federal, State, and City regulations.

The Project will not have a significant impact on the City's waste stream and disposal to the H-POWER Plant. The Applicant will coordinate with waste management providers to ensure that solid waste disposal aligns with City requirements. Similar to current practice, regular responsible maintenance of the Project site and the public beach access easement will be conducted daily to avoid potential solid waste spillover onto the beach. The Cove ~~may~~ will implement recycling efforts to minimize solid waste. Measures include, but may not be limited to, the recycling of glass, plastic bottles, cardboard, aluminum, and paper; the use of compostable or alternative disposable cutlery, like cups and silverware made from cornstarch or bamboo; and, recycling of food waste. Educational signage and guidelines may be posted around the Cove Property to encourage thoughtful care for the site and the surrounding environment. Recycling ~~may~~ will also be encouraged through the use of trash cans with recycling containers.

4.8.5 Power and Telecommunications

Existing Conditions

The existing entertainment venue is provided power and telephone service from lines located along Ali'inui Drive. Within the Cove Property, there are two Hawaiian Electric Company (HECO) transformers located at the north and south portions of the site. Electrical services are provided throughout the Cove Property.

On-site telecommunication services are provided from the vault located at the south end of the site. Existing structures located near the parking lot along Ali'inui Drive are equipped with telephone service.

Potential Impacts and Mitigation Measures

Based on the existing service, electrical service is anticipated to be provided from Ali'inui Drive and may utilize the existing on-site electrical system. As the design of the project continues to progress, HECO will be consulted to ensure The Cove is provided with adequate electrical services.

It is anticipated that planned structures be equipped with telecommunication services. As design of the Project progresses, improvements to the telecommunication services at the Cove Property will be coordinated with the relevant service provider.

4.9 Noise

An Acoustic Study was conducted for the project in August 2022 by Y. Ebisu & Associates (*Appendix GH*) and subsequently updated in September 2024 to reflect the relocation of the new amphitheater. The study ~~to assesses~~ assesses the existing and future (Construction Year 2026) traffic noise environment in the vicinity of ~~t~~The Cove Property following the redevelopment of the site, as well as the existing and potential noise impacts from entertainment events. Sound measurements across eight sites were conducted on June 29, 2022 and July 6, 2022 (see Figure III-3 of *Appendix H*) as part of the study. Additionally, the study provides recommendations for minimizing identified potential noise impacts. A summary of the report's findings is provided below.

Existing Conditions

Noise Descriptors, Relationship to Land Use Compatibility, and Study Methodology

The noise descriptor typically used to assess environmental noise is the Day-Night Average Sound Level (DNL). As a general rule, in urbanized areas which are shielded from high volume streets, DNL levels range from 55 to 65 DNL and are usually controlled by motor vehicle traffic noise. Residences which front major roadways are generally exposed to levels of 65 DNL and as high as 75 DNL when the roadway is a high-speed freeway. Noise acceptability standards are generally set by the U.S. Department of Housing and Urban Development (*HUD*), Federal Housing Administration (*FHA*) and are applied nationally. According to these standards, a DNL of 65 or less is considered acceptable for residences and is used a standard for planning purposes. For commercial, industrial, and other non-noise sensitive land uses, exterior noise levels as high as 75 DNL are generally acceptable. Exceptions to this occur when naturally ventilated office and other commercial establishments are exposed to exterior levels which exceed 65 DNL.

On the island of O'ahu, HDOH regulates noise in accordance HAR, Title 11, Chapter 46, Community Noise Control. In contrast with *FHA* standards, HDOH noise regulations are expressed in maximum allowable noise limits rather than DNL. Although they are not directly comparable to noise criteria expressed in DNL, HDOH noise limits for preservation/residential, apartment/commercials, and agricultural/industrial lands equate to approximately 55, 60, and 76 DNL, respectively. However, the HDOH noise regulations apply primarily to fixed machinery sources and not to crowd noise or public address systems.

The sound levels associated with events at establishments that require liquor licenses, such as the planned lū'au show, are regulated by the Honolulu Liquor Commission. The applicable noise limits are identical to those of the HDOH, and are 60 dBA during the daytime period of 7:00 AM to 10:00 PM and 50 dBA during the nighttime period of 10:00 PM to 7:00 AM. The Honolulu Liquor Commission noise regulations are not limited to fixed machinery, and may be applied to crowd noise or public address systems.

Traffic Noise

Existing traffic noise levels were measured at two locations in the Project vicinity to describe the existing traffic noise environment at noise sensitive locations which are removed from roadway traffic and to provide a basis for developing the Project's potential future (Year 2026) traffic noise contributions along Farrington Highway and Ali'inui Drive. Traffic noise measurements were performed during the AM and PM peak traffic hours in June 2021 on Farrington Highway and in August 2022 along Ali'inui Drive. The results of the traffic noise measurements were also compared to calculations

of existing traffic noise levels to validate the traffic noise computer model used (see Table III-1 of Appendix H). Traffic noise calculations for existing conditions and for noise predictions for the Year 2026 were performed using the Federal Highway Administration Noise Prediction Model. Traffic data entered into the noise prediction model derived from the TIR (Appendix D) and HDOT traffic counts at the Ko Olina Interchange along Farrington Highway, and included hourly traffic volumes, average vehicle speeds, and estimates of traffic mix.

The existing background ambient noise levels in the Project vicinity are controlled by traffic on Farrington Highway, local traffic on Ali'inui Drive, Ko Olina Golf Course waterfalls, wind, and surf. The sounds of automobiles, heavy trucks, and buses, as well as the sounds of music and amplified voice announcements from various activities at the existing entertainment venue control the background ambient noise levels on the project site between 4:30 PM and 9:45 PM. At locations in the immediate vicinity of the Project site and which are removed from Farrington Highway, existing average background ambient noise levels range from 50 to 55 Leq, which are considered to be "Minimal Exposure, Unconditionally Acceptable" noise exposure levels. On the Cove Property, average background noise levels rise to levels between 75 to 85 Leq in the immediate vicinity of the various existing entertainment events which occur in a programmed sequence during a typical day. The higher sound levels are audible at developed lands near the north, east, and south property boundaries of the property.

Existing traffic noise levels along Farrington Highway at approximately 150 feet set back from the roadway's centerline are approximately 72 DNL and are in the "Significant Exposure, Normally Unacceptable" noise exposure category. High traffic noise levels here are controlled by non-Project traffic. Along the section of Ali'inui Drive northeast of the Cove Property, existing traffic noise levels associated with traffic on Farrington Highway tend to mask the noise from local traffic on Ali'inui Drive. Traffic noise levels from Ali'inui Drive could currently exceed the 65 DNL HUD FHA standard at Kai Lani at Ko Olina. Along the section of Ali'inui Drive south of the Cove Property, existing traffic noise levels are relatively low and less than 65 DNL and within the "Moderate Exposure, Acceptable" noise exposure category.

Sound Levels During Entertainment Events

During the period from late afternoon until about 8:30 to 9:00 PM, the existing Paradise Cove hosts live commercial entertainment events, including the imu amphitheater and lū'au dinner shows. Based on sound level measurements conducted during the existing lū'au show in 2022 for this assessment, sound levels during this period are audible throughout the Cove Property and immediately beyond its boundaries, primarily to the south and east. At these points, exceedances of the Honolulu Liquor Commission's 60 dBA limit may occur. The existing sound levels associated with live commercial entertainment events do not exceed the Honolulu Liquor Commission's 60 dBA limit at the closest residences to the Cove Property, including The Coconut Plantation – Ko Olina and Kai Lani at Ko Olina where existing sound levels range from 48 dBA to 52 dBA. This is attributed to the design of the existing sound system, which provides sound shielding effects, and the distance of the current show from these residences acting as a natural buffer.

Potential Impacts and Mitigation Measures

Construction Noise

Unavoidable, but temporary, noise impacts may occur during construction of the Project, particularly during the site preparation and earth-moving activities. Specifically, occupants in the existing buildings at Lanikūhonua and residents at the Kai Lani at Ko Olina and Coconut Plantation – Ko Olina are

predicted to experience the highest average noise levels (between 65 and 64 dBA) during construction activities. Because construction activities are predicted to be audible at neighboring and properties beyond, the quality of the acoustic environment may be degraded to levels exceeding 65 dBA during periods of construction. However, these anticipated construction noise levels are not extreme and are similar to existing background noise levels measured along Ali'inui Drive (refer to Sites 7 and 8 of Figure III-3 of Appendix H).

Adverse noise impacts are not expected to occur inside air-conditioned structures which are beyond 450 feet of the Project construction site. Inside naturally ventilated structures, interior noise levels (with windows or doors opened) are estimated to range between 56 to 55 dBA at a 450-foot distance from the Cove Property. Closure of doors and windows facing the construction site would generally reduce interior noise levels by an additional five to ten dBA. With windows and doors closed, the highest construction noise levels of 65 dBA at 450 feet outdoors would potentially decrease to approximately 50 to 45 dBA indoors.

Adverse impacts from construction noise are not expected to be in the "public health and welfare" category due to the temporary nature of the work, and the regulation of construction noise by the HDOH. Potential impacts are anticipated to be limited to the temporary degradation of the quality of the acoustic environment in the vicinity of the Project site. Because of the relatively high noise levels associated with construction activities (75 to 85+ dBA at 100-foot distance) and due to the exterior nature of the work, Mitigation measures to reduce construction noise to inaudible levels will not be practical in all cases, but the use of quiet equipment is recommended.

Permissible noise levels during construction are regulated by the HDOH in accordance with permit requirements under HAR, Title 11, Chapter 46. The use of drilling and cast-in-place piles for foundation may also minimize risks of potential noise and vibration impacts on the surrounding area during the construction phase. Prior to the start of construction, a noise permit will be obtained from HDOH. Contractors will comply with HDOH construction noise limits and curfew times in accordance HAR, Title 11, Chapter 46. Under current permit procedures, noisy construction activities are restricted to hours between 7:00 AM and 6:00 PM, from Monday through Friday, and exclude certain holidays. Construction activities are typically restricted to the hours of 9:00 AM to 6:00 PM on Saturdays, with construction not permitted on Sundays. The use of heavy equipment would be scheduled as much as possible during daylight hours to avoid disturbing area residents during the evening.

Traffic Noise

Along Ali'inui Drive, predicted increases in traffic noise levels associated with the Project traffic are anticipated to approximately equal to or less than 0.4 DNL. An increase in traffic noise of 0.4 DNL will be difficult to perceive and is not considered significant. For this reason, special traffic noise impacts associated with the Project are not considered to be significant.

Forecasted noise levels along Ali'inui Drive are not expected to exceed the 65 DNL FHA standard at a 59-foot setback distance from the roadway's centerline. Existing and future dwelling units along Ali'inui Drive that are not shielded from traffic noise by walls, buildings, or natural terrain features but are at setback distances greater than 59 feet from the roadway's centerline can be expected to be exposed to "Moderate, Acceptable" traffic noise levels through Construction Year 2026. Along Olani Street and Kamoana Place, future traffic noise level increases are not expected to occur.

Along Farrington Highway, Project-related traffic noise impacts are not anticipated because of the dominating influence of non-Project traffic noise.

Sound Levels During Entertainment Events

The most significant acoustical change from existing conditions will be the replacement of the existing amphitheater and lū'au show stage with a new amphitheater at the northwest corner of the site. The anticipated buffer distances between the new amphitheater and Kai Lani at Ko Olina and The Coconut Plantation – Ko Olina are 719 feet and 913 feet, respectively. Due to changes in buffer distances, sound levels in the future during the lū'au show may increase by 3.6 dBA at Kai Lani at Ko Olina and decrease by 1.9 dBA at The Coconut Plantation – Ko Olina.

Amplified sound from the planned lū'au show at the new amphitheater/ performing arts venue may continue to spill over to adjacent areas, potentially impacting noise sensitive receptors (i.e., residential areas) in the surrounding neighborhood. Preservation-zoned land to the north and east of the Cove Property will continue to mitigate the potential increase in noise levels by acting as a buffer between the site and the residential areas of Kai Lani at Ko Olina and The Coconut Plantation – Ko Olina.

Measures to minimize noise impacts include limiting sound spillover to 60 DNL or less and restricting such occurrences to the hours between 7:00 AM to 10:00 PM. The amount of sound spillover will depend on the design of the new sound system of the planned amphitheater and the noise-shielding effects of intervening building structures within the Cove Property. It is anticipated that amplified sound from entertainment shows at the new amphitheater/performing arts venue will remain comparable to existing conditions.

Given the reduced buffer distances between the planned amphitheater and Kai Lani at Ko Olina, a three to four dBA reduction of spillover sound levels will be required to mitigate the potential noise impacts and ensure that amplified sound remains comparable to existing conditions. The new amphitheater's sound amplification system is being designed to achieve the three to four dBA reduction while maintaining current maximum program sound levels within the audience seating area. This mitigation measure will ensure that the new amphitheater will maintain the existing sound levels of the current lū'au show. The final design of the sound system will be determined as the Project progresses.

Presently, scheduling conflicts between commercial entertainment shows at Paradise Cove and activities at Lanikūhonua are infrequent, and spillover sound from the entertainment show does not result in significant adverse impacts. Given the relocation of the amphitheater, it is estimated that the planned commercial entertainment shows will be approximately 11 dBA quieter along the south property line. Sound abatement may be integrated into the venue to mitigate potential noise impacts on the surrounding area.

4.10 Socio-Economic Conditions

Existing Conditions

An Economic Impact Report (EIR) was conducted by Environment and Economics LLC in February 2024 to assess the potential economic impacts the Project may have on the economy, including jobs, labor income, and economic output, as well as the fiscal revenue of the State of Hawai'i and City and County of Honolulu governments (*Appendix H1*). The potential economic and fiscal impacts are assessed for both the construction and operation phases of the Project, and are summarized below.

For purposes of the analysis, the construction phase is assumed to take place over an approximate 24-month period, while operations would be expected to begin just after construction is complete and

continue for the foreseeable future. Given these timeframes, economic and fiscal impacts for construction are presented on a total basis (to include all impacts over the 24-month period), and impacts for operations are presented on an annual basis and are assumed to be consistent on an ongoing basis for the life of the Project.

Population and Demographics

Administratively, the Cove Property is located in the ‘Ewa Census County Division (CCD) of the City and County of Honolulu (U.S. Census Bureau). *Table 4.12* provides population data for 2010, 2015, and 2021 for the State, City, and ‘Ewa CCD, in addition to average annual growth rates from 2010 to 2015 and 2015 to 2021. As of 2021, the State population was approximately 1.44 million, about 1 million of which reside in the City and County of Honolulu (approximately 70 percent of the State population). The ‘Ewa CCD had a 2021 population of approximately 360,000, encompassing about 35 percent of the City population.

Population growth rates statewide, countywide, and through most CCDs were lower from 2015 to 2021 than they were from 2010 to 2015. The ‘Ewa CCD grew at an average annual rate of 1.1 percent from 2010-2015 matching the State rate, and maintained that growth rate from 2015-2020 while the State rate slowed (1.1 percent in ‘Ewa compared to 0.4 percent statewide).

Table 4.12: Population and Annual Growth Rates by Area					
	2010	2015	2021	Average Annual Growth Rate 2010-2015	Average Annual Growth Rate 2015-2020
State of Hawai‘i	1,333,591	1,406,299	1,441,553	1.1%	0.4%
City & County of Honolulu	936,984	984,178	1,015,167	1.0%	0.5%
‘Ewa CCD	320,373	338,521	360,178	1.1%	1.1%
Honolulu CCD	382,622	400,823	406,004	1.0%	0.2%
Ko‘olaupoko CCD	118,083	115,873	119,225	-0.4%	0.5%
Waianae CCD	46,482	48,350	52,829	0.8%	1.5%
Wahiawa CCD	36,724	46,707	42,608	5.4%	-1.5%
Ko‘olauloa CCD	19,634	20,837	21,079	1.2%	0.2%
Waialua CCD	13,066	13,067	13,244	0.0%	0.2%

Source: U.S. Census, 2010, 2015, and 2021

The Project area is within U.S. Census Bureau Tract 86.10. In 2020, the residential population of the U.S. Census Bureau-defined “Ko Olina Resort Census Tract” was estimated at approximately 1,020 persons (U.S. Census Bureau, 2020). Recognized as a second resort area on the island of O‘ahu, the average daily population of the region fluctuates based on a transient visitor population.

Labor Statistics

Table 4.13 summarizes labor statistics for the State and City from 2017 to 2023, including the size of the labor force, the total number of employed individuals, the total number of unemployed individuals, and the unemployment rate. Unemployment rates for both the State and City were generally low from 2017 through 2019, but surged in 2020 due to business closures and travel restrictions associated with the COVID-19 pandemic. From 2019 to 2020, the unemployment rate for the both the State and City more than quadrupled, with the State unemployment rate in 2020 being 4.64 times the rate in 2019, and the 2020 rate being 4.43 times the 2019 rate for the City. Data for the years 2021 through 2023 indicates that unemployment rates are in decline, falling statewide from 11.7 percent in 2020 to 3.0 percent in 2023 and from 10.3 percent to 2.7 percent for the City. The size of the labor forces and the number employed in the State and City have not yet returned to 2019 levels.

Table 4.13: State of Hawai'i and City & County of Honolulu Labor Statistics, 2016-2022							
	2016	2017	2018	2019	2020	2021	2022*
State of Hawai'i							
Labor force	679,121	695,303	691,982	684,690	662,491	668,413	671,833
Employment	659,557	679,865	675,681	667,914	582,979	630,187	646,684
Unemployment	19,564	15,438	16,301	16,776	79,512	38,226	22,292
Unemployment rate	2.9%	2.2%	2.4%	2.5%	12.0%	5.7%	3.7%
City & County of Honolulu							
Labor force	463,370	472,592	469,477	463,895	449,402	451,661	454,854
Employment	450,745	462,531	458,834	453,077	402,027	427,780	438,802
Unemployment	12,625	10,061	10,643	10,818	47,275	23,881	16,052
Unemployment rate	2.7%	2.1%	2.3%	2.3%	10.5%	5.3%	3.5%

Source: U.S. Bureau of Labor Statistics, 2024

Approximately 210 jobs are supported by the existing commercial lū'au operations, which contributes to the local economy through wages, consumer spending, and local business patronage. While precise data on current fiscal impacts, such as tax revenue, is not provided, the current operation generates income and general excise taxes that supports the State and City economy.

Visitor Arrivals

Table 4.14 summarizes recent data on visitor arrivals to the State of Hawai'i from 2010 to 2021, in addition to year-over-year rates of change. The State saw increases in visitor arrivals every year from 2010 to 2019, with the highest year-over-year growth occurring from 2011 to 2012 (a 9.7 percent increase in a single year). From 2017 to 2019, the State experienced steady growth in visitor arrivals at approximately 5.0 percent per year. Travel restrictions in 2020 led to a massive decline in visitor arrivals, down 74 percent from 2019 numbers, with close to 100 percent declines during both the second and third quarters of that year. Visitor arrivals surged from 2020 to 2021, increasing by 153 percent. Through July of 2022, visitor arrivals were 46.5 percent greater than the same period in 2021.

Table 4.14: Statewide & O’ahu Visitor Arrivals, 2010-2023

Year	Statewide Visitor Arrivals (by Air)	Statewide Year over Year Change	Oahu Visitor Arrivals (by Air)	Oahu Year over Year Change	Oahu % of Statewide Total
2010	6,916,894		4,273,658		61.8%
2011	7,174,397	3.7%	4,401,624	3.0%	61.4%
2012	7,867,143	9.7%	4,904,046	11.4%	62.3%
2013	8,003,474	1.7%	5,044,276	2.9%	63.0%
2014	8,196,342	2.4%	5,192,621	2.9%	63.4%
2015	8,563,018	4.5%	5,339,912	2.8%	62.4%
2016	8,821,802	3.0%	5,447,229	2.0%	61.7%
2017	9,277,613	5.2%	5,683,344	4.3%	61.3%
2018	9,761,448	5.2%	5,862,358	3.1%	60.1%
2019	10,243,165	4.9%	6,154,248	5.0%	60.1%
2020	2,686,403	-73.8%	1,506,316	-75.5%	56.1%
2021	6,777,761	152.3%	3,326,622	120.8%	49.1%
2022	9,138,674	34.8%	4,858,170	46.0%	53.2%
2023	9,488,477	3.8%	5,614,956	15.6%	59.2%

Source: State Department of Business, Economic Development, and Tourism, 2024.

Potential Impacts and Mitigation Measures

Population and Demographics

The redevelopment of the Cove Property will not add permanent residents to the surrounding area. As a direct result of the project, new jobs will be created in the ‘Ewa region. Employees are expected to be comprised of local residents already living in the State or on the island. Therefore, adverse impacts to the current population and demographics of Project area and O’ahu are not anticipated.

Economic Impacts

To estimate the economic impacts of the Project, the EIR evaluates three variables (jobs, labor income, and economic output) utilizing the Impact Analysis for Planning (IMPLAN) economic model. Each of the three variables will have a direct, indirect, and induced impact.

Direct impacts are associated with the Project itself, such as jobs directly linked to initial Project-related expenditures, the corresponding incomes derived from these positions, and the overall economic output generated by these initial expenditures.

Indirect impacts refer to the secondary effects generated within the wider local economy as a result of the Project, such as employment opportunities at businesses that will supply goods and services to The Cove, manufacturing activities, and the associated labor income.

Induced impacts result from the spending behaviors of both direct and indirect workers. As they utilize their wages and salaries for various goods and services like food, housing, transportation, and medical services, this expenditure triggers additional economic activity across diverse sectors of the wider economy, most notably within service sectors. The estimated economic impacts of the Project during the construction and operation phases are summarized in the following section.

Construction

Table 4.15 summarizes the Project’s estimated economic impact during the short-term construction phase. Over an estimated 24-month construction period, the Project is anticipated to generate or sustain an estimated total of 1,429 jobs (1,386 FTE), of which 900 (873 FTE) would be direct, 152 (148 FTE) indirect, and 377 (366 FTE) induced. During the same period, an estimated total of \$114.4 million in labor income is estimated to be generated or sustained from Project construction, of which \$79.8 million would be direct, \$11.3 million indirect, and \$23.4 million induced. An estimated total of \$247.0 million in economic output may be generated or sustained from Project construction, of which \$135.6 million would be direct, \$35.4 million indirect, and \$75.9 million induced.

Table 4.15: Economic Impacts – Short-term (Construction), 2024 Dollars				
Impact Type	Total Jobs	FTE Jobs¹	Labor Income	Economic Output
Direct	900	873	\$79,789,032	\$135,637,819
Indirect	152	148	\$11,254,773	\$35,417,259
Induced	377	366	\$23,392,655	\$75,900,214
Totals²	1,429	1,386	\$114,436,459	\$246,955,292

¹ FTE calculated at a rate of 0.97 using IMPLAN employment to FTE ratios.

² Some totals may not appear to sum from their parts due to rounding.

Operations

Table 4.16 summarizes the Project’s estimated annual economic impact during the long-term operation phase. Once in operation, the Project is anticipated to generate and ~~or~~ sustain an estimated total of 817 jobs (678 FTE) annually, of which 583 (484 FTE) would be direct, 121 (100 FTE) indirect, and 113 (94 FTE) induced. Annually, the Project is estimated to generate and ~~or~~ sustain a total increase of \$34.5 million in labor income, of which \$20.4 million would be direct, \$7.1 million indirect, and \$7.0 million induced. An estimated annual increase of \$100.0 million in economic output may be generated or sustained from Project operation, of which \$53.8 million would be direct, \$23.4 million indirect, and \$22.8 million induced.

Impact Type	Total Jobs	FTE Jobs¹	Labor Income	Economic Output
Direct	583	484	\$20,379,543	\$53,779,740
Indirect	121	100	\$7,081,787	\$23,350,764
Induced	113	94	\$7,033,846	\$22,822,409
Totals²	817	678	\$34,495,176	\$99,952,914

¹ FTE calculated at a rate of 0.83 using IMPLAN employment to FTE ratios.

² Some totals may not appear to sum from their parts due to rounding.

Fiscal Impacts

The EIR analyzes two variables to estimate overall fiscal impacts: State of Hawai‘i government revenue and City and County of Honolulu government revenue.

Revenue that would be accrued by the State government because of construction and operations are presented in the following four categories: (1) General Excise Tax (GET) and Use Tax, (2) Corporate Profits Tax, (3) Personal Income Tax, and (4) Other. Estimates were calculated by the IMPLAN model based on incomes, spending of incomes, and industry expenditures, and results were calculated in 2024 dollars.

Revenue that would be accrued by the City government because of construction and operations of the Project are presented in two categories: (1) Property Tax and (2) Other. Estimated property tax was calculated by the IMPLAN model based on additional property tax revenue associated with income from Project-related jobs. Other revenue to the City calculated by the IMPLAN model include, but are not limited to, sales tax revenue and revenue from licenses and fees. Property tax revenue associated with the Cove Property itself were estimated based on a commercial property tax rate of 1.24 percent, historical land values, and, for future payments that include new construction, the value of new construction. Results were calculated in 2024 dollars.

Construction

As shown in *Table 4.17*, approximately \$10.2 million in State of Hawai‘i government revenue is estimated to be generated or sustained from Project construction. The majority of this revenue would be generated through GET & Use taxes and personal income taxes.

Over the 24-month construction period, a total of approximately \$3.3 million in City government revenue is estimated to be generated or sustained from Project construction. The majority of this revenue (approximately \$2.4 million) would be generated through property taxes, including two annual on-site property tax payments estimated at \$115,000 (a total of \$230,000).

Table 4.17: Fiscal Impacts – Short-term (Construction), 2024 Dollars	
Tax Category	Total
State of Hawai'i	
GET & Use Tax	\$5,205,067
Corporate Profit	\$292,067
Personal Income	\$4,177,300
Other	\$496,101
Total¹	\$10,170,535
City and County of Honolulu	
Property ²	\$2,426,065
Other	\$883,472
Total¹	\$3,309,537

¹ Some totals may not appear to sum from their parts due to rounding.

² Includes two annual on-site property tax payments of \$115,000.

Operation

As shown in *Table 4.18*, approximately \$4.6 million in State of Hawai'i government revenue is estimated to be generated or sustained from Project operations, annually. The majority of this revenue (approximately \$3.1 million) would be generated through GET & Use taxes.

During Project operation, a total of approximately \$2.1 million in City government revenue is estimated to be generated or sustained. The majority of this revenue (approximately \$1.6 million) would be generated through property taxes, including annual payments of approximately \$1.2 million for the site itself.

Table 4.18: Fiscal Impacts – Long-term (Operation), 2024 Dollars	
Tax Category	Total
State of Hawai'i	
GET & Use Tax	\$3,073,521
Corporate Profit	\$202,166
Personal Income	\$1,272,425
Other	\$43,266
Total¹	\$4,591,378
City and County of Honolulu	
Property ²	\$1,620,748
Other	\$441,480
Total¹	\$2,062,228

¹ Some totals may not appear to sum from their parts due to rounding.

² Includes estimated annual on-site property tax payments of \$1.2 million.

4.11 Visual Resources

Existing Conditions

As part of the vision for the region, the 'Ewa DP calls for the protection of important views of landforms along the Wai'anae Coast, the ridgeline of the Wai'anae Range, and the ocean. Prominent views specifically identified in the 'Ewa DP include the following:

- Makai view from Farrington Highway at the entrance to Ko Olina Resort
- Makai view from coastal roadways makai of Farrington Highway
- Views of the Wai'anae Coast from the shoreline
- Mauka and lateral views of the property from the Small Boat Harbor and the Deep Draft Harbor

The visual environment within the Cove Property is typical of the surrounding resort environment. Existing structures on the site are either enclosed or open-air and ~~designed in a~~ includes design elements that are Polynesian-inspired or Hawai'i-themed architectural style. These structures are complemented by open landscaped or sandy areas throughout that enhance various view corridors, including the ocean.

Immediately surrounding the Cove Property, the environment is characterized by a mix of resort, recreational, and residential uses. The Ko Olina Resort is accessed via Ali'inui Drive, which is approximately 680 feet from the nearest shoreline. In the Project vicinity, pedestrian-level views toward the ocean and mountains along Ali'inui Drive are intermittent due to the presence of existing structures at the Cove Property, landscaping/screening consisting of tall tree canopies and hedges, and surrounding resorts. At the Cove Property's street frontage, this landscaping, as well as the presence of existing structures, currently obstructs views of the shoreline. Within Ko Olina Resort, ~~Public~~ public beach access is provided at various points along the street, and a constructed—A pedestrian walkway stretches along the coast fronting the Resort, where visitors can enjoy unobstructed views of the Pacific Ocean. Pedestrian-level mauka views of the Wai'anae Mountains from Ali'inui Drive are intermittent; however, these views are still obstructed by existing residential developments east of the Project site.

Potential Impacts and Mitigation Measures

During construction, the presence of construction equipment may impact the surrounding environment. The use of construction fencing will mitigate potential impacts to the extent possible, and equipment will be confined to work areas. Following completion of the Project, all construction-related equipment will be removed from the site.

The Project vicinity is typical of the surrounding resort environment. Existing aging structures on the Cove Property will be demolished and replaced with several new structures. Redevelopment of the Cove Property will enhance the visual environment on the site and fit with the character of the surrounding area. Design of The Cove will reflect contemporary and Hawaiian architecture, and landscaping is expected to consist of native, Polynesian-introduced, or tropical trees, shrubs, and ground cover of varying sizes. The Cove will consist of a low building profile. Structures will range from 13.0 to 36.5 feet height, adhering to the 40-foot height limit of the B-1, Neighborhood Business District, and will be set back at least 60 feet from the shoreline. Finished floor elevations of the planned structures may range from 9 to 12 feet above msl.

Redevelopment of The Cove is not anticipated to adversely impact significant views identified in the 'Ewa DP, as summarized in *Table 4.19* below (see *Figure 4.2021* for a photo key and *Figures 4.2122 through 4.2829* for viewpoints).

Table 4.19: Assessment of Impacts to Public Views		
Public View Corridor	Figure No.	Discussion
'Ewa DP Viewpoints (2013, amended 2020)*		
1. Makai view from Farrington Highway at the entrance to Ko Olina Resort	View 1, Figure 4.221	From Farrington Highway, visitors enter the resort area via Ali'inui Drive and immediately encounter the Cove Property. As shown in <i>Figure 4.221</i> , pedestrian-level views of the ocean at the entrance are currently obstructed by the existing development and landscaping along Ali'inui Drive. This condition will remain with redevelopment of the property for The Cove. As such, makai (seaward) views from Farrington Highway are not anticipated to be adversely impacted by the Project. The Project will replace existing aging structures with a more contemporary, authentic Hawaiian gathering place. Existing trees along Ali'inui Drive will remain in place, and landscaping will be incorporated throughout the site to enhance the property. The Project is therefore anticipated to enhance the aesthetic environment of the surrounding area.
2. Makai view from coastal roadways makai of Farrington Highway	View 2, Figure 4.232	The only roadway makai (seaward) of Farrington Highway in the Project vicinity is Ali'inui Drive (<i>Figure 4.232</i>). The alignment of Ali'inui Drive runs parallel to the coastline; however, the road is set far back from the shoreline. Pedestrian-level views of the ocean are <u>currently</u> intermittent and are primarily blocked by existing resorts, recreational uses, or other undeveloped land. <u>This condition will continue with the redevelopment of the Cove Property (<i>Figure 4.232</i>)</u> . As such, makai views are not anticipated to be adversely impacted.
3. Views of the Wai'anae Coast from the shoreline	View 3, Figure 4.243	The Cove Property is adjacent to the beach. As shown in <i>Figure 4.243</i> , the Wai'anae Coast is not visible from shoreline fronting the property. As such, these views will not be adversely impacted. <u>The Project will integrate landscaping throughout the site to screen views of The Cove from the shoreline (<i>Figure 4.243</i>). Landscaping is expected to consist of native, Polynesian-introduced, or tropical trees and shrubs of varying sizes. See <i>Section 3.3.9, Figure 3.15, Figure 3.16, and Figure 3.17</i> for further details.</u>
4. Mauka and lateral views of the property from the Small Boat Harbor and the Deep Draft Harbor	View 4, Figure 4.254	As shown in <i>Figure 4.254</i> , the Project vicinity can be seen from a distance from the Wai'anae Small Boat Harbor. However, the harbor is over 8.5 miles northwest of the Cove Property. <u>From the harbor, the Cove Property appears behind Pu'u 'Ohulu.</u> <u>The Cove will include structures ranging from 13.0 to 36.5 feet high and follow a relatively low profile.</u> As such, the Project will not be clearly visible from the harbor, and adverse impacts to mauka and lateral views of the surrounding area are not anticipated.
Additional Views Studied		
5. View of the Cove Property across Ali'inui Drive	View 5, Figure 4.265	Currently, landscaping consisting of trees and hedges along Ali'inui Drive help to screen the Cove Property; however, existing structures are still clearly visible (<i>Figure 4.25</i>). Redevelopment of the site and replacement of the existing aging structures with a contemporary, authentic Hawaiian gathering place will enhance the aesthetic environment along Ali'inui Drive. <u>Additional landscaping will be added to screen structures from the roadway.</u>

Table 4.19: Assessment of Impacts to Public Views

Public View Corridor	Figure No.	Discussion
6. View along Ali'inui Drive (looking north, at the Lanikūhonua driveway entrance)	View 6, Figure 4.276	Currently, landscaping consisting of trees and hedges along Ali'inui Drive help to screen the Cove Property; however, existing structures are still clearly visible (<i>Figure 4.26</i>). Redevelopment of the site and replacement of the existing aging structures with a contemporary, authentic Hawaiian gathering place will enhance the aesthetic environment along Ali'inui Drive.
7. View from Farrington Highway, Eastbound	View 7, Figure 4.287	Beyond the vacant parcel north of the Project site, the existing chapel is slightly visible from Farrington Highway (going in the eastbound direction toward Honolulu) (<i>Figure 4.287</i>). Other structures on the Cove Property are not visible due to the presence of existing trees. The existing chapel will remain in place as part of the Cove Property's redevelopment; as such, it will continue to be slightly visible from the highway. The new planned structures are not anticipated to be visible from this point.
8. View from Farrington Highway, Westbound	View 8, Figure 4.298	Traveling westbound along Farrington Highway, the taller resort towers in the Project vicinity are visible from the road. However, the Cove Property is not visible (<i>Figure 4.298</i>). New buildings planned for The Cove will <u>range in height from 13.0 to 36.5 feet, below not exceed</u> the 40-foot height limit allowed in the B-1, Neighborhood Business District. As such, The Cove is not anticipated to be visible from this viewpoint.

* Note: The Cove Property is not within a view corridor identified on the 'Ewa DP Open Space Map (2013, amended 2020).



Figure 4.2120

View Study Photo Key

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Before



After

Figure 4.2221

View 1: Makai view from Farrington Highway at the entrance to Ko Olina Resort



Before



After

Figure 4.2322

View 2: Makai view from coastal roadways makai of Farrington Highway (Ali'inui Drive)



Before



After

Figure 4.2423

View 3: Views of the Wai'anae Coast from the shoreline



Before



After

Figure 4.2524

View 4: Mauka and lateral views of the property from the Small Boat Harbor and the Deep Draft Harbor



Before



After

Figure 4.2625

View 5: View of the Cove Property across Ali'inui Drive



Before



After

Figure 4.2726

View 6: View along Ali'inui Drive (looking north, at the Lanikūhonua driveway entrance)



Before



After

Figure 4.2827

View 7: View from Farrington Highway, Eastbound



Before



After

Figure 4.2928

View 8: View from Farrington Highway, Westbound

As part of the UA, redevelopment of the Cove Property will encompass approximately 13.84 percent (approximately 65,413 sf) of the parcel, well under ~~adhere to~~ the 30 percent lot coverage limit, which allows for up to 141,827 sf of building area on 472,757-sf lot. As such, ~~and~~ open space will continue to be preserved and maintained at the Project site. Planned structures will be set back at least 60 feet from the shoreline and ~~Public~~ access to the beach/natural cove adjacent to the west of the Cove Property will also continue to be provided. Preserving open space along the shoreline will help retain lateral coastal views along the Wai'anae coast and views of significant features, such as Pu'u o Hulu Kai.

Existing landscaping along Ali'inui Drive used for screening, including tall canopy trees and hedges, will remain in place during construction and operation of the Project. New landscaping will be installed to enhance the aesthetic environment of the Cove Property, and is expected to consist of native, Polynesian-introduced, or tropical trees, shrubs, and ground cover of varying sizes.

Views of the Cove Property from the beach side will be renewed with the construction of a more contemporary and authentic Hawaiian gathering place. The Project will demolish existing outdated structures on the Cove Property and will include open-air structures and pavilions consisting of clean, natural, and textured materials that complement the surrounding environment. These elements are intended to blend with the landscape and enhance, rather than obstruct, the views from the beach to the mountains. Planned structures on the Cove property will not exceed a height of 40 feet and will be thoughtfully positioned to minimize visual impacts on the beach experience.

The planned redevelopment is not expected to adversely impact views of the ocean from Farrington Highway. The Cove occupies a small portion of the overall viewshed, and the existing landscaping and surrounding resort structures will continue to effectively screen The Cove.

4.12 Sustainability Features

The Cove is being proactively planned and designed to be sustainable and resilient and to help reduce carbon emissions and address the predicted impacts of climate change and SLR. Sustainability efforts are in alignment with goals articulated for the State and City, as described throughout *Section 5.0*. The Cove plans to incorporate sustainability practices into its overall design and operations. Planned design and operational measures include, but are not limited to, the following:

- Structures throughout the Cove Property will be designed with a finished floor elevation of at least eight feet above msl.
- Structures will be set back at least 60 feet from the certified shoreline.
- Various structures may be elevated on concrete piers to allow for flexibility.
- Covered open air structures will be integrated throughout to reduce reliance on air conditioning and conserve energy.
- LID measures, such as bioswales, rain gardens, planter boxes, sand filters, or permeable pavement, may will be integrated into the Project design, ~~as feasible~~ and located where appropriate.
- ~~The use of gray water and other BMPs may be incorporated to minimize the potential increase in wastewater generation. The Applicant is studying the use of a blackwater system for The Cove which would be intended to recycle water from all onsite plumbing fixtures to R1 level per the requirements of HDOH. The R1 water would be reused on site to flush toilets, urinals and irrigation per 2021 United Plumbing Code, Chapter 16. The system is designed to process~~

and recycle an estimated 60,000 gallons of blackwater daily. The determination of use and final design of a blackwater system will be determined as the Project progresses.

- Non-motorized transportation modes, such as walking and biking, will be encouraged by providing bicycle storage, enhancing connectivity within the Cove Property and the surrounding area, and incorporating pathways and landscaping throughout.
- Design of off-street parking stalls will adhere to the City's EV charging standards.
- The Project will maintain over 30 percent of open space at the property, which is anticipated to mitigate the overall heat island effect.
- During construction, materials resulting from demolition activity may be re-used or recycled, to the extent possible.
- During operation, the following solid waste management practices may be implemented: recycling of glass, plastic bottles, cardboard, aluminum, and paper; the use of compostable or alternative disposable cutlery, like cups and silverware made from cornstarch or bamboo; and, recycling of food waste.
- Recycling may also be encouraged through the use of trash cans with recycling containers.
- Educational signage and guidelines may be posted around the Cove Property to encourage thoughtful care for the site and the surrounding environment.
- The Project will incorporate water conservation measures, such as low flow plumbing fixtures, to encourage water efficiency.
- Structures may be designed to be solar-ready.
- As recommended by DLNR CWRM, the Applicant will review the Hawai'i Green Business Program and its applicability to the Project as design and programming progress.
- Whenever feasible, construction materials and products may be sourced locally, reducing emissions associated with transportation.

4.13 Summary of Probable Impacts

4.13.1 Interrelationships and Cumulative Environmental Impacts

According to HAR, Chapter 11-200.1-2, cumulative impacts refer to the incremental effect of an action when added to other past, present, and reasonably foreseeable future actions regardless of what agency or person undertakes the other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time. Located within the 'Ewa DP area, the Cove Property is designated for Resort/Recreation Area uses. The following analysis considers the 'Ewa region's development trends, including potential effects on land use, population density, economic growth, infrastructure, air quality, water resources, and transportation systems.

The Project vicinity is envisioned by the City as an integral part of developing the region as the island's "Secondary Urban Center," and therefore serves a unique social and economic function. The area is envisioned as an employment center and waterfront destination for the public. Redevelopment of the property is intended to support and contribute to the region's growing visitor population and local population by providing construction jobs in the short-term, and long-term operational jobs in closer proximity to residents' homes. As discussed in *Section 4.10*, operation of the Project is estimated to create 817 total jobs (678 FTE jobs), and generate approximately \$34,495,176 annually in labor

income and approximately \$99,952,914 in economic output. The growing local population will also be supported with a new gathering place with various dining, retail, and recreational opportunities, enhancing the attractiveness and quality of life in the region.

Redevelopment of the Cove Property will also continue to enhance and promote the Project vicinity as a secondary resort destination on O‘ahu to relieve growth pressure in Waikīkī. The Project represents a continuous trend of investment into the resort and wider area of the ‘Ewa district. The ‘Ewa DP estimates that the resort area will add approximately 5,500 hotel units by 2035, which will collectively impact the region’s land use and environmental conditions.

Currently, there are several ongoing public and private development efforts in the vicinity of the Project that are considered in the cumulative analysis, including the following:

- Limited-service hotels, including the Embassy Suites, Residents Inn, and Hampton Inn & Suites have been developed and operating in West O‘ahu. These hotels have been attracting local residents, business travelers, sports teams, and other customers often seeking more affordable accommodations. In addition to the three existing hotels, two additional limited-service hotels, the Element Hotel and a Hyatt Hotel, are planned to be developed in the West O‘ahu region. The Cove will complement these developments, collectively supporting a secondary resort destination and helping to relieve pressure on high-volume recreational areas such as Waikīkī.
- The Ho‘opili Master Plan is a mixed-use community development plan in ‘Ewa. The Ho‘opili Master Plan calls for a community that is complete with employment centers; quality schools’ shopping, gathering and recreational places; and parks and open space for residents; and approximately 12,000 homes offering a variety of affordable housing options. As of August 2022, housing projects completed as part of the Ho‘opili Master Plan include Kohina at Ho‘opili, Kaikoi at Ho‘opili, Kaikea at Ho‘opili, Mamaka at Ho‘opili, Ikena at Ho‘opili, and Ho‘oulu at Ho‘opili. The Cove contributes to this cumulative growth by serving as a recreational and cultural hub for new residents in the Ho‘opili community and the wider region, enhancing the area’s appeal. This interrelationship promotes balanced regional growth and underscores the Project’s role in fulfilling the region’s vision as a vibrant urban center.
- The Hawai‘i Housing Finance and Development Corporation has proposed to increase the existing 94-unit Hale Uhiwai Nalu U.S. veterans’ residential housing and service facility located in Kapolei to 326 units in an effort to address the need for affordable rental housing. The proposed housing complex will be composed of energy-efficient apartments, and will provide clinically supported housing and employment assistance, as well as other life skills services for veterans. The Cove aligns with these efforts by offering a variety of cultural and recreational activities for residents in alignment with the UA, cumulatively supporting community’s social fabric.
- The City Department of Design and Construction has proposed improvements to Farrington Highway to enhance sub-regional roadway connectivity and mobility, increase capacity for future transportation demands, and accommodate multimodal transportation along an approximately three-mile section of Farrington Highway in the ‘Ewa region. With the continued growth of the ‘Ewa region, the improvements to Farrington Highway will help to provide the infrastructure necessary to support the transportation demands of the area. While improvements to Farrington Highway begin approximately 4 miles east of the Cove Property, the Project benefits overall from planned infrastructure improvements in the ‘Ewa district, emphasizing the interconnected nature of regional growth.

- Hunt Communities Hawai'i has proposed to improve roadways, intersections, and utility systems within the former Barbers Point Naval Air Station property in 'Ewa. When completed, the improvements will support future development of public, residential, and commercial uses within the Kalaeloa Community Development District. While the Cove Project will not directly utilize or impact this infrastructure, both developments reflect the continuing efforts to manage regional growth. The Cove project, in its own capacity, complements the area's broader strategy for enhancing cultural and recreational facilities in the 'Ewa district.
- The Department of Hawaiian Home Lands has proposed to develop approximately 40 acres of State-owned land as a homestead community in Mā'ili. This community is envisioned to accommodate approximately 280 single-family and multifamily residences which will be offered to beneficiaries of the Hawaiian Homes Commission Act. The nature of the proposed uses at The Cove, which will include a cultural pavilion and other spaces intended to host Hawaiian cultural educational experiences, as well as other recreational uses associated with a Hawaiian Theme Park and luau operation, could result in positive cumulative impacts particularly for current and future resident of the region with special interests in Hawaiian culture.

The cumulative impacts of developments in the 'Ewa region, including The Cove Redevelopment, will potentially affect natural resources and environmental quality in the greater region. Increased activity from housing and resort/commercial development may contribute to increased long-term impacts on air quality, climate (urban heat island effect), water quality, and natural habitats, including coastal ecosystems. To mitigate these impacts, the Cove will implement BMPs during construction, as well as long-term measures including, but not limited to, LID features, landscaping with native plants, recycling, water conservation measures, studying the use of a blackwater system, and species-specific mitigation measures as detailed in Section 4.3.4. By incorporating such measures, the Project aligns with wider regional efforts to balance development with the protection of natural resources as stated in the 'Ewa DP's "Vision for 'Ewa's Future".

While the Cove Project does not directly impact infrastructure improvements in Kalaeloa or along Farrington Highway, the combined growth from regional developments will affect public services and infrastructure, such as water supply, waste management, and emergency services. Infrastructure for The Cove will be within the City's current capacity (Section 4.8) and will be finalized as the Project progresses. Cumulative impacts to public services will be coordinated with the relevant City agencies to ensure that both current and future demands are met efficiently.

Coastal developments in 'Ewa, including the Cove Project, must consider potential impacts related to climate change, such as SLR and flooding. The Cove Project incorporates climate-resilient design features, such as elevating structures between eight to 19.5 feet above msl and providing a 60-foot shoreline setback that will be free of structures (Section 4.4.6). The Project will also remove structures in the shoreline setback area. These measures align with broader State and City policies and strategies (e.g., the Hawai'i 2050 Sustainability Plan, Coastal Zone Management Program (HRS, Chapter 205A), and the 'Ewa DP) to adapt to and mitigate the effects of climate change. The cumulative impacts of the Cove Project, in combination with other regional developments, are not expected to be adverse. While redevelopment of the Cove Property will expand uses on the site to include ancillary dining and retail associated with the commercial lū'au operation and Hawaiian Theme Park, these activities, which are allowed under the UA (Ordinance No. 89-27), support the 'Ewa region's growth as the Secondary Urban Center and are estimated to provide significant economic and fiscal benefits (Section 4.10).

Additionally, The Cove will serve as an authentic community gathering space for the region, offering programming and spaces that honor the property's legacy and Hawaiian culture and arts. Through carefully programmed spaces that enhance cultural exchange, dynamic ancillary dining and retail components, landscaping and site improvements that enhance the property's natural beauty, and the preservation of access to recreational resources, both residents and visitors will have the opportunity to experience this special property beyond the lū'au itself. This approach aligns with the 'Ewa DP vision for the property and stakeholders' expressed desire to celebrate Hawaiian culture in a contemporary setting. This comprehensive vision balances economic development, cultural legacy, and recreational access, thereby outweighing potential negative impacts.

4.13.2 Potential Secondary Effects

Secondary impacts are indirectly means an effect that is caused by the action and may occur is later in time or farther removed in distance, but are is still reasonably foreseeable in the future (HAR, Chapter 11.200.1-2). Such effects may include a growth-inducing effect and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air, water, and other natural systems, including ecosystems. The Cove will create an authentic Hawaiian gathering place for residents and visitors. The Project will provide contemporary retail, entertainment, and dining services at the Cove Property, supporting the growth of the secondary resort destination area on O'ahu.

Pedestrian safety and connectivity in the Project vicinity will be improved with the Project creating a welcoming environment for guests staying in the surrounding area. Enhanced pedestrian safety and connectivity throughout the Cove Property may encourage more foot traffic, potentially supporting surrounding businesses and influencing demand for increased connectivity in the region. This indirect effect aligns with regional development goals but could lead to increased demand for local services and amenities.

Landscaping features will enhance open space at the Project site and complement the site's immersive coastal setting. The enhanced open spaces may indirectly attract recreational and cultural activities, such as community events, markets, or outdoor educational programs, fostering a more vibrant community space that supports both locals and visitors. This attraction can lead to an increase in visitation. The Project's attractiveness as a cultural and recreational facility may influence visitor patterns, potentially encouraging longer stays or more frequent visits to the region, indirectly benefiting the local economy.

The Project's unique mix of offerings with a focus on Hawaiian culture could lead to more educational initiatives, such as cultural workshops, classes, and events focused on Hawaiian traditions and practices, indirectly strengthening regional cultural identity.

Increased foot traffic and recreational activities might result in increased activity on the adjacent beach. This may necessitate management practices, such as education signage, to preserve its integrity. However, the redevelopment includes ancillary amenities such as dining options, retail, and event spaces that cater to both tourists and local residents. These amenities are intended to attract visitors to the Cove Property itself, potentially reducing the direct pressure on the beach.

Several comments on the Draft EIS indicate that the Project may result in adverse secondary traffic and infrastructure impacts to the surrounding area. However, as discussed in Sections 4.7.1, The Cove is not anticipated to adversely affect traffic operations in the vicinity of the Project area. Traffic operations in the vicinity of the Project area are generally expected to remain similar to baseline and

Without Project conditions. In accordance with direction given by DPP, a TMP is being prepared for the Project and will identify strategies to mitigate potential traffic impacts. As discussed in Section 4.8.2, BWS has confirmed that the Project can be accommodated by existing water infrastructure. Additionally, to accommodate the Project, the Applicant is coordinating with the City to update the sewer connection application and allocation of sewer capacity within the master planned tributary area, as allowed under the Kapolei Interceptor Sewer Assessment Agreement. The Project is also studying to use of a blackwater system which would be intended to recycle water from all onsite plumbing fixtures to R1 level per the requirements of HDOH. The comments and more detailed responses are provided in Table 7.3.

In the long term, operations at The Cove will require additional goods and services from other visitor industry businesses on O‘ahu and across the state. For example, demand for locally sourced food products, traditional crafts, and entertainment services may rise, creating indirect job opportunities within sectors such as agriculture, retail, and the arts. This could stimulate local economies, especially for small businesses that align with the Project's cultural and recreational focus. This demand may create additional jobs outside of operations at The Cove.

The potential environmental impacts of the Project are discussed throughout Section 4.0. will be addressed through the Project's sustainable practices. These include the use of native landscaping, water conservation measures, and LID features to manage stormwater. By proactively incorporating these measures, the Project supports a balanced approach to growth and aligns with regional efforts to mitigate secondary impacts on natural and human environments.

4.13.3 Relationship Between Local Short-term Uses of the Environment and the Maintenance and Enhancement of Long-term Productivity

The relationship between the short-term uses of the environment and the long-term productivity of the Project primarily involves the short-term impacts during construction. Short-term impacts during construction include temporary noise, air, and soil erosion impacts from the demolition of the existing buildings, excavation, and construction of new buildings. Construction activities are required to adhere to State and City regulations and to ensure the use of proper equipment and regular vehicle maintenance. BMPs as discussed throughout this EIS and summarized in *Table 1.1* will be employed during construction to mitigate potential short-term impacts. Traffic, including pedestrian, bicycle, bus, and vehicle circulation, may also be impacted temporarily during construction when materials and equipment are transported to the site and if any lane or road closures are required (*Section 4.7*).

An AMP will be prepared and implemented during construction to ensure protection of archaeological resources. Additionally, on-site archaeological monitoring will be conducted to identify and document any additional exposures of SIHP Nos. -Q3362 and -Q4968 and any newly identified historic properties that may be identified during construction. Construction will cease if inadvertent archaeological finds are discovered and SHPD will be notified immediately. Construction will be limited to daylight hours to minimize impacts to neighboring residents during construction.

The Project will maintain and enhance the long-term productivity of the site for residents and visitors. Moreover, the redevelopment of The Cove will continue to enhance the surrounding area as a secondary resort destination on O‘ahu. Redevelopment of the Cove Property will provide a welcoming and authentic Hawaiian outdoor recreation facility and gathering place featuring a renewed lū‘au program and experience. Combined with the ancillary retail and restaurants, The Cove will support the recreational needs and desires of the growing ‘Ewa region. Pedestrian facilities will be improved to

enhance connectivity and create a safe and pleasant pedestrian environment for visitors of the Cove Property and the surrounding area.

The long-term economic productivity of the Cove Property will be enhanced. As discussed in *Section 4.10*, operation of the Project is estimated to create 817 total jobs (678 FTE jobs), generate approximately \$34.5 million annually in labor income, and generate approximately \$100.0 million in economic output. In the long-term, the State government is estimated to accrue approximately \$4.6 million per year annually, while the City government may accrue approximately \$2.1 million per year annually.

Redevelopment will consider the predicted impacts of climate change, including SLR. Structures will be set back at least 60 feet from the shoreline to consider resilience and adaptation to climate change and its anticipated impacts, including SLR and increased storm events. Structures will be elevated from eight to 19.5 feet above msl. Consideration will also be made for the natural and cultural sensitivity of the nearshore areas. The current level of beach access and parking will be maintained to protect the natural cove and lagoon that is a valued natural resource in the area. The Project will therefore balance economic prosperity with social and community well-being and environmental stewardship.

Trade-offs among short-term and long-term gains and losses

The short-term inconveniences caused by construction activity include the temporary closure of operations at the Cove Property, increased noise and dust, and increased traffic due to construction vehicles. Once construction is completed, redevelopment of the Cove Property will enhance the growing 'Ewa region. The Cove will provide residents and visitors with a dynamic mix of retail, entertainment, and dining experiences within an immersive coastal setting that authentically honors the property's Hawaiian legacy in a contemporary form. These long-term benefits outweigh the relatively short-term losses anticipated during construction.

Foreclosure of future options

Redevelopment of the Cove Property maintains reasonable uses of the Property and does not foreclose future options. The planned program maintains flexibility in uses within the parameters of the UA, which imposes conditions on the property. For example, the new amphitheater/performing arts venue will be flexible to allow activation during the day and night for various types of programs and activities, including the daily lū'au show, cultural education programs, holiday programs, corporate retreats, graduation ceremonies, or other events. Open landscaped areas and a cultural pavilion will also offer flexibility in use. The optional marketplace may be incorporated to provide a varied retail offering.

Narrowing of the range of beneficial uses of the environment

Located in 'Ewa district on the island of O'ahu, the Cove Property has been used as an entertainment venue since the late 1970s. Pursuant to the conditions of the UA, the Project does not propose a change in land use or a narrowing of the range of beneficial uses of the environment. Public access to the adjacent beach and natural cove will be maintained at its current level. Redevelopment of the Cove Property will complement and support the 'Ewa region by providing a welcoming and authentic Hawaiian outdoor recreation facility and gathering place in the 'Ewa region featuring a lū'au entertainment show and cultural programming supported by ancillary retail and restaurant experiences that will benefit both locals and visitors.

Long-term risks to health and safety

The Project will not create long term risk to health and safety. As discussed throughout the EIS, climate change and SLR are an inevitable part of Hawai'i's future. As such, the Applicant is committed to proactively planning and designing structures to be adaptive and resilient to ensure the ongoing successful, safe, and sustainable operations for the foreseeable future. Elevations of the planned structures range from eight to 19.5 feet above msl, and buildings will be set back at least 60 feet from the shoreline. See *Section 4.4.6* for further discussion. Additionally, the severity and frequency of storms may increase due to climate change. As such, standard operating procedures will also be in place and followed in the event of a natural hazard (*Section 4.4*).

Existing outdated structures at the property will be removed. Accordingly, if hazardous materials are identified, hazardous materials will be disposed of properly prior to demolition.

4.13.4 Irreversible and Irretrievable Commitments of Resources

Construction of The Cove will require the irreversible and irretrievable commitments of fiscal resources, labor, energy, construction materials and the various resources used to demolish existing outdated structures. There will be a permanent commitment of funds and resources to plan, design, construct and operate The Cove. Redevelopment of the site should be weighed against the consequence of taking no action, which would result in the continued underutilization of the property and degradation of existing facilities.

Redevelopment of the Cove Property involves a permanent commitment of land, as new structures will be added to the site. However, the site has been in commercial use for over 30 years. The planned structures are designed to have minimal environmental impact and will be flexible in use. ~~Approximately 30 percent~~ The majority of the lot will remain as ~~landscaped~~ open space, offering opportunities for programming, gathering, or relaxing. Additionally, the existing level of access to the adjacent public beach and natural cove will be maintained. Ultimately, the redevelopment of The Cove will provide residents and visitors with a dynamic mix of retail, entertainment, and dining experiences within an immersive coastal setting that authentically honors the property's Hawaiian legacy in a contemporary form.

The Project does not involve a significant loss or irrevocable commitment of natural or cultural resources. To protect the adjacent beach and natural cove, the current level of beach access and parking will be maintained throughout construction and long-term operation of The Cove. BMPs will be implemented during construction to prevent sedimentation and pollution that could adversely affect the surrounding natural environment, including the nearshore waters and marine ecosystems. In the long-term, redevelopment of the Cove Property will require improvements to existing drainage conditions and is therefore anticipated to decrease the total stormwater runoff generated on site, representing an improvement from existing conditions. Stormwater runoff will be properly treated on site in accordance with applicable State and City rules and standards, including the City's Rules Relating to Water Quality (*Section 4.8.1*).

The Project will not irrevocably commit significant historic sites or cultural resources. As discussed in *Section 4.1*, a draft AIS was prepared for the Project, which confirmed two previously-identified historic properties within the Cove Property (SIHP Nos. -03362 and -04968) and identified new portions of SIHP No. -03362. Additionally, the burial preserve for SIHP No. -04968 was designated "CSH 2" during the course of the AIS. To ensure the preservation of historic resources, the draft AIS proposes two primary mitigation measures which consist of archaeological monitoring (a form of data recovery) and

preservation through avoidance. Archaeological monitoring of all ground-disturbing activities will be conducted in accordance with an accepted AMP. With regard to the preservation of SIHP No. -04968, consultation with the signatories of the 1995 Burial Agreement, as well as known cultural and lineal descendants of the area has been initiated and is ongoing as of publication of this Final EIS. This consultation is regarding the specifics for the interim and long-term protection measures which will be outlined in the BSCPP document. As requested by SHPD, a buffer zone larger than the existing buffer zone is being considered and will be presented to recognized lineal and cultural descendants for their consideration. It is currently unclear if SIHP No. -04968 was recorded with the Bureau of Conveyances. However, the landowner will verify this and, if not, will record the burial preserve area (CSH 2) for SIHP No. -04968. The burial preserve area shall remain in perpetuity to preserve the iwi kūpuna. Furthermore, the Project will maintain access to the shoreline, which supports various traditional cultural practices such as gathering of limu, fish, and salt. The Cove will include educational programming that will honor the legacy of the property and perpetuate Hawaiian culture.

4.13.5 Adverse Environmental Effects that Cannot Be Avoided

Implementation of the Project will produce unavoidable impacts in the short and long term. Short-term impacts are generally associated with construction and are therefore temporary. Long-term impacts generally follow completion of the improvements and relate to net changes to either programs or operations, and are permanent. Effects that are considered both adverse and unavoidable are discussed below.

Short-term Effects

- Construction activities are expected to generate short-term impacts to air quality, primarily from fugitive dust emissions (*Section 4.2.2*).
- Temporary increases in soil erosion may result from construction operations, and small amounts of soil and dust may be carried beyond construction sites in surface runoff water (*Sections 4.3.1, 4.3.2, and 4.8.1*).
- Traffic impacts from construction activities may occur as the result of the following: increases in truck traffic associated with removal and redistribution of excavation spoil or with imported fill materials and delivery of construction materials; increases in automobile traffic associated with construction workers travelling to and from the site; and, reductions in existing street capacity from temporary lane closures necessary for the construction of project facilities (*Section 4.7.1*).
- Unavoidable, but temporary, noise impacts may occur during the demolition and construction activities within the project site (*Section 4.9*).

Long-term Effects

- The Project site will experience passive flooding as a result of 3.2 feet of global SLR predicted by 2100, as discussed in *Section 4.4.6*. The Applicant is committed to proactively planning and designing The Cove to be resilient to ensure the ongoing successful, safe, and sustainable operation of The Cove for the foreseeable future. As such, planned structures will be constructed at elevations ranging from eight to 19.5 feet above msl and buildings will be set back at least 60 feet from the shoreline. Additional mitigation measures that may be integrated into the design of The Cove are discussed in *Section 4.4.6*.

- There will be some increase in vehicular and pedestrian traffic in the immediate Project area. In the long-term, traffic conditions in the immediate area are expected to remain similar to existing traffic conditions (*Section 4.7.1*).
- The Cove Property will experience increased traffic on-site during peak hours, as discussed in *Section 4.7.3*. Parking management strategies will be implemented to mitigate potential impacts to traffic on site.
- The Project will result in an increase in water consumption, wastewater disposal, and solid waste generation. Therefore, there will be increased demand on existing utilities and infrastructure. As discussed in Sections 4.8.2 and 4.8.3, the existing City water and wastewater systems can adequately accommodate the Project. Where practical and feasible, sustainable design practices, technology, and recycling will be utilized to minimize demand requirements (*Section 4.8*). For example, the Applicant is studying the use of a blackwater system for The Cove, which would be intended to recycle water from all onsite plumbing fixtures to R1 level per the requirements of HDOH for reuse (*Section 4.8.3*). Appropriate State and City agencies will be consulted with to ensure existing facilities have the capacity to serve the Project site and improvements are built in accordance with applicable design standards.
- Amplified sound from the planned commercial lū'au show or other cultural programs at the relocated amphitheater/performing arts venue may spill over to adjacent areas, potentially impacting noise sensitive receptors (i.e., residential areas) in the surrounding neighborhood. Given the reduced buffer distances between the planned amphitheater and Kai Lani at Ko Olina, a three to four dBA reduction of spillover sound levels will be required to mitigate the potential noise impacts. The new amphitheater's sound amplification system is being designed to achieve the three to four dBA reduction while maintaining the existing sound levels of the current lū'au show. The final design of the sound system will be determined as the Project progresses. However, Additionally, preservation-zoned land to the north and east of the Cove Property will continue to mitigate the potential increase in noise levels by acting as a buffer between the site and the residential areas of Kai Lani at Ko Olina and The Coconut Plantation – Ko Olina. With the implementation of mitigation measures, it is anticipated that amplified sound from the lū'au at the new amphitheater/performing arts venue will remain comparable to existing conditions and no adverse impact is expected (*Section 4.9*).

4.14 Unresolved Issues

The below identified issue is actively being addressed and is currently unresolved:

- **Archaeological, Cultural, and Historic Resources:** *Section 4.1.1* details the findings of the AIS conducted for the Project. In summary, two previously identified historic properties were confirmed: State Inventory of Historic Places (SIHP) Site No. SIHP Site No. 50-80-12-3362 (-03362) (coastal wetlands) and 50-80-12-4968 (-04968) (five sets of human skeletal remains identified within a gas line excavation related to the existing development). As a part of the current survey, new portions of SIHP No. -03362 were identified and the burial preserve for SIHP No. -04968 was designated "CSH 2."

SHPD's records for SIHP No. -04968 indicate that consultation with NHOs, CSH, and representatives from the James Campbell Estate was conducted and that long-term preservation was agreed upon during a meeting held on January 18, 1995. The outcome of the meeting was formalized in the 1995 Burial Agreement. However, SHPD has no record of a

preservation plan for SIHP No. -04968. SHPD confirmed that a BSCPP is required for SIHP No. -04968.

Consultation with the signatories of the 1995 Burial Agreement, as well as, known cultural and lineal descendants of the area has been initiated and is ongoing as of publication of this Final EIS. This consultation is regarding the specifics for the interim and long-term protection measures and will be outlined in the BSCPP document. As requested by SHPD, a larger buffer zone than the existing buffer zone is being considered and will be presented to recognized lineal and cultural descendants of the area for their consideration. The results of consultation will be incorporated into the revised draft AIS. The revised draft AIS and BSCPP will be submitted to SHPD via the online HICRIS system (File No. 2020PR32795).

Additionally, archaeological monitoring of all ground-disturbing activities on the Project site will be conducted. An AMP will be prepared by CSH and submitted to SHPD prior to the start of construction. On-site archaeological monitoring will be conducted to identify and document any additional exposures of SIHP Nos. -03362 and -04968 and any newly identified historic properties that may be identified during construction.

- **Shoreline Survey:** A preliminary shoreline survey has been submitted to the DLNR for certification (see further discussion in *Section 1.10.2*). DLNR inspected the site in August 2024, and the survey is currently under review. Further coordination is ongoing to address outstanding considerations before finalizing the certification process.

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**Relationship of the Proposed Project
to Land Use Plans, Policies and
Controls for the Affected Area**



Section 5

Relationship of the Proposed Project to Land Use Plans, Policies and Controls for the Affected Area

The relationship of the redevelopment of the Cove Property to the following Federal, State, and City land use plans, policies and regulatory controls is assessed below:

Federal

- Coastal Zone Management Act
- Title III of the Americans with Disabilities Act

State of Hawai'i

- Environmental Impact Statements (HRS, Chapter 343)
- Land Use Commission (HRS, Chapter 205)
- Hawai'i State Plan (HRS, Chapter 226)
- Hawai'i 2050 Sustainability Plan (HRS, Section 226-65)
- Hawai'i State Functional Plans
- Hawai'i Tourism Authority- Hawai'i Tourism Strategic Plan: 2020-2025
- Coastal Zone Management (HRS, Chapter 205A)

City and County of Honolulu

- General Plan
- 'Ewa Development Plan
- Land Use Ordinance (ROH, Section 21-9.80)
- Special Management Area (ROH, Chapter 25)
- Shoreline Setback (ROH, Chapter 26)
- Flood Hazard Areas (ROH, Chapter 21A)
- Urban Design Provisions for Ewa, West Beach Special Area / Ko Olina Resort
- Ola: O'ahu Resiliency Strategy
- Climate Action Plan 2020-2025

5.1 Federal

5.1.1 Coastal Zone Management Act

In 1972, the Federal government enacted the Coastal Zone Management Act (CZMA) to effectively manage, use, protect, and develop coastal areas in the U.S. The CZMA was a government response to increasing and competing demands upon habitats and resources of coastal lands and waters. Such demands often resulted in a loss of living marine resources and wildlife; depleted nutrient-rich areas; shoreline erosion; diminished open space for public use; and permanent and adverse changes to ecological systems. Under the CZMA, states are authorized to work in a unified manner with Federal and local governments to develop programs, policies, evaluation criteria, and development standards that lend to the effective protection and prudent use of coastal lands and waters.

The enforcement authority for the Federal Coastal Management Program (Public Law 104-150, as amended in 1996) has been delegated to the State under HRS, Chapter 205A, Coastal Zone Management (CZM) Program. The State defines the coastal zone management area as the following:

“All lands of the State and the area extending seaward from the shoreline limit of the State’s police power and management authority, including the United States territorial sea.”

Discussion: *The Project is not located within the coastal zone management area, as defined by the State. The Project improvements are designed to conform to the goals, policies, and objectives of Hawai‘i’s CZM Program. A full discussion of the plan’s compatibility with HRS, 205A is provided in Section 5.2.8.*

5.1.2 Title III of the Americans with Disabilities Act

In 1991, the Federal government enacted the ADA to provide equal accessibility for persons with disabilities. The ADA Title III covers businesses that are considered public accommodations. Public accommodations include private entities that own, lease, or operate facilities such as restaurants, retail stores, and hotels. Public accommodations must comply with basic nondiscrimination requirements that prohibit exclusion, segregation, and unequal treatment of persons with disabilities as addressed in the ADA. They also must comply with specific requirements related to architectural standards for new and altered buildings: reasonable modifications to policies, practices, and procedures; effective and accessible communication; and other access requirements.

Discussion: *The redevelopment of The Cove will adhere to applicable design standards to ensure facilities are ADA-accessible. Additionally, improvements to pedestrian facilities associated with the Project will meet ADA requirements.*

5.2 State of Hawai‘i

5.2.1 Environmental Impact Statements, Hawai‘i Revised Statutes Chapter 343

Under HRS, Chapter 343, the State legislature found that the quality of humanity’s environment is critical to its well-being, and that human activities have broad and profound effects upon the interrelations of all components of the environment. Accordingly, the environmental review process is necessary to integrate the review of environmental concerns with existing planning processes of the State and counties. This process alerts decision makers to significant environmental effects that may

result from the implementation of certain actions and discloses proposed mitigation measures to address potential impacts. HRS, Chapter 343 states that a process of reviewing environmental effects is important to enhance environmental consciousness, encourage cooperation and coordination, and invite community participation during the public comment period. As such, the State has established a system of environmental review to ensure that concerns are given appropriate consideration in decision-making, in addition to economic and technical considerations. This process alerts decision makers to significant environmental effects which may result from the implementation of certain actions and discloses proposed mitigation measures to address potential impacts.

Discussion: *This Draft EIS has been prepared in compliance with environmental requirements outlined in HRS, Chapter 343 and HAR, Chapter 11-200.1. The Project site is located within the Special Management Area (SMA) and will require the approval of a SMA (Major) Use Permit (Major), pursuant to ROH, Chapter 25. Chapter 25 requires the preparation and acceptance of an EA or EIS, as determined by the DPP. Using its the judgement and expertise, the DPP determined that an EIS would need to be prepared.*

An EISPN for the Project was published by the ERP in the June 23, 2021 edition of The Environmental Notice (TEN). Subsequently, an EIS Public Scoping Meeting was held virtually on July 7, 2021 at 5:30 p.m. Comment letters received during the EISPN 30-day review period are attached as Appendix A. See Section 7.0 for summary of comments received and responses provided. A Draft EIS for the Project was published in TEN on May 8, 2024 and a Second Draft EIS was published in TEN on June 8, 2024. Comments received during the 45-day public comment period for the First Draft EIS and the Second Draft EIS have been considered. A total of 46 agencies, organizations, and individuals provided comments on the Draft EIS (Table 7.1). Copies of each comment letter are provided in Appendix A-2. A summary of comments received and associated responses is provided in Table 7.3, which is organized by major topics.

5.2.2 State Land Use Commission, Hawai'i Revised Statutes Chapter 205

Under HRS, Chapter 205, all lands of the State are to be classified in one of four categories: Urban, Rural, Agricultural, and Conservation. The State Land Use Commission (LUC), an agency of DBEDT, is responsible for each district's standards and for determining the boundaries of each district. The LUC is also responsible for administering all requests for district reclassifications and/or amendments to district boundaries, pursuant to HRS, Chapter 205-4, and HAR, Title 15, Chapter 15 as amended.

Discussion: *The Project is located in the State Land Use Urban District. The Urban District generally includes lands characterized by "city-like" concentrations of people, structures and services. The establishment of permitted uses and regulation of land is the responsibility of the individual counties. On O'ahu, the City DPP administers the zoning code articulated in ROH, Chapter 21.*

Uses planned at The Cove are allowable within the Urban District and are consistent with the surrounding resort area. Development of the Project will meet standards articulated in the LUO, and is subject to approval by the City's DPP, and by the City Council. See Section 5.3 for further discussion.

5.2.3 Hawai'i State Plan, Hawai'i Revised Statutes Chapter 226

In 1978, the State Legislature found a need to improve the planning process in the State, to increase the effectiveness of government and private actions, to improve the coordination among different agencies and levels of government, and to provide for the wise use of Hawai'i's resources to guide the future development of the State. Under HRS, Chapter 226 (Hawai'i State Planning Act), the Hawai'i

State Plan serves as a guide for the future long-range development of the State. The Hawai'i State Plan identifies the goals, objectives, policies, and priorities for the State; provides a basis for determining priorities and allocating limited resources, such as public funds, services, human resources, land, energy, water, and other resources; improves coordination of Federal, State, and County plans, policies, programs, projects, and regulatory activities; and establishes a system for plan formulation and program coordination to provide for an integration of all major State and County activities.

Table 5.1 assesses and evaluates how the redevelopment of The Cove supports the Hawai'i State Plan, as promulgated under HRS, Chapter 226. Where appropriate, if the State Plan goals are not applicable, it is so noted.

Table 5.1: Hawai'i State Plan (HRS, Chapter 226) S = Supportive, N/S = Not Supportive, N/A = Not Applicable		S	N/S	N/A
Section 226-4: State Goals.				
In order to ensure, for present and future generations, those elements of choice and mobility that ensure that individuals and groups may approach their desired levels of self-reliance and self-determination, it shall be the goal of the State to achieve:				
(1)	A strong, viable economy, characterized by stability, diversity, and growth, that enables the fulfillment of the needs and expectations of Hawai'i's present and future generations.	X		
(2)	A desired physical environment, characterized by beauty, cleanliness, quiet, stable natural systems, and uniqueness, that enhances the mental and physical well-being of the people.	X		
(3)	Physical, social, and economic well-being, for individuals and families in Hawai'i, that nourishes a sense of community responsibility, of caring, and of participation in community life.	X		
<p>Discussion: Revitalizing the Cove Property will support the growing 'Ewa region and strengthen the surrounding area as a secondary resort destination on O'ahu. The Cove will provide residents and visitors with a dynamic mix of experiences characteristic of a Hawaii-themed outdoor recreational facility within an immersive coastal setting that authentically honors the property's Hawaiian legacy in a contemporary form.</p> <p>Access to open space, the public beach and shoreline will be maintained and enhanced by lush landscaping and improved connectivity throughout the Project site. The current level of access to the adjacent beach and natural cove/lagoon will be maintained. The Cove will also enhance existing recreational and gathering opportunities on the property and the region by providing on-site programming opportunities and open space in a contemporary and authentic Hawaiian setting. Such opportunities to access the outdoors are expected to promote the mental and physical well-being of residents and visitors alike.</p> <p>It is anticipated the Project will generate or sustain 1,429 jobs (1,386 FTE) short-term jobs related to construction, as well as <u>an estimated 583 (484 FTE) direct jobs on site, in addition to 121 (100 FTE) indirect and 113 (94 FTE) induced jobs, for an estimated 817 total jobs (678 FTE jobs) in the long-term, supporting residents in the West O'ahu region. Offering employment opportunities in the West O'ahu area will also expand options for workers, enabling them to shorten their commutes and improve their overall well-being.</u></p>				
Section 226-5: Objective and Policies for Population.				
(A) It shall be the objective in planning for the State's population to guide population growth to be consistent with the achievement of physical, economic, and social objectives contained in this chapter.				
(B) To achieve the population objective, it shall be the policy of this State to:				
(1)	Manage population growth statewide in a manner that provides increased opportunities for Hawai'i's people to pursue their physical, social, and economic aspirations while recognizing the unique needs of each county.			X
(2)	Encourage an increase in economic activities and employment opportunities on the neighbor islands consistent with community needs and desires.			X
(3)	Promote increased opportunities for Hawai'i's people to pursue their socio-economic aspirations throughout the islands.	X		
(4)	Encourage research activities and public awareness programs to foster an understanding of Hawai'i's limited capacity to accommodate population needs and to address concerns resulting from an increase in Hawai'i's population.			X

Table 5.1: Hawai'i State Plan (HRS, Chapter 226) S = Supportive, N/S = Not Supportive, N/A = Not Applicable		S	N/S	N/A
(5)	Encourage federal actions and coordination among major governmental agencies to promote a more balanced distribution of immigrants among the states, provided that such actions do not prevent the reunion of immediate family members.			X
(6)	Pursue an increase in federal assistance for states with a greater proportion of foreign immigrants relative to their state's population.			X
(7)	Plan the development and availability of land and water resources in a coordinated manner so as to provide for the desired levels of growth in each geographic area.	X		
<p>Discussion: Redevelopment of the Cove Property will support the growing 'Ewa region and strengthen the surrounding area as a secondary resort destination on O'ahu. The Project will provide increased opportunities for Hawai'i's people to pursue socio-economic aspirations. The Project will maintain the lū'au show as the focal point of the property and will also add dynamic ancillary uses such as restaurant and retail options. The Project is estimated to generate or sustain 1,429 jobs (1,386 FTE) short-term jobs during the construction period and approximately 583 (484 FTE) direct jobs on site, in addition to 121 (100 FTE) indirect and 113 (94 FTE) induced jobs, for an estimated 817 total jobs (678 FTE jobs) during operation. The Project will provide employment opportunities for residents of the West O'ahu region, reducing commute times and enhancing overall quality of life.</p> <p>Redevelopment will be coordinated in a manner that is consistent with the current availability of land and water resources. As discussed in Sections 4.8.2 and 4.8.3, water and sewer demand will be supported by the City's current capacity.</p>				
Section 226-6: Objectives and Policies for the Economy in General.				
(A) Planning for the State's economy in general shall be directed toward achievement of the following objectives:				
(1)	Increased and diversified employment opportunities to achieve full employment, increased income and job choice, and improved living standards for Hawai'i's people, while at the same time stimulating the development and expansion of economic activities capitalizing on defense, dual-use, and science and technology assets, particularly on the neighbor islands where employment opportunities may be limited.	X		
(2)	A steadily growing and diversified economic base that is not overly dependent on a few industries and includes the development and expansion of industries on the neighbor islands.			X
(B) To achieve the general economic objectives, it shall be the policy of this State to:				
(1)	Promote and encourage entrepreneurship within Hawai'i by residents and nonresidents of the State.	X		
(2)	Expand Hawai'i's national and international marketing, communication, and organizational ties, to increase the State's capacity to adjust to and capitalize upon economic changes and opportunities occurring outside the State.			X
(3)	Promote Hawai'i as an attractive market for environmentally and socially sound investment activities that benefit Hawai'i's people.			X
(4)	Transform and maintain Hawai'i as a place that welcomes and facilitates innovative activity that may lead to commercial opportunities.			X
(5)	Promote innovative activity that may pose initial risks, but ultimately contribute to the economy of Hawai'i.			X
(6)	Seek broader outlets for new or expanded Hawaii business investments.			X
(7)	Expand existing markets and penetrate new markets for Hawai'i's products and services.	X		
(8)	Assure that the basic economic needs of Hawai'i's people are maintained in the event of disruptions in overseas transportation.			X
(9)	Strive to achieve a level of construction activity responsive to, and consistent with, state growth objectives.	X		
(10)	Encourage the formation of cooperatives and other favorable marketing arrangements at the local or regional level to assist Hawai'i's small scale producers, manufacturers, and distributors.	X		
(11)	Encourage labor-intensive activities that are economically satisfying and which offer opportunities for upward mobility.	X		
(12)	Encourage innovative activities that may not be labor-intensive, but may otherwise contribute to the economy of Hawai'i.	X		

Table 5.1: Hawai'i State Plan (HRS, Chapter 226) S = Supportive, N/S = Not Supportive, N/A = Not Applicable	S	N/S	N/A
(13) Foster greater cooperation and coordination between the government and private sectors in developing Hawai'i's employment and economic growth opportunities.			X
(14) Stimulate the development and expansion of economic activities which will benefit areas with substantial or expected employment problems.	X		
(15) Maintain acceptable working conditions and standards for Hawai'i's workers.	X		
(16) Provide equal employment opportunities for all segments of Hawai'i's population through affirmative action and nondiscrimination measures.	X		
(17) Stimulate the development and expansion of economic activities capitalizing on defense, dual-use, and science and technology assets, particularly on the neighbor islands where employment opportunities may be limited.			X
(18) Encourage businesses that have favorable financial multiplier effects within Hawai'i's economy, particularly with respect to emerging industries in science and technology.			X
(19) Promote and protect intangible resources in Hawai'i, such as scenic beauty and the aloha spirit, which are vital to a healthy economy.	X		
(20) Increase effective communication between the educational community and the private sector to develop relevant curricula and training programs to meet future employment needs in general, and requirements of new or innovative potential growth industries in particular.			X
(21) Foster a business climate in Hawai'i--including attitudes, tax and regulatory policies, and financial and technical assistance programs--that is conducive to the expansion of existing enterprises and the creation and attraction of new business and industry.			X
<p>Discussion: It is anticipated that the Project may generate approximately 1,429 jobs (1,386 FTE) short-term jobs related to construction and approximately 583 (484 FTE) direct jobs on site, in addition to 121 (100 FTE) indirect and 113 (94 FTE) induced jobs, for an estimated total of 817 total jobs (678 FTE jobs) in the long-term related to operations, supporting residents in the West O'ahu region. Offering employment opportunities in the West O'ahu area will also expand options for workers, enabling them to shorten their commutes and improve their overall well-being. Additionally, is anticipated that operations will contribute to the economy through associated visitor spending and off-site servicing (Section 4.10).</p> <p>Once in operation, planned retail shops and the potential marketplace/retail space may feature a curated selection of goods, including those made in Hawai'i, supporting local entrepreneurship. The ancillary restaurants may support the economy and community by featuring local culinary talent and prioritizing the use of fresh, Hawai'i-grown produce when possible. Renewed programming at the site will provide opportunities for local entertainers, cultural practitioners, and educators to share their talents. The Project presents an opportunity to expose visitors to authentic local brands and products, expands support for Hawai'i-made goods, and supports the relationship between producers and consumers.</p> <p>The Project will take advantage of the Cove Property's immersive coastal setting by allowing visitors to enjoy increased access to the site at various hours of the day. Simultaneously, the current level of beach access and parking will be maintained to protect the beach and natural cove/agoon.</p>			
Section 226-7 Objectives and Policies for the Economy – Agriculture.			
(A) Planning for the State's economy with regard to agriculture shall be directed towards achievement of the following objectives:			
(1) Viability of Hawai'i's sugar and pineapple industries.			X
(2) Growth and development of diversified agriculture throughout the State.			X
(3) An agriculture industry that continues to constitute a dynamic and essential component of Hawai'i's strategic, economic, and social well-being.			X
(B) To achieve the agriculture objectives, it shall be the policy of this State to:			
(1) Establish a clear direction for Hawai'i's agriculture through stakeholder commitment and advocacy.			X
(2) Encourage agriculture by making the best use of natural resources.			X
(3) Provide the governor and the legislature with information and options needed for prudent decision-making for the development of agriculture.			X
(4) Establish strong relationships between the agricultural and visitor industries for mutual marketing benefits.	X		

Table 5.1: Hawai'i State Plan (HRS, Chapter 226) S = Supportive, N/S = Not Supportive, N/A = Not Applicable		S	N/S	N/A
(5)	Foster increased public awareness and understanding of the contributions and benefits of agriculture as a major sector of Hawai'i's economy.			X
(6)	Seek the enactment and retention of federal and state legislation that benefits Hawai'i's agricultural industries.			X
(7)	Strengthen diversified agriculture by developing an effective promotion, marketing, and distribution system between Hawai'i's food producers and consumers in the State, nation, and world.	X		
(8)	Support research and development activities that strengthen economic productivity in agriculture, stimulate greater efficiency, and enhance the development of new products and agricultural by-products.			X
(9)	Enhance agricultural growth by providing public incentives and encouraging private initiatives.			X
(10)	Assure the availability of agriculturally suitable lands with adequate water to accommodate present and future needs.			X
(11)	Increase the attractiveness and opportunities for an agricultural education and livelihood.			X
(12)	In addition to the State's priority on food, expand Hawai'i's agricultural base by promoting growth and development of flowers, tropical fruits and plants, livestock, feed grains, forestry, food crops, aquaculture, and other potential enterprises.			X
(13)	Promote economically competitive activities that increase Hawai'i's agricultural self-sufficiency, including the increased purchase and use of Hawai'i-grown food and food products by residents, businesses, and governmental bodies as defined under section 103D-104.	X		
(14)	Promote and assist in the establishment of sound financial programs for diversified agriculture.			X
(15)	Institute and support programs and activities to assist the entry of displaced agricultural workers into alternative agricultural or other employment.			X
(16)	Facilitate the transition of agricultural lands in economically nonfeasible agricultural production to economically viable agricultural uses.			X
(17)	Perpetuate, promote, and increase use of traditional Hawaiian farming systems, such as the use of loko i'a, māla, and irrigated lo'i, and growth of traditional Hawaiian crops, such as kalo, 'uala, and 'ulu.			X
(18)	Increase and develop small-scale farms.			X
<i>Discussion: The Cove supports the State's policies for the economy with regard to agriculture. Once in operation, planned retail shops and the potential marketplace/retail space may feature a curated selection of goods, including those made in Hawai'i. The restaurants may support the economy and community by featuring local culinary talent and prioritizing the use of fresh, Hawai'i-grown produce when possible. The Project presents an opportunity to expose visitors to authentic local brands and products, expands support for Hawai'i-made goods, and supports the relationship between producers and consumers.</i>				
Section 226-8 Objective and Policies for the Economy - Visitor Industry.				
(A) Planning for the State's economy with regard to the visitor industry shall be directed towards the achievement of the objective of a visitor industry that constitutes a major component of steady growth for Hawai'i's economy.				
(B) To achieve the visitor industry objective, it shall be the policy of this State to:				
(1)	Support and assist in the promotion of Hawai'i's visitor attractions and facilities.	X		
(2)	Ensure that visitor industry activities are in keeping with the social, economic, and physical needs and aspirations of Hawai'i's people.	X		
(3)	Improve the quality of existing visitor destination areas by utilizing Hawai'i's strengths in science and technology.			X
(4)	Encourage cooperation and coordination between the government and private sectors in developing and maintaining well-designed, adequately serviced visitor industry and related developments which are sensitive to neighboring communities and activities.			X
(5)	Develop the industry in a manner that will continue to provide new job opportunities and steady employment for Hawai'i's people.	X		

Table 5.1: Hawai'i State Plan (HRS, Chapter 226) S = Supportive, N/S = Not Supportive, N/A = Not Applicable		S	N/S	N/A
(6)	Provide opportunities for Hawai'i's people to obtain job training and education that will allow for upward mobility within the visitor industry.			X
(7)	Foster a recognition of the contribution of the visitor industry to Hawai'i's economy and the need to perpetuate the aloha spirit.	X		
(8)	Foster an understanding by visitors of the aloha spirit and of the unique and sensitive character of Hawai'i's cultures and values.	X		
<p>Discussion: The planned improvements will be the first major enhancement of the Cove Property in over 25 years. Redevelopment of the Cove Property will help support the growing 'Ewa region and strengthen the surrounding area as a secondary resort destination on O'ahu. The lū'au show will be maintained as the focal point of the property and will be complemented by a dynamic mix of ancillary uses, such as restaurants and retail spaces, in an immersive coastal setting that authentically honors the property's Hawaiian legacy in a contemporary form.</p> <p>The Project is estimated to create approximately 1,429 jobs (1,386 FTE) short-term jobs related to construction, as well as sustain approximately 583 (484 FTE) direct jobs on site, in addition to 121 (100 FTE) indirect and 113 (94 FTE) induced jobs, for an estimated total of 817 total jobs (678 FTE jobs) in the long-term, supporting residents in the West O'ahu region. Offering employment opportunities in the West O'ahu area will also expand options for workers, enabling them to shorten their commutes and improve their overall well-being. Additionally, it is anticipated that operations of the Project will contribute to the economy through associated visitor spending and off-site servicing. An overall benefit to the State's economy from the creation of jobs and wages is also expected. Overall, there will be a positive net economic benefit to both the State and City.</p> <p>The Cove will create an authentic Hawaiian community gathering place for residents and visitors that honors and reflects the history, culture, and connection to this place. The Cove Property will be renewed and reprogrammed to perpetuate and honor the Hawaiian culture and history of place through the traditions of hula, mele, and other practices.</p>				
Section 226-9 Objective and Policies for the Economy - Federal Expenditures.				
(A) Planning for the State's economy with regard to federal expenditures shall be directed towards achievement of the objective of a stable federal investment base as an integral component of Hawai'i's economy.				
(B) To achieve the federal expenditures objective, it shall be the policy of this State to:				
(1)	Encourage the sustained flow of federal expenditures in Hawai'i that generates long-term government civilian employment;			X
(2)	Promote Hawai'i's supportive role in national defense, in a manner consistent with Hawai'i's social, environmental, and cultural goals by building upon dual-use and defense applications to develop thriving ocean engineering, aerospace research and development, and related dual-use technology sectors in Hawai'i's economy;			X
(3)	Promote the development of federally supported activities in Hawai'i that respect statewide economic concerns, are sensitive to community needs, and minimize adverse impacts on Hawai'i's environment;			X
(4)	Increase opportunities for entry and advancement of Hawai'i's people into federal government service;			X
(5)	Promote federal use of local commodities, services, and facilities available in Hawai'i;			X
(6)	Strengthen federal-state-county communication and coordination in all federal activities that affect Hawai'i; and			X
(7)	Pursue the return of federally controlled lands in Hawai'i that are not required for either the defense of the nation or for other purposes of national importance, and promote the mutually beneficial exchanges of land between federal agencies, the State, and the counties.			X
<p>Discussion: The State's policies for the economy in regard to federal expenditures are not directly applicable to the Project.</p>				
Section 226-10 Objective and Policies for the Economy - Potential Growth and Innovative Activities.				
(A) Planning for the State's economy with regard to potential growth and innovative activities shall be directed towards achievement of the objective of development and expansion of potential growth and innovative activities that serve to increase and diversify Hawai'i's economic base.				
(B) To achieve the potential growth and innovative activity objective, it shall be the policy of this State to:				

Table 5.1: Hawai'i State Plan (HRS, Chapter 226) S = Supportive, N/S = Not Supportive, N/A = Not Applicable		S	N/S	N/A
(1)	Facilitate investment and employment growth in economic activities that have the potential to expand and diversify Hawai'i's economy, including but not limited to diversified agriculture, aquaculture, renewable energy development, creative media, health care, and science and technology-based sectors;			X
(2)	Facilitate investment in innovative activity that may pose risks or be less labor-intensive than other traditional business activity, but if successful, will generate revenue in Hawai'i through the export of services or products or substitution of imported services or products;			X
(3)	Encourage entrepreneurship in innovative activity by academic researchers and instructors who may not have the background, skill, or initial inclination to commercially exploit their discoveries or achievements;			X
(4)	Recognize that innovative activity is not exclusively dependent upon individuals with advanced formal education, but that many self-taught, motivated individuals are able, willing, sufficiently knowledgeable, and equipped with the attitude necessary to undertake innovative activity;			X
(5)	Increase the opportunities for investors in innovative activity and talent engaged in innovative activity to personally meet and interact at cultural, art, entertainment, culinary, athletic, or visitor-oriented events without a business focus;	X		
(6)	Expand Hawai'i's capacity to attract and service international programs and activities that generate employment for Hawai'i's people;	X		
(7)	Enhance and promote Hawai'i's role as a center for international relations, trade, finance, services, technology, education, culture, and the arts;			X
(8)	Accelerate research and development of new energy-related industries based on wind, solar, ocean, underground resources, and solid waste;			X
(9)	Promote Hawai'i's geographic, environmental, social, and technological advantages to attract new or innovative economic activities into the State;			X
(10)	Provide public incentives and encourage private initiative to attract new or innovative industries that best support Hawai'i's social, economic, physical, and environmental objectives;			X
(11)	Increase research and the development of ocean-related economic activities such as mining, food production, and scientific research;			X
(12)	Develop, promote, and support research and educational and training programs that will enhance Hawaii's ability to attract and develop economic activities of benefit to Hawai'i;			X
(13)	Foster a broader public recognition and understanding of the potential benefits of new or innovative growth-oriented industry in Hawai'i;			X
(14)	Encourage the development and implementation of joint federal and state initiatives to attract federal programs and projects that will support Hawaii's social, economic, physical, and environmental objectives;			X
(15)	Increase research and development of businesses and services in the telecommunications and information industries;			X
(16)	Foster the research and development of nonfossil fuel and energy efficient modes of transportation; and			X
(17)	Recognize and promote health care and health care information technology as growth industries.			X
<i>Discussion: The Cove will maintain the lū'au show as the focal point of the property, and will include a dynamic mix of ancillary uses, such as restaurants and retail spaces, in an immersive coastal setting that authentically honors the property's Hawaiian legacy in a contemporary form. The upgraded, new amphitheater/performing arts venue and other new or renovated structures planned on the site may serve as a venue for local, national, and international programs. Simultaneous use of the property for various events will maximize the use of site, thereby supporting the local economy through increased demand for goods and services.</i>				
Section 226-10.5 Objectives and Policies for the Economy - Information Industry.				
(A) Planning for the State's economy with regard to telecommunications and information technology shall be directed toward recognizing that broadband and wireless communication capability and infrastructure are foundations for an innovative economy and positioning Hawaii as a leader in broadband and wireless communications and applications in the Pacific Region.				
(B) To achieve the information industry objective, it shall be the policy of this State to:				

Table 5.1: Hawai'i State Plan (HRS, Chapter 226)			
S = Supportive, N/S = Not Supportive, N/A = Not Applicable			
	S	N/S	N/A
(1) Promote efforts to attain the highest speeds of electronic and wireless communication within Hawai'i and between Hawai'i and the world, and make high speed communication available to all residents and businesses in Hawai'i;			X
(2) Encourage the continued development and expansion of the telecommunications infrastructure serving Hawai'i to accommodate future growth and innovation in Hawai'i's economy;			X
(3) Facilitate the development of new or innovative business and service ventures in the information industry which will provide employment opportunities for the people of Hawai'i;			X
(4) Encourage mainland- and foreign-based companies of all sizes, whether information technology-focused or not, to allow their principals, employees, or contractors to live in and work from Hawai'i, using technology to communicate with their headquarters, offices, or customers located out-of-state;			X
(5) Encourage greater cooperation between the public and private sectors in developing and maintaining a well-designed information industry;			X
(6) Ensure that the development of new businesses and services in the industry are in keeping with the social, economic, and physical needs and aspirations of Hawai'i's people;			X
(7) Provide opportunities for Hawai'i's people to obtain job training and education that will allow for upward mobility within the information industry;			X
(8) Foster a recognition of the contribution of the information industry to Hawai'i's economy; and			X
(9) Assist in the promotion of Hawai'i as a broker, creator, and processor of information in the Pacific.			X
<i>Discussion: While the Project supports the State's policies for the economy in regard to the information industry, they are not directly applicable to the Project.</i>			
Section 226-11 Objectives and Policies for the Physical Environment - Land-based, Shoreline, and Marine Resources.			
(A) Planning for the State's physical environment with regard to land-based, shoreline, and marine resources shall be directed towards achievement of the following objectives:			
(1) Prudent use of Hawai'i's land-based, shoreline, and marine resources.	X		
(2) Effective protection of Hawai'i's unique and fragile environmental resources.	X		
(B) To achieve the land-based, shoreline, and marine resources objectives, it shall be the policy of this State to:			
(1) Exercise an overall conservation ethic in the use of Hawai'i's natural resources.	X		
(2) Ensure compatibility between land-based and water-based activities and natural resources and ecological systems.	X		
(3) Take into account the physical attributes of areas when planning and designing activities and facilities	X		
(4) Manage natural resources and environs to encourage their beneficial and multiple use without generating costly or irreparable environmental damage.	X		
(5) Consider multiple uses in watershed areas, provided such uses do not detrimentally affect water quality and recharge functions.			X
(6) Encourage the protection of rare or endangered plant and animal species and habitats native to Hawai'i.	X		
(7) Provide public incentives that encourage private actions to protect significant natural resources from degradation or unnecessary depletion.			X
(8) Pursue compatible relationships among activities, facilities, and natural resources.	X		
(9) Promote increased accessibility and prudent use of inland and shoreline areas for public recreational, educational, and scientific purposes.	X		

Table 5.1: Hawai'i State Plan (HRS, Chapter 226)		S	N/S	N/A
S = Supportive, N/S = Not Supportive, N/A = Not Applicable				
<p>Discussion: The Project will steward the use of and/or effectively protect land-based, shoreline, and marine resources. The current level of beach access and parking will continue to be maintained at current levels to protect the natural cove and lagoon. Public use of the beach/cove adjacent to the Project site will continue to be limited to certain activities pursuant to the SMA Use Permit approved in 1993 (File No. Resolution 93-318). This will help to maintain a balance between public enjoyment and conservation of the beach. The existing public beach access along the southern end of the property will remain in place and continue to be maintained by the landowner.</p> <p>As discussed in Section 4.3.3 and 4.3.4, the Project is not anticipated to impact rare, threatened, or endangered plant or animal species. Potential short-term related construction activity will be mitigated by the use of BMPs.</p> <p>Redevelopment of the Cove Property will expand access to the site and introduce uses that are compatible with the surrounding natural and built environment. Design features of The Cove, such as outdoor terrace seating, open-air structures, and the use of clean, natural materials, will encourage visitors to enjoy the immersive coastal setting.</p>				
Section 226-12 Objective and Policies for the Physical Environment - Scenic, Natural Beauty, and Historic Resources.				
(A) Planning for the State's physical environment shall be directed towards achievement of the objective of enhancement of Hawaii's scenic assets, natural beauty, and multi-cultural/historical resources.				
(B) To achieve the scenic, natural beauty, and historic resources objective, it shall be the policy of this State to:				
(1)	Promote the preservation and restoration of significant natural and historic resources.	X		
(2)	Provide incentives to maintain and enhance historic, cultural, and scenic amenities.	X		
(3)	Promote the preservation of views and vistas to enhance the visual and aesthetic enjoyment of mountains, ocean, scenic landscapes, and other natural features.	X		
(4)	Protect those special areas, structures, and elements that are an integral and functional part of Hawaii's ethnic and cultural heritage.	X		
(5)	Encourage the design of developments and activities that complement the natural beauty of the islands.	X		
<p>Discussion: As discussed in Section 4.1, a draft AIS was prepared for the Project, which confirmed two previously identified historic properties within the Cove Property (SIHP Nos. -03362 and -04968) and identified new portions of SIHP No. -03362. Additionally, the burial preserve for SIHP No. -04968 was designated "CSH 2" during the course of the AIS. To ensure the preservation of historic resources, the AIS proposes two primary mitigation measures which consist of archaeological monitoring (a form of data recovery) and preservation through avoidance, including a Archaeological monitoring of all ground-disturbing activities will be conducted in accordance with an accepted AMP and dedication of the existing burial preserve area (SIHP No. -04968) in perpetuity. Consultation with SHPD and cultural descendants of the area is ongoing. With regard to the preservation of SIHP No. -04968, consultation with the signatories of the 1995 Burial Agreement, as well as known cultural and lineal descendants of the area has been initiated and is ongoing as of publication of this Final EIS. This consultation is regarding the specifics for the interim and long-term protection measures which will be outlined in the BSCPP document. As requested by SHPD, a buffer zone larger than the existing buffer zone is being considered and will be presented to recognized lineal and cultural descendants for their consideration. It is currently unclear if SIHP No. -04968 was recorded with the Bureau of Conveyances. However, the landowner will verify this and, if not, will record the burial preserve area (CSH 2) for SIHP No. -04968. The burial preserve area shall remain in perpetuity to preserve the iwi kūpuna.</p> <p>The redevelopment of The Cove will create an authentic Hawaiian community gathering place for residents and visitors that honors and reflects the history, culture, and connection to place. Structures will be designed to reflect Hawaiian architecture in a contemporary form, enhancing the immersive coastal setting of the Cove Property. To complement the natural, oceanside beauty of the Cove Property and create an immersive experience, open-air structures and pavilions consisting of clean, natural, and textured materials will be favored, and key gathering areas, such as the new amphitheater/performing arts venue and restaurants, will be located along the coast. Planned structures at the site will be set back at least 60 feet from the certified shoreline, which will maintain the public beach's natural setting along the coast. Structures will also adhere to the 40-foot height limit of the B-1, Neighborhood Business District and will not adversely impact protected viewsheds (Section 4.11). Landscaping elements will continue to enhance the open space areas and screen the site, protecting and preserving scenic views and natural features.</p>				
Section 226-13 Objectives and Policies for the Physical Environment - Land, Air, and Water Quality.				
(A) Planning for the State's physical environment with regard to land, air, and water quality shall be directed towards achievement of the following objectives:				
(1)	Maintenance and pursuit of improved quality in Hawai'i's land, air, and water resources.	X		

Table 5.1: Hawai'i State Plan (HRS, Chapter 226) S = Supportive, N/S = Not Supportive, N/A = Not Applicable		S	N/S	N/A
(2)	Greater public awareness and appreciation of Hawai'i's environmental resources.	X		
(B) To achieve the land, air, and water quality objectives, it shall be the policy of this State to:				
(1)	Foster educational activities that promote a better understanding of Hawai'i's limited environmental resources.			X
(2)	Promote the proper management of Hawai'i's land and water resources.	X		
(3)	Promote effective measures to achieve desired quality in Hawai'i's surface, ground, and coastal waters.			X
(4)	Encourage actions to maintain or improve aural and air quality levels to enhance the health and well-being of Hawai'i's people.	X		
(5)	Reduce the threat to life and property from erosion, flooding, tsunamis, hurricanes, earthquakes, volcanic eruptions, and other natural or man-induced hazards and disasters.	X		
(6)	Encourage design and construction practices that enhance the physical qualities of Hawai'i's communities.	X		
(7)	Encourage urban developments in close proximity to existing services and facilities.	X		
(8)	Foster recognition of the importance and value of the land, air, and water resources to Hawai'i's people, their cultures and visitors.	X		
<p>Discussion: Redevelopment of the Cove Property supports the maintenance and pursuit of improved quality in land, air, and water resources. As discussed in Sections 4.2.2 and 4.3.2, potential impacts to air and water resources will be mitigated through the implementation of BMPs. Long-term adverse impacts are not anticipated. The Cove will enhance the existing the surrounding area and will be located in close proximity to existing services and facilities. As such, visitors will be encouraged to utilize alternative modes of transportation to the site, including walking or biking, which will help to reduce the generation of GHGs.</p> <p>The current level of beach access and parking will be maintained to protect the beach and natural cove area. The Cove will foster awareness and appreciation for environmental resources through programming, including education and cultural workshops as appropriate.</p> <p>The Project has been designed to reduce threat to life and property from natural hazards, primarily in the context of climate change. Methods to mitigate potential threats posed by flooding, climate change, and other natural hazards are discussed throughout Section 4.4.</p>				
Section 226-14 Objective and Policies for Facility Systems - In General.				
(A) Planning for the State's facility systems in general shall be directed towards achievement of the objective of water, transportation, sustainable development, climate change adaptation, sea level rise adaptation, waste disposal, and energy and telecommunication systems that support statewide social, economic, and physical objectives.				
(B) To achieve the general facility systems objective, it shall be the policy of this State to:				
(1)	Accommodate the needs of Hawai'i's people through coordination of facility systems and capital improvement priorities in consonance with state and county plans.	X		
(2)	Encourage flexibility in the design and development of facility systems to promote prudent use of resources and accommodate changing public demands and priorities.			X
(3)	Ensure that required facility systems can be supported within resource capacities and at reasonable cost to the user.	X		
(4)	Pursue alternative methods of financing programs and projects and cost-saving techniques in the planning, construction, and maintenance of facility systems.	X		
(5)	Identify existing and planned state facilities that are vulnerable to sea level rise, flooding impacts, and natural hazards.			X
(6)	Assess a range of options to mitigate the impacts of sea level rise to existing and planned state facilities.			X
<p>Discussion: Off-site and on-site improvements to surrounding facility systems (water, wastewater, roadways, solid waste, power, and telecommunications) will be coordinated with the appropriate State and City agencies or private utility providers, as discussed in Section 4.8. Existing facility systems are expected to have the capacity to meet the needs of the Project without adding new public facility infrastructure.</p>				

Table 5.1: Hawai'i State Plan (HRS, Chapter 226)			
S = Supportive, N/S = Not Supportive, N/A = Not Applicable			
	S	N/S	N/A
226-15 Objectives and Policies for Facility Systems - Solid and Liquid Wastes.			
(A) Planning for the State's facility systems with regard to solid and liquid wastes shall be directed towards the achievement of the following objectives:			
(1) Maintenance of basic public health and sanitation standards relating to treatment and disposal of solid and liquid wastes.	X		
(2) Provision of adequate sewerage facilities for physical and economic activities that alleviate problems in housing, employment, mobility, and other areas.			X
(B) To achieve solid and liquid waste objectives, it shall be the policy of this State to:			
(1) Encourage the adequate development of sewerage facilities that complement planned growth.	X		
(2) Promote reuse and recycling to reduce solid and liquid wastes and employ a conservation ethic.	X		
(3) Promote research to develop more efficient and economical treatment and disposal of solid and liquid wastes.			X
<i>Discussion: The Project will not have a significant impact on the City's waste stream and disposal to the H-POWER Plant, which has the capacity to handle 3,000 tons per day. As discussed in Section 4.8.4, The Cove may implement existing recycling efforts practiced at the Cove Property to minimize solid waste. Measures include, but may not be limited to, the recycling of glass, plastic bottles, cardboard, aluminum, and paper; the use of compostable or alternative disposal cutlery, like cups and silverware made from cornstarch or bamboo; and, recycling of food waste.</i>			
<i>The Cove will utilize existing sewer laterals owned by the City (Section 4.8.3).</i>			
226-16 Objective and Policies for Facility Systems - Water.			
(A) Planning for the State's facility systems with regard to water shall be directed towards achievement of the objective of the provision of water to adequately accommodate domestic, agricultural, commercial, industrial, recreational, and other needs within resource capacities.			
(B) To achieve the facility systems water objective, it shall be the policy of this State to:			
(1) Coordinate development of land use activities with existing and potential water supply.	X		
(2) Support research and development of alternative methods to meet future water requirements well in advance of anticipated needs.			X
(3) Reclaim and encourage the productive use of runoff water and wastewater discharges.	X		
(4) Assist in improving the quality, efficiency, service, and storage capabilities of water systems for domestic and agricultural use.	X		
(5) Support water supply services to areas experiencing critical water problems.			X
(6) Promote water conservation programs and practices in government, private industry, and the general public to help ensure adequate water to meet long-term needs.	X		
<i>Discussion: The existing water system has adequate capacity to accommodate the domestic water and off-site fire protection for the Project (Section 4.8.2). Water conservation measures, such as drip systems, moisture sensors, nonpotable water for irrigation, etc., will be implemented where feasible and finalized as the Project progresses.</i>			
226-17 Objectives and Policies for Facility Systems - Transportation.			
(A) Planning for the State's facility systems with regard to transportation shall be directed towards the achievement of the following objectives:			
(1) An integrated multi-modal transportation system that services statewide needs and promotes the efficient, economical, safe, and convenient movement of people and goods.			X
(2) A statewide transportation system that is consistent with and will accommodate planned growth objectives throughout the State.			X
(B) To achieve the transportation objectives, it shall be the policy of this State to:			
(1) Design, program, and develop a multi-modal system in conformance with desired growth and physical development as stated in this chapter;			X

Table 5.1: Hawai'i State Plan (HRS, Chapter 226) S = Supportive, N/S = Not Supportive, N/A = Not Applicable		S	N/S	N/A
(2)	Coordinate state, county, federal, and private transportation activities and programs toward the achievement of statewide objectives;			X
(3)	Encourage a reasonable distribution of financial responsibilities for transportation among participating governmental and private parties;			X
(4)	Provide for improved accessibility to shipping, docking, and storage facilities;			X
(5)	Promote a reasonable level and variety of mass transportation services that adequately meet statewide and community needs;			X
(6)	Encourage transportation systems that serve to accommodate present and future development needs of communities;	X		
(7)	Encourage a variety of carriers to offer increased opportunities and advantages to interisland movement of people and goods;			X
(8)	Increase the capacities of airport and harbor systems and support facilities to effectively accommodate transshipment and storage needs;			X
(9)	Encourage the development of transportation systems and programs which would assist statewide economic growth and diversification;			X
(10)	Encourage the design and development of transportation systems sensitive to the needs of affected communities and the quality of Hawaii's natural environment;			X
(11)	Encourage safe and convenient use of low-cost, energy-efficient, non-polluting means of transportation;	X		
(12)	Coordinate intergovernmental land use and transportation planning activities to ensure the timely delivery of supporting transportation infrastructure in order to accommodate planned growth objectives; and			X
(13)	Encourage diversification of transportation modes and infrastructure to promote alternate fuels and energy efficiency.	X		
<i>Discussion: Guests of the surrounding resorts will be able to take advantage of the Project's close proximity and utilize non-vehicular modes of transportation, thus mitigating potential impacts to traffic and aligning with State and City sustainable mobility policies. The Project will include improvements to pedestrian facilities within the Cove Property, including such as pathways throughout the Cove Property, to create a safe and attractive environment and to support connectivity on site and throughout the area. Bicycle parking stalls consistent with LUO standards will be provided on-site to support cyclists. EV charging consistent with City standards will be provided.</i>				
226-18 Objectives and Policies for Facility Systems - Energy.				
(A)	Planning for the State's facility systems with regard to energy shall be directed toward the achievement of the following objectives, giving due consideration to all:			
(1)	Dependable, efficient, and economical statewide energy systems capable of supporting the needs of the people;			X
(2)	Increased energy security and self-sufficiency through the reduction and ultimate elimination of Hawaii's dependence on imported fuels for electrical generation and ground transportation;			X
(3)	Greater diversification of energy generation in the face of threats to Hawaii's energy supplies and systems;			X
(4)	Reduction, avoidance, or sequestration of greenhouse gas emissions from energy supply and use; and	X		
(5)	Utility models that make the social and financial interests of Hawai'i's utility customers a priority.			X
(B)	To achieve the energy objectives, it shall be the policy of this State to ensure the short- and long-term provision of adequate, reasonably priced, and dependable energy services to accommodate demand.			
(C)	To further achieve the energy objectives, it shall be the policy of this State to:			
(1)	Support research and development as well as promote the use of renewable energy sources;			X
(2)	Ensure that the combination of energy supplies and energy-saving systems is sufficient to support the demands of growth;	X		
(3)	Base decisions of least-cost supply-side and demand-side energy resource options on a comparison of their total costs and benefits when a least-cost is determined by a reasonably comprehensive, quantitative, and qualitative			X

Table 5.1: Hawai'i State Plan (HRS, Chapter 226) S = Supportive, N/S = Not Supportive, N/A = Not Applicable		S	N/S	N/A
accounting of their long-term, direct and indirect economic, environmental, social, cultural, and public health costs and benefits;				
(4)	Promote all cost-effective conservation of power and fuel supplies through measures, including: (A) Development of cost-effective demand-side management programs; (B) Education; (C) Adoption of energy-efficient practices and technologies; and (D) Increasing energy efficiency and decreasing energy use in public infrastructure;	X		
(5)	Ensure, to the extent that new supply-side resources are needed, that the development or expansion of energy systems uses the least-cost energy supply option and maximizes efficient technologies;			X
(6)	Support research, development, demonstration, and use of energy efficiency, load management, and other demand-side management programs, practices, and technologies;			X
(7)	Promote alternate fuels and transportation energy efficiency;	X		
(8)	Support actions that reduce, avoid, or sequester greenhouse gases in utility, transportation, and industrial sector applications;			X
(9)	Support actions that reduce, avoid, or sequester Hawai'i's greenhouse gas emissions through agriculture and forestry initiatives;			X
(10)	Provide priority handling and processing for all state and county permits required for renewable energy projects;			X
(11)	Ensure that liquefied natural gas is used only as a cost-effective transitional, limited-term replacement of petroleum for electricity generation and does not impede the development and use of other cost-effective renewable energy sources; and			X
(12)	Promote the development of indigenous geothermal energy resources that are located on public trust land as an affordable and reliable source of firm power for Hawaii.			X
<i>Discussion: Planning for the State's facility systems with regard to energy does not directly apply to the Project. However, the Project will support this objective through the promotion of alternative, non-polluting modes of transportation. The Project will include improvements to pedestrian facilities within the Cove Property, including such as pathways throughout the Cove Property, to create a safe and attractive pedestrian environment and to support connectivity on site and throughout the area. Bicycle parking stalls consistent with LUO standards will be provided on-site to support cyclists. EV charging consistent with City standards will be provided.</i>				
226-18.5 Objectives and Policies for Facility Systems - Telecommunications.				
(A) Planning for the State's telecommunications facility systems shall be directed towards the achievement of dependable, efficient, and economical statewide telecommunications systems capable of supporting the needs of the people.				
(B) To achieve the telecommunications objective, it shall be the policy of this State to ensure the provision of adequate, reasonably priced, and dependable telecommunications services to accommodate demand.				
(C) To further achieve the telecommunications objective, it shall be the policy of this State to:				
(1)	Facilitate research and development of telecommunications systems and resources;			X
(2)	Encourage public and private sector efforts to develop means for adequate, ongoing telecommunications planning;			X
(3)	Promote efficient management and use of existing telecommunications systems and services; and			X
(4)	Facilitate the development of education and training of telecommunications personnel.			X
<i>Discussion: The State's policies for facility systems in regard to telecommunications are not directly applicable to the Project.</i>				
226-19 Objectives and Policies for Socio-Cultural Advancement - Housing.				
(A) Planning for the State's socio-cultural advancement with regard to housing shall be directed toward the achievement of the following objectives:				
(1)	Greater opportunities for Hawai'i's people to secure reasonably priced, safe, sanitary, and livable homes, located in suitable environments that satisfactorily accommodate the needs and desires of families and individuals, through collaboration and cooperation between government and nonprofit and for-profit developers to ensure that more rental and for sale affordable housing is made available to extremely low-, very low-, lower-, moderate-, and above moderate-income segments of Hawai'i's population.			X

Table 5.1: Hawai'i State Plan (HRS, Chapter 226) S = Supportive, N/S = Not Supportive, N/A = Not Applicable		S	N/S	N/A
(2)	The orderly development of residential areas sensitive to community needs and other land uses.			X
(3)	The development and provision of affordable rental housing by the State to meet the housing needs of Hawaii's people.			X
(B) To achieve the housing objectives, it shall be the policy of this State to:				
(1)	Effectively accommodate the housing needs of Hawai'i's people.			X
(2)	Stimulate and promote feasible approaches that increase affordable rental and for sale housing choices for extremely low-, very low-, lower-, moderate-, and above moderate-income households.			X
(3)	Increase homeownership and rental opportunities and choices in terms of quality, location, cost, densities, style, and size of housing.			X
(4)	Promote appropriate improvement, rehabilitation, and maintenance of existing rental and for sale housing units and residential areas.			X
(5)	Promote design and location of housing developments taking into account the physical setting, accessibility to public facilities and services, and other concerns of existing communities and surrounding areas.			X
(6)	Facilitate the use of available vacant, developable, and underutilized urban lands for housing.			X
(7)	Foster a variety of lifestyles traditional to Hawaii through the design and maintenance of neighborhoods that reflect the culture and values of the community.			X
(8)	Promote research and development of methods to reduce the cost of housing construction in Hawai'i.			X
<i>Discussion: The Project includes commercial uses; therefore, the State's policies for the socio-cultural advancement in regard to housing are not directly applicable to the Project.</i>				
226-20 Objectives and Policies for Socio-Cultural Advancement - Health.				
(A) Planning for the State's socio-cultural advancement with regard to health shall be directed towards achievement of the following objectives:				
(1)	Fulfillment of basic individual health needs of the general public.			X
(2)	Maintenance of sanitary and environmentally healthful conditions in Hawai'i's communities.	X		
(3)	Elimination of health disparities by identifying and addressing social determinants of health.			X
(B) To achieve the health objectives, it shall be the policy of this State to:				
(1)	Provide adequate and accessible services and facilities for prevention and treatment of physical and mental health problems, including substance abuse.			X
(2)	Encourage improved cooperation among public and private sectors in the provision of health care to accommodate the total health needs of individuals throughout the State.			X
(3)	Encourage public and private efforts to develop and promote statewide and local strategies to reduce health care and related insurance costs.			X
(4)	Foster an awareness of the need for personal health maintenance and preventive health care through education and other measures.			X
(5)	Provide programs, services, and activities that ensure environmentally healthful and sanitary conditions.	X		
(6)	Improve the State's capabilities in preventing contamination by pesticides and other potentially hazardous substances through increased coordination, education, monitoring, and enforcement.			X
(7)	Prioritize programs, services, interventions, and activities that address identified social determinants of health to improve native Hawaiian health and well-being consistent with the United States Congress' declaration of policy as codified in title 42 United States Code section 11702, and to reduce health disparities of disproportionately affected demographics, including native Hawaiians, other Pacific Islanders, and Filipinos. The prioritization of affected demographic groups other than native Hawaiians may be reviewed every ten years and revised based on the best available epidemiological and public health data.			X

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S = Supportive, N/S = Not Supportive, N/A = Not Applicable			
	S	N/S	N/A
<i>Discussion: The Project supports the State's objectives with regards to health. The planned redevelopment and replacement of existing outdated structures will improve existing conditions at the site, thereby improving the overall health of property. The Cove will be regularly maintained and kept in a sanitary, healthy state. Solid waste services and wastewater disposal will meet regulatory requirements to maintain public health standards (Sections 4.8.3 and 4.8.4).</i>			
226-21 Objective and Policies for Socio-Cultural Advancement - Education.			
(A) Planning for the State's socio-cultural advancement with regard to education shall be directed towards achievement of the objective of the provision of a variety of educational opportunities to enable individuals to fulfill their needs, responsibilities, and aspirations.			
(B) To achieve the education objective, it shall be the policy of this State to:			
(1) Support educational programs and activities that enhance personal development, physical fitness, recreation, and cultural pursuits of all groups.			X
(2) Ensure the provision of adequate and accessible educational services and facilities that are designed to meet individual and community needs.			X
(3) Provide appropriate educational opportunities for groups with special needs.			X
(4) Promote educational programs which enhance understanding of Hawai'i's cultural heritage.	X		
(5) Provide higher educational opportunities that enable Hawai'i's people to adapt to changing employment demands.			X
(6) Assist individuals, especially those experiencing critical employment problems or barriers, or undergoing employment transitions, by providing appropriate employment training programs and other related educational opportunities.			X
(7) Promote programs and activities that facilitate the acquisition of basic skills, such as reading, writing, computing, listening, speaking, and reasoning.			X
(8) Emphasize quality educational programs in Hawai'i's institutions to promote academic excellence.			X
(9) Support research programs and activities that enhance the education programs of the State.			X
<i>Discussion: The State's goals with regard to general education are not directly applicable to the Project, and impacts to schools in the West O'ahu region are not anticipated. However, the Project will support programs that enhance the understanding of Hawai'i's cultural heritage. The existing nightly entertainment program will be renewed to perpetuate and honor the Hawaiian culture and history of place through the traditions of hula, mele, and other practices. The creation of new ancillary spaces on the property will expand potential programming; for example, the cultural pavilion may host Hawaiian cultural arts and educational programming and cultural community events for all ages.</i>			
226-22 Objective and Policies for Socio-Cultural Advancement - Social Services.			
(A) Planning for the State's socio-cultural advancement with regard to social services shall be directed towards the achievement of the objective of improved public and private social services and activities that enable individuals, families, and groups to become more self-reliant and confident to improve their well-being.			
(B) To achieve the social service objective, it shall be the policy of the State to:			
(1) Assist individuals, especially those in need of attaining a minimally adequate standard of living and those confronted by social and economic hardship conditions, through social services and activities within the State's fiscal capacities.			X
(2) Promote coordination and integrative approaches among public and private agencies and programs to jointly address social problems that will enable individuals, families, and groups to deal effectively with social problems and to enhance their participation in society.			X
(3) Facilitate the adjustment of new residents, especially recently arrived immigrants, into Hawai'i's communities.			X
(4) Promote alternatives to institutional care in the provision of long-term care for elder and disabled populations.			X
(5) Support public and private efforts to prevent domestic abuse and child molestation, and assist victims of abuse and neglect.			X
(6) Promote programs which assist people in need of family planning services to enable them to meet their needs.			X
<i>Discussion: While the Project supports the State's policies for the socio-cultural advancement in regard to social services, they are not directly applicable to the Project.</i>			

Table 5.1: Hawai'i State Plan (HRS, Chapter 226)			
S = Supportive, N/S = Not Supportive, N/A = Not Applicable			
	S	N/S	N/A
226-23 Objective and Policies for Socio-Cultural Advancement - Leisure.			
(A) Planning for the State's socio-cultural advancement with regard to leisure shall be directed towards the achievement of the objective of the adequate provision of resources to accommodate diverse cultural, artistic, and recreational needs for present and future generations.			
(B) To achieve the leisure objective, it shall be the policy of this State to:			
(1) Foster and preserve Hawai'i's multi-cultural heritage through supportive cultural, artistic, recreational, and humanities-oriented programs and activities.	X		
(2) Provide a wide range of activities and facilities to fulfill the cultural, artistic, and recreational needs of all diverse and special groups effectively and efficiently.	X		
(3) Enhance the enjoyment of recreational experiences through safety and security measures, educational opportunities, and improved facility design and maintenance.	X		
(4) Promote the recreational and educational potential of natural resources having scenic, open space, cultural, historical, geological, or biological values while ensuring that their inherent values are preserved.	X		
(5) Ensure opportunities for everyone to use and enjoy Hawai'i's recreational resources.	X		
(6) Assure the availability of sufficient resources to provide for future cultural, artistic, and recreational needs.	X		
(7) Provide adequate and accessible physical fitness programs to promote the physical and mental well-being of Hawai'i's people.			X
(8) Increase opportunities for appreciation and participation in the creative arts, including the literary, theatrical, visual, musical, folk, and traditional art forms.	X		
(9) Encourage the development of creative expression in the artistic disciplines to enable all segments of Hawaii's population to participate in the creative arts.	X		
(10) Assure adequate access to significant natural and cultural resources in public ownership.	X		
<p>Discussion: The planned improvements will be the first major enhancement of the Cove Property in over 25 years. The intent of the Project is to create an authentic Hawaiian outdoor recreation facility and community gathering place for residents and visitors that honors and reflects the history, culture, and connection to place. The Cove will maintain the lū'au show as the focal point of the property, and will also include a dynamic mix of retail, entertainment, and dining experiences within an immersive and inviting coastal setting, ideal for leisurely activities. The existing lū'au entertainment program will be renewed to perpetuate and honor the Hawaiian culture and history of place through the traditions of hula, mele, and other practices. The creation of new spaces on the property will expand potential programming. For example, the new amphitheater/performing arts venue may include wedding and event receptions, corporate retreats, Hawaiian cultural arts and educational programming, community events, holiday programs, and graduations. Additionally, the cultural pavilion may host educational demonstrations featuring lei-making, kapa-making canoe/wa'a activities, and imu activities.</p> <p>The current level of beach access and parking will be maintained to protect the beach and natural cove/lagoon. Simultaneously, the renewed site program will allow visitors to enjoy increased access to the site at various hours of the day. The Cove will enhance existing recreational opportunities on the property and the wider area by providing on-site programming and open space in a contemporary and authentic Hawaiian setting. Lush landscaping will be integrated throughout the Cove Property to create an immersive and relaxing experience. Landscaping will be intentionally designed to complement new structures, open space areas, pedestrian pathways, and outdoor seating throughout The Cove, enhancing the overall atmosphere and visual environment of the property. Pedestrian pathways will be incorporated throughout the Cove Property to foster connectivity throughout the site and to the adjacent beach and resort area.</p>			
226-24 Objective and Policies for Socio-Cultural Advancement - Individual Rights and Personal Well-Being.			
(A) Planning for the State's socio-cultural advancement with regard to individual rights and personal well-being shall be directed towards achievement of the objective of increased opportunities and protection of individual rights to enable individuals to fulfill their socio-economic needs and aspirations.			
(B) To achieve the individual rights and personal well-being objective, it shall be the policy of this State to:			
(1) Provide effective services and activities that protect individuals from criminal acts and unfair practices and that alleviate the consequences of criminal acts in order to foster a safe and secure environment.			X
(2) Uphold and protect the national and state constitutional rights of every individual.			X

Table 5.1: Hawai'i State Plan (HRS, Chapter 226) S = Supportive, N/S = Not Supportive, N/A = Not Applicable		S	N/S	N/A
(3)	Assure access to, and availability of, legal assistance, consumer protection, and other public services which strive to attain social justice.			X
(4)	Ensure equal opportunities for individual participation in society.	X		
<i>Discussion: Through the provision of quality jobs and extension of business to local companies, the Project supports the individual rights and personal well-being of residents and visitors.</i>				
226-25 Objective and Policies for Socio-Cultural Advancement - Culture.				
(A) Planning for the State's socio-cultural advancement with regard to culture shall be directed toward the achievement of the objective of enhancement of cultural identities, traditions, values, customs, and arts of Hawai'i's people.				
(B) To achieve the culture objective, it shall be the policy of this State to:				
(1)	Foster increased knowledge and understanding of Hawai'i's ethnic and cultural heritages and the history of Hawai'i.	X		
(2)	Support activities and conditions that promote cultural values, customs, and arts that enrich the lifestyles of Hawai'i's people and which are sensitive and responsive to family and community needs.	X		
(3)	Encourage increased awareness of the effects of proposed public and private actions on the integrity and quality of cultural and community lifestyles in Hawai'i.	X		
(4)	Encourage the essence of the aloha spirit in people's daily activities to promote harmonious relationships among Hawai'i's people and visitors.	X		
<i>Discussion: The purpose of the planned redevelopment is to create an authentic Hawaiian community gathering place for residents and visitors that honors and reflects the history, culture, and connection to this place. The site will be renewed and reprogrammed to honor and reflect the history, culture, and connection to this place. The renewed lū'au show and entertainment program is expected to incorporate Hawaiian traditions of hula, mele, and other practices. Once in operation, planned retail shops and the potential marketplace/retail space may feature a curated selection of goods, including those made in Hawai'i, and the restaurants may feature local culinary talent and prioritize the use of fresh, Hawai'i-grown produce when possible. Key gathering areas are incorporated throughout the property, offering beautiful spaces for harmonious interaction. The Applicant values the cultural legacy and history of the site and will continue to consult with the cultural descendants of the area as the design of the redevelopment progresses.</i>				
226-26 Objectives and Policies for Socio-Cultural Advancement - Public Safety.				
(A) Planning for the State's socio-cultural advancement with regard to public safety shall be directed towards the achievement of the following objectives:				
(1)	Assurance of public safety and adequate protection of life and property for all people.	X		
(2)	Optimum organizational readiness and capability in all phases of emergency management to maintain the strength, resources, and social and economic well-being of the community in the event of civil disruptions, wars, natural disasters, and other major disturbances.	X		
(3)	Promotion of a sense of community responsibility for the welfare and safety of Hawai'i's people.	X		
(B) To achieve the public safety objectives, it shall be the policy of this State to:				
(1)	Ensure that public safety programs are effective and responsive to community needs.			X
(2)	Encourage increased community awareness and participation in public safety programs.			X
(C) To further achieve public safety objectives related to criminal justice, it shall be the policy of this State to:				
(1)	Support criminal justice programs aimed at preventing and curtailing criminal activities.			X
(2)	Develop a coordinated, systematic approach to criminal justice administration among all criminal justice agencies.			X
(3)	Provide a range of correctional resources which may include facilities and alternatives to traditional incarceration in order to address the varied security needs of the community and successfully reintegrate offenders into the community.			X
(D) To further achieve public safety objectives related to emergency management, it shall be the policy of this State to:				

Table 5.1: Hawai'i State Plan (HRS, Chapter 226) S = Supportive, N/S = Not Supportive, N/A = Not Applicable		S	N/S	N/A
(1)	Ensure that responsible organizations are in a proper state of readiness to respond to major war-related, natural, or technological disasters and civil disturbances at all times.			X
(2)	Enhance the coordination between emergency management programs throughout the State.			X
<i>Discussion: Security and staff at The Cove will be trained to address a range of situations that require immediate response to emergencies or unlawful activity on-site. Standard operating procedures may be in place in the event of natural disasters (Section 4.4).</i>				
226-27 Objectives and Policies for Socio-Cultural Advancement - Government.				
(A)	Planning the State's socio-cultural advancement with regard to government shall be directed towards the achievement of the following objectives:			
(1)	Efficient, effective, and responsive government services at all levels in the State.			X
(2)	Fiscal integrity, responsibility, and efficiency in the state government and county governments.			X
(B)	To achieve the government objectives, it shall be the policy of this State to:			
(1)	Provide for necessary public goods and services not assumed by the private sector.			X
(2)	Pursue an openness and responsiveness in government that permits the flow of public information, interaction, and response.			X
(3)	Minimize the size of government to that necessary to be effective.			X
(4)	Stimulate the responsibility in citizens to productively participate in government for a better Hawai'i.			X
(5)	Assure that government attitudes, actions, and services are sensitive to community needs and concerns.			X
(6)	Provide for a balanced fiscal budget.			X
(7)	Improve the fiscal budgeting and management system of the State.			X
(8)	Promote the consolidation of state and county governmental functions to increase the effective and efficient delivery of government programs and services and to eliminate duplicative services wherever feasible.			X
<i>Discussion: While the Project supports the objectives and policies for socio-cultural advancement in regard to government, they are not directly applicable to the Project.</i>				
Hawai'i State Plan - HRS Ch. 226 - Part III. Priority Guideline				
226-101 Purpose.				
The purpose of this part is to establish overall priority guidelines to address areas of statewide concern.				
226-102 Overall Direction.				
The State shall strive to improve the quality of life for Hawai'i's present and future population through the pursuit of desirable courses of action in seven major areas of statewide concern which merit priority attention: economic development, population growth and land resource management, affordable housing, crime and criminal justice, quality education, principles of sustainability, and climate change adaptation.				
226-103 Economic Priority Guidelines.				
(A)	Priority guidelines to stimulate economic growth and encourage business expansion and development to provide needed jobs for Hawai'i's people and achieve a stable and diversified economy:			
(1)	Seek a variety of means to increase the availability of investment capital for new and expanding enterprises.			
(A)	Encourage investments which:			
	(i) Reflect long-term commitments to the State;	X		
	(ii) Rely on economic linkages within the local economy;	X		
	(iii) Diversify the economy;	X		
	(iv) Reinvest in the local economy;	X		
	(v) Are sensitive to community needs and priorities; and	X		
	(vi) Demonstrate a commitment to provide management opportunities to Hawai'i residents; and	X		
(B)	Encourage investments in innovative activities that have a nexus to the State, such as:			

Table 5.1: Hawai'i State Plan (HRS, Chapter 226)		S	N/S	N/A
S = Supportive, N/S = Not Supportive, N/A = Not Applicable				
(i)	Present or former residents acting as entrepreneurs or principals;			X
(ii)	Academic support from an institution of higher education in Hawai'i;			X
(iii)	Investment interest from Hawai'i residents;			X
(iv)	Resources unique to Hawai'i that are required for innovative activity; and	X		
(v)	Complementary or supportive industries or government programs or projects.			X
(2)	Encourage the expansion of technological research to assist industry development and support the development and commercialization of technological advancements.			X
(3)	Improve the quality, accessibility, and range of services provided by government to business, including data and reference services and assistance in complying with governmental regulations.			X
(4)	Seek to ensure that state business tax and labor laws and administrative policies are equitable, rational, and predictable.			X
(5)	Streamline the processes for building and development permit and review and telecommunication infrastructure installation approval and eliminate or consolidate other burdensome or duplicative governmental requirements imposed on business, where scientific evidence indicates that public health, safety, and welfare would not be adversely affected.			X
(6)	Encourage the formation of cooperatives and other favorable marketing or distribution arrangements at the regional or local level to assist Hawai'i's small-scale producers, manufacturers, and distributors.	X		
(7)	Continue to seek legislation to protect Hawai'i from transportation interruptions between Hawai'i and the continental United States.			X
(8)	Provide public incentives and encourage private initiative to develop and attract industries which promise long-term growth potentials and which have the following characteristics:			
(a)	An industry that can take advantage of Hawai'i's unique location and available physical and human resources.	X		
(b)	A clean industry that would have minimal adverse effects on Hawai'i's environment.	X		
(c)	An industry that is willing to hire and train Hawai'i's people to meet the industry's labor needs at all levels of employment.	X		
(d)	An industry that would provide reasonable income and steady employment.	X		
(9)	Support and encourage, through educational and technical assistance programs and other means, expanded opportunities for employee ownership and participation in Hawai'i business.			X
(10)	Enhance the quality of Hawai'i's labor force and develop and maintain career opportunities for Hawai'i's people through the following actions:			
(A)	Expand vocational training in diversified agriculture, aquaculture, information industry, and other areas where growth is desired and feasible.			X
(B)	Encourage more effective career counseling and guidance in high schools and post-secondary institutions to inform students of present and future career opportunities.			X
(C)	Allocate educational resources to career areas where high employment is expected and where growth of new industries is desired.			X
(D)	Promote career opportunities in all industries for Hawai'i's people by encouraging firms doing business in the State to hire residents.			X
(E)	Promote greater public and private sector cooperation in determining industrial training needs and in developing relevant curricula and on-the-job training opportunities.			X
(F)	Provide retraining programs and other support services to assist entry of displaced workers into alternative employment.			X
(B)	Priority guidelines to promote the economic health and quality of the visitor industry:			
(1)	Promote visitor satisfaction by fostering an environment which enhances the aloha spirit and minimizes inconveniences to Hawai'i's residents and visitors.	X		

Table 5.1: Hawai'i State Plan (HRS, Chapter 226)		S	N/S	N/A
S = Supportive, N/S = Not Supportive, N/A = Not Applicable				
(2)	Encourage the development and maintenance of well-designed, adequately serviced hotels and resort destination areas which are sensitive to neighboring communities and activities and which provide for adequate shoreline setbacks and beach access.	X		
(3)	Support appropriate capital improvements to enhance the quality of existing resort destination areas and provide incentives to encourage investment in upgrading, repair, and maintenance of visitor facilities.	X		
(4)	Encourage visitor industry practices and activities which respect, preserve, and enhance Hawai'i's significant natural, scenic, historic, and cultural resources.	X		
(5)	Develop and maintain career opportunities in the visitor industry for Hawai'i's people, with emphasis on managerial positions.	X		
(6)	Support and coordinate tourism promotion abroad to enhance Hawai'i's share of existing and potential visitor markets.	X		
(7)	Maintain and encourage a more favorable resort investment climate consistent with the objectives of this chapter.	X		
(8)	Support law enforcement activities that provide a safer environment for both visitors and residents alike.			X
(9)	Coordinate visitor industry activities and promotions to business visitors through the state network of advanced data communication techniques.			X
(C) Priority guidelines to promote the continued viability of the sugar and pineapple industries:				
(1)	Provide adequate agricultural lands to support the economic viability of the sugar and pineapple industries.			X
(2)	Continue efforts to maintain federal support to provide stable sugar prices high enough to allow profitable operations in Hawai'i.			X
(3)	Support research and development, as appropriate, to improve the quality and production of sugar and pineapple crops.			X
(D) Priority guidelines to promote the growth and development of diversified agriculture and aquaculture:				
(1)	Identify, conserve, and protect agricultural and aquacultural lands of importance and initiate affirmative and comprehensive programs to promote economically productive agricultural and aquacultural uses of such lands.			X
(2)	Assist in providing adequate, reasonably priced water for agricultural activities.			X
(3)	Encourage public and private investment to increase water supply and to improve transmission, storage, and irrigation facilities in support of diversified agriculture and aquaculture.			X
(4)	Assist in the formation and operation of production and marketing associations and cooperatives to reduce production and marketing costs.			X
(5)	Encourage and assist with the development of a waterborne and airborne freight and cargo system capable of meeting the needs of Hawai'i's agricultural community.			X
(6)	Seek favorable freight rates for Hawai'i's agricultural products from interisland and overseas transportation operators.			X
(7)	Encourage the development and expansion of agricultural and aquacultural activities which offer long-term economic growth potential and employment opportunities.			X
(8)	Continue the development of agricultural parks and other programs to assist small independent farmers in securing agricultural lands and loans.			X
(9)	Require agricultural uses in agricultural subdivisions and closely monitor the uses in these subdivisions.			X
(10)	Support the continuation of land currently in use for diversified agriculture.			X
(11)	Encourage residents and visitors to support Hawai'i's farmers by purchasing locally grown food and food products.	X		
(E) Priority guidelines for water use and development:				
(1)	Maintain and improve water conservation programs to reduce the overall water consumption rate.	X		

Table 5.1: Hawai'i State Plan (HRS, Chapter 226) S = Supportive, N/S = Not Supportive, N/A = Not Applicable		S	N/S	N/A
(2)	Encourage the improvement of irrigation technology and promote the use of nonpotable water for agricultural and landscaping purposes.	X		
(3)	Increase the support for research and development of economically feasible alternative water sources.			X
(4)	Explore alternative funding sources and approaches to support future water development programs and water system improvements.			X
(F) Priority guidelines for energy use and development:				
(1)	Encourage the development, demonstration, and commercialization of renewable energy sources.			X
(2)	Initiate, maintain, and improve energy conservation programs aimed at reducing energy waste and increasing public awareness of the need to conserve energy.			X
(3)	Provide incentives to encourage the use of energy conserving technology in residential, industrial, and other buildings.			X
(4)	Encourage the development and use of energy conserving and cost-efficient transportation systems.	X		
(G) Priority guidelines to promote the development of the information industry:				
(1)	Establish an information network, with an emphasis on broadband and wireless infrastructure and capability, that will serve as the foundation of and catalyst for overall economic growth and diversification in Hawai'i.			X
(2)	Encourage the development of services such as financial data processing, a products and services exchange, foreign language translations, telemarketing, teleconferencing, a twenty-four-hour international stock exchange, international banking, and a Pacific Rim management center.			X
(3)	Encourage the development of small businesses in the information field such as software development; the development of new information systems, peripherals, and applications; data conversion and data entry services; and home or cottage services such as computer programming, secretarial, and accounting services.			X
(4)	Encourage the development or expansion of educational and training opportunities for residents in the information and telecommunications fields.			X
(5)	Encourage research activities, including legal research in the information and telecommunications fields.			X
(6)	Support promotional activities to market Hawaii's information industry services.			X
(7)	Encourage the location or co-location of telecommunication or wireless information relay facilities in the community, including public areas, where scientific evidence indicates that the public health, safety, and welfare would not be adversely affected.			X
Discussion: Revitalizing the Cove Property supports the State's economic priority guidelines, primarily as they relate to the economic health and quality of the visitor industry and land use development.				
The Project will support the growing 'Ewa region and strengthen the surrounding area as a secondary resort destination on O'ahu by providing residents and visitors with a dynamic mix of retail, entertainment, and dining experiences within an immersive coastal setting that authentically honors the property's Hawaiian legacy in a contemporary form. Moreover, the Project will generate a substantial number of short-term and long-term employment opportunities in the West O'ahu region (Section 4.10). Local businesses are also expected to benefit through the purchase of goods and services needed for operation of The Cove. The Project presents an opportunity to expose visitors to authentic local brands and products and expands support for Hawai'i-made goods, supporting the local economy. Once in operation, planned retail shops and the potential marketplace/retail space may feature a curated selection of goods, including those made in Hawai'i. The new restaurants will support the economy and community by featuring local culinary talent and prioritizing the use of fresh, Hawai'i-grown produce when possible. Renewed programming at the site will provide opportunities for local entertainers, cultural practitioners, and educators.				
Existing utilities at the site will accommodate the Project, and water conservation measures will be implemented in accordance with State and City requirements (Section 4.8.2). Open structures will allow the use of natural ventilation, thereby reducing the overall energy footprint of The Cove. Landscaping will be incorporated to complement the outdoor seating areas and create a lush, relaxing environment, while also providing permeable surface to mitigate potential flooding at the site.				
226-104 Population Growth and Land Resources Priority Guidelines.				

Table 5.1: Hawai'i State Plan (HRS, Chapter 226)		S	N/S	N/A
S = Supportive, N/S = Not Supportive, N/A = Not Applicable				
(A) Priority guidelines to effect desired statewide growth and distribution:				
(1)	Encourage planning and resource management to insure that population growth rates throughout the State are consistent with available and planned resource capacities and reflect the needs and desires of Hawai'i's people.	X		
(2)	Manage a growth rate for Hawai'i's economy that will parallel future employment needs for Hawai'i's people.			X
(3)	Ensure that adequate support services and facilities are provided to accommodate the desired distribution of future growth throughout the State.	X		
(4)	Encourage major state and federal investments and services to promote economic development and private investment to the neighbor islands, as appropriate.			X
(5)	Explore the possibility of making available urban land, low-interest loans, and housing subsidies to encourage the provision of housing to support selective economic and population growth on the neighbor islands.			X
(6)	Seek federal funds and other funding sources outside the State for research, program development, and training to provide future employment opportunities on the neighbor islands.			X
(7)	Support the development of high technology parks on the neighbor islands.			X
(B) Priority guidelines for regional growth distribution and land resource utilization:				
(1)	Encourage urban growth primarily to existing urban areas where adequate public facilities are already available or can be provided with reasonable public expenditures, and away from areas where other important benefits are present, such as protection of important agricultural land or preservation of lifestyles.	X		
(2)	Make available marginal or nonessential agricultural lands for appropriate urban uses while maintaining agricultural lands of importance in the agricultural district.			X
(3)	Restrict development when drafting of water would result in exceeding the sustainable yield or in significantly diminishing the recharge capacity of any groundwater area.			X
(4)	Encourage restriction of new urban development in areas where water is insufficient from any source for both agricultural and domestic use.			X
(5)	In order to preserve green belts, give priority to state capital-improvement funds which encourage location of urban development within existing urban areas except where compelling public interest dictates development of a noncontiguous new urban core.			X
(6)	Seek participation from the private sector for the cost of building infrastructure and utilities, and maintaining open spaces.	X		
(7)	Pursue rehabilitation of appropriate urban areas.	X		
(8)	Support the redevelopment of Kaka'ako into a viable residential, industrial, and commercial community.			X
(9)	Direct future urban development away from critical environmental areas or impose mitigating measures so that negative impacts on the environment would be minimized.	X		
(10)	Identify critical environmental areas in Hawai'i to include but not be limited to the following: watershed and recharge areas; wildlife habitats (on land and in the ocean); areas with endangered species of plants and wildlife; natural streams and water bodies; scenic and recreational shoreline resources; open space and natural areas; historic and cultural sites; areas particularly sensitive to reduction in water and air quality; and scenic resources.			X
(11)	Identify all areas where priority should be given to preserving rural character and lifestyle.			X
(12)	Utilize Hawai'i's limited land resources wisely, providing adequate land to accommodate projected population and economic growth needs while ensuring the protection of the environment and the availability of the shoreline, conservation lands, and other limited resources for future generations.	X		
(13)	Protect and enhance Hawai'i's shoreline, open spaces, and scenic resources.	X		

Table 5.1: Hawai'i State Plan (HRS, Chapter 226)		S	N/S	N/A
S = Supportive, N/S = Not Supportive, N/A = Not Applicable				
<p>Discussion: The Project supports the State's population growth and land resources priority guidelines, primarily as they relate to growth and resource utilization. The Project will be served by existing utilities (Section 4.8).</p> <p>The majority of population growth on O'ahu is expected to occur in the 'Ewa region. Furthermore, the Project vicinity is designated as O'ahu's secondary resort destination. Continuing to focus commercial redevelopment in urban areas is consistent with the State's plan to direct urban development away from critical areas reserved for conservation or other uses. The Project is envisioned to provide residents and visitors with a unique and dynamic mix of experiences, distinct from other offerings in the 'Ewa region. Additionally, locating jobs within the 'Ewa district will provide opportunities for employees to reduce their commute times, enhancing their overall quality of life.</p> <p>The Project will take advantage of the Cove Property's immersive coastal setting by allowing visitors to enjoy increased access to the site at various hours of the day. Simultaneously, the current level of beach access and parking will be maintained to protect the beach and natural cove area.</p>				
226-105 Crime and Criminal Justice Priority Guidelines.				
(A) Priority guidelines in the area of crime and criminal justice:				
(1)	Support law enforcement activities and other criminal justice efforts that are directed to provide a safer environment.	X		
(2)	Target state and local resources on efforts to reduce the incidence of violent crime and on programs relating to the apprehension and prosecution of repeat offenders.			X
(3)	Support community and neighborhood program initiatives that enable residents to assist law enforcement agencies in preventing criminal activities.			X
(4)	Reduce overcrowding or substandard conditions in correctional facilities through a comprehensive approach among all criminal justice agencies which may include sentencing law revisions and use of alternative sanctions other than incarceration for persons who pose no danger to their community.			X
(5)	Provide a range of appropriate sanctions for juvenile offenders, including community-based programs and other alternative sanctions.			X
(6)	Increase public and private efforts to assist witnesses and victims of crimes and to minimize the costs of victimization.			X
<p>Discussion: Operation of The Cove is expected to include security measures and maintenance of standard operating procedures.</p>				
226-106 Affordable Housing Priority Guidelines.				
(A) Priority guidelines for the provision of affordable housing:				
(1)	Seek to use marginal or nonessential agricultural land, urban land, and public land to meet housing needs of extremely low-, very low-, lower-, moderate-, and above moderate-income households.			X
(2)	Encourage the use of alternative construction and development methods as a means of reducing production costs.			X
(3)	Improve information and analysis relative to land availability and suitability for housing.			X
(4)	Create incentives for development which would increase home ownership and rental opportunities for Hawai'i's extremely low-, very low-, lower-, and moderate-income households and residents with special needs.			X
(5)	Encourage continued support for government or private housing programs that provide low interest mortgages to Hawai'i's people for the purchase of initial owner-occupied housing.			X
(6)	Encourage public and private sector cooperation in the development of rental housing alternatives.			X
(7)	Encourage improved coordination between various agencies and levels of government to deal with housing policies and regulations.			X
(8)	Give higher priority to the provision of quality housing that is affordable for Hawai'i's residents and less priority to development of housing intended primarily for individuals outside of Hawai'i.			X
<p>Discussion: While the Project supports the objectives and policies for affordable housing, they are not directly applicable to the Project.</p>				

Table 5.1: Hawai'i State Plan (HRS, Chapter 226)		S	N/S	N/A
S = Supportive, N/S = Not Supportive, N/A = Not Applicable				
226-107 Quality Education Priority Guidelines.				
(A) Priority guidelines to promote quality education:				
(1)	Pursue effective programs which reflect the varied district, school, and student needs to strengthen basic skills achievement;			X
(2)	Continue emphasis on general education "core" requirements to provide common background to students and essential support to other university programs;			X
(3)	Initiate efforts to improve the quality of education by improving the capabilities of the education workforce;			X
(4)	Promote increased opportunities for greater autonomy and flexibility of educational institutions in their decision-making responsibilities;			X
(5)	Increase and improve the use of information technology in education by the availability of telecommunications equipment for:			
(a)	The electronic exchange of information;			X
(b)	Statewide electronic mail; and			X
(c)	Access to the Internet.			X
	Encourage programs that increase the public's awareness and understanding of the impact of information technologies on our lives;			X
(6)	Pursue the establishment of Hawai'i's public and private universities and colleges as research and training centers of the Pacific;			X
(7)	Develop resources and programs for early childhood education;			X
(8)	Explore alternatives for funding and delivery of educational services to improve the overall quality of education; and			X
(9)	Strengthen and expand educational programs and services for students with special needs.			X
<i>Discussion: The objectives and policies for education are not directly applicable to the Project; however, increased State revenues (e.g., from General Excise Taxes) will help support the State's educational objectives.</i>				
226-107 Sustainability Priority Guidelines.				
(A) Priority guidelines and principles to promote sustainability shall include:				
(1)	Encouraging balanced economic, social, community, and environmental priorities;	X		
(2)	Encouraging planning that respects and promotes living within the natural resources and limits of the State;	X		
(3)	Promoting a diversified and dynamic economy;	X		
(4)	Encouraging respect for the host culture;	X		
(5)	Promoting decisions based on meeting the needs of the present without compromising the needs of future generations;	X		
(6)	Considering the principles of the ahupua'a system; and			X
(7)	Emphasizing that everyone, including individuals, families, communities, businesses, and government, has the responsibility for achieving a sustainable Hawai'i.	X		
<i>Discussion: The Project supports the State's priority guidelines with regard to sustainability. Throughout the planning, construction, and operation of the Project, it is the Applicant's intent that economic, social, community, and environmental priorities will be balanced. The current level of beach access and parking will be maintained to protect the beach and natural cove/lagoon. Sustainability measures, as discussed in Section 4.12, may be implemented and refined throughout the operation of the Project.</i>				
<i>The Project supports a diversified economy in the 'Ewa region, providing residents and visitors with a dynamic mix of experiences distinct from other offerings in the 'Ewa region. The Hawaiian legacy of the property will be honored through design features, culinary arts, and programming, including a renewed lū'au show and/or educational programs coordinated with the neighboring Lanikūhonua Cultural Institute.</i>				

Table 5.1: Hawai'i State Plan (HRS, Chapter 226) S = Supportive, N/S = Not Supportive, N/A = Not Applicable		S	N/S	N/A
226-109 Climate Change Adaptation Priority Guidelines. Priority guidelines to prepare the State to address the impacts of climate change, including impacts to the areas of agriculture; conservation lands; coastal and nearshore marine areas; natural and cultural resources; education; energy; higher education; health; historic preservation; water resources; the built environment, such as housing, recreation, transportation; and the economy shall:				
(1)	Ensure that Hawai'i's people are educated, informed, and aware of the impacts climate change may have on their communities;			X
(2)	Encourage community stewardship groups and local stakeholders to participate in planning and implementation of climate change policies;			X
(3)	Invest in continued monitoring and research of Hawai'i's climate and the impacts of climate change on the State;			X
(4)	Consider native Hawaiian traditional knowledge and practices in planning for the impacts of climate change;			X
(5)	Encourage the preservation and restoration of natural landscape features, such as coral reefs, beaches and dunes, forests, streams, floodplains, and wetlands, that have the inherent capacity to avoid, minimize, or mitigate the impacts of climate change;	X		
(6)	Explore adaptation strategies that moderate harm or exploit beneficial opportunities in response to actual or expected climate change impacts to the natural and built environments;	X		
(7)	Promote sector resilience in areas such as water, roads, airports, and public health, by encouraging the identification of climate change threats, assessment of potential consequences, and evaluation of adaptation options;	X		
(8)	Foster cross-jurisdictional collaboration between county, state, and federal agencies and partnerships between government and private entities and other nongovernmental entities, including nonprofit entities;			X
(9)	Use management and implementation approaches that encourage the continual collection, evaluation, and integration of new information and strategies into new and existing practices, policies, and plans; and			X
(10)	Encourage planning and management of the natural and built environments that effectively integrate climate change policy.	X		
<i>Discussion: SLR is an inevitable part of Hawai'i's future, and the Project supports the State's priority guidelines with regard to climate change. As discussed in Section 4.4.6, 3.2 feet of SLR by the year 2100 may result in annual high wave flooding on the site. Planned structures at the site will be elevated from eight to 19.5 feet above msl and will be set back at least 60 feet from the certified shoreline. The shoreline setback area will be maintained as open space, providing a natural buffer to mitigate potential impacts related to flooding. LID and green infrastructure measures, where feasible, will be incorporated and will be determined as the design progresses.</i>				

5.2.4 Hawai'i 2050 Sustainability Plan

Updated in June 2021, the Hawai'i 2050 Sustainability Plan serves as the State's sustainability and climate strategic action plan; aligns the State's goals, policies, and actions with the United Nations (UN) Sustainable Development Goals (SDGs); and recommends sustainability and climate change actions for 2020–2030. The revised plan guides the coordination and implementation of Hawai'i's sustainability and climate adaptation goals, principles, and policies, pursuant to HRS, Section 226-65. It also provides recommendations for a sustainable and resilient economic recovery for Hawai'i.

The Hawai'i 2050 Sustainability Plan identifies eight focus areas with 38 strategies and more than 250 recommended actions toward a sustainable Hawai'i. The focus areas align with priorities identified through public and stakeholder engagement, as well as ongoing commitments the State has made. The Project's consistency with the focus areas and strategies outlined in the Hawai'i 2050 Sustainability Plan are discussed in the following *Table 5.2*.

Table 5.2: Hawai'i 2050 Sustainability Plan (HRS, Section 226-65) S = Supportive, N/S = Not Supportive, N/A = Not Applicable	S	N/S	N/A
1. Promote a Sustainable Economic Recovery			
Strategy 1: Support farmer livelihoods			X
Strategy 2: Support local markets for locally grown food	X		
Strategy 3: Promote sustainable & resilient farmland, practices, and infrastructure			X
Strategy 4: Invest in green workforce development beginning with youth.			X
Strategy 5: Foster the development of jobs that can sustain families financially.	X		
Strategy 6: Support diversification of the economy.	X		
Strategy 7: Reduce the environmental footprint of the tourism industry.			X
Strategy 8: Support native Hawaiian culture and reduce impacts of the tourism industry to local communities.	X		
<p>Discussion: The Project supports a diversified economy in the 'Ewa region, providing residents and visitors with a dynamic mix of experiences distinct from other offerings in the 'Ewa region. The Hawaiian legacy of the property will be honored through design features and programming, including a renewed lu'au show and/or educational programs and demonstrations. Once in operation, planned retail shops and the potential marketplace/retail space may host goods including those made in Hawai'i. The new restaurants may feature local culinary talent and prioritizing the use of fresh, Hawai'i-grown produce when possible.</p> <p>The Project is estimated to generate or sustain approximately 1,429 jobs (1,386 FTE) short-term jobs related to construction, as well as <u>approximately 583 (484 FTE) direct jobs on site, in addition to 121 (100 FTE) indirect and 113 (94 FTE) induced jobs, for an estimated total of 817 total jobs (678 FTE jobs)</u> in the long-term, supporting residents in the West O'ahu region. Offering employment opportunities in the West O'ahu area will also expand options for workers, enabling them to shorten their commutes and improve their overall well-being.</p>			
2. Reduce Greenhouse Gas Emissions			
Strategy 9: Measure, manage, and plan for GHG emission reduction.			X
Strategy 10: Incorporate climate change planning into decision-making processes.	X		
Strategy 11: Promote energy conservation and efficiency through outreach, communication, and community and public engagement.			X
Strategy 12: Continue to invest in the deployment of clean energy technologies to reduce reliance on fossil fuels.			X
Strategy 13: Expand the adoption of zero emission vehicles.			X
Strategy 14: Promote alternative modes of transportation.	X		
Strategy 15: Reduce the generation of waste, including plastic waste.	X		
Strategy 16: Increase diversion of waste through recycling, reuse, and composting.	X		
<p>Discussion: The Project will promote alternative, non-polluting modes of transportation. The Project will include improvements to pedestrian facilities <u>within the Cove Property such as, including pathways throughout the Cove Property, to create a safe and attractive pedestrian environment and to support connectivity on site and throughout the area.</u> Bicycle parking stalls consistent with LUO standards will be provided on-site to support cyclists. EV charging consistent with City standards will also be provided.</p> <p>Sustainability measures, such as recycling or promoting the use of compostable or alternative disposable cutlery, may be implemented and refined throughout the operation of the Project (Section 4.12).</p>			
3. Improve Climate Resilience			
Strategy 17: Integrate climate change adaptation and resilience considerations into planning and implementation.	X		
Strategy 18: Assess and communicate the impacts of climate change to residents, businesses, and communities most likely to be impacted.			X
Strategy 19: Implement actions that improve the State's resilience to climate change.	X		
Strategy 20: Increase the resilience of vulnerable populations to the impacts of climate change and other shocks and stressors.			X

Table 5.2: Hawai'i 2050 Sustainability Plan (HRS, Section 226-65) S = Supportive, N/S = Not Supportive, N/A = Not Applicable				S	N/S	N/A
<p>The Applicant is committed to proactively planning and designing structures to be adaptive and resilient to ensure the ongoing successful, safe, and sustainable operations for the foreseeable future. Planned structures at the site will be elevated from eight to 19.5 feet above msl and will be set back at least 60 feet from the shoreline. The shoreline setback area will be maintained as open space, providing a natural buffer to mitigate potential impacts related to flooding. LID and green infrastructure measures, where feasible, will be incorporated and will be determined as the design progresses.</p>						
4. Advance Sustainable Communities						
Strategy 21: Advance smart growth initiatives and multimodal transportation systems.				X		
Strategy 22: Advance sustainability in school and university operations						X
Strategy 23: Integrate sustainable design principles into new and existing buildings.				X		
<p>Discussion: The Project will promote multimodal modes of transportation. The Project will include improvements to pedestrian facilities <u>within the Cove Property such as:</u> including pathways throughout the Cove Property, to create a safe and attractive pedestrian environment and to support connectivity on site and throughout the area. Bicycle parking stalls consistent with LUO standards will be provided on-site to support cyclists. EV charging consistent with City standards will also be provided.</p> <p>Sustainable design principles will be incorporated into the design of new buildings and/or renovation of the existing chapel. Covered open air structures will be integrated throughout to reduce reliance on air conditioning and conserve energy.</p>						
5. Advance Equity						
Strategy 24: Strengthen broadband access to support digital learning and online solutions in rural areas.						X
Strategy 25: Continue to improve economic and social sustainability of individuals through access to affordable housing.						X
Strategy 26: Continue to implement strategies that reduce homelessness in Hawai'i to enhance livelihoods.						X
Strategy 27: Continue to advance opportunities for all, regardless of gender.				X		
<p>Discussion: The Project will support sustainable employment opportunities for all, regardless of gender identification.</p>						
6. Institutionalize Sustainability Throughout Government						
Strategy 28: Invest in staff and other resources to coordinate and advance sustainability goals across State agencies and local governments.						X
Strategy 29: Update State policies to reflect sustainability and climate change priorities.						X
Strategy 30: Incorporate sustainability into government operations.						X
<p>Discussion: The Hawai'i 2050 Sustainability Plan's focus area of institutionalizing sustainability through government is not directly applicable to the Project.</p>						
7. Preserve the Natural Environment						
Strategy 31: Improve water quality through reduced pollution and dumping.				X		
Strategy 32: Support water reuse strategies to conserve water.				X		
Strategy 33: Establish policies to protect Hawai'i's unique marine ecosystems.						X
Strategy 34: Manage climate change impacts to marine resources.				X		
Strategy 35: Protect and manage watersheds.						X
Strategy 36: Continue to adopt strategies that protect land-based natural resources.						X
Strategy 37: Conserve working forest landscapes, protect forests from harm, and enhance public benefits from trees and forests.						X
<p>Discussion: The Project will mitigate potential short- and long-term impacts to water quality due to stormwater runoff through compliance with the conditions of the necessary City grading permit and applicable provisions of HAR, Sections 11-54 and 11-55. Where feasible, LID measures, such as bioswales, rain gardens, planter boxes, sand filters, or permeable pavement, may be integrated into Project design in the long term.</p>						

Table 5.2: Hawai'i 2050 Sustainability Plan (HRS, Section 226-65) S = Supportive, N/S = Not Supportive, N/A = Not Applicable		S	N/S	N/A
8. Perpetuate Traditional Ecological Knowledge and Values				
Strategy 38: Ground climate and sustainability strategies in our cultural foundation.		X		
<i>Discussion:</i> During consultation conducted for the CIA, participants expressed the importance of maintaining access to the shoreline. The current level of beach access and parking will be maintained to protect the beach and natural cove/lagoon.				

5.2.5 Hawai'i State Functional Plans

Developed in the late 1980s and early 1990s as part of the Statewide Planning System, the State Functional Plans are the primary guidance tools for implementing the Hawai'i State Plan. While the Hawai'i State Plan establishes long-term objectives for Hawai'i, the purposes of the Functional Plans are to identify major statewide concerns; define current strategies for particular functions; identify major relationships among different functions; and provide strategies for departmental policies, programs, and priorities. The Functional Plans provide guidance as to State and County roles and the allocation of resources to fulfill identified activities in the areas of agriculture, conservation lands, education, employment, energy, health, higher education, historic preservation, housing, human services, recreation, tourism, transportation, and water resources. Applicable functional plans and their objectives are discussed in *Table 5.3*.

Table 5.3: Hawai'i State Functional Plans S = Supportive, N/S = Not Supportive, N/A = Not Applicable		S	N/S	N/A
Employment State Functional Plan (1990)				
Objective I.A:	Improve the qualifications of entry level workers and their transition to employment			X
Objective I.B:	Develop and deliver education, training and related services to ensure and maintain a quality and competitive workforce.			X
Objective I.C:	Improve labor exchange			X
Objective I.D:	Improve the quality of life for workers and families.	X		
Objective I.E:	Improve planning of economic development, employment and training activities			X
<i>Discussion:</i> Redevelopment of the Cove Property will provide jobs for residents of West O'ahu and support the growth of the secondary urban center. As described in Section 4.10, the Project is anticipated to create approximately 1,429 jobs (1,386 FTE) short-term jobs related to construction, as well as <u>approximately 583 (484 FTE) direct jobs on site, in addition to 121 (100 FTE) indirect and 113 (94 FTE) induced jobs, for an estimated total of 817 total jobs (678 FTE jobs) related to long-term operations in the growing 'Ewa region. Locating jobs within the 'Ewa district will provide opportunities for employees to reduce their commute times, enhancing their quality of life.</u>				
Historic Preservation State Functional Plan (1991)				
Policy A.1:	Expand Statewide Historic Sites Inventory Program			X
Policy B.1:	Provide timely historic property reviews which are integrated effectively into the land use regulatory system.	X		
Policy B.2:	Establish and make available a variety of mechanisms to better protect historic properties.			X
Policy C.1:	Evaluate and designate significant historic properties for legal recognition in a timely manner.	X		
Policy C.2:	Encourage the preservation and maintenance of historical properties through economic incentives and support.			X
Policy C.3:	Explore innovative means to better manage historic properties.			X

Table 5.3: Hawai'i State Functional Plans		S	N/S	N/A
S = Supportive, N/S = Not Supportive, N/A = Not Applicable				
Policy C.4:	Encourage proper preservation techniques.	X		
Policy D.1:	Provide adequate facilities to preserve historic resources.			X
Policy E.1:	Provide support and coordination to activities involved with the collection and conservation of historic records and materials.	X		
Policy F.1:	Support programs to facilitate the public's gathering of historic information			X
Policy F.2:	Coordinate and support programs to disseminate information to the public.			X
Policy G.1:	Provide opportunities for continuing education for persons involved with collecting and preserving historical resources.			X
<p>Discussion: A draft EA-AIS and CIA were conducted to assess the sensitivity and potential occurrence of historic resources, including subsurface resources such as burials. As discussed in Section 4.1, the AIS confirmed two previously-identified historic properties within the Cove Property (SIHP Nos. -03362 and -04968) and identified new portions of SIHP No. -03362. Additionally, the burial preserve for SIHP No. -04968 was designated "CSH 2" during the course of the AIS. To ensure the preservation of historic resources, the AIS proposes two primary mitigation measures which consist of archaeological monitoring (a form of data recovery) and preservation through avoidance, including a Archaeological monitoring of all ground-disturbing activities will be conducted in accordance with an accepted AMP. With regard to the preservation of SIHP No. -04968, consultation with the signatories of the 1995 Burial Agreement, as well as known cultural and lineal descendants of the area has been initiated and is ongoing as of publication of this Final EIS. This consultation is regarding the specifics for the interim and long-term protection measures which will be outlined in the BSCPP document. As requested by SHPD, a buffer zone larger than the existing buffer zone is being considered and will be presented to recognized lineal and cultural descendants for their consideration. It is currently unclear if SIHP No. -04968 was recorded with the Bureau of Conveyances. However, the landowner will verify this, and, if not, will record the burial preserve area (CSH 2) for SIHP No. -04968. The burial preserve area shall remain in perpetuity to preserve the ivi kūpuna, and dedication of the existing burial preserve area (SIHP No. 4968) in perpetuity. Consultation with SHPD and cultural descendants of the area is ongoing.</p>				
Tourism State Functional Plan (1991)				
Objective I.A:	Development, implementation and maintenance of policies and actions which support the steady and balanced growth of the visitor industry.			X
Objective II.A:	Development and maintenance of well-designed visitor facilities and related developments which are sensitive to the environment, sensitive to neighboring communities and activities, and adequately serviced by infrastructure and support services.	X		
Objective III.A:	Enhancement of respect and regard for the fragile resources which comprise Hawai'i's natural and cultural environment. Increased preservation and maintenance efforts.	X		
Objective IV.A:	Support of Hawai'i's diverse range of lifestyles and natural environment.	X		
Objective IV.B:	Achievement of mutual appreciation among residents, visitors, and the visitor industry.	X		
Objective V.A:	Development of a productive workforce to maintain a high quality visitor industry.	X		
Objective V.B:	Enhancement of career and employment opportunities in the visitor industry.	X		
Objective VI.A:	Maintenance of high consumer awareness of Hawai'i as a visitor destination in specific desired market segments.	X		

Table 5.3: Hawai'i State Functional Plans		S	N/S	N/A
S = Supportive, N/S = Not Supportive, N/A = Not Applicable				
<p>Discussion: Revitalizing the Cove Property will strengthen the surrounding area as a secondary resort destination on O'ahu. The Cove will provide both residents and visitors with a dynamic mix experiences characteristic of a Hawaiian-themed outdoor recreation facility within an immersive coastal setting that authentically honors the property's Hawaiian legacy in a contemporary form. Design of the Project will be sensitive to the surrounding environment and will be adequately serviced by infrastructure and support services (Sections 4.6 and 4.8). Mitigation measures as discussed throughout Section 4.0 and summarized in Table 1.1 will be implemented to address potential impacts during construction or long-term operation.</p> <p>The Project supports the preservation and/or maintenance of the surrounding natural and cultural environment. The current level of beach access and parking will be maintained to protect the beach and natural cove/lagoon. To ensure the preservation of historic resources, the AIS proposes two primary mitigation measures, including archaeological monitoring of all ground-disturbing activities in accordance with an accepted AMP and dedication of the existing burial preserve area (SIHP No. 4968) in perpetuity. Consultation with SHPD and cultural descendants of the area is ongoing.</p> <p>The redevelopment of The Cove is estimated to generate or sustain approximately 1,429 jobs (1,386 FTE) short-term jobs related to construction and generate <u>approximately 583 (484 FTE) direct jobs on site, in addition to 121 (100 FTE) indirect and 113 (94 FTE) induced jobs, for an estimated total of 817 total-jobs (678 FTE jobs) during long-term operation, supporting the growth of the secondary urban center in the West O'ahu region and a workforce serving the visitor industry.</u></p>				
Transportation State Functional Plan (1991)				
Objective A:	Expansion of the transportation system and reduction of congestion by increasing transportation capacity, modernizing transportation infrastructure, improving regional mobility, and promoting the development of public transportation systems.			X
Objective B:	Reduction of travel demand through zoning and decentralization initiatives, by closing the gap between where people live and work.	X		
Objective C:	Management of existing transportation systems through a program of transportation systems management.			X
Objective D:	Identification and reservation of lands and rights-of-way required for future transportation improvements.			X
Objective E:	Planning and designing State highways to enhance inter-regional mobility.			X
Objective F:	Improving and enhancing transportation safety	X		
Objective G:	Improved transportation maintenance programs.			X
Objective H:	Ensure that transportation facilities are accessible to people with disabilities.	X		
Objective I:	Development of a transportation infrastructure that supports economic development initiatives.			X
Objective J:	Expansion of revenue bases for transportation improvements.			X
Objective K:	Providing educational programs.			X
<p>Discussion: Redevelopment of the Cove Property supports the maintenance and pursuit of improved quality in land, air, and water resources. As discussed in Sections 4.2.2 and 4.3.2, potential impacts to air and water resources will be mitigated through the implementation of BMPs (summarized in Table 1.1). Long-term adverse impacts are not anticipated.</p> <p>The Cove Property is located in close proximity to existing services and facilities. As such, visitors will be encouraged to utilize alternative modes of transportation to the site, including walking or biking, which will help to reduce the generation of GHGs. As discussed in Section 4.7, the Project will include improvements to pedestrian facilities <u>within the Cove Property such as:</u> including pathways throughout the Cove Property, to create a safe and attractive environment and to support connectivity on site and throughout the area. Bicycle parking stalls consistent with LUO standards will be provided on-site to support cyclists. EV charging consistent with City standards will also be provided. Improvements to transportation facilities will be designed in accordance with ADA standards.</p> <p>Jobs generated by the Project support the growing 'Ewa region, providing residents with job opportunities in the area they live in and thereby reducing travel demand, closing the gap between where people live and work, and improving overall quality of life.</p>				

5.2.6 Hawai'i Tourism Authority – Hawai'i Tourism Strategic Plan: 2020-2025

The Hawai'i Tourism Authority (HTA) was established by Act 156, SLH 1998 to “strategically manage Hawai'i tourism in a sustainable manner consistent with economical goals, cultural values, preservation of natural resources, community desires, and visitor industry needs.” Introduced in 2020, *The Hawai'i Tourism Strategic Plan: 2020-2025*, the plan outlines four interacting “Pillars” supported by research and other administrative functions, and outlines goals and objectives for each. The Pillars, goals and objectives are outlined and discussed in *Table 5.4*:

Table 5.4: Hawai'i Tourism Strategic Plan 2020-2025 S = Supportive, N/S = Not Supportive, N/A = Not Applicable		S	N/S	N/A
Natural Resources Pillar				
Goal:	Dedicate resources to programs that enhance and support Hawai'i's natural resources and cultural sites to improve the quality of life for all of Hawai'i's residents and to enhance the visitor experience.	X		
Objective 1:	Encourage and support sustainable and responsible tourism.	X		
Objective 2:	Engage and encourage active natural and cultural resource management strategies in areas frequented by visitors.	X		
Objective 3:	Promote visitor industry alignment with the Aloha+ Challenge, Hawai'i's recognized model to achieve the UN SDGs, especially for energy and water			X
<i>Discussion: Revitalizing the Cove Property will support the growing 'Ewa region and strengthen the surrounding area as a secondary resort destination on O'ahu. The Cove will provide residents and visitors with a dynamic mix of retail, entertainment, and dining experiences within an immersive coastal setting that authentically honors the property's Hawaiian legacy in a contemporary form. The Project supports sustainable tourism and the preservation and/or maintenance of the surrounding natural and cultural environment. The current level of beach access and parking will be maintained to protect the beach and natural cove/lagoon. To ensure the preservation of historic resources, the AIS proposes two primary mitigation measures, including archaeological monitoring of all ground-disturbing activities in accordance with an accepted AMP and dedication of the existing burial preserve area (SIHP No. 4968) in perpetuity. Consultation with SHPD and cultural descendants of the area is ongoing.</i>				
Hawaiian Culture Pillar				
Goal:	Ho'oulu (grow) the uniqueness and integrity of the Native Hawaiian culture and community through genuine experiences for both visitors and residents.	X		
Objective 1:	Support the everyday use of the Hawaiian language.			X
Objective 2:	Ensure the accurate portrayal of Hawaiian culture by HTA's marketing contractors			X
Objective 3:	Encourage accurate portrayal of Hawaiian culture in visitor industry marketing and experiences for visitors.	X		
Objective 4:	Increase understanding and respect for cultural practitioners, cultural sites, and cultural resources	X		
Objective 5:	Provide the visitor industry with opportunities for Native Hawaiian cultural education and training for its workforce.			X
<i>Discussion: The Cove will provide residents and visitors with a dynamic mix of retail, entertainment, and dining experiences within an immersive coastal setting that authentically honors the property's Hawaiian legacy in a contemporary form. The current nightly commercial lū'au show will be renewed and reprogrammed to perpetuate and honor the Hawaiian culture and history of place through the traditions of hula and mele. Potential programming may be expanded to include educational and cultural workshops and/or activities that highlight the sense of place and fit appropriately within the coastal setting or coordinated events and programs with the neighboring Lanikūhonua Cultural Institute. Ancillary retail shops and the potential marketplace/retail space may include goods, including those made in Hawai'i, and the restaurants may feature local culinary talent and prioritize the use of fresh, Hawai'i-grown produce when possible.</i>				

Table 5.4: Hawai'i Tourism Strategic Plan 2020-2025		S	N/S	N/A
S = Supportive, N/S = Not Supportive, N/A = Not Applicable				
Community Pillar				
Goal:	Work to make sure residents and local communities benefit from tourism by supporting projects valued by the community and aligned with the destination's brand and image; informing both residents and visitors of these projects and events; strengthening relations between residents and visitors; and forming partnerships to build a resilient tourism workforce and community.	X		
Objective 1:	Generate and/or invest in initiatives and projects that provide for positive resident-visitor interaction, celebrate Hawai'i's multicultural heritage, and support better relations between communities and the tourism industry.	X		
Objective 2:	Help build a globally competitive visitor industry workforce with programs for residents starting from school age to college students, and to those already in the visitor industry.			X
Objective 3:	Generate effective messages to enhance residents' understanding of how Hawai'i tourism helps perpetuate Hawaiian culture, preserve the environment, and support communities			X
Objective 4:	Support education and prevention programs to improve safety among visitors and residents and to maintain Hawai'i's reputation as a safe destination.			X
Objective 5:	Actively participate in Hawai'i Emergency Management Agency's (HI-EMA's) preparedness exercises and serve as a communications link to assist Hawai'i's visitor industry and visitors during times of crisis			X
Objective 6:	Identify, mitigate, and address key issues threatening community support for tourism and the integrity of Hawai'i's tourism industry by working with public agencies and private organizations			X
Objective 7:	Support sports programs that create community engagement, have marketing value, provide economic benefits, support Hawai'i's youth, and are aligned with Hawai'i's brand.			X
<i>Discussion: The planned improvements will be the first major enhancement of the Cove Property in over 25 years. The intent of the Project is to create an authentic Hawaiian community gathering place for residents and visitors that honors and reflects the history, culture, and connection to place. The current nightly commercial lū'au show will be renewed and reprogrammed to perpetuate and honor the Hawaiian culture and history of place through the traditions of hula and mele. Potential programming may be expanded to include educational and cultural workshops and/or activities that highlight the sense of place and fit appropriately within the coastal setting or coordinated events and programs with the neighboring Lanikūhonua Cultural Institute. The Applicant will continue to explore opportunities for programming that highlights relevant community-based organizations.</i>				
Brand Marketing Pillar				
Goal:	Take the lead in protecting and enhancing Hawai'i's globally competitive brand in a way that is coordinated, authentic, and market-appropriate; is focused on Hawai'i's unique culture and natural environment; and supports Hawai'i's economy by effectively attracting higher-spending, lower-impact travelers.	X		
Objective 1:	Ensure that Hawai'i's brand image is globally aligned and consistent with marketing principles of authenticity, uniqueness, and Responsible Tourism.	X		
Objective 2:	Ensure marketing is focused on higher-spending, lower impact market segments in each market area.			X
Objective 3:	Maintain or improve the strength of Hawai'i's brand relative to its competitors.			X
<i>Discussion: The Cove will provide residents and visitors with a dynamic mix of retail, entertainment, and dining experiences within an immersive coastal setting that authentically honors the property's Hawaiian legacy in a contemporary form. The Project is envisioned to offer unique experiences distinct from other opportunities in the 'Ewa region. The current nightly commercial lū'au show will be renewed and reprogrammed to authentically perpetuate and honor the Hawaiian culture and history of place. Potential programming may be expanded to include educational and cultural workshops and/or activities that highlight the sense of place and fit appropriately within the coastal setting or coordinated events and programs with the neighboring Lanikūhonua Cultural Institute.</i>				

5.2.7 Hawai'i Tourism Authority O'ahu Destination Management Action Plan (2021-2024)

The HTA initiated the process of developing community-based Destination Management Plans (DMAPs) in an effort to redefine the direction of tourism on each island over a three-year period. The current O'ahu DMAP includes a vision, goal, objectives and actions for 2021-2024. The vision of the O'ahu DMAP is the following:

“By 2024, together with the community, the visitor industry will be rooted in mālama – to take care of this place and each other. O'ahu will live in joy, abundance, and resilience because visitors and residents understand what is pono, share common goals, and have respect for each other and the environment.”

Table 5.5 outlines the objectives and actions from the O'ahu DMAP.

Table 5.5: O'ahu Destination Management Action Plan 2021-2024 S = Supportive, N/S = Not Supportive, N/A = Not Applicable		S	N/S	N/A
Objectives				
Objective 1:	Create positive contributions to the quality of life for O'ahu's residents.	X		
Objective 2:	Support the maintenance, enhancement, and protection of O'ahu's natural resources.	X		
Objective 3:	Ensure the authentic Hawaiian culture is perpetuated and accurately presented in experiences for residents and visitors, materials, and marketing efforts.	X		
Objective 4:	Maintain and improve visitor satisfaction of their experience on O'ahu.	X		
Objective 5:	Strengthen the economic contribution of O'ahu's visitor industry.	X		
Objective 6:	Increase communication and understanding between the residents and visitor industry.			X
<p>Discussion: The planned improvements will be the first major enhancement of the Cove Property in over 25 years. The intent of the Project is to create an authentic Hawaiian community gathering place for residents and visitors that honors and reflects the history, culture, and connection to place. The Cove will provide a unique mix of entertainment, dining, and retail experiences in a unique and immersive coastal setting. The Cove Property will be renewed and reprogrammed to perpetuate and honor the Hawaiian culture and history of place through the traditions of hula, mele, and other practices. Special attention will be given to the selection and utilization of native, Polynesian-introduced, and tropical plants, fostering a connection to the surrounding environment and legacy of the Cove Property.</p> <p>Construction of the Project will support the economy of the 'Ewa region of O'ahu and the overall State (Section 4.10). The redevelopment is estimated to create <u>approximately 583 (484 FTE) direct jobs on site, in addition to 121 (100 FTE) indirect and 113 (94 FTE) induced jobs, for an estimated total of 817 total jobs (678 FTE jobs) jobs and contribute to the economic diversity in the West O'ahu region. Locating jobs within the 'Ewa district will provide opportunities for employees to reduce their commute times, thereby enhancing their quality of life. This coastal development will serve as a major recreational resource, visual amenity, and economic generator for the community.</u></p>				
Actions				
Action A: Decrease the total number of visitors to O'ahu to a manageable level by controlling the number of visitor accommodations and exploring changes to land use, zoning and airport policies.				
A. 1:	Lower the number of illegal short-term vacation rentals by supporting the County to improve enforcement of current regulations. Support the County in implementing new rules			X
A. 2:	Provide resources to engage communities and agencies to collaborate on additional rules; particularly to limit expansion of legal short-term vacation rentals outside of the resort areas.			X
A. 3:	Commit resources to study methods of limiting supply such as:			X
o	Controlling new visitor accommodation development through building permits or approvals for new sites.			X

Table 5.5: O'ahu Destination Management Action Plan 2021-2024		S	N/S	N/A
S = Supportive, N/S = Not Supportive, N/A = Not Applicable				
○ Exploring changes to land use, zoning, airport policies, etc. that influence tourism infrastructure and ultimately determine the number of visitors that can access O'ahu sites.				
<i>Discussion: Action A is not directly applicable to the Project.</i>				
Action B: Implement a pre- and post-arrival tourism communications program to encourage respectful and supportive behavior.				
B. 1: Identify the best messaging and ways to reach and communicate with visitors prior to arrival.				X
B. 2: Support Hawaiian cultural educational and training programs – including 'Ōlelo Hawai'i (Hawaiian language) for the employees in the visitor industry (e.g. hotels, tour guides).				X
B. 3: Develop a messaging program (physical and virtual) to educate visitors and locals about significant sites or areas and pono practices related to them.				X
B. 4: Enhance the goHawaii app to include more real time information, road closures, events, local etiquette, resource protection, and areas that are of-limits.				X
B. 5: Boost the goHawaii app with geofencing capabilities to notify visitors when they are in proximity to a hotspot and redirect them to other more accessible areas through a reservation system.				X
B. 6: Promote use of the goHawaii app to travelers to encourage safe travels and communicate with them to understand where to go and not go.				X
B. 7: Provide visitors with other means of accessing information such as using artificial intelligence to answer visitor questions or share videos and pictures over smartphones to make it easy for visitors to engage.				X
<i>Discussion: While The Cove supports the intent of a pre- and post-arrival tourism communications program, it is not directly applicable to the Project. Communication means at The Cove, such as signage and wayfinding, may integrate educational messaging and the use of 'Ōlelo Hawai'i.</i>				
Action C: Identify sites and implement stewardship plans for key hotspots on O'ahu.				
C. 1: Work with stakeholders to identify sites associated with public impact on natural and cultural resources. Prioritize sites where: 1. Communities and/or neighborhoods have issues with visitors; 2. Conflicts exist within communities regarding visitors; or 3. Residents' access and traditional cultural access need protection.				X
C. 2: Work with communities to determine desired conditions or limits of acceptable change then identify management actions to achieve/sustain those conditions to ensure integrity and avert degradation of hotspots.				X
C. 3: Develop a process to support government and community collaboration on how to manage and steward sites. Determine if there are similar issues across some of the hotspots, so they can be addressed in a group or pilot program.				X
C. 4: Increase opportunities for community-led initiatives that steward and manage these resources, including closure of areas and managing traffic.				X
C. 5: Advocate for increased funding and resources for Department of Land and Natural Resources, City and County Department of Planning and Permitting, and City and County Parks and Recreation, to better manage hotspots.				X
C. 6: Investigate site user fees or hiking permits that go directly to support and manage specific hotspots and the affected communities. Review studies to determine whether site fees are warranted and how fees are to be processed and returned to that spot or community for maintenance, management and enforcement. Evaluate if the fees are working.				X
C. 7: Explore the process of requiring hikers to apply for and acquire a hiking permit. Fees would also go to reimburse search and rescue expenses. The process would include mandatory education on safety and protocol while hiking.				X
<i>Discussion: While The Cove supports Action C, it is not directly applicable to the Project. As a steward of this valuable place, the Applicant has consulted with key cultural descendants and stakeholders in the planning of this Project.</i>				
Action D: Increase enforcement and active management of sites and trails.				

Table 5.5: O’ahu Destination Management Action Plan 2021-2024		S	N/S	N/A
S = Supportive, N/S = Not Supportive, N/A = Not Applicable				
D. 1: Explore ways to improve enforcement of parking rules at hotspots and popular visitor attractions. Crack down on illegal tour vans and buses dropping people off at beaches and trails.				X
D. 2: Increase biosecurity at Daniel K. Inouye International Airport and trails.				X
<ul style="list-style-type: none"> o Promote sanitation protocols for cleaning gear. o Encourage responsible visitor practices like cleaning gear at hiking trails and not tracking in invasive species. 				X
<i>Discussion: While The Cove supports Action D, it is not directly applicable to the Project.</i>				
Action E: Develop a reservation system to monitor and manage users at natural resource and cultural sites.				
E. 1: Explore a reservation system and demand-based fee pricing at popular sites and hotspots.				X
E. 2: Evaluate the current reservation systems at Hanauma Bay and Lē‘ahi to support a sustainable capacity of visitors and advocate for expansion to other hotspots on the island.				X
E. 3: Pilot a program for a statewide reservation system that can redistribute excess demand to other sites or to other participating attractions.				X
<i>Discussion: While The Cove supports Action E, it is not directly applicable to the Project.</i>				
Action F: Establish a “Regenerative Tourism Fee” that directly supports programs to regenerate Hawai‘i’s resources, protect natural resources, and address unfunded conservation liabilities.				
F. 1: Identify how to legally collect this fee (State gives the County the authority to establish such a fee), distribute this type of fee, and develop accountability measures. The fee would support the management system, impacted communities, and workforce development in jobs related to invasive species removal, fishpond restoration, coral growing, and native ecosystem restoration.				X
F. 1a: Educate the visitor industry on the need for the fee and how it signifies visitor industry contribution to sustainability.				X
F. 1b: Share with the traveler/visitor about how the fee would be used to enhance their visit by protecting the place.				X
<i>Discussion: The development of a “Regenerative Tourism Fee” is not directly applicable to the Project. The Cove will maintain the current level of beach access and parking to protect the beach and natural cove/lagoon, which is a valuable natural and cultural resource in the area.</i>				
Action G: Develop and implement marketing programs to attract positive-impact travelers who prioritize the environment, culture and investing in our local community.				
G. 1: Continue to develop and focus marketing messaging to market segments that appreciate learning about unique cultures and natural resources.				X
G. 2: Continue to develop plans to attract higher spending travelers (i.e., meetings, conventions and incentives (MCI) visitors, weddings, business travelers, medical tourism, LGBTQ, and arts and culture).				X
G. 3: Continue to reassess and adjust marketing O’ahu with context and not just surf and sand. Include island values, prioritize environment and culture to attract the right kind of visitors.				X
G. 4: Use marketing campaigns as an opportunity for visitors to connect with O’ahu on a deeper level through immersive experiences, and travel in a way that enriches their lives while giving back to the communities they are fortunate enough to visit.				X
G. 5: Continue to develop campaigns to shift visitation from peak periods to slower shoulder periods.				X
G. 6: Be intentional about what we promote to ensure that it is authentic. Enhance the current “The Hawaiian Islands” brand guidelines for the industry partners and encourage consistent use.		X		
G. 7: Develop metrics and collect data to measure marketing effectiveness beyond the economic impacts (e.g., Aloha+ Challenge measures, acceptance of tourism by local residents, visitors participating in voluntourism, buying local, etc.).				X
<i>Discussion: The Cove will provide residents and visitors with a dynamic mix of retail, entertainment, and dining experiences within an immersive coastal setting that authentically honors the property’s Hawaiian legacy in a contemporary form.</i>				
Action H: Continue to develop and implement “Buy Local” programs to promote purchase of local products and services to keep funds in our communities and minimize carbon footprint.				
H. 1: Continue to encourage the visitor industry to prioritize purchase of Hawai‘i based, ‘āina friendly products, services and technology solutions to include literature, crafts, fashion, music, performance art, film, fresh produce, value-added products, and software.		X		

Table 5.5: O'ahu Destination Management Action Plan 2021-2024 S = Supportive, N/S = Not Supportive, N/A = Not Applicable	S	N/S	N/A
H. 2: Work with hotels, restaurants, and visitor retail to feature or promote local products.	X		
H. 3: Continue to leverage programs that support buying local. Coordinate with various certification programs for a cohesive promotion program.	X		
H. 4: Promote O'ahu artisans, including local crafts, fashion, music, performing, and visual arts.	X		
<p>Discussion: The purpose of the Project is to enhance the Hawaiian-themed outdoor recreation facility and create an authentic Hawaiian community gathering place for residents and visitors that honors and reflects the history, culture, and connection to place. The primary focal point at The Cove will be a new amphitheater/performing arts venue, which will feature a renewed program. Programming will perpetuate and honor the Hawaiian culture and history of place through the traditions of hula, mele, and other practices. With the variety of programming, the new performing arts venue will support local artists, thereby supporting the overall economy.</p> <p>Planned retail shops will foster an authentic connection between people and place, and may feature a curated selection of goods, including those made in Hawai'i. The new restaurants will support the economy and community by featuring local culinary talent and prioritizing the use of fresh, Hawai'i-grown produce when possible.</p>			
Action I: Manage the visitors' use of cars as transportation on O'ahu.			
I. 1: Work with the O'ahu Metropolitan Planning Organization to examine the issues stemming from visitor traffic in impacted communities. Determine how to alleviate those issues such as developing infrastructure to reduce stress on residential areas or a penalty structure to discourage visitors or industry from violating restrictions.			X
I. 2: Support O'ahu Metropolitan Planning Organization efforts to provide safe, convenient, reliable and efficient private and public transportation to shift visitors from driving rental cars to more environmentally sustainable modes. Include the development, support of, and advocacy for bike paths and the promotion of bicycle use.			X
I. 3: Consider creating pedestrian-oriented areas.	X		
I. 4: Look at shuttles from parking areas to sites to alleviate individual cars or parking reservation systems.	X		
<p>Discussion: Redevelopment of the Cove Property will offer an exciting and accessible destination within the 'Ewa region. Resort visitors will be able to take advantage of the Project's close proximity and utilize non-vehicular modes of transportation to the site. Pedestrian pathways will be integrated to provide improved connection and circulation throughout the property. Walkways will be enhanced by lighting, landscaping, and other themed design elements. Improvements at the Cove Property will create an inviting pedestrian experience, thereby enhancing openness to and connectivity within the on-site, and within the wider vicinity to public beaches and adjacent hotels, timeshares, and condominiums.</p>			
Action J: Work with community partners to develop, market, encourage, and support more collaborative, curated experiences that enrich residents and visitors alike.			
J. 1: Increase the number of suitable places for visitor and resident activities by renovating popular hikes/sites away from residential areas or developing new sites. Improvements would include adding walking paths, developing parking, signage, etc.			X
J. 2: Commit resources to promote alternatives to overused sites or going off the beaten path. Redirect visitors to areas that can accept higher traffic away from residential areas. Enhance these places with signage and messaging, develop programs, educational offerings, increase exhibits, etc.			X
J. 3: Develop new recreational opportunities for residents to ease the burden on sites that are heavily used by visitors and residents.	X		
J. 4: Explore the creation of a curated "city pass" program to move visitors to sites and attractions that have capacity and infrastructure to handle more visitors.			X
J. 5: Examine creation of "Kama'āina Days" at identified sites with priority for weekends.			X
<p>Discussion: The Project is located adjacent to the Ko Olina Resort area, which is designated in the City GP as one of four "secondary" resort destinations on the island and are part of the City's overall strategy to relieve growth pressure on Waikīkī (DPP, 2020). The planned improvements will be the first major enhancement of the Cove Property in over 25 years. The Project will redevelop the existing Cove Property into an authentic Hawaiian community gathering place for residents and visitors that honors and reflects the history, culture, and connection to this place. The redevelopment will refresh the existing entertainment programming and add new recreational opportunities such as restaurants, retail, and outdoor gathering spaces, appealing to residents and visitors alike.</p>			

5.2.8 Coastal Zone Management, Hawai'i Revised Statutes Chapter 205A

Under HRS, Chapter 205A, CZM is a comprehensive program that establishes and enforces standards and policies to guide the development of public and private lands within coastal areas. The State CZM objectives and policies address the following 10 subject areas: (1) recreational resources, (2) historic resources, (3) scenic and open space resources, (4) coastal ecosystems, (5) economic uses, (6) coastal hazards, (7) managing development, (8) public participation, (9) beach protection, and (10) marine resources. The subject areas primarily relate to potential development impacts on the shoreline, nearshore, and ocean environments.

The State's SMA permitting system is part of the CZM Program. The SMA permit is a management tool administered by counties to assure that uses, activities, or operations on land or touching water within an SMA are designed and carried out in compliance with the CZM objectives and policies and SMA guidelines as articulated in ROH, Chapter 25 (see Section 5.3.5 for further discussion). Table 5.6 discusses the Project's compliance the CZM objectives and policies articulated in HRS, Chapter 205A.

Table 5.6: Coastal Zone Management Program (HRS, Section 205A)			
Objective and Policies			
S = Supportive, N/S = Not Supportive, N/A = Not Applicable			
	S	N/S	N/A
OBJECTIVES & POLICIES			
(1) Recreational resources;			
Provide coastal recreational opportunities accessible to the public.			
(A) Improve coordination and funding of coastal recreational planning and management; and			X
(B) Provide adequate, accessible, and diverse recreational opportunities in the coastal zone management area by:			
(i) Protecting coastal resources uniquely suited for recreational activities that cannot be provided in other areas;	X		
(ii) Requiring restoration of coastal resources that have significant recreational and ecosystem value, including but not limited to coral reefs, surfing sites, fishponds, sand beaches, and coastal dunes, when these resources will be unavoidably damaged by development; or requiring reasonable monetary compensation to the State for recreation when restoration is not feasible or desirable;			X
(iii) Providing and managing adequate public access, consistent with conservation of natural resources, to and along shorelines with recreational value;	X		
(iv) Providing an adequate supply of shoreline parks and other recreational facilities suitable for public recreation;	X		
(v) Ensuring public recreational uses of county, State and federally owned or controlled shoreline lands and waters having recreational value consistent with public safety standards and conservation of natural resources.			X
(vi) Adopting water quality standards and regulating point and non-point sources of pollution to protect, and where feasible, restore the recreational value of coastal waters	X		
(vii) Developing new shoreline recreational opportunities, where appropriate, such as artificial lagoons, artificial beaches, and artificial reefs for surfing and fishing			X
(viii) Encouraging reasonable dedication of shoreline areas with recreational value for public use as part of discretionary approvals or permits by the land use commission, board of land and natural resources, and county authorities; and crediting such dedication against the requirements of section 46-6.			X

Table 5.6: Coastal Zone Management Program (HRS, Section 205A)			
Objective and Policies			
S = Supportive, N/S = Not Supportive, N/A = Not Applicable			
	S	N/S	N/A
<p>Discussion: The Project supports the CZM objectives for recreational resources. The Cove has been designed to provide residents and visitors with a unique mix of gathering opportunities while also being mindful of the nearshore coastal environment. Public access to the beach will continue to be maintained at current levels to protect the natural cove/Alagoon. Planned structures at the site will be set back 60-feet from the shoreline to ensure the natural coastal environment is maintained and protected. Open-air lawn areas will provide guests with a relaxed setting and maintain views of the ocean. The Project will also mitigate potential short- and long-term impacts to water quality through compliance with the conditions of the necessary City grading permit and applicable provisions of HAR, Sections 11-54 and 11-55. Where feasible, LID measures, such as bioswales, rain gardens, planter boxes, sand filters, or permeable pavement, may be integrated into Project design in the long term.</p>			
(2) Historic resources;			
Protect, preserve, and, where desirable, restore those natural and manmade historic and prehistoric resources in the coastal zone management area that are significant in Hawaiian and American history and culture.			
(A) Identify and analyze significant archaeological resources;	X		
(B) Maximize information retention through preservation of remains and artifacts or salvage operations; and	X		
(C) Support State goals for protection, restoration, interpretation, and display of historic resources.	X		
<p>Discussion: A draft AIS and CIA were conducted to assess the sensitivity and potential occurrence of historic resources, including subsurface resources such as burials. As discussed in Section 4.1, the AIS confirmed two previously-identified historic properties within the Cove Property (SIHP Nos. -Q3362 and -Q4968) and identified new portions of SIHP No. -03362. Additionally, the burial preserve for SIHP No. -04968 was designated "CSH 2" during the course of the AIS. To ensure the preservation of historic resources, the AIS proposes two primary mitigation measures which consist of archaeological monitoring (a form of data recovery) and preservation through avoidance, including a Archaeological monitoring of all ground-disturbing activities will be conducted in accordance with an accepted AMP. With regard to the preservation of SIHP No. -04968, consultation with the signatories of the 1995 Burial Agreement, as well as known cultural and lineal descendants of the area has been initiated and is ongoing as of publication of this Final EIS. This consultation is regarding the specifics for the interim and long-term protection measures which will be outlined in the BSCPP document. As requested by SHPD, a buffer zone larger than the existing buffer zone is being considered and will be presented to recognized lineal and cultural descendants for their consideration. It is currently unclear if SIHP No. -04968 was recorded with the Bureau of Conveyances. However, the landowner will verify this, and, if not, will record the burial preserve area (CSH 2) for SIHP No. -04968. The burial preserve area shall remain in perpetuity to preserve the iwi kūpuna, and dedication of the existing burial preserve area (SIHP No. 4968) in perpetuity. Consultation with SHPD and cultural descendants of the area is ongoing.</p>			
(3) Scenic and open space resources;			
Protect, preserve, and, where desirable, restore or improve the quality of coastal scenic and open space resources.			
(A) Identify valued scenic resources in the coastal zone management area;	X		
(B) Ensure that new developments are compatible with their visual environment by designing and locating those developments to minimize the alteration of natural landforms and existing public views to and along the shoreline;	X		
(C) Preserve, maintain, and, where desirable, improve and restore shoreline open space and scenic resources; and	X		
(D) Encourage those developments that are not coastal dependent to locate in inland areas.			X
<p>Discussion: As discussed in Section 4.1.1, the redevelopment of the Cove Property is not anticipated to adversely impact protected public viewsheds. Existing aging structures on the Cove Property will be demolished and replaced with new structures. Redevelopment of the Cove Property will therefore enhance the visual environment on the site and fit with the character of the overall Project area. Open space will continue to be preserved on the site consistent with the conditions of the UA. Lush vegetation will be integrated throughout the Cove Property to complement the surrounding natural environment and reflect culturally appropriate themes. Landscaping is expected to consist of native, Polynesian-introduced, or tropical trees, and shrubs of varying sizes.</p>			
(4) Coastal ecosystems;			
Protect valuable coastal ecosystems, including reefs, beaches, and coastal dunes, from disruption and minimize adverse impacts on all coastal ecosystems.			

Table 5.6: Coastal Zone Management Program (HRS, Section 205A)			
Objective and Policies			
S = Supportive, N/S = Not Supportive, N/A = Not Applicable			
	S	N/S	N/A
(A) Exercise an overall conservation ethic, and practice stewardship in the protection, use, and development of marine and coastal resources;	X		
(B) Improve the technical basis for natural resource management;			X
(C) Preserve valuable coastal ecosystems of significant biological or economic importance, including reefs, beaches, and dunes;	X		
(D) Minimize disruption or degradation of coastal water ecosystems by effective regulation of stream diversions, channelization, and similar land and water uses, recognizing competing water needs; and			X
(E) Promote water quantity and quality planning and management practices that reflect the tolerance of fresh water and marine ecosystems and maintain and enhance water quality through the development and implementation of point and non-point source water pollution control measures.	X		
<i>Discussion: Redevelopment of the Cove Property will protect valuable coastal ecosystems. To mitigate potential impacts to water quality during construction, the Project will comply with the conditions of the City grading permit and applicable provisions of HAR, Sections 11-54 and 11-55. Where feasible, LID measures, such as bioswales, rain gardens, planter boxes, sand filters, or permeable pavement, may be integrated into Project design in the long term. Additionally, to protect the adjacent beach and natural cove in the long term, the current level of access and parking for beachgoers will be maintained throughout construction and long-term operation of The Cove.</i>			
(5) Economic uses;			
Provide public or private facilities and improvements important to the State's economy in suitable locations.			
(A) Concentrate coastal dependent development in appropriate areas;	X		
(B) Ensure that coastal dependent development and coastal related development are located, designed, and constructed to minimize exposure to coastal hazards and adverse social, visual, and environmental impacts in the coastal zone management area; and	X		
(C) Direct the location and expansion of coastal development to areas designed and used for that development and permit reasonable long-term growth at those areas, and permit coastal development outside of designated areas when: (i) Use of designated locations is not feasible; (ii) Adverse environmental effects and risks from coastal hazards are minimized; and (iii) The development is important to the State's economy.	X		
<i>Discussion: The Cove Property has been used for commercial activities for 40 years, and the planned improvements will be the first major enhancement of existing amenities in over 25 years. The Project will continue the commercial use of the property, while providing enhancements in alignment with the State and City's vision for the region.</i>			
<i>The Cove will be designed to minimize exposure to coastal hazards by locating new structures at least 60 feet from the shoreline and ensuring that finished floor elevations are above the 3.2-foot SLR-XA (see Table 3.1 for estimated floor elevations). Potential adverse social, visual, and environmental impacts will be minimized through the implementation of mitigation measures as summarized in Table 1.1 and discussed throughout Section 4.0.</i>			
<i>The long-term economic productivity of the Cove Property will be enhanced by the Project. As discussed in Section 4.10, long-term operation of the Project is estimated to create approximately 583 (484 FTE) direct jobs on site, in addition to 121 (100 FTE) indirect and 113 (94 FTE) induced jobs, for an estimated 817 total jobs (678 FTE jobs) and generate approximately \$34.5 million annually in labor income and approximately \$100.0 million in economic output. In the long-term, the State government is estimated to accrue approximately \$4.6 million per year annually, while the City government may accrue approximately \$2.1 million per year annually.</i>			
(6) Coastal hazards;			
Reduce hazard to life and property from coastal hazards.			
(A) Develop and communicate adequate information about the risks of coastal hazards;			X
(B) Control development, including planning and zoning control, in areas subject to coastal hazards;	X		
(C) Ensure that developments comply with requirements of the National Flood Insurance Program; and	X		
(D) Prevent coastal flooding from inland projects.	X		

Table 5.6: Coastal Zone Management Program (HRS, Section 205A)			
Objective and Policies			
S = Supportive, N/S = Not Supportive, N/A = Not Applicable			
	S	N/S	N/A
<p>Discussion: The Cove Property is located within the SMA. As such, the Applicant will be applying for a SMA (Major) Use Permit (Major) to ensure the Project adheres to SMA guidelines for coastal development. The Cove will be designed to minimize exposure to coastal hazards, as discussed throughout Section 4.4. New structures will be located at least 60 feet from the shoreline and finished floor elevations will be above the 3.2-foot SLR-XA (see Table 3.1 for estimated floor elevations). Structures will be built in accordance with IBC, State, and City building code standards to promote public safety, and LID measures to mitigate potential flooding at the site will be incorporated where feasible and will be determined as the design progresses (Section 4.8).</p> <p>The Project site is located in FEMA Flood Zones D and VE, which is considered a SFHA and is subject to development standards articulated in ROH, Chapter 21A. The Project will comply with ROH, Chapter 21A as required.</p>			
(7) Managing development;			
Improve the development review process, communication, and public participation in the management of coastal resources and hazards.			
(A) Use, implement, and enforce existing law effectively to the maximum extent possible in managing present and future coastal zone development;			X
(B) Facilitate timely processing of applications for development permits and resolve overlapping or conflicting permit requirements; and			X
(C) Communicate the potential short and long-term impacts of proposed significant coastal developments early in their life cycle and in terms understandable to the public to facilitate public participation in the planning and review process.	X		
<p>Discussion: This EIS has been prepared in compliance with environmental requirements outlined in HRS, Chapter 343 and HAR, Chapter 11-200.1. The Project will be conducted in compliance with all necessary State and City environmental rules and regulations as discussed throughout this EIS.</p>			
(8) Public participation;			
Stimulate public awareness, education, and participation in coastal management.			
(A) Promote public involvement in coastal zone management processes;	X		
(B) Disseminate information on coastal management issues by means of educational materials, published reports, staff contact, and public workshops for persons and organizations concerned with coastal issues, developments, and government activities; and			X
(C) Organize workshops, policy dialogues, and site-specific mediations to respond to coastal issues and conflicts.			X
<p>Discussion: A EISPN was published by the ERP in The Environmental Notice on June 23, 2021 to notify agencies, organizations, and individuals that a Draft EIS would be prepared for the Project. Publication of the EISPN was followed by a 30-day public comment period to solicit guidance on the scope of the studies to be prepared and to gather input on important topics to be covered in the Draft EIS. A total of 18 agencies and individuals provided responses during the public comment period. In addition, an EIS public scoping meeting was held virtually on July 7, 2021 to collect further input. See Table 7.1 for a listing of those who provided comments, input received during the EIS public scoping meeting, and responses provided.</p> <p>Subsequently, First Draft EIS for the Project was published in TEN on May 8, 2024 and a Second Draft EIS was published in TEN on June 8, 2024. Comments received during the 45-day public comment period for the First Draft EIS and the Second Draft EIS have been considered. A total of 46 agencies, organizations, and individuals provided comments on the Draft EIS (Table 7.1). Copies of each comment letter are provided in Appendix A-2. A summary of comments received and associated responses is provided in Table 7.3, which is organized by major topics.</p> <p>Agencies, organizations, and individuals notified of the EISPN and Draft EIS will be contacted when the Draft Final EIS is published and will be notified of the 45-day comment period.</p>			
(9) Beach and coastal dune protection;			
(A) Protect beaches and coastal dunes for:			
(i) Public use and recreation;	X		
(ii) The benefit of coastal ecosystems; and	X		

Table 5.6: Coastal Zone Management Program (HRS, Section 205A)			
Objective and Policies			
S = Supportive, N/S = Not Supportive, N/A = Not Applicable			
	S	N/S	N/A
(iii) Use as natural buffers against coastal hazards;	X		
(B) Coordinate and fund beach management and protection.			
(A) Locate new structures inland from the shoreline setback to conserve open space, minimize interference with natural shoreline processes, and minimize loss of improvements due to erosion;	X		
(B) Prohibit construction of private shoreline hardening structures, including seawalls and revetments, at sites having sand beaches and at sites where shoreline hardening structures interfere with existing recreational and waterline activities;	X		
(C) Minimize the construction of public shoreline hardening structures, including seawalls and revetments, at sites having sand beaches and at sites where shoreline hardening structures interfere with existing recreational and waterline activities;	X		
(D) Minimize grading and damage to coastal dunes;			X
(E) Prohibit private property owners from creating a public nuisance by inducing or cultivating the private property owner's vegetation in a beach transit corridor; and	X		
(F) Prohibit private property owners from creating a public nuisance by allowing the private property owner's unmaintained vegetation to interfere or encroach upon a beach transit corridor.	X		
<i>Discussion: While the Project will increase access to the Cove Property, the current level of access to the adjacent beach and parking will be maintained to continue to protect and steward this important natural and recreational resource. Planned structures at the site will be set back 60 feet from the certified shoreline. The Project will not involve shoreline hardening or grading or damage to coastal dunes. The Applicant will continue to maintain vegetation on the Cove Property so as to not interfere or encroach upon the adjacent beach transit corridor.</i>			
(10) Marine and coastal resources;			
Promote the protection, use, and development of marine and coastal resources to assure their sustainability.			
(A) Ensure that the use and development of marine and coastal resources are ecologically and environmentally sound and economically beneficial;	X		
(B) Coordinate the management of marine and coastal resources and activities to improve effectiveness and efficiency;	X		
(C) Assert and articulate the interests of the State as a partner with federal agencies in the sound management of ocean resources within the United States exclusive economic zone;			X
(D) Promote research, study, and understanding of ocean and coastal processes, impacts of climate change and sea level rise, marine life, and other ocean resources to acquire and inventory information necessary to understand how coastal development activities relate to and impact ocean and coastal resources; and			X
(E) Encourage research and development of new, innovative technologies for exploring, using, or protecting marine and coastal resources.			X
<i>Discussion: Redevelopment of the Cove Property will ensure that coastal resources are used in a manner that is environmentally sound and economically beneficial. To protect the adjacent beach and natural cove, the current level of access and parking for beachgoers will be maintained throughout construction and long-term operation of The Cove. Redevelopment of the Cove Property will provide various beneficial economic benefits. Once in operation, planned retail shops and the potential marketplace/retail space may feature a curated selection of goods, including those made in Hawai'i, supporting local entrepreneurship. The new restaurants will support the economy and community by featuring local culinary talent and prioritizing the use of fresh, Hawai'i-grown produce when possible. Renewed programming at the site will provide opportunities for local entertainers, cultural practitioners, and educators to share their talents. As discussed in Section 4.10, long-term operation of the Project is estimated to create approximately 583 (484 FTE) direct jobs on site, in addition to 121 (100 FTE) indirect and 113 (94 FTE) induced jobs, for an estimated total of 817 total jobs and. The Project is also estimated to generate approximately \$34.5 million annually in labor income and approximately \$100.0 million in economic output. In the long-term, the State government is estimated to accrue approximately \$4.6 million per year annually, while the City government may accrue approximately \$2.1 million per year annually.</i>			

5.3 City and County of Honolulu Plans, Policies and Controls

5.3.1 City and County of Honolulu General Plan

The General Plan for the City was adopted in 1977 and subsequently amended and adopted by the Honolulu City Council on December 21, 2021. The 2021 General Plan is a statement of long-range socio-economic, environmental, and design objectives and policies to be achieved for the general prosperity and welfare for the people of the O’ahu and is intended to serve as a guide for all levels of government, private enterprise, neighborhood and citizen groups, organizations, and individual citizens.

The General Plan consists of 11 subject areas and provides the framework for the City’s public policy concerning the needs of the people and the functions of government. The subject areas address aspects of health, safety, and welfare for O’ahu’s communities, including the following: population trends and growth, economic activity, the natural environment, housing, transportation and utilities, energy, physical development and urban design, public safety, health and education, culture and recreation, and government operations and fiscal management. *Table 5.7* discusses the Project’s alignment with the applicable objectives and policies of the General Plan.

Table 5.7: City and County of Honolulu General Plan		S	N/S	N/A
S = Supportive, N/S = Not Supportive, N/A = Not Applicable				
PART I: POPULATION				
Objective A: To plan for anticipated population in a manner that acknowledges the limits of O’ahu’s natural resources, protects the environment, and minimizes social, cultural, and economic disruptions.				
Policy 1: Allocate efficiently the money and resources of the City in order to meet the needs of O’ahu’s current and future population.				X
Policy 2: Provide adequate support facilities to accommodate future numbers of visitors to O’ahu while seeking to minimize disruption to residents and protect the natural environment.	X			
Policy 3: Seek a balanced pace of physical development in harmony with the City’s environmental, social, cultural, and economic goals by effecting and enforcing City regulations.	X			
Policy 4: Establish geographic growth boundaries to accommodate future population growth while at the same time protecting valuable agricultural lands, environmental resources, and open space.				X
Policy 5: Support family planning and social equity.				X
Objective B: To establish a pattern of population distribution that will allow the people of O’ahu to live, work and play in harmony.				
Policy 1: Facilitate the full development of the primary urban center through higher-density redevelopment and the provision of adequate infrastructure.				X
Policy 2: Encourage development within the secondary urban center at Kapolei and the ‘Ewa and Central O’ahu urban-fringe areas to relieve developmental pressures in the remaining urban-fringe and rural areas and to meet housing needs not readily provided in the primary urban center.	X			
Policy 3: Manage land use and development in the urban-fringe and rural areas so that: a. Development is contained within growth boundaries; and b. Population densities in all areas remain consistent with the character, culture, and environmental qualities desired for each community.	X			
Policy 4: Direct growth according to Policies 1, 2, and 3 above by providing development capacity and needed infrastructure to support a distribution of O’ahu’s resident population that is consistent with the following for the Primary Urban Center: 43% distribution of the 2040 O’ahu population.				X

Table 5.7: City and County of Honolulu General Plan			
S = Supportive, N/S = Not Supportive, N/A = Not Applicable			
	S	N/S	N/A
<i>Discussion: Redevelopment of the Cove Property will support the growing 'Ewa region and strengthen the surrounding area as a secondary resort destination on O'ahu. The Cove will provide residents and visitors with a dynamic mix of retail, entertainment, and dining experiences within an immersive coastal setting that authentically honors the property Hawaiian legacy in a contemporary form. The Project is estimated to generate 1,429 jobs (1,386 FTE) short-term jobs during the construction period and approximately 583 (484 FTE) direct jobs on site, in addition to 121 (100 FTE) indirect and 113 (94 FTE) induced jobs, for an estimated total of 817 total jobs (678 FTE jobs) during operation. The Project will provide employment opportunities for residents of the West O'ahu region, reducing commute times and enhancing overall quality of life.</i>			
PART II: BALANCED ECONOMY			
Objective A: To promote diversified economic opportunities that enable all the people of O'ahu to attain meaningful employment and a decent standard of living.			
Policy 1: Support a strong, diverse, and dynamic economic base that protects the natural environment and is resilient to changes in global conditions.	X		
Policy 2: Encourage the viability of businesses and industries, including support for small businesses, which contribute to the economic and social well-being of O'ahu residents.	X		
Policy 3: Pursue opportunities to grow and strategically develop non-polluting industries such as healthcare, agriculture, renewable energy, and technology in appropriate locations that contribute to O'ahu's long-term environmental, economic, and social sustainability.			X
Policy 4: Support entrepreneurship and innovation through creative efforts such as partnerships with businesses and non-profit organizations, and by encouraging complementary policies that support access to capital markets.			X
Policy 5: Foster a healthy business climate by streamlining regulatory processes to be transparent, predictable, and efficient.			X
Policy 6: Encourage the development of local, national, and world markets for the products of O'ahu-based industries.	X		
Policy 7: Explore and encourage alternate economic models that reflect traditional cultural values and improve economic resilience, i.e., subsistence, barter and a culture of reciprocity and sharing.			X
Objective B: To maintain a successful visitor industry that creates living wage employment, enhances quality of life, and actively supports our unique sense of place, natural beauty, Native Hawaiian culture, and multi-cultural heritage.			
Policy 1: Encourage the visitor industry to support the quality of the visitor experience, the economic and social well-being of communities, the environment, and the quality of life of residents.	X		
Policy 2: Respect and emphasize the value that Native Hawaiian culture, its cultural practitioners, and other established ethnic traditions bring to enrich the visitor experience and appreciation for island heritage, culture, and values.	X		
Policy 3: Guide the development and operation of visitor accommodations and attractions in a manner that avoids unsustainable increases in the cost of providing public services and infrastructure, and that respects existing lifestyles, cultural practices, and natural, cultural, and historic resources.	X		
Policy 4: Partner with the private sector to support the long-term viability of Waikiki as a world class visitor destination and as O'ahu's primary resort area, and to support adequate adaptation strategies against climate change impacts.			X
Policy 5: Provide related public expenditures for rural and urban-fringe areas that are highly impacted by the visitor industry.			X
Policy 6: Provide for a high-quality, livable, and safe environment for visitors and residents in Waikiki, and support measures to ensure visitors' and residents' safety in all areas of O'ahu.			X
Policy 7: Concentrate on the quality of the visitor experience in Waikiki, rather than on development densities.			X
Policy 8: Facilitate the development of the following secondary resort areas: Ko 'Olina, Turtle Bay, Hoakalei, and Mākaha Valley in a manner that respects existing lifestyles and the natural environment.	X		
Policy 9: Preserve scenic qualities of O'ahu for residents and visitors alike.	X		

Table 5.7: City and County of Honolulu General Plan S = Supportive, N/S = Not Supportive, N/A = Not Applicable	S	N/S	N/A
Policy 10: Encourage physical improvements, social services, and cultural programs that contribute to a high-quality visitor experience, while seeking financial support of these improvements from the visitor industry.	X		
Objective C: To ensure the long-term viability, continued productivity, and sustainability of agriculture on O'ahu.			
Policy 1: Foster a positive business climate for agricultural enterprises of all sizes, as well as innovative approaches to farming as a business, to ensure the continuation of agriculture as an important component of O'ahu's economy.			X
Policy 2: Support agricultural diversification to strengthen the agricultural industry and make more locally grown food available for local consumption.			X
Policy 3: Foster market opportunities and increased consumer demand for safe, locally grown, fresh, processed, and value-added agricultural products.			X
Policy 4: Streamline the implementation of regulations to enhance a producer's ability to develop, market, and distribute locally grown food and products.			X
Policy 5: Identify the economic benefits of local food production for local markets. Provide economic incentives to encourage local food production and sustainability, and encourage agricultural and aquaculture occupations.			X
Policy 6: Promote small-scale farming activities and other operations, such as truck farming, flower growing, aquaculture, livestock production, taro growing, subsistence farms, and community gardens.			X
Policy 7: Encourage landowners to actively use agricultural lands for agricultural purposes, and to pursue the long-term preservation of agricultural land with high productivity potential for agricultural production.			X
Policy 8: Encourage sustainable agricultural production to coexist on lands with renewable energy generation.			X
Policy 9: Prohibit the urbanization of agricultural land located outside the City's growth boundaries.			X
Policy 10: Support and encourage technologies and agricultural practices that conserve and protect water, soil, air quality, and drainage areas, reduce carbon emissions, and promote public health and safety.			X
Policy 11: Support and encourage the availability and use of non-potable water for irrigation, where feasible.			X
Policy 12: Provide plans, incentives, and strategies to ensure the affordability of agricultural land for farmers.			X
Policy 13: Encourage both public and private investments to improve and expand agricultural infrastructure, such as irrigation systems, agricultural processing centers, and distribution networks.			X
Policy 14: Promote farming as a desirable and fulfilling occupation by encouraging agricultural education and training programs and by raising public awareness and appreciation for agriculture.			X
Policy 15: Protect the right to farm by enforcing right-to-farm laws, enacting policies to protect agricultural operations, and imposing meaningful buffer zones.			X
Policy 16: Seek ways to discourage agricultural theft and vandalism.			X
Policy 17: Recognize the scenic value of agricultural lands as an open-space resource and amenity.			X
Objective D: To use the economic resources of the sea in a sustainable manner.			
Policy 1: Encourage the fishing industry to maintain its viability at a level that does not degrade or damage marine ecosystems.			X
Policy 2: Encourage the ongoing development of aquaculture, ocean research, and other ocean-related industries.			X
Policy 3: Encourage the expansion of ocean recreation activities for residents and visitors that are operated in a sustainable manner.			X
Objective E: To ensure meaningful employment and economic equity.			
Policy 1: Support public and private training and employment programs to prepare residents for existing and future jobs, including those for historically marginalized communities.			X
Policy 2: Make full use of State and Federal employment and training programs.			X

Table 5.7: City and County of Honolulu General Plan S = Supportive, N/S = Not Supportive, N/A = Not Applicable		S	N/S	N/A
Policy 3:	Encourage the provision of retraining programs for workers in industries with planned reductions in their labor force.			X
Policy 4:	Identify emerging industries, encourage investments needed to support the industries, and develop a skilled workforce in these fields			X
Objective F: To maintain federal programs and economic activity on O'ahu consistent with the City's infrastructure and environmental goals.				
Policy 1:	Take full advantage of Federal programs and grants which will contribute to the economic and social well-being of O'ahu's residents.			X
Policy 2:	Encourage the Federal government to pay for the cost of public services used by Federal agencies.			X
Policy 3:	Encourage the Federal government to lease new facilities rather than construct them on tax exempt public land.			X
Policy 4:	Encourage the military to purchase locally all needed services and supplies which are available on O'ahu.			X
Policy 5:	Encourage the continuation of a high level of military-related employment both on and off base in the Hickam-Pearl Harbor, Wahiawā, Kailua-Kāne'ohe, and 'Ewa areas.			X
Objective G: To bring about orderly economic growth on O'ahu.				
Policy 1:	Concentrate economic activity and government services in the primary urban center and in the secondary urban center at Kapolei.			X
Policy 2:	Advance the equitable distribution of City capital spending, employment opportunities, infrastructure investments, and other benefits throughout communities based on need and regardless of income level. Allow infrastructure and business activity in urban fringe areas appropriate to population needs.			X
Policy 3:	Maintain sufficient land in appropriately located commercial and industrial areas to help ensure a favorable business climate on O'ahu.	X		
Policy 4:	Encourage the continuation of a high level of military-related employment in the Hickam-Pearl Harbor, Wahiawa, Kailua-Kaneohe, and 'Ewa areas.			X
<p>Discussion: The Project meets the City's objectives and policies as they relate to a balanced economy, particularly with regards to maintaining a successful visitor industry, encouraging improvements that enhance the visitor experience, ensuring meaningful employment, and bringing about orderly economic growth.</p> <p>The planned improvements will be the first major enhancement of the Cove Property in over 25 years. Redevelopment of the Cove Property will create an authentic Hawaiian gathering for residents and visitors honors and reflects the history, culture, and connection to this place. The Project will support programs that enhance the understanding of Hawai'i's cultural heritage. The existing nightly entertainment program will be renewed to perpetuate and honor the Hawaiian culture and history of place through the traditions of hula, mele, and other practices. The creation of new spaces on the property will expand potential programming; for example, the new amphitheater/performing arts venue may host Hawaiian cultural arts and educational programming and cultural community events.</p> <p>Once in operation, planned retail shops and the potential marketplace/retail space may feature a curated selection of goods, including those made in Hawai'i, supporting local entrepreneurship. The new restaurants may support the economy and community by featuring local culinary talent and prioritizing the use of fresh, Hawai'i-grown produce when possible. Renewed programming at the site will provide opportunities for local entertainers, cultural practitioners, and educators to share their talents. The Project presents an opportunity to expose visitors to authentic local brands and products, expands support for Hawai'i-made goods, and supports the relationship between producers and consumers.</p> <p>Redevelopment of the Cove Property will help support the growing 'Ewa region and strengthen the surrounding area as a secondary resort destination on O'ahu. It is anticipated the Project will generate 1,429 jobs (1,386 FTE) short-term jobs related to construction, as well as approximately 583 (484 FTE) direct jobs on site, in addition to 121 (100 FTE) indirect and 113 (94 FTE) induced jobs, for an estimated total of 817 total jobs (678 FTE jobs) in the long-term, supporting residents in the West O'ahu region. Offering employment opportunities in the West O'ahu area will also expand options for workers, enabling them to shorten their commutes and improve their overall well-being.</p>				
PART III: NATURAL ENVIRONMENT AND RESOURCE STEWARDSHIP				

Table 5.7: City and County of Honolulu General Plan			
S = Supportive, N/S = Not Supportive, N/A = Not Applicable			
	S	N/S	N/A
Objective A: To protect and preserve the natural environment.			
Policy 1: Protect O'ahu's natural environment, especially the shoreline, valleys, and ridges, from incompatible development.	X		
Policy 2: Seek the restoration of environmentally damaged areas and natural resources.			X
Policy 3: Preserve, protect, and restore stream flows and stream habitats to support aquatic and environmental processes and riparian, scenic, recreational, and Native Hawaiian cultural resources.			X
Policy 4: Require development projects to give due consideration to natural features and hazards such as slope, inland and coastal erosion, flood hazards, water-recharge areas, and existing vegetation, as well as to plan for coastal hazards that threaten life and property.	X		
Policy 5: Require sufficient setbacks from O'ahu's shorelines to protect life and property, preserve natural shoreline areas and sandy beaches, and minimize the future need for protective structures or relocation of structures.	X		
Policy 6: Design and maintain surface drainage and flood-control systems in a manner which will help preserve natural and cultural resources.	X		
Policy 7: Protect the natural environment from damaging levels of air, water, and noise pollution.	X		
Policy 8: Protect plants, birds, and other animals that are unique to the State of Hawai'i and the Island of O'ahu.			X
Policy 9: Increase tree canopy and ensure its integration into new developments, and protect significant trees on public and private lands.	X		
Policy 10: Increase public awareness and appreciation of O'ahu's land, air, and water resources.			X
Policy 11: Support the State and federal governments in the protection of the unique environmental, marine, cultural and wildlife assets of the Northwestern Hawaiian Islands.			X
Policy 12: Plan, prepare for, and mitigate the impacts of climate change on the natural environment, including strategies of adaptation.	X		
Objective B: To preserve and enhance the natural monuments and scenic views of O'ahu for the benefit of both residents and visitors.			
Policy 1: Protect the Island's well-known resources: its mountains and craters; forests and watershed areas; marshes, rivers, and streams; shoreline, fishponds, and bays; and reefs and offshore islands.	X		
Policy 2: Protect O'ahu's scenic views, especially those seen from highly developed and heavily traveled areas.	X		
Policy 3: Locate roads, highways, and other public facilities and utilities in areas where they will least obstruct important views of the mountains and the sea.	X		
Policy 4: Protect and expand public access to the natural and coastal environment for recreational, educational, and cultural purposes, and maintain access in a way that does not damage natural, historic, or cultural resources.	X		
<p>Discussion: Redeveloping the Cove Property will improve facilities at the site to ensure development is compatible with the natural coastal setting. The Project will give due consideration to natural features and hazards as discussed in Section 4.4. Planned structures at the site will be elevated from eight to 19.5 feet above msl and will be set back at least 60 feet from the shoreline. The shoreline setback area will be maintained as open space, providing a natural buffer to mitigate potential impacts related to flooding. LID and green infrastructure measures, where feasible, will be incorporated and will be determined as the design progresses.</p> <p>The Project will not involve a substantial degradation of environmental quality on-site or in the surrounding environment. Construction impacts related to noise and air quality are temporary and will be minimized by implementing erosion control BMPs, as described throughout Section 4.0 of this EIS. Long-term significant impacts to air and water quality, noise, and natural resources are not anticipated.</p> <p>As discussed in Section 3.3.9, the center of the Cove Property features existing trees valued for their age, these trees serve as key site landmarks for wayfinding across the property. The two existing significant trees will be preserved in place to the extent practicable. Other healthy trees may be relocated elsewhere on site, as appropriate. Additionally, large native, Polynesian-introduced, and tropical canopy trees that provide shade and screening are expected to be installed throughout the site.</p>			

Table 5.7: City and County of Honolulu General Plan			
S = Supportive, N/S = Not Supportive, N/A = Not Applicable			
	S	N/S	N/A
<i>The Project will not adversely impact public views articulated in the 'Ewa DP (Section 4.11). Finally, to protect the adjacent beach and natural cove in the long term, the current level of access and parking for beachgoers will be maintained throughout construction and long-term operation of The Cove.</i>			
PART IV: HOUSING			
Objective A: To ensure a balanced mix of housing opportunities and choices for all residents at prices they can afford.			
Policy 1: Support programs, policies, and strategies that will provide decent and affordable homes for local residents, especially those in the lowest income brackets			X
Policy 2: Streamline approval and permit procedures, in a transparent manner, for housing and other development projects.			X
Policy 3: Encourage innovative residential developments that result in lower costs, sustainable use of resources, more efficient use of land and infrastructure, greater convenience and privacy, and a distinct community identity.			X
Policy 4: Support and encourage programs to maintain and improve the condition of existing housing.			X
Policy 5: Make full use of government programs that provide assistance for low- and moderate-income renters and homebuyers.			X
Policy 6: Maximize local funding programs available for affordable housing.			X
Policy 7: Provide financial and other incentives to encourage the private sector to build homes for low- and moderate-income residents.			X
Policy 8: Encourage and participate in joint public-private development of low- and moderate-income housing.			X
Policy 9: Encourage the replacement of low- and moderate-income housing in areas which are being redeveloped at higher densities.			X
Policy 10: Promote the design and construction of dwellings which take advantage of O'ahu's year-round moderate climate and use other sustainable design techniques.			X
Policy 11: Encourage the construction of affordable homes within established low-density and rural communities by such means as 'ohana units, duplex dwellings, and cluster development that embraces the 'ohana concept by maintaining multi-generational proximity for local families.			X
Policy 12: Promote higher-density, mixed-use development where appropriate, including rail transit-oriented development, to increase the supply of affordable and market housing in convenient proximity to jobs, schools, shops, and public transit.			X
Policy 13: Encourage the production and maintenance of affordable rental housing.			X
Policy 14: Encourage the provision of affordable housing designed for the elderly and people with disabilities in locations convenient to critical services and to public transit.			X
Policy 15: Encourage equitable relationships between landowners and leaseholders, between landlords and tenants, and between condominium developers and owners.			X
Policy 16: Support collaborative partnerships that work toward immediate solutions to house and service homeless populations and also toward long-term strategies to prevent and eliminate homelessness.			X
Policy 17: Support programs to address all facets of homelessness, so that every homeless person has a place to stay, along with the infrastructure and support services that are needed.			X
Objective B: To reduce speculation in land and housing.			
Policy 1: Encourage the State government to coordinate its urban-area designations with the developmental policies of the City and County.			X
Policy 2: Discourage speculation in lands outside of areas planned for urban use, reduce the prevalence of vacant dwelling units, and reduce the use of residential dwelling units for short-term vacation rentals.			X

Table 5.7: City and County of Honolulu General Plan S = Supportive, N/S = Not Supportive, N/A = Not Applicable		S	N/S	N/A
Policy 3:	Seek public benefits from increases in the value of land owing to City and State developmental policies and decisions.			X
Policy 4:	Require government-subsidized housing to be delivered to appropriate purchasers and renters.			X
Policy 5:	Ensure that owners of housing properties, including government-subsidized housing, maintain housing affordability over the long term.			X
Objective C:	To provide residents with a choice of living environments that are reasonably close to employment, schools, recreation, and commercial centers, and that are adequately served by transportation networks and public utilities.			
Policy 1:	Ensure that residential developments offer affordable housing to people of different income levels and to families of various sizes to alleviate the existing condition of overcrowding.			X
Policy 2:	Encourage the fair distribution of low- and moderate-income housing throughout the Island.			X
Policy 3:	Encourage the co-location of residential development and employment centers with commercial, educational, social, and recreational amenities in the development of desirable communities.			X
Policy 4:	Encourage residential development in suburban areas where existing roads, utilities, and other community facilities are not being used to capacity, and in urban areas where higher densities may be readily accommodated.			X
Policy 5:	Support mixed-use development and higher-density redevelopment in areas surrounding rail transit stations.			X
Policy 6:	Discourage residential development in areas where the topography makes construction difficult or hazardous, where sea level rise and flooding are a hazard, and where providing and maintaining roads, utilities, and other facilities would be extremely costly or environmentally damaging.			X
Policy 7:	Encourage public and private investments in older communities as needed to keep the communities vibrant and livable.			X
Policy 8:	Encourage the military to provide housing for active duty personnel and their families on military bases and in areas turned over to military housing contractors.			X
<i>Discussion: While the Project supports the General Plan objectives and policies in regard to housing, they are not directly applicable to the Project.</i>				
PART V: TRANSPORTATION AND UTILITIES				
Objective A:	To create a multi-modal transportation system that moves people and goods safely, efficiently, and at a reasonable cost and minimizes fossil fuel consumption and greenhouse gas emissions; serves all users, including limited income, elderly, and disabled populations; and is integrated with existing and planned development.			
Policy 1:	Develop a comprehensive, well-connected and integrated ground transportation system that reduces carbon emissions and enables safe, comfortable and convenient travel for all users, including motorists, pedestrians, bicyclists, and public transportation users of all ages and abilities.			X
Policy 2:	Provide multi-modal transportation services to people living within the 'Ewa, Central O'ahu, and Pearl City-Hawai'i Kai corridors primarily through a mass transit system including exclusive right-of-way rail transit and feeder-bus components as well as through the existing highway system.			X
Policy 3:	Provide transportation services outside the 'Ewa, Central O'ahu, and Pearl City-Hawai'i Kai corridors primarily through a system of express- and feeder-buses as well as through the highway system with limited to moderate improvements sufficient to meet the needs of the communities being served.			X
Policy 4:	Work with the State to ensure adequate and safe access for communities served by O'ahu's coastal highway system, and to plan for the relocation of highways and roads subject to sea level rise away from coastlines.			X
Policy 5:	Support the rail transit system as the transportation spine for the urban core, with links to the airport and maritime terminals, which will work together with other alternative modes of transit and transit-oriented development to reduce automobile dependency and increase multi-modal travel.			X

Table 5.7: City and County of Honolulu General Plan S = Supportive, N/S = Not Supportive, N/A = Not Applicable		S	N/S	N/A
Policy 6:	Support the development of transportation plans, programs, and facilities that are based on Complete Streets features. Maintain and improve road, bicycle, pedestrian, and micro mobility facilities in existing communities to eliminate unsafe conditions.			X
Policy 7:	Design street networks to incorporate greater roadway and pathway connectivity.			X
Policy 8:	Make available transportation services to people with limited mobility: the young, the elderly, the handicapped, and the poor.			X
Policy 9:	Consider environmental, social, cultural, and climate change and natural hazard impacts, as well as construction and operating costs, as important factors in planning transportation system improvements.	X		
Policy 10:	Reduce traffic congestion and maximize the efficient use of transportation resources by pursuing transportation demand management strategies such as carpooling, telecommuting, flexible work schedules, and incentives to use alternative travel modes.			X
Policy 11:	Enhance pedestrian-friendly and bicycle-friendly travel via public and private programs and improvements.	X		
Policy 12:	Maintain separate aviation facilities for general aviation operations to supplement the capacity of the Daniel K. Inouye International Airport.			X
Policy 13:	Support improvements to Kalaeloa Barbers Point Harbor as O'ahu's second deep-water harbor.			X
Policy 14:	Support the operation, maintenance and improvement of Honolulu Harbor as O'ahu's primary cargo and ocean transportation hub.			X
Policy 15:	Advance the transition to electric and alternative fuel infrastructure to provide adequate and accessible charging spaces and renewal fueling stations for ground transportation on O'ahu.			X
Objective B:	Provide an adequate supply of water and environmentally sound systems of waste disposal for O'ahu's existing population and for future generations, and support a one water approach that uses and manages freshwater, wastewater, and stormwater resources in an integrated manner.			
Policy 1:	Develop and maintain an adequate, safe, and reliable supply of fresh water in a cost-effective way that supports the long-term sustainability of the resource and considers the impacts of climate change.			X
Policy 2:	Help to develop and maintain an adequate, safe, and reliable supply of water for agricultural and industrial needs in a resource-integrated and cost-effective way that supports the long-term health of the resource.			X
Policy 3:	Use technologies that provide water, waste disposal, and recycling services at a reasonable cost and in a manner that addresses environmental and community impacts.			X
Policy 4:	Encourage the increased availability and use of recycled or brackish water to meet nonpotable demands.	X		
Policy 5:	Pursue strategies and programs to reduce the per capita consumption of water and the per capita production of waste.	X		
Policy 6:	Provide safe, reliable, efficient, and environmentally sound waste-collection, waste disposal, and recycling services that consider the near- and long-term impacts of climate change during the siting and construction of new facilities.	X		
Policy 7:	Pursue programs to expand on-island recycling and resource recovery from O'ahu's solid waste and wastewater streams.	X		
Policy 8:	Support initiatives that educate the community about the importance of conserving resources and reducing waste streams through reduction, reuse, and recycling.	X		
Policy 9:	Require the safe use and disposal of hazardous materials.			X
Objective C:	To ensure reliable, cost-effective, and responsive service for all utilities with equitable access for residents.			
Policy 1:	Maintain and upgrade utility systems in order to avoid major breakdowns and service interruptions.	X		
Policy 2:	Provide improvements to utilities in existing neighborhoods to reduce substandard conditions, and increase resilience to use fluctuations, natural hazards, extreme weather, and other climate impacts.			X

Table 5.7: City and County of Honolulu General Plan			
S = Supportive, N/S = Not Supportive, N/A = Not Applicable			
	S	N/S	N/A
Policy 3: Facilitate timely and orderly upgrades and expansions of utility systems.	X		
Policy 4: Increase the efficiency of public-serving utilities by encouraging a mixture of uses with peak periods of demand aligning with the availability of resources.			X
Objective D: To maintain transportation and utility systems which will help O'ahu continue to be a desirable place to live and visit.			
Policy 1: Provide adequate resources to ensure the maintenance and improvement of transportation systems and utilities.			X
Policy 2: Evaluate the social, cultural, economic, and environmental impact of additions to the transportation and utility systems before they are constructed.			X
Policy 3: Require the installation of underground utility lines wherever feasible.			X
Policy 4: Seek improved taxing powers for the City in order to provide a more equitable means of financing transportation and utility services.			X
Policy 5: Evaluate impacts of sea level rise on existing public infrastructure, especially sewage treatment plants, roads, and other public and private utilities located along or near O'ahu's coastal areas, and avoid the placement of future public infrastructure in threatened areas.			X
<p>Discussion: The Project will promote alternative, non-polluting modes of transportation. The Project will include improvements to pedestrian facilities <u>within the Cove Property such as, including pathways throughout the Cove Property, to create a safe and attractive pedestrian environment and to support connectivity on site and throughout the surrounding area.</u> Bicycle parking stalls consistent with LUO standards will be provided on-site to support cyclists. EV charging consistent with City standards will also be provided.</p> <p>Existing water, power, and wastewater systems have been evaluated, as discussed throughout Section 4.8. <u>The relevant City agencies have confirmed that the Project can be accommodated by existing systems.</u> Project utilities will be designed in accordance with City standards. The Project further supports policies related to recycling. During operation, the following solid waste management practices may be implemented: recycling of glass, plastic bottles, cardboard, aluminum, and paper; the use of compostable or alternative disposable cutlery, like cups and silverware made from cornstarch or bamboo; and, recycling of food waste. Recycling may will also be encouraged through the use of trash cans with recycling containers. Educational signage and guidelines may be posted around the Cove Property to encourage thoughtful care for the site and the surrounding environment.</p>			
PART VI: ENERGY			
Objective A: To increase energy self-sufficiency through renewable energy and maintain an efficient, reliable, resilient, and cost-efficient energy system.			
Policy 1: Encourage the implementation of a comprehensive plan to guide and coordinate energy conservation and renewable energy development and utilization programs.			X
Policy 2: Support and encourage programs and projects, including economic incentives, regulatory measures, and educational efforts, and seek to eliminate O'ahu's dependence on fossil fuels.			X
Policy 3: Ensure access to an adequate reserve of fuel and energy supplies to aid disaster response and recovery.			X
Policy 4: Support the increased use of solid waste energy recovery and other biomass energy conversion systems.			X
Policy 5: Support and participate in research, development, demonstration, commercialization, and optimization programs aimed at developing cost-effective and environmentally sound renewable energy supplies.			X
Policy 6: Support State and federal initiatives to utilize renewable energy sources.			X
Policy 7: Manage resources and development of communities in line with long-term efficiency and sustainability goals and targets in the areas of energy, carbon emissions, waste streams, all utilities, and food security.	X		
Policy 8: Encourage and equitably incentivize the use of commercially available renewable energy systems in public facilities, institutions, residences, and business developments.			X
Policy 9: Consider health, safety, environmental, cultural, and aesthetic impacts, as well as resource limitations, land use patterns, and relative costs in all major decisions on renewable energy.			X

Table 5.7: City and County of Honolulu General Plan S = Supportive, N/S = Not Supportive, N/A = Not Applicable		S	N/S	N/A
Policy 10: Work closely with the State and federal governments in the formulation and implementation of all City energy-related programs and regulations, including updating building energy codes.				X
Objective B: To conserve energy through the more efficient management of its use and through more energy-efficient technologies.				
Policy 1: Ensure that the efficient use of energy is a primary factor in the preparation and administration of land use plans and regulations.				X
Policy 2: Provide incentives and, where appropriate, mandatory controls to achieve energy efficient and sustainable siting and design of new developments. Support the increased use of nationally recognized energy efficiency and resource conservation rating and certification systems.				X
Policy 3: Provide incentives and, where appropriate, mandatory controls to reduce energy consumption in existing buildings and outdoor facilities, and in design and construction practices.				X
Policy 4: Promote the development of a multi-modal transportation system that minimizes and seeks to eliminate fossil fuel consumption and greenhouse gas emissions.		X		
Policy 5: Encourage the implementation of an adaptable and reliable electrical grid, energy transmission, energy storage, microgrids, and energy generation technologies.				X
Policy 6: Support the availability and use of energy efficient vehicles, especially hybrid, fuel cell, and pure electrical vehicles.				X
Objective C: To foster an ethic of energy conservation that inspires residents to engage in sustainable practices.				
Policy 1: Provide citizens with the information they need to fully understand severe climate change, supply chain issues, costs, security, and other issues associated with O'ahu's dependence on imported fossil fuels.				X
Policy 2: Increase consumer awareness of available renewable energy sources and their costs and benefits.				X
Policy 3: Provide information concerning the impact of public and private decisions on future energy generation, transmission, storage, and use.				X
Policy 4: Provide communities with timely, relevant, and accurate information concerning renewable energy facilities proposed in their area, and ensure adequate buffer zones required for health or safety.				X
<p>Discussion: The Project will not require substantial energy consumption or emit substantial greenhouse gases. Covered open air structures will be integrated throughout to reduce reliance on air conditioning and conserve energy. Additionally, structures may be designed to be solar-ready.</p> <p>The Project will promote alternative, non-polluting modes of transportation. The Project will include improvements to pedestrian facilities <u>within the Cove Property such as,</u> including pathways throughout the Cove Property, to create a safe and attractive pedestrian environment and to support connectivity on site and throughout the surrounding area. Bicycle parking stalls consistent with LUO standards will be provided on-site to support cyclists. EV charging consistent with City standards will also be provided.</p>				
PART VII: PHYSICAL DEVELOPMENT AND URBAN DESIGN				
Objective A: To coordinate changes in the physical environment of O'ahu to ensure that all new developments are timely, well-designed, and appropriate for the areas in which they will be located.				
Policy 1: Provide infrastructure improvements to serve new growth areas, redevelopment areas, and areas with badly deteriorating infrastructure.				X
Policy 2: Coordinate the location and timing of new development with the availability of adequate water supply, sewage treatment, drainage, transportation, and other public facilities and services.		X		
Policy 3: Require new developments to provide or pay the cost of all essential community services, including roads, utilities, schools, parks, and emergency facilities that are intended to directly serve the development.		X		
Policy 4: Facilitate and encourage compact, higher-density development in urban areas designated for such uses.				X
Policy 5: Encourage the establishment of mixed-use town centers that are compatible with the physical and social character of their community.				X

Table 5.7: City and County of Honolulu General Plan S = Supportive, N/S = Not Supportive, N/A = Not Applicable	S	N/S	N/A
Policy 6: Facilitate transit-oriented development in rail transit station areas to create live/work/play multi-modal communities that reduce travel and traffic congestion.			X
Policy 7: Encourage the clustering of development to reduce the cost of providing utilities and other public services.			X
Policy 8: Locate new industries and new commercial areas so that they will be well-related to their markets and suppliers, and to residential areas and transportation facilities.	X		
Policy 9: Locate community facilities on sites that will be convenient to the people they are intended to serve.			X
Policy 10: Discourage uses which are major sources of noise, air, and light pollution	X		
Policy 11: Implement siting and design solutions that seek to reduce exposure to natural hazards, including those related to climate change, flooding, and sea level rise.	X		
Policy 12: Prohibit new airfields, high-powered electromagnetic-radiation sources, and storage places for fuel and explosives from locating on sites where they will endanger or disrupt nearby communities.			X
Policy 13: Promote opportunities for the community to participate meaningfully in planning and development processes, including new forms of communication and social media.			X
Objective B To plan and prepare for the long-term physical impacts of climate change.			
Policy 1: Integrate climate change adaptation into the planning, design, and construction of all significant improvements to and development of the built environment.	X		
Policy 2: Coordinate plans in the private and public sectors that support research, monitoring, and educational programs on climate change.			X
Policy 3: Prepare for the anticipated impacts of climate change and sea level rise on existing communities and facilities through mitigation, adaptation, managed retreat, or other measures in exposed areas.	X		
Objective C: To develop the urban corridor stretching from Wai'alaie-Kāhala to Pearl City as the island's primary urban center.			
Policy 1: Provide downtown Honolulu and other major business centers with a well-balanced mixture of uses.			X
Policy 2: Encourage the development of attractive residential communities in downtown and other business centers.			X
Policy 3: Maintain and improve downtown as the financial and office center of the island, and as a major retail center.			X
Policy 4: Provide for the continued viability of the Hawai'i Capital District as a center of government activities and as an attractive park-like setting in the heart of the city.			X
Policy 5: Foster the development of Honolulu's waterfront as the State's major port and maritime center, as a people-oriented mixed-use area, and as a major recreation area with accommodation for sea level rise.			X
Objective D: To develop a secondary urban center in 'Ewa with its nucleus in the Kapolei area.			
Policy 1: Support public projects that are needed to facilitate development of the secondary urban center at Kapolei.			X
Policy 2: Encourage the development of a major residential, commercial, and employment center within the secondary urban center at Kapolei.	X		
Policy 3: Encourage the continuing development of the area encompassing Campbell Industrial Park, Kalaeloa Barbers Point Harbor, and West Kapolei as a major industrial center.			X
Policy 4: Coordinate plans for the development of the secondary urban center at Kapolei with the State and federal governments, major landowners and developers, and the community.	X		
Policy 5: Cooperate with the State and federal governments in the improvements to the deep water harbor at Kalaeloa Barbers Point.			X
Policy 6: Encourage the development of the Ocean Pointe/Hoakalei Communities as a major residential and recreation area emphasizing recreational activities and a waterfront commercial center containing light-industrial, commercial, and visitor accommodation uses.			X

Table 5.7: City and County of Honolulu General Plan		S	N/S	N/A
S = Supportive, N/S = Not Supportive, N/A = Not Applicable				
Objective E: To maintain those development characteristics in the urban-fringe and rural areas which make them desirable places to live.				
Policy 1:	Develop and maintain urban-fringe areas as predominantly residential areas characterized by generally low rise, low density development which may include significant levels of retail and service commercial uses as well as satellite institutional and public uses geared to serving the needs of households.			X
Policy 2:	Coordinate plans for developments within the 'Ewa and Central O'ahu urban-fringe areas with the State and Federal governments and with major landowners and developers, agricultural industries, and the community			X
Policy 3:	Maintain a "green belt" of open space and agricultural land around developed communities in the 'Ewa and Central O'ahu areas of O'ahu.			X
Policy 4:	Maintain rural areas that reflect an open and scenic setting, dominated by small to moderate size agricultural pursuits, with small towns of low-density and low-rise character, and which allows modest growth opportunities tailored to address area residents' future needs.			X
Policy 5:	Encourage the development of a variety of housing choices including affordable housing in rural communities, to give people the choice to continue to live in the community that they were raised in.			X
Policy 6:	Ensure the social and economic vitality of rural communities by supporting infill development and modest increases in heights and densities around existing rural town areas where feasible to maintain an adequate supply of housing for future generations.			X
Objective F: To create and maintain attractive, meaningful, and stimulating environments throughout O'ahu.				
Policy 1:	Encourage distinctive community identities for both new and existing communities and neighborhoods.			X
Policy 2:	Require the consideration of urban design principles in all development projects.			X
Policy 3:	Require developments in stable, established communities and rural areas to be compatible with the existing communities and areas.	X		
Policy 4:	Provide design guidelines and controls that will allow more compact development and intensive use of lands in the primary urban center and along the rail transit corridor.			X
Policy 5:	Seek to protect residents' quality of life and to maintain the integrity of neighborhoods by strengthening regulatory and enforcement strategies that address the presence of inappropriate non-residential activities.	X		
Policy 6:	Promote public and private programs to beautify the urban and rural environments.	X		
Policy 7:	Design public structures to meet high aesthetic and functional standards and to complement the physical character of the communities they will serve.			X
Policy 8:	Design public street networks to be safe and accessible for users of all ages and abilities, to accommodate multiple modes of travel to be visually attractive and to support sustainable ecological processes, such as stormwater infiltration.			X
Policy 9:	Recognize the importance of using Native Hawaiian plants in landscaping to further the traditional Hawaiian concept of mālama 'āina and to create a more Hawaiian sense of place.	X		
Objective G: To promote and enhance the social and physical character of O'ahu's older towns and neighborhoods.				
Policy 1:	Encourage new construction in established areas to be compatible with the character and cultural values of the surrounding community.	X		
Policy 2:	Encourage, wherever desirable, the rehabilitation of existing substandard structures.			X
Policy 3:	Provide and maintain roads, public facilities, and utilities without damaging the character of older communities.	X		
Policy 4:	Seek the satisfactory relocation of residents before permitting their displacement by new development, redevelopment, or neighborhood rehabilitation.			X
Policy 5:	Acknowledge the cultural and historical significance of kuleana lands, the ancestral ownership of kuleana lands, and promote policies that preserve and protect kuleana lands.			X

Table 5.7: City and County of Honolulu General Plan			
S = Supportive, N/S = Not Supportive, N/A = Not Applicable			
	S	N/S	N/A
Policy 6: Support and encourage cohesive neighborhoods which foster interactions among neighbors, promote vibrant community life, and enhance livability.	X		
<p>Discussion: The Project supports the GP's objectives with regard to physical development and urban design. Existing water, power, and wastewater systems have been evaluated, as discussed throughout Section 4.8. <u>The relevant City agencies have confirmed that the Project can be accommodated by existing systems.</u> Project utilities will be designed in accordance with City standards (Section 4.8).</p> <p>The Project has been designed to reduce threat to life and property from natural hazards, primarily in the context of climate change. Methods to mitigate potential threats posed by flooding, climate change, and other natural hazards are discussed throughout Section 4.4. In general, planned structures at the site will be elevated from eight to 19.5 feet above msl and will be set back at least 60 feet from the shoreline. The shoreline setback area will be maintained as open space, providing a natural buffer to mitigate potential impacts related to flooding. LID and green infrastructure measures, where feasible, will be incorporated and will be determined as the design progresses.</p> <p>Redevelopment of the Cove Property will provide jobs for residents of West O'ahu and support the growth of the secondary urban center. As described in Section 4.10, the Project is anticipated to create approximately 1,429 jobs (1,386 FTE) short-term jobs related to construction, as well as <u>approximately 583 (484 FTE) direct jobs on site, in addition to 121 (100 FTE) indirect and 113 (94 FTE) induced jobs, for an estimated total of 817 total jobs (678 FTE jobs)</u> related to long-term operations in the growing 'Ewa region. Locating jobs within the 'Ewa district will provide opportunities for employees to reduce their commute times, enhancing their quality of life.</p> <p>The planned improvements will be the first major enhancement of the Cove Property in over 25 years. The redevelopment of The Cove will create a gathering place that honors and reflects the history, culture, and connection to place. The entertainment venue will provide residents and visitors with daytime activities that may include cultural workshops hosted and guided by cultural practitioners to bring awareness to the host culture. Open space areas and a cultural pavilion will invite opportunities for gathering and promote a vibrant community life. Design of the structures will be inspired by both contemporary and Hawaiian architecture to provide a welcoming and authentic setting. Lush vegetation will be integrated throughout the Cove Property to complement the surrounding natural environment and reflect culturally appropriate themes. Landscaping is expected to consist of native, Polynesian-introduced, or tropical trees, and shrubs of varying sizes.</p>			
PART VIII: PUBLIC SAFETY AND COMMUNITY RESILIENCE			
Objective A: To prevent and control crime and maintain public order.			
Policy 1: Provide a safe environment for residents and visitors on O'ahu.	X		
Policy 2: Provide adequate criminal justice facilities and staffing for City and County law-enforcement agencies.			X
Policy 3: Provide adequate training, staffing, and support for City public safety agencies.			X
Policy 4: Emphasize improvements to police and prosecution operations which will result in a higher proportion of wrongdoers who are arrested, convicted, and punished for their crimes.			X
Policy 5: Support policies and programs that expand access to treatment, rehabilitation, and reentry programs for adult and juvenile offenders.			X
Policy 6: Keep the public informed of the nature and extent of criminal activity on O'ahu			X
Policy 7: Establish and maintain programs to encourage public cooperation in the prevention and solution of crimes, and promote strong community-police relationships.			X
Policy 8: Seek the help of State and federal law-enforcement agencies to curtail the activities of organized crime syndicates on O'ahu.			X
Policy 9: Conduct periodic reviews of criminal laws to ensure their relevance to the community's needs and values.			X
Policy 10: Cooperate with other law-enforcement agencies to develop new methods of addressing crime. Support communication and coordination across federal, State and City law enforcement and corrections agencies.			X
Policy 11: Encourage the improvement of rehabilitation programs and facilities for criminals and juvenile offenders.			X
Objective B: To protect the people of O'ahu and their property against natural disasters and other emergencies, traffic and fire hazards, and unsafe conditions.			
Policy 1: Keep up-to-date and enforce all City and County safety regulations.	X		

Table 5.7: City and County of Honolulu General Plan			
S = Supportive, N/S = Not Supportive, N/A = Not Applicable			
	S	N/S	N/A
Policy 2: Require all developments in areas subject to floods and tsunamis, and coastal erosion to be located and constructed in a manner that will not create any health or safety hazards or cause harm to natural and public resources.	X		
Policy 3: Participate with State and federal agencies in the funding and construction of flood control projects, and prioritize the use of ecologically sensitive flood-control strategies whenever feasible.			X
Policy 4: Collaborate with State and federal agencies to provide emergency warnings, protection, mitigation, response, and recovery, during and after major emergencies such as tsunamis, hurricanes, and other high-hazard events.			X
Policy 5: Cooperate with State and federal agencies to provide protection from war, civil disruptions, pandemics, and other major disturbances.			X
Policy 6: Reduce hazardous traffic conditions.			X
Policy 7: Provide adequate resources to effectively prepare for and respond to natural and manmade threats to public safety, property, and the environment.	X		
Policy 8: Foster disaster-ready communities and households through implementation of resilience hubs and other resiliency strategies.			X
Policy 9: Plan for the impacts of climate change and sea level rise on public safety, in order to minimize potential future hazards.	X		
Policy 10: Develop emergency management plans, policies, programs, and procedures to protect and promote public health, safety, and welfare of the people.	X		
Policy 11: Provide educational materials on emergency management preparedness, fire protection, traffic hazards, and other unsafe conditions.			X
<p>Discussion: The Project supports the General Plan objectives and policies with regard to public safety. Long-term operation of The Cove may incorporate standard operating procedures for employees and visitors in the event of emergencies. During operation, additional private security on the property will be evaluated and considered, as needed.</p> <p>As discussed in Section 4.4.3, the improvements at The Cove will be completed outside Flood Zone VE. The Project site is within the 3.2-foot SLR-XA and is particularly susceptible to annual high wave flooding. As such, new structures will be located at least 60 feet from the certified shoreline and may be elevated eight to 19.5 feet above msl (see Table 3.1 for estimated floor elevations). Structures will be built in accordance with IBC, State, and City building code standards to promote public safety. LID measures may be integrated where feasible to reduce surface stormwater runoff, promote infiltration, manage stormwater, improve water quality, and enhance overall resilience to extreme weather events. The site will be graded to allow stormwater runoff and potential coastal flooding to flow through the site (Section 4.8).</p>			
PART IX: HEALTH AND EDUCATION			
Objective A: To protect the health and well-being of residents and visitors.			
Policy 1: Encourage the provision of health-care facilities that are accessible to both employment and residential centers.			X
Policy 2: Encourage prompt and adequate ambulance and first-aid services in all areas of O'ahu.			X
Policy 3: Coordinate City and County health codes and other regulations with State and Federal health codes to facilitate the enforcement of air-, water-, and noise-pollution controls.			X
Policy 4: Integrate public health concerns such as air and water pollution as a consideration in land use planning decisions.	X		
Policy 5: Encourage healthy lifestyles by supporting opportunities that increase access to and promote consumption of fresh, locally grown foods.			X
Policy 6: Encourage healthy lifestyles through walkable and livable communities, safe street crossings, safe routes to schools, and parks and pathways for pedestrians and bicyclists.			X
Policy 7: Support efforts to make healthcare accessible and affordable for everyone.			X

Table 5.7: City and County of Honolulu General Plan S = Supportive, N/S = Not Supportive, N/A = Not Applicable	S	N/S	N/A
Policy 8: Support efforts to improve and expand access to mental health, drug treatment, community-based programs, and other similar programs for those requiring such services.			X
Policy 9: Support becoming an age-friendly city that provides people of all ages with user-friendly parks and other public gathering places, that offers safe streets and multi-modal transportation options, that provides an adequate supply of affordable housing, that encourages growth in needed and desirable jobs, that provides quality health-care and support services, and that encourages civic participation, social inclusion, and respect between interest groups.			X
Policy 10: Plan for our aging population's growing health-care, personal service, and diverse daily activity needs, and encourage these services to be provided in a timely manner, including age-specific social activities.			X
Objective B: To provide a wide range of educational opportunities for the people of O'ahu.			
Policy 1: Support education programs that encourage the development of employable skills.			X
Policy 2: Encourage the provision of informal educational programs for people of all age groups.			X
Policy 3: Encourage the after-hours use of school buildings, grounds, and facilities.			X
Policy 4: Encourage the construction of school facilities that are designed for flexibility and high levels of use.			X
Policy 5: Facilitate the appropriate location of childcare facilities as well as learning institutions from the preschool through the university levels			X
Policy 6: Encourage outdoor learning opportunities and venues that reflect our unique natural environment and Native Hawaiian culture.			X
Objective C: To make Honolulu the center of higher education in the Pacific.			
Policy 1: Encourage continuing improvement in the quality of higher education in Hawai'i, as well as ways to make higher education more affordable.			X
Policy 2: Encourage the development of diverse opportunities in higher education.			X
Policy 3: Encourage research institutions to establish branches on O'ahu.			X
Policy 4: Establish Honolulu as a knowledge center and international Pacific crossroads hub.			X
<i>Discussion: The Project supports the General Plan objectives regarding health and well-being. Construction impacts related to noise and air quality are temporary and will be minimized by implementing erosion control BMPs, as described throughout Section 4.0 of this EIS. With the implementation of mitigation measures, long-term significant impacts to air and water quality, noise, and natural resources are not anticipated. The Project will integrate sustainable design features to protect water quality, such as LID and the use of water conservation features, which will be determined as the design progresses.</i>			
PART X: CULTURE AND RECREATION			
Objective A: To foster the multiethnic culture of Hawai'i and respect the host culture of the Native Hawaiian people.			
Policy 1: Recognize the Native Hawaiian host culture, including its customs, language, history, and close connection to the natural environment, as a dynamic, living culture and as an integral part of O'ahu's way of life.	X		
Policy 2: Promote the preservation and enhancement of local cultures, values and traditions.	X		
Policy 3: Encourage greater public awareness, understanding, and appreciation of the cultural heritage and contributions to Hawai'i made by O'ahu's various ethnic groups.	X		
Policy 4: Foster equity and increased opportunities for positive interaction among people with different ethnic, social, and cultural backgrounds.			X
Policy 5: Preserve the identities of the historical communities of O'ahu.			X
Objective B: To preserve and enhance O'ahu's cultural, historic, architectural, and archaeological resources.			
Policy 1: Promote the restoration and preservation of early Hawaiian structures, artifacts, and landmarks.	X		

Table 5.7: City and County of Honolulu General Plan S = Supportive, N/S = Not Supportive, N/A = Not Applicable	S	N/S	N/A
Policy 2: Identify and, to the extent possible, preserve and restore buildings, sites, and areas of social, cultural, historic, architectural, and archaeological significance.			X
Policy 3: Cooperate with the State and federal governments in developing and implementing a comprehensive preservation program for social, cultural, historic, architectural, and archaeological resources.	X		
Policy 4: Promote the interpretive and educational use of cultural, historic, architectural, and archaeological sites, buildings, and artifacts.			X
Policy 5: Seek public and private funds, and encourage public participation and support, to protect, preserve and enhance social, cultural, historic, architectural, and archaeological resources.			X
Policy 6: Provide incentives for the restoration, preservation, maintenance, and enhancement of social, cultural, historic, architectural, and archaeological resources.			X
Policy 7: Encourage the protection of areas that are historically important to Native Hawaiian cultural practices and to the cultural practices of other ethnicities, in order to further preserve and continue these practices for future generations.	X		
Objective C: To foster the visual and performing arts.			
Policy 1: Encourage and support programs and activities for the visual and performing arts.	X		
Policy 2: Encourage creative expression and access to the arts by all segments of the population.			X
Policy 3: Provide permanent art in appropriate City public buildings and places.			X
Objective D: To provide a wide range of recreational facilities and services that are readily available to residents and visitors alike, and to balance access to natural areas with the protection of those areas.			
Policy 1: Develop and maintain community-based parks to meet the needs of the different communities on O'ahu.			X
Policy 2: Develop, maintain, and expand a system of regional parks and specialized recreation facilities, based on the cumulative demand of residents and visitors.			X
Policy 3: Develop, maintain, and improve urban parks, squares, and beautification areas in high density urban places.			X
Policy 4: Encourage public and private botanic and zoological parks on O'ahu to foster an awareness and appreciation of the natural environment.			X
Policy 5: Encourage the State to develop and maintain a system of natural resource-based parks, such as beach, shoreline, and mountain parks.			X
Policy 6: Ensure that public recreational facilities balance the demand for facilities against capital and operating cost constraints so that they are adequately sized and properly maintained			X
Policy 7: Ensure and maintain convenient and safe access to beaches, ocean environments and mauka recreation areas in a manner that protects natural and cultural resources.	X		
Policy 8: Encourage ocean and water-oriented recreation activities that do not adversely impact the natural environment and cultural assets, or result in overcrowding or overuse of beaches, shoreline areas and the ocean.			X
Policy 9: Require all new developments to provide their residents with adequate recreation space.			X
Policy 10: Utilize our unique natural environment in a responsible way to promote cultural events and activities, and maintain cultural practices.			X
Policy 11: Encourage the after-hours, weekend, and summertime use of public schools facilities for recreation.			X
Policy 12: Provide for safe and secure use of public parks, beaches, and recreation facilities.	X		
Policy 13: Create and promote recreational venues for kūpuna and keiki and for kama'āina and malihini.	X		
Policy 14: Encourage the State and Federal governments to transfer excess and underutilized land to the City and County for public recreation use.			X

Table 5.7: City and County of Honolulu General Plan			
S = Supportive, N/S = Not Supportive, N/A = Not Applicable			
	S	N/S	N/A
<p>Discussion: The Project meets the General Plan’s objectives and policies for culture and recreation. The planned improvements will be the first major enhancement of the Cove Property in over 25 years. The purpose of redeveloping the property for The Cove is to replace the existing outdated structures and programming with an authentic Hawaiian community gathering place for residents and visitors that honors and reflects the history, culture, and connection to this place. The Project will support programs that enhance the understanding of Hawai’i’s cultural heritage. The existing nightly entertainment program will be renewed to perpetuate and honor the Hawaiian culture through the traditions of hula, mele, and other practices. The creation of new spaces on the property will expand potential programming; for example, the cultural pavilion may host Hawaiian cultural arts and educational programming and cultural community events for all ages.</p> <p>The Project does not involve a significant loss of natural or cultural resources. To protect the adjacent beach and natural cove/lagoon, the current level of access and parking for beachgoers will be maintained throughout construction and long-term operation of The Cove. As discussed in Section 4.1, a draft AIS was prepared for the Project, which confirmed two previously-identified historic properties within the Cove Property (SIHP Nos. -03362 and -04968) and identified new portions of SIHP No. -03362. Additionally, the burial preserve for SIHP No. -04968 was designated “CSH 2” during the course of the AIS. To ensure the preservation of historic resources, the AIS proposes two primary mitigation measures which consist of archaeological monitoring (a form of data recovery) and preservation through avoidance, including a Archaeological monitoring of all ground-disturbing activities will be conducted in accordance with an accepted AMP. With regard to the preservation of SIHP No. -04968, consultation with the signatories of the 1995 Burial Agreement, as well as known cultural and lineal descendants of the area has been initiated and is ongoing as of publication of this Final EIS. This consultation is regarding the specifics for the interim and long-term protection measures which will be outlined in the BSCPP document. As requested by SHPD, a buffer zone larger than the existing buffer zone is being considered and will be presented to recognized lineal and cultural descendants for their consideration. It is currently unclear if SIHP No. -04968 was recorded with the Bureau of Conveances. However, the landowner will verify this and, if not, will record the burial preserve area (CSH 2) for SIHP No. -04968. The burial preserve area shall remain in perpetuity to preserve the iwi kūpuna. and dedication of the existing burial preserve area (SIHP No. 4968) in perpetuity. Consultation with SHPD and cultural descendants of the area is ongoing.</p>			
PART XI: GOVERNMENT OPERATIONS AND FISCAL MANAGEMENT			
Objective A: To promote increased efficiency, effectiveness, and responsiveness in the provision of government services by the City and County of Honolulu.			
Policy 1: Maintain and adequately fund County government services at the level necessary to be effective.			X
Policy 2: Promote alignment and consolidation of State and City functions whenever more efficient and effective delivery of government programs and services may be achieved.			X
Policy 3: Ensure that government attitudes, actions, and services are sensitive to community needs and concerns, and held accountable to the public trust.			X
Policy 4: Sufficiently fund and staff the timely preparation, maintenance, and update of public policies and plans to guide and coordinate City programs and regulatory responsibilities.			X
Policy 5: Expand the adoption of technology across all City agencies to achieve greater transparency, efficiency, and accountability to the general public throughout government operations.			X
Objective B: To ensure fiscal integrity, responsibility, and efficiency by the City and County government in carrying out its responsibilities.			
Policy 1: Provide for a balanced budget.			X
Policy 2: Allocate fiscal resources of the City and County to efficiently implement the policies of the General Plan and Development Plans.			X
Policy 3: Ensure accountability and transparency in government operations.			X
Objective C: To achieve equitable outcomes for City programs, policies, and allocation of resources throughout the O’ahu community.			
Policy 1: Promote policies that actively address and eliminate disparate outcomes for historically underserved communities.			X
Policy 2: Seek equitable distribution of City investments towards promoting employment opportunities, infrastructure, and other community benefits appropriate to the community needs and proportionate to the population size.			X

Table 5.7: City and County of Honolulu General Plan S = Supportive, N/S = Not Supportive, N/A = Not Applicable	S	N/S	N/A
Policy 3: Promote adherence to processes that advance procedural, distributional, structural, intergenerational, and cultural equity within the City.			X
Policy 4: Provide resources for City employees to understand and actively advance equity solutions within all agencies of City government.			X
<i>Discussion: The General Plan objectives and policies regarding government operations and fiscal management are not directly applicable to the Project.</i>			

5.3.2 City and County of Honolulu ‘Ewa Development Plan (Ordinance No. 20-46)

The City and County of Honolulu prepares and updates eight Development Plans (DPs) and Sustainable Communities Plans (SCPs) for the island of O‘ahu. Each of these plans corresponds to one geographic area and serves as a guide for projected growth and future development. The DPs/SCPs are required by City Charter and are adopted by City Council Ordinance.

The purpose of the DPs is to implement the comprehensive vision of the General Plan through policies and guidelines that reflect the unique conditions, geography and concerns of each region¹. The Project area is located within the ‘Ewa DP area, which encompasses the communities of ‘Ewa Beach, Kapolei, and Makakilo.

The ‘Ewa DP (Ordinance No. 20-46, effective December 9, 2020 amended, 2020) and supports both the ‘Ewa region and the island by relieving housing pressures through concentrating a wide range of commercial, higher-education, industrial, and resort jobs in the secondary urban center. Accordingly, the following *Table 5.8* presents an overview of policies and guidelines provided in the current adopted ‘Ewa DP (2020) and discusses how the Project supports the ‘Ewa DP’s Vision Statement and land use policies. *Table 5.9*, presented in the following section (*Section 5.3.3*), provides an analysis of the specific guidelines and provisions of the Ewa DP applicable to the Ko Olina resort area.

Table 5.8: ‘Ewa Development Plan (Amended 2020) – Objectives and Policies S = Supportive, N/S = Not Supportive, N/A = Not Applicable	S	N/S	N/A
Chapter 1: ‘Ewa’s Role In O‘ahu’s Development Pattern			
In support of the General Plan policies, the ‘Ewa Development Plan:			
Provides a secondary employment center with its nucleus in the City of Kapolei to supplement the Primary Urban Center (PUC) and to divert commuter traffic from the PUC;	X		

¹ Section 6 of the Revised Charter of the City and County of Honolulu (Revised Charter), explains that:

“Development plans” shall promote the formation of smart and sustainable communities. Development plans shall consist of conceptual schemes for implementing and accomplishing the development objectives and policies of the general plan . . . [and] include a map, statements of standards and principles with respect to land uses, statements of urban design principles and controls, and priorities as necessary to facilitate coordination of major development activities. The development plans and maps (which shall not be detailed in the manner of zoning maps) shall describe the desired urban character and the significant natural, scenic and cultural resources for the several parts of the city to a degree which is sufficient to serve as a policy guide for more detailed zoning maps and regulations and public and private sector investment decisions.

Table 5.8: ‘Ewa Development Plan (Amended 2020) – Objectives and Policies S = Supportive, N/S = Not Supportive, N/A = Not Applicable	S	N/S	N/A
Concentrates primary employment activities at industrial and resort areas and at government service and higher education centers around the City of Kapolei so that secondary markets are created for office and retail activities;	X		
Provides for significant residential development throughout ‘Ewa, consistent with the General Plan to meet the needs of O‘ahu’s citizens;			X
Provides for a variety of housing types from affordable units and starter homes to mid-size multi-family and single family units;			X
Promotes diversified agriculture on prime agricultural lands along Kunia Road and surrounding the West Loch Naval Magazine in accordance with the General Plan policy to support agricultural diversification in all agricultural areas on O‘ahu;			X
Provides a secondary resort area at West Beach (Ko ‘Olina);			X
Helps relieve urban development pressures on rural and urban fringe Development Plan Areas (Waianae, North Shore, Ko‘olauloa, and Ko‘olaupoko) so as to preserve the "country" lifestyle of these areas; and	X		
Provides, along with the PUC, a focus for directed and concentrated public and private infrastructure investment for growth.			X
<p>Discussion: The Project supports ‘Ewa’s role in the island’s overall development pattern. Located within the ‘Ewa DP area, the Cove Property is designated for Resort/Recreation Area uses. The Project vicinity is envisioned by the City as an integral part of developing the region as the island’s “Secondary Urban Center,” and therefore serves a unique social and economic function. The surrounding area is designated in the City GP as one of four “secondary” resort destinations on the island, which are part of the City’s overall strategy to relieve growth pressure on Waikīkī (DPP, 2020). In addition to its designation as a primary resort destination, the area is envisioned as an employment center and waterfront destination for the public. Overall, population in the ‘Ewa DP is expected to grow from 68,7000 in 2000 to over 164,000 by 2035, while job growth is estimated to grow from 16,400 non-construction jobs in 2000 to over 87,000 by 2035 (DPP, 2020). Redevelopment of the property will support the region’s growing visitor population and local population by providing construction jobs in the short-term, and long-term operational jobs in closer proximity to residents’ homes. As discussed in Section 4.10, operation of the Project is estimated to create <u>approximately 583 (484 FTE) direct jobs on site, in addition to 121 (100 FTE) indirect and 113 (94 FTE) induced jobs, for an estimated total of 817 total jobs (678 FTE jobs) and</u>. The Project is also anticipated to generate approximately \$34,495,176 annually in labor income and approximately \$99,952,914 in economic output. The growing local population will also be supported with a new gathering place with various dining, retail, and recreational opportunities, enhancing the attractiveness and quality of life in the region. Locating jobs within the ‘Ewa district will provide opportunities for employees to reduce their commute times, enhancing their quality of life.</p> <p>In the long-term, the State government is estimated to accrue approximately \$4.6 million per year annually, while the City government may accrue approximately \$2.1 million per year annually.</p>			
<p>Chapter 2: The Vision For ‘Ewa’s Future</p>			
<p>This vision for ‘Ewa has two horizons. The first horizon extends from the present to the year 2035. The horizon was used to project likely socio-economic change in ‘Ewa and to assess the infrastructure and public facility needs that will have to be met over that period.</p> <p>The Vision to 2035 - By 2035, the ‘Ewa Development Plan Area will have experienced tremendous growth, and will have made significant progress toward providing a Secondary Urban Center for O‘ahu. Population will have grown from 68,700 people in 2000 to over 164,000. Between 2000 and 2035, over 35,000 new housing units will have been built in a series of master planned communities.</p> <p>Job growth will be equally impressive, rising from 16,400 non-construction jobs in 2000 to over 87,000 in 2035. O‘ahu residents and visitors will be attracted to ‘Ewa by a new university campus, the Ko Olina resort, the Hoakalei Resort, a major super regional park, and a thriving City of Kapolei which has retail and commercial establishments and private and government offices.</p> <p>Beyond 2035. In the course of the Development Plan revision in 1995, it became clear that there was value in looking beyond the planning horizon to identify what ‘Ewa should look like when "fully" developed.</p> <p>Such a perspective helped identify where open space should be preserved within the urbanized area, and where to set the limits to development in ‘Ewa for the foreseeable future. As such, this second horizon might be called the "built-out" horizon and is probably 40 or 50 years in the future.</p>	X		
<p><i>The Project supports ‘Ewa’s role in the island’s overall development pattern. In addition to its designation as a primary resort destination, the area is envisioned as an employment center and waterfront destination for the public. As discussed in Section 4.10, operation of the Project is estimated to create <u>approximately 583 (484 FTE) direct jobs on site, in addition</u></i></p>			

Table 5.8: 'Ewa Development Plan (Amended 2020) – Objectives and Policies			
S = Supportive, N/S = Not Supportive, N/A = Not Applicable			
	S	N/S	N/A
<p><i>to 121 (100 FTE) indirect and 113 (94 FTE) induced jobs, for an estimated total of 817 total jobs (678 FTE jobs), and. The Project is also estimated to generate approximately \$34.5 million annually in labor income and approximately \$100.0 million in economic output. The growing local population will also be supported with a new gathering place with various dining, retail, and recreational opportunities, enhancing the attractiveness and quality of life in the region. Locating jobs within the 'Ewa district will provide opportunities for employees to reduce their commute times, enhancing their quality of life. In the long-term, the State government is estimated to accrue approximately \$4.6 million per year annually, while the City government may accrue approximately \$2.1 million per year annually.</i></p> <p><i>The Project will help fulfill the vision of the 'Ewa region as a thriving community. The planned improvements will be the first major enhancement of the Cove Property in over 25 years. The intent of the Project is to create an authentic Hawaiian community gathering place for residents and visitors that honors and reflects the history, culture, and connection to place. The current nightly commercial lū'au show will be renewed and reprogrammed to perpetuate and honor the Hawaiian culture and history of place through the traditions of hula and mele. Potential programming may be expanded to include educational and cultural workshops and/or activities that highlight the sense of place and fit appropriately within the coastal setting or coordinated events and programs with the neighboring Lanikūhonua Cultural Institute. The Applicant will continue to explore opportunities for programming that highlights relevant community-based organizations.</i></p>			
Chapter 3: Land Use Policies, Principles, and Guidelines			
3.1 Open Space Preservation and Development – General Policies			
Open space will be used to:			
a. Provide long range protection for diversified agriculture on lands outside the Community Growth Boundary,			X
b. Protect scenic views and natural, cultural, and historic resources; provide recreation,	X		
c. Provide recreation,	X		
d. Define the boundaries of communities, by; <ul style="list-style-type: none"> o Using the large expanses of open space beyond the Community Growth Boundary to provide the basic definition of the regional urban pattern, and o Using the open space system within the Community Growth Boundary to visually distinguish and physically separate individual communities, neighborhoods, and land use areas; 			X
e. Provide a fire safety buffer where developed areas border "wildlands" either in preservation areas within the Community Growth Boundary or in the State Conservation District;			X
f. Promote the accessibility of shoreline and mountain areas (as required by City ordinance);	X		
g. Preserve natural gulches and ravines as drainageways and stormwater retention areas; and			X
h. Create major pedestrian and bikeway linkages between communities, such as the OR&L / Pearl Harbor Historic Trail, through a network of greenways along transportation and utility corridors and drainageways connection major open space areas.			X
<p>Discussion: <i>No adverse impacts to public views articulated in the 'Ewa DP are anticipated (Section 4.11). The Project will enhance the visual environment of the site by replacing the existing structures with The Cove, which will be designed to reflect both contemporary and Hawaiian architecture. Lush landscaping will be incorporated throughout to enhance the surrounding visual environment, and is expected to consist of native, Polynesian-introduced, or tropical trees, and shrubs of varying sizes.</i></p> <p><i>The Project will have a lot coverage of approximately 13.84 percent (approximately 65,413 sf), adhere to well under the 30 percent lot coverage limit required by the UA (Ordinance No. 89-27), which allows for up to (approximately 141,827 71,860 sf of building area on 472,757-sf lot). Open areas will be incorporated throughout to preserve views and create a relaxed setting. The site layout will enhance existing views of the ocean for visitors by locating key gathering areas, such as the amphitheater/performing arts venue and restaurants, along the coast. Structures will be set back at least 60 feet from the shoreline, which will maintain lateral public beach access and ocean views from the shoreline.</i></p> <p><i>The current level of beach access and parking will be maintained to protect the natural cove and lagoon, which is a valued natural resource in the area. Public use of the beach/lagoon adjacent to the Project site will continue to be limited to certain activities pursuant to the SMA Use Permit approved in 1993 (File No. Resolution 93-318). This will help to maintain a balance between public enjoyment and conservation of the beach. The existing public beach access along the southern end of the property will remain in place and continue to be maintained by the landowner. In addition, The Cove may include a new public restroom on site, adjacent to the public beach access. In addition, restrooms within The Cove will be available</i></p>			

Table 5.8: 'Ewa Development Plan (Amended 2020) – Objectives and Policies S = Supportive, N/S = Not Supportive, N/A = Not Applicable		S	N/S	N/A
<i>for public use representing a significant improvement over existing conditions. This facility will be accessible to both guests and beach users, further enhancing the overall experience and supporting the needs of the community.</i>				
Chapter 3.2 Regional Parks and Recreation Complexes – General Policies				
a.	Consider using public-private partnerships to build, and maintain new park and recreation complexes in order to sustain economic development			X
b.	Design the built environment to avoid adverse impacts on natural resources or processes in the coastal zone or any other environmentally sensitive area.	X		
Chapter 3.2 Regional Parks and Recreation Complexes – Regional Parks				
a.	Develop a new Kalaeloa Regional Park which will feature a large shoreline park with beach recreation and support facilities; a wide range of activity areas including athletic fields in the mauka lands; and preserves for historic and cultural resources, wildlife habitats, wetlands, and endangered plant colonies. The Park will encompass mostly undeveloped lands, bordered by the shoreline on the south, the airfield and developed portions of the facility to the north and west, and the existing military golf course and the Hoakalei Country Club golf course to the east. Key elements of the Park are as follows: <ul style="list-style-type: none"> ○ The Park will include and preserve two wetland areas and an endangered plant preserve that have been recommended for preservation by the U.S. Fish and Wildlife Service ○ Proposed uses for the mauka areas include a Hawaiian cultural park, continuation of the existing riding stable, cabin and tent camping, archery, and various other passive and active recreation uses. ○ The Park will also provide access to a continuous shoreline easement extending from the Ocean Pointe/Hoakalei development to Ko Olina. 			X
b.	Complete development of Kapolei Regional Park to provide diverse active and passive recreation within easy walking distance of both the City Center and the Villages of Kapolei. The 73-acre park includes the Pu'u O Kapolei and serves as a defining limit for the northeastern edge of the City of Kapolei and as a visual gateway to the City. The park provides diverse active and passive recreation within easy walking distance of both the City Center and the Villages of Kapolei.			X
c.	Develop Pu'u Pālalailai below Makakilo as a private nature park providing hikers excellent views of the 'Ewa Plain and distant views of downtown Honolulu and Diamond Head.			X
Chapter 3.2 Regional Parks and Recreation Complexes – Golf Courses				
a.	Use golf courses, where appropriate, to provide protection for open space, and help reduce flooding and non-point pollution by helping retain storm water.			X
Chapter 3.2 Regional Parks and Recreation Complexes – Recreation Complexes				
a.	Design recreation complexes to be compatible with surrounding land uses and environmental features.			X
<i>Discussion: As discussed throughout Section 4.0, the Project will be designed to avoid adverse impacts on natural resources or processes in the coastal zone or any other environmentally sensitive area. See also Sections 5.2.8 and 5.3.4 for further discussion regarding development within the coastal zone.</i>				
Chapter 3.3 Community-Based Parks – General Policies				
a.	Provide adequate parks to meet residents' recreational needs. The Department of Parks and Recreation (DPR) standard for community-based parks is that a minimum of two acres of community-based parks should be provided per 1,000 residents, with one acre per thousand needed for district parks and one acre needed for community parks, neighborhood parks, and mini-parks. (Even if these standards are met, there may still be unmet park needs due to demographic or other community conditions.) The need for community-based parks can be either through public parks operated by the City or private community parks and recreation centers operated by home owner associations. <ul style="list-style-type: none"> ○ Currently, 'Ewa has significantly less district park acreage than the DPR standard indicates is needed for its existing population. To meet the DPR standard, 'Ewa's population of 101,397 in 2010 needed 203 acres with 101 acres needed in district parks. The combined total of 'Ewa public and private community-based parks in 2008 was 140 acres, with only one 25-acre district park, 'Ewa Mahikō. ○ 'Ewa's population is projected to grow to 164,500 by 2035. Based on DPR standards, 189 more acres of community-based parks should be added to the existing park acreage to meet the needs of the projected 2035 'Ewa population, including 140 acres at district parks. 			X

Table 5.8: ‘Ewa Development Plan (Amended 2020) – Objectives and Policies			
S = Supportive, N/S = Not Supportive, N/A = Not Applicable			
	S	N/S	N/A
○ Land has been set aside for the development of future community-based parks as part of master-planned communities throughout ‘Ewa. There are plans to develop 350 acres of new parks, including 136 in district parks.			
b. Protect and expand access to recreational resources in the mountains, at the shoreline, and in the ocean. Trails to and through natural areas of the gulches and mountains are an important public recreational asset. Some areas are difficult to access because of landowner restrictions.	X		
c. Support efforts to expand access to mountain and gulch trails in areas where urban development will not occur.			X
<i>Discussion: To protect the adjacent beach and natural cove, the current level of access and parking for beachgoers will be maintained throughout construction and long-term operation of The Cove. The Cove will enhance existing recreational opportunities on the property and the wider area by providing on-site programming opportunities and open space in a contemporary and authentic Hawaiian setting. Lush landscaping will be integrated throughout the Cove Property to create an immersive and relaxing experience. Landscaping will be intentionally designed to complement new structures, open space areas, pedestrian pathways, and outdoor seating throughout The Cove, enhancing the overall atmosphere and visual environment of the property. Pedestrian pathways will be incorporated throughout the Cove Property to foster connectivity throughout the site and to the adjacent beach and resort area.</i>			
Chapter 3.4 Historic and Cultural Resources - General Policies			
a. Emphasize physical references to ‘Ewa’s history and cultural roots to help define ‘Ewa’s unique sense of place.	X		
b. Protect existing visual landmarks, and support creation of new culturally appropriate landmarks.	X		
c. Preserve significant historic features from the plantation era and earlier periods.	X		
d. Vary the treatment of sites according to their characteristics and potential value.	X		
e. Use in situ preservation and appropriate protection measures for historic, cultural, or archaeological sites with high preservation value because of their good condition or unique features, as recommended by the State Historic Preservation Officer. In such cases, the site should be either restored or remain intact out of respect for its inherent value.	X		
f. Retain significant vistas whenever possible.	X		
g. Where known archaeological and cultural sites have been identified and impact mitigations approved as part of prior development approvals, assume that the mitigations carry out the Plan vision and policies for preservation and development of historic and cultural resources in ‘Ewa.	X		
<i>Discussion: The Cove will provide an authentic Hawaiian community gathering place for residents and visitors that honors and reflects the history, culture, and connection to this place. The Cove Property will be reprogrammed to perpetuate and honor the Hawaiian culture and history of place through the traditions of hula, mele, and other practices. As discussed in Section 4.1, a draft AIS was prepared for the Project, which confirmed two previously-identified historic properties within the Cove Property (SIHP Nos. -03362 and -04968) and identified new portions of SIHP No. -03362. Additionally, the burial preserve for SIHP No. -04968 was designated “CSH 2” during the course of the AIS. To ensure the preservation of historic resources, the AIS proposes two primary mitigation measures which consist of archaeological monitoring (a form of data recovery) and preservation through avoidance, including a Archaeological monitoring of all ground-disturbing activities will be conducted in accordance with an accepted AMP. With regard to the preservation of SIHP No. -04968, consultation with the signatories of the 1995 Burial Agreement, as well as known cultural and lineal descendants of the area has been initiated and is ongoing as of publication of this Final EIS. This consultation is regarding the specifics for the interim and long-term protection measures which will be outlined in the BSCPP document. As requested by SHPD, a buffer zone larger than the existing buffer zone is being considered and will be presented to recognized lineal and cultural descendants for their consideration. It is currently unclear if SIHP No. -04968 was recorded with the Bureau of Conveances. However, the landowner will verify this, and, if not, will record the burial preserve area (CSH 2) for SIHP No. -04968. The burial preserve area shall remain in perpetuity to preserve the iwi kūpuna, and dedication of the existing burial preserve area (SIHP No. 4968) in perpetuity. Consultation with SHPD and cultural descendants of the area is ongoing. No adverse impacts to public views articulated in the ‘Ewa DP are anticipated (Section 4.11). The Project will enhance the visual environment of the site by replacing the existing structures with The Cove, which will be designed to reflect both contemporary and Hawaiian architecture. Lush landscaping will be incorporated throughout to enhance the surrounding visual environment, and is expected to consist of native, Polynesian-introduced, or tropical trees, and shrubs of varying sizes.</i>			

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	S	N/S	N/A
Chapter 3.5: Natural Resources - General Policies			
a. Conserve potable water.	X		
b. Protect valuable habitat for waterbirds and other endangered animals and plants.	X		
c. Protect endangered fish and invertebrates in sinkholes.			X
d. Clean up contaminated areas that pose hazards to soil and water quality, especially in Kalaeloa.			X
e. Require surveys for proposed new development areas to identify endangered species habitat, and require appropriate mitigations for adverse impacts on endangered species due to new development.	X		
f. Reduce light pollution's adverse impact on wildlife and human health and its unnecessary consumption of energy by using, where sensible, fully shielded lighting fixtures using lower wattage.	X		
<p>Discussion: Existing utilities at the site will accommodate the Project, and water conservation measures will be implemented in accordance with State and City requirements (Section 4.8.2). The use of non-potable water for irrigation and fire protection purposes is preliminarily planned.</p> <p>The Project site does not include known rare, threatened, or endangered species or critical habitat. Mitigation measures as discussed in Section 4.3.4 and summarized in Table 1.1 may be implemented to address potential impacts to the <u>marine ecosystem</u>, Hawaiian hoary bat, Hawaiian green sea turtle, Hawaiian monk seal, and migratory birds or Hawaiian seabirds that may overfly the area. No long-term impacts are anticipated. Measures will include the downward shielding of light fixtures throughout The Cove to reduce glare and from migrating and/or nocturnally flying seabirds.</p>			
Chapter 3.6: City of Kapolei – General Policies			
a. Develop the City of Kapolei as the urban core, or the "downtown" for the Secondary Urban Center. It should accommodate a major share of the new employment in the Secondary Urban Center.			X
b. Allow the City of Kapolei to have a balanced mix of business and residential areas, complemented by the recreational, social and cultural activities of a city. Mixed use should be permitted and encouraged throughout most of the City area, in order to achieve the diversity and intensity of uses that characterize a city.			X
c. Develop the City of Kapolei as a true city, encompassing a full range of urban land uses, and laid out in small blocks connected by a grid system of public streets.			X
<p>Discussion: While Applicant supports the general policies regarding the City of Kapolei, the policies are not directly applicable to the Project.</p>			
Chapter 3.7: 'Ewa Plantation Villages– General Policies			
a. Preserve and enhance the existing rural form and historic character of the remaining 'Ewa Villages.			X
b. Ensure the continues tenancy and ownership opportunities for current residents.			X
c. Use the Master Plan as a vehicle for preservation efforts within the existing villages.			X
d. Rehabilitate or adapt existing village structures in the 'Ewa Villages for reuse.			X
e. Develop related affordable and market housing to create a total of 1,900 units, including the existing housing.			X
f. Develop additional neighborhood parks/open space, and a small shopping center; and make infrastructure improvements.			X
g. Re-establish 'Ewa Villages as a thriving and identifiable community, and a living example of Hawai'i's plantation heritage through the preservation of existing schools and churches, the expansion of parks and public open space areas, and the establishment of community facilities and a market place for local businesses.			X
<p>Discussion: While Applicant supports the general policies regarding the 'Ewa Plantation Villages, the policies are not directly applicable to the Project.</p>			
Chapter 3.8 Ocean Pointe/Hoakalei – General Policies			
a. Develop Hoakalei as the region's principal recreational marina destination for local residents and visitors. With over 1,100 acres located between 'Ewa Beach and Kalaeloa, the Ocean Pointe/Hoakalei community should be centered			X

Table 5.8: 'Ewa Development Plan (Amended 2020) – Objectives and Policies			
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around a marina that should serve as a major recreational resource and visual amenity for the community. The marina should provide recreational boating opportunities, supported by boat slips, marine haul-out and other repair facilities, and a public boat ramp. The marine could also serve as a terminal for a commuter ferry to downtown Honolulu if such a service is found to be feasible and if financing can be found for the improvements needed to serve such a ferry.			
b. A recreational waterfront project (consisting of a lagoon) may be developed where the marina is. Such a waterfront development would similarly serve as a major recreational resource, visual amenity, and economic generator for the community, and is a compatible use that would not preclude eventual development of a marina.			X
c. Develop Ocean Point/Hoakalei in ways that ensure environmental compatibility of uses.			X
d. Provide substantial public areas at Ocean Pointe/Hoakalei through shoreline and waterfront access, expansion of One'ula Beach Park, and dedication of a District Park on Fort Weaver Road.			X
e. Develop the public waterfront promenade at Hoakalei with a hard edge and a focus on recreational water activities. Provide shoreline parks linked by pedestrian ways for public uses along the entire waterway.			X
f. Develop the golf course to provide a major open space and visual amenity while also providing detention basins to receive run-off from light storms.			X
g. On the west, develop a mix of activities around the basin, including a Waterfront Mixed Use area with resort and commercial development, a Medium Density Residential area, and a Light Industrial Mixed Use Support area. Hoakalei is planned to have about 950 visitor units to support its waterfront-oriented activities.			X
<i>Discussion: While Applicant supports the general policies regarding Ocean Pointe/Hoakalei, the policies are not directly applicable to the Project.</i>			
Chapter 3.9: Existing and Planned Residential Communities – General Policies			
Overall Density – To achieve the desired compactness and character of development in planned residential community, develop with the housing density of the aggregate area zoned for residential use (including the streets) in the range of 10 to 15 units per acre. (This average does not include areas zoned for commercial or industrial use.)			X
Higher Density Housing Along the Rail Transit Corridor – To promote use of the elevated rail transit line, develop higher-density residential use along the rail transit corridor linking Kapolei with Waipahū and PUC communities to the east. Apartment and Commercial uses should be developed at greater densities at the eight transit nodes. Each transit node will generally cover areas influenced by a rail transit station.			X
Affordable Housing – Addressing affordable housing needs continues to be a high priority given the persistent shortage. Require that 30 percent of the housing units in new residential developments on lands within existing Unilateral Agreements (UAs) be affordable to low and low-moderate income households. Residential development that occurs on lands without existing UAs may be subject to affordable housing requirements established by the City.			X
Community Benefits Bonus (CBB) - To further achieve the desired urban form and character of development in the Secondary Urban Center, developments proposed in transit nodes subject to City-established transit-oriented development plans may exceed the baseline level of floor area ratio (FAR) and/or building height in exchange for providing commensurate community benefits. CBBs for developments proposed in such transit nodes must be in alignment with the vision and general policies and guidelines contained in this Plan.			X
Physical Definition of Neighborhoods - Make the boundaries of neighborhoods evident through the use of natural features, street patterns, landscaping, building form, and siting. The focus of neighborhood activity should be on the local street or a common pedestrian right-of-way or recreation area			X
Community Centers - In the Master Plan for each new residential community, identify where its village center, town center or “Main Street” area is and how that center or Main Street will be established and supported by any existing or planned commercial development.			X
Compatible Mix of Building Forms - Use a variety of housing types and densities to avoid visual monotony and accommodate a variety of housing needs, but avoid sharp contrasts between the exterior appearance of adjacent housing areas.			X
Transit-Oriented Streets - Design street patterns and rights-of-way to accommodate mass transit service and make it convenient to access for as many households as possible.			X

Table 5.8: ‘Ewa Development Plan (Amended 2020) – Objectives and Policies			
S = Supportive, N/S = Not Supportive, N/A = Not Applicable			
	S	N/S	N/A
Connectivity - Minimize dead end streets, provide for intersections at regular intervals, and connect with adjacent development. Allow roadway cross-sections within new residential developments to be reduced from current standards where higher capacity is provided by multiple alternative routes.			X
Pedestrian and Bicycle Travel - Encourage pedestrian and bicycle travel, particularly to reach neighborhood destinations such as schools, parks, and convenience stores. At a minimum, provide pedestrian and bikeway connectivity, where roadway connectivity is deemed not feasible, to allow direct travel through the community and to neighborhood districts.			X
Integration of Linear Corridors - Encourage physical and visual connections between communities through the creative design of transportation and utility corridors and drainage systems.			X
Provision of Community Facilities - Provide land for community facilities including churches; community centers, and elderly and child care centers.			X
<i>Discussion: The ‘Ewa DP’s policy for existing and planned residential communities are not directly applicable to the Project.</i>			
Chapter 3.10: Planned Commercial Retail Centers – General Policies			
a. Develop planned commercial centers, outside of the City of Kapolei, to provide retail shopping and services for the ‘Ewa residential communities in which they are located.	X		
b. Develop commercial centers outside of the City of Kapolei by concentrating commercial uses in central locations instead of in continuous commercial strips along arterial roads.			X
c. Emphasize pedestrian and transit access to and within the centers.	X		
d. Permit multi-family residential use above the first floor and include it wherever possible in commercial centers.			X
e. Wherever possible, design new commercial centers to help create and/or support pedestrian-friendly village centers, town centers, or “Main Street” areas for their communities. <ul style="list-style-type: none"> Such centers or Main Streets provide a place where people from the surrounding neighborhoods gather, shop, dine, or play and are a key element that defines a community’s identity. 	X		
f. Limit development of Major Community Commercial Centers or Regional Commercial Centers to the City of Kapolei since the City of Kapolei is intended to provide for most regional shopping needs. [Note: The DHHL has notified the DPP that it has exempted itself from City and County planning and zoning to develop a 1.6 million square foot Regional Shopping Center on 67 acres near the intersection of Kualaka’i Parkway and Kapolei Parkway. Included in the project are two hotels with 300 rooms and two office towers with 100,000 square feet of office space.]			X
g. Allow Neighborhood Commercial Centers to be located within any residential community, and to be reviewed and approved as part of development of master planned residential communities or redevelopment of existing communities.			X
h. Allow Community Commercial Centers at ‘Ewa Beach, Laulani, Ho’opili (near the intersection of Farrington Highway and Kunia Road), East Kapolei (near the intersection of Farrington Highway and the Kualaka’i Parkway and near the intersection of Kapolei Parkway and the Kualaka’i Parkway), the Villages of Kapolei, Makaiwa Hills, and Ko Olina Marina.			X
i. Allow medium density mixed use commercial development within a quarter-mile radius of proposed transit stations on the rail transit corridor linking Waipahu with the City of Kapolei/Kapolei West.			X
j. Restrict office uses as a principal use in ‘Ewa Community Commercial Centers. Offices that provide services to the local community may be included in the centers, but the emphasis should be on retail uses. Offices providing support to functions of the University of Hawaii West O’ahu may be included in the Transit Oriented Development areas around the two transit stations closest to the campus. Locate developments primarily oriented to office uses in the City of Kapolei			X
<i>Discussion: The Cove Property has been used for commercial activities for 40 years, and the planned improvements will be the first major enhancement of existing amenities in over 25 years. Revitalizing the Cove Property will support the growing ‘Ewa region and strengthen the surrounding area as a secondary resort destination on O’ahu. The Cove will provide residents and visitors with a dynamic mix of retail, entertainment, and dining experiences within an immersive coastal setting that authentically honors the property’s Hawaiian legacy in a contemporary form.</i>			

Table 5.8: 'Ewa Development Plan (Amended 2020) – Objectives and Policies			
S = Supportive, N/S = Not Supportive, N/A = Not Applicable			
	S	N/S	N/A
<p>The Project will include improvements to pedestrian facilities <u>within the Cove Property</u> such as, including pathways throughout the Cove Property, to create a safe and attractive environment and to support connectivity on site and throughout the Project vicinity.</p> <p>The Cove will provide various gathering opportunities for the community. The ancillary restaurant component aims to establish The Cove as a distinctive destination and gathering place in the overall West O'ahu region for residents and visitors. Each restaurant may include outdoor terrace seating (covered and uncovered) to allow property visitors to enjoy the coastal setting. A conceptual "Village Walk" retail area in the center of the property is envisioned to seamlessly integrate with the surrounding restaurants, lawn areas, and the cultural pavilion with performance stage. The relaxing setting will be enhanced by lush landscaping, shade canopies, and outdoor seating, creating an inviting gathering place for visitors of the property. The entertainment venue will provide residents and visitors with daytime activities that may include cultural workshops hosted and guided by cultural practitioners to bring awareness to the host culture. Open space areas and a cultural pavilion will invite additional opportunities for gathering and promote a vibrant community life.</p>			
Chapter 3.11: Ko Olina Resort – General Policies			
Develop Ko Olina Resort as an integral part of the Secondary Urban Center.	X		
Develop Ko Olina to provide substantial waterfront areas for public use. The entire shoreline should be natural open space, softened by landscaping, and should focus on the beach and swimming lagoons.	X		
Design the built environment to avoid adverse impacts on natural resources or processes in the coastal zone.	X		
<p><i>Discussion:</i> The Cove Property is designated for Resort/Recreation Area uses adjacent to the Ko Olina Resort. This area is envisioned by the City as an integral part of developing the region as the island's "Secondary Urban Center," and therefore serves a unique social and economic function. In addition to its designation as a secondary resort destination, the area is envisioned as an employment center and waterfront destination for the public. Overall, population in the 'Ewa DP is expected to grow from 68,7000 in 2000 to over 164,000 by 2035, while job growth is estimated to grow from 16,400 non-construction jobs in 2000 to over 87,000 by 2035 (DPP, 2020). Redevelopment of the property will support the region's growing visitor population and local population by providing construction jobs in the short term, and long term operational jobs in closer proximity to residents' homes. As discussed in Section 4.10, operation of the Project is estimated to create 817 total jobs (678 FTE jobs) and generate approximately \$34,495,176 annually in labor income and approximately \$99,952,914 in economic output. The growing local population will also be supported with a new gathering place with various dining, retail, and recreational opportunities, enhancing the attractiveness and quality of life in the region. Locating jobs within the 'Ewa district will provide opportunities for employees to reduce their commute times, enhancing their quality of life.</p> <p>The Project will continue to provide access to waterfront areas for public use, consistent with the 'Ewa DP. The current level of beach access and parking will be maintained to protect the beach and natural cove/lagoon.</p> <p>Natural resources and processes of the adjacent beach will be protected by the Project. Planned structures at the site will be set back at least 60 feet from the certified shoreline. The shoreline setback area will be maintained as open space, providing a natural buffer to mitigate potential impacts related to flooding.</p>			
Chapter 3.12: Industrial Centers - General Policies			
a. Maintain industrial activity at Barbers Point Industrial Area, Kalaeloa, Honouliuli Industrial Area, and Kahe Valley and permit industrial activity at other dispersed industrial areas, as noted below.			X
b. If a major film studio is developed within industrial areas in 'Ewa, allow accessory uses, such as film production offices, a "back lot" area with commercial uses, and visitor attractions. Overnight accommodations for film crews are allowable as an accessory use to a major film studio.			X
c. Industrial uses will be prioritized in industrial areas within transit nodes before consideration will be given to residential and commercial uses.			X
Barbers Point Industrial Area/Kalaeloa			
a. Maintain the Barbers Point Industrial Area as one of O'ahu's and the State's most important industrial areas			X
b. Allow construction of an additional electrical power generating plant at the Barbers Point Industrial Area, possibly taking advantage of cogeneration opportunities with other industrial activities. The 138 kilovolt transmission corridor running from the Barbers Point Industrial Area to Waiuu could accommodate additional load on the existing poles.			X

Table 5.8: 'Ewa Development Plan (Amended 2020) – Objectives and Policies			
S = Supportive, N/S = Not Supportive, N/A = Not Applicable			
	S	N/S	N/A
c. Develop the northern parts of Kapolei Business Park, Kapolei Harborside, and any Kalaeloa lands designated for industrial use for light industrial uses or compatible commercial uses as a transition between heavy industry at Campbell Industrial Park and the City of Kapolei			X
Honouliuli Industrial Area			
a. Develop Honouliuli as a smaller industrial area, used for wastewater treatment and for light industrial and industrial-commercial mixed uses to serve the surrounding communities.			X
b. Allow a power generation facility to be included if it is dependent on wastewater treatment operations and can be designed so that it is generally not visible from nearby major public rights-of-way, residential areas, and commercial areas.			X
c. Expand the Honouliuli Wastewater Treatment Plant to accommodate additional growth in the region as well as to provide additional facilities for higher levels of wastewater treatment.			X
Other Industrial Areas			
a. Allow service-oriented industrial uses throughout the region as noted below. Uses requiring larger lots should be located in Campbell Industrial Park. Small-lot uses, including automobile repair shops, contractor's yards, and businesses serving residential and commercial areas, should be allowed to locate near the City of Kapolei in the Kapolei Business Park and on any industrial lands which may be designated within Kalaeloa.			X
b. The Hawaiian Electric Company generating plant in Kahe Valley is and should remain the largest source of electrical power on O'ahu. Allow the plant to be expanded to take advantage of available land area, cooling system capacity, and power transmission lines.			X
c. Allow development of the industrial area planned for the western edge of Ocean Pointe to accommodate marine haul-out facilities, repair shops, and related small boat industrial uses.			X
<i>Discussion: While Applicant supports the general policies with regard to industrial areas, the policies are not directly applicable to the Project.</i>			
Chapter 3.13: Kalaeloa – General Policies			
a. Use Kalaeloa's redevelopment as an opportunity to integrate the circulation system and land use pattern of the 'Ewa Plain.			X
b. Develop a major new regional public park, and provide of continuous lateral public access along the shoreline of Kalaeloa.			
c. Create a continuous pedestrian route along most of the 'Ewa coast by reserving the entire shoreline of Kalaeloa for public access and recreation, and linking to adjacent pathways in Ocean Pointe/Hoakalei and Campbell Industrial Park.			X
d. Require building setbacks from the shoreline.			X
e. Integrate the road network within Kalaeloa with the regional circulation system for all of 'Ewa to provide additional ways for residents and workers to cross 'Ewa from east to west and north to south.			X
f. Provide ample lands within Kalaeloa devoted to uses that will create long term jobs for 'Ewa's residents.			X
<i>Discussion: While Applicant supports the general policies with regard to Kalaeloa the policies are not directly applicable to the Project.</i>			
Chapter 3.14: Pearl Harbor Naval Base (West Loch)			
a. Expand limited public access to the shoreline waters of West Loch beyond the West Loch Shoreline Park.			X
b. Retain and enhance wetland wildlife habitat areas along the Pearl Harbor shoreline.			X
<i>Discussion: While Applicant supports the general policies with regard to Pearl Harbor Naval Base (West Loch), the policies are not directly applicable to the Project.</i>			
Chapter 3.15: University Of Hawai'i West O'ahu – General Policies			

Table 5.8: 'Ewa Development Plan (Amended 2020) – Objectives and Policies			
S = Supportive, N/S = Not Supportive, N/A = Not Applicable			
	S	N/S	N/A
a. Develop the campus to be environmentally and culturally sensitive to the site and reflective of the Hawaiian culture and of the heritage of 'Ewa.			X
b. Develop the campus in combination with an adjacent University Village to evoke a unique sense of place that distinguishes it as an important civic and cultural institution in 'Ewa.			X
c. Provide direct vehicle access to the campus from both Farrington Highway and Kualaka'i Parkway.			X
d. Orient the campus to support pedestrian access to and transit usage from two rail transit stations, one located near the corner of Farrington Highway and Kualaka'i Parkway, and a second located on the Kualaka'i Parkway midway between Farrington and Kapolei Parkway.			X
e. Design the campus to use open space areas for flood detention and retention as part of the Kalo'i Gulch watershed master plan.			X
<i>Discussion: While Applicant supports the general policies with regard to University of Hawai'i West-O'ahu, the policies are not directly applicable to the Project.</i>			
Chapter 4.1: Transportation Systems – General Policies			
Transportation System Functions – To support 'Ewa's role as the site for the Secondary Urban Center and a major growth area for new residential and employment development, its transportation system should:			
a. Provide adequate access between residences and jobs, shopping, and recreation centers in 'Ewa as development occurs;	X		
b. Provide improved access to and from adjacent areas, especially Central O'ahu; and			X
c. Provide adequate capacity for major peak-hour commuting to work in the Primary Urban Center. (Although the share of residents who will both live and work in 'Ewa is projected to increase from 17 percent in 1990 to 46 percent by 2030, a majority of residents will still commute to jobs outside the region.)			X
<i>Discussion: Improvements to the City's transportation system are not proposed as part of the Project, however The Cove will provide adequate access between the site and the surrounding resort area. As discussed in Section 4.7, the Project will include improvements to pedestrian facilities within the Cove Property such as, including pathways throughout the Cove Property, to create a safe and attractive environment and to support connectivity throughout the area. Bicycle parking stalls consistent with LUO standards will be provided on-site to support cyclists.</i>			
<i>As described in Section 4.10, the Project is anticipated to create approximately 1,429 jobs (1,386 FTE) short-term jobs related to construction, as well as approximately 583 (484 FTE) direct jobs on site, in addition to 121 (100 FTE) indirect and 113 (94 FTE) induced jobs, for an estimated total of 817 total jobs (678 FTE jobs) related to long-term operations in the growing 'Ewa region. Locating jobs within the 'Ewa district will provide opportunities for employees to reduce their commute times, enhancing their quality of life.</i>			
Transportation Development Priorities - Meet demand for peak-hour transportation in 'Ewa by:			
a. Increased use of transit; and			X
b. Transportation demand management through: <ul style="list-style-type: none"> ○ Provision of improved service on High Occupancy Vehicle (HOV) facilities; ○ Provision of park-and-ride facilities; and ○ Use of other programs which encourage reduced use of the single occupant private automobile. 			X
<i>Discussion: Transit service in the vicinity of the Project is currently limited to routes along Farrington Highway. The nearest bus stop is located along the eastbound direction of that roadway approximately 2,000 feet from the Cove Property.</i>			
<i>As discussed in Section 4.7.3, no shuttle service is currently provided from the Project site to the neighboring resorts. Should one be provided in the future, the PMP recommends that the Project site accommodate a shuttle, which may involve dedication of a specific curb space and waiting area for passenger loading and unloading. Future implementation would require further coordination with the wider resort area.</i>			
Comprehensive Roadway Network			
a. Design and develop the roadway system to provide multiple routes for traveling among the various residential communities and activity centers of 'Ewa, thereby lending variety to travel within the region and promoting			X

Table 5.8: 'Ewa Development Plan (Amended 2020) – Objectives and Policies S = Supportive, N/S = Not Supportive, N/A = Not Applicable		S	N/S	N/A
communication among its communities. Network designs for communities should take on more of a grid pattern, providing intersections between collector or connector streets at approximately quarter-mile intervals.				
b.	Design and develop the roadway system to increase connections between parallel major collectors and arterials - e.g., between Kualaka'i Parkway and Fort Weaver Road - rather than relying primarily upon loop roads to feed the major roadways. Planning for East Kapolei and for Kalaeloa are important opportunities for creating such connections.			X
<i>Discussion:</i> Plans for the redevelopment of The Cove do not include improvements to City roadways. Access to the site will continue to be provided via Ali'inui Drive.				
Land Use Planning Anticipating Rail Transit				
a.	Reserve land sufficient for the right-of-way for the Council-identified rail transit corridor prior to development and plan for medium density, high-traffic land uses along the corridor. This strategy will contribute to the feasibility of developing a high-speed transit line and will result in a more mobile, less automobile-dependent community.			X
b.	Plan all the communities along the proposed transit corridor on Farrington Highway, on Kualaka'i Parkway, through Kalaeloa, and on Kapolei Parkway to reflect the desire to establish a rail transit corridor with medium density residential and commercial nodes located at regular intervals.			X
<i>Discussion:</i> The Project site is not located along the rail transit corridor; as such, general policies with regard to land use planning anticipating rail transit are not directly applicable to the Project.				
Transit-Oriented Community Street Systems				
a.	Design circulation systems within residential communities and commercial centers to emphasize connections between north-south and east-west streets and accessibility from residential streets to bus routes, parks, schools, and commercial centers.			X
b.	Design circulation systems to facilitate bicycle and pedestrian travel, to increase transit use, and to reduce dependence on automobile travel (see Chapter 3, Sections 3.9 and 3.10, for more detailed planning principles and guidelines for circulation in residential communities and commercial centers).	X		
<i>Discussion:</i> . The Project will include improvements to pedestrian facilities <u>within the Cove Property such as,</u> including pathways throughout the Cove Property, to create a safe and attractive environment and to support connectivity throughout the area site. Bicycle parking stalls consistent with LUO standards will be provided on-site to support cyclists.				
Adequate Access and Services - Before zoning approval is given by the City Council for new residential and commercial development in 'Ewa, the Department of Transportation Services, DPP, and State Department of Transportation, as appropriate, should:				
a.	Report if adequate transportation access and services can be provided with existing facilities and systems; and			X
b.	If adequate capacity cannot be provided by existing facilities, recommend conditions that should be included as part of the zone change approval in order to assure adequacy, including timing of any necessary improvements.			X
<i>Discussion:</i> The Applicant is not seeking a change in zoning; as such, the noted policies regarding access and services are not applicable to the Project.				
Roadways				
a.	Develop the roads listed in the 'Ewa Highway Master Plan and the O'ahu Regional Transportation Plan to meet the development anticipated by 2035.			X
b.	Develop additional east-west and north-south roadways to enhance movement between the various parts of the 'Ewa region and to provide improved access to activity centers such as the proposed Kalaeloa Regional Park and the Hoakalei marina.			X
c.	Design the extension of the Kualaka'i Parkway south of Kapolei Parkway into Kalaeloa to minimize adverse impacts on historic railway operations and historic resources at the 'Ewa Marine Corps Air Field.			X
<i>Discussion:</i> While the Applicant supports general policies with regards to the development of City roadways, these policies are not directly applicable to the Project.				
Transit				

Table 5.8: 'Ewa Development Plan (Amended 2020) – Objectives and Policies S = Supportive, N/S = Not Supportive, N/A = Not Applicable		S	N/S	N/A
a.	Increase transit service in 'Ewa to enhance circulation within 'Ewa and between 'Ewa and the adjacent Wai'anae and Central O'ahu areas and to provide suitable service for peak-hour commuting.			X
b.	Provide sites for transportation centers and park-and-ride facilities as new communities are developed.			X
c.	Develop a rail transit corridor connecting the City of Kapolei with the Primary Urban Center to provide both a shuttle service between Kapolei West, the City of Kapolei, Kalaeloa, DHHL East Kapolei, the UHWO campus, Ho'opili, and Waipahū, and an express commuter service to and from the Primary Urban Center.			X
d.	Set aside land in the City of Kapolei and along the rail transit corridor for rail transit stations and park-and-ride facilities.			X
e.	Establish a commuter ferry service to downtown Honolulu from Hoakalei Marina if such service is found to be feasible and if sufficient financing can be obtained to construct improvements needed to provide such service from the Marina.			X
<i>Discussion: While the Applicant supports general policies with regards to the City public transit, these policies are not directly applicable to the Project. Transit service in the vicinity of the Project is currently limited to routes along Farrington Highway. The nearest bus stop is located along the eastbound direction of that roadway approximately 2,000 feet from the Cove Property.</i>				
Bikeway System				
f.	Develop major bike paths along the OR&L right-of-way, Kapolei Parkway, the Kualaka'i Parkway, and Fort Weaver Road.			X
g.	Incorporate bikeways into other major roadways.			X
h.	Develop an extensive network of bike lanes within the City of Kapolei and the Villages of Kapolei.			X
<i>Discussion: While the Applicant supports general policies with regards to the City bikeway system, these policies are not directly applicable to the Project. The O'ahu Bike Plan has identified the provision of bike facilities in the vicinity of the Cove Property, including a bike lane along Ali'inui Drive between the Ko Olina Resort entrance and Farrington Highway and a new shared-use pathway is planned to run alongside the heritage railway route with shoulder bikeways proposed along Farrington Highway from Piliokahi Avenue to Kalaeloa Boulevard. Such improvements will improve the bikeway system serving the Project site. Bicycle parking stalls consistent with LUO standards will be provided on-site to support cyclists.</i>				
Chapter 4.2: Water Allocation and System Development – General Policies				
Adequacy of Water Supply				
a.	Before zoning approval is given for new residential or commercial development in 'Ewa, the Board of Water Supply should: <ul style="list-style-type: none"> • Report if adequate potable and nonpotable water is available; and • If adequate potable and nonpotable water is not available, recommend conditions that should be included as part of the zone change approval in order to assure adequacy. 	X		X
b.	Confirm adequacy of existing capacity at the time of land subdivision or building permit applications for existing lots.	X		
<i>Discussion: BWS verified water availability in a letter dated July 13, 2024 commenting on the Draft EIS, confirming their potable system could accommodate the Project's anticipated water needs (Appendix A-2). The final approval of water availability will be determined confirmed when the building permit application is submitted for approvals. Water usage at the Cove Property is anticipated to increase by approximately 66,067 gpd with the planned redevelopment. Non-potable or irrigation water demand is not anticipated to increase significantly from the existing conditions (Section 4.8.2). Since the projected non-potable water demand for the Project is expected to remain consistent with that of the existing development, the need for an additional non-potable water resource is not anticipated at this time. However, BWS has indicated that water conservation measures are still required for non-potable irrigation systems. The Applicant is also studying the use of a blackwater system for The Cove intended to recycle water from all onsite plumbing fixtures to R1 level per the requirements of HDOH. This water would be used for various approved purposes, including irrigation. Further discussion is provided in Section 4.8.3.</i>				
<i>BWS verified water availability in a letter dated July 28, 2021, confirming their system could accommodate the Project's anticipated water needs (Appendix A). At the time of this letter, BWS stated that water would need to be coordinated with the Ke Olina Community Association. However, further coordination with BWS following the EISPN publication has</i>				

Table 5.8: 'Ewa Development Plan (Amended 2020) – Objectives and Policies				S	N/S	N/A
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<p><i>clarified that the Project may seek review and approval directly from the agency. The final approval of water availability will be determined when the building permit application is submitted for approvals.</i></p> <p><i>Recent correspondence with BWS in 2023 regarding the availability of non-potable water stated that plans for a new non-potable well source for the area has advanced. Given this commitment and progress, BWS has indicated that they may review and approve building permits for the planned non-potable uses needed for the Project. A letter from BWS confirming this condition was requested by G70 in late 2023 and is currently pending.</i></p>						
Water use Efficiency and Conservation						
a.	Require developments to conserve water resources by implementing water conservation measures, such as low flow plumbing fixtures, drought tolerant landscaping, sub-metering and efficient irrigation systems with soil moisture sensors. Such requirements shall be determined during review of building permit applications. Encourage owners of existing plumbing systems to conduct regular water audits and effect repairs to reduce water loss:	X				
b.	Dual Water-Lines - Require developments with large landscaped areas (such as golf courses, parks, or schools), roadway landscaping, and industrial processes to have dual water lines to allow conservation of potable water and use of nonpotable water for irrigation and other appropriate uses. Such requirements shall be determined during review of project water master plans for new developments and approval of zoning applications and construction plans.	X				
c.	Development and Allocation of Potable and Nonpotable Water – The State Commission on Water Resource Management has authority in all matters regarding administration of the State Water Code. By City Charter, the Board of Water Supply has the authority to manage, control and operate the water systems of the City, and therefore should coordinate the development and allocation of potable and nonpotable water sources and systems intended for municipal use on O'ahu as guided by the City's land use plans and the OWMP.	X				
<p><i>Discussion: The Applicant will continue to coordinate with BWS on the water requirements for the Project, and final construction drawings will be reviewed and approved by both BWS and HFD. The Project will incorporate water conservation measures, such as low flow plumbing fixtures and the use of drought tolerant landscaping, to encourage water efficiency.</i></p> <p><i>Since the projected non-potable water demand for the Project is expected to remain consistent with that of the existing development, the need for an additional non-potable water resource is not anticipated at this time. However, BWS has indicated that water conservation measures are still required for non-potable irrigation systems. The Applicant is studying the use of a blackwater system for The Cove intended to recycle water from all onsite plumbing fixtures to R1 level per the requirements of HDOH. This water would be used for various approved purposes, including irrigation. Further discussion is provided in Section 4.8.3.</i></p> <p><i>Recent correspondence with BWS in 2023 regarding the availability of non-potable water stated that plans for a new non-potable well source for the area has advanced. Given this commitment and progress, BWS has indicated that they may review and approve building permits for the planned non-potable uses needed for the Project. A letter from BWS confirming this condition was requested by G70 in late 2023 and is currently pending.</i></p>						
Use of Nonpotable Water						
a.	Develop an adequate supply of nonpotable water for irrigation and other suitable uses on the 'Ewa Plain in order to conserve the supply of potable water and to take advantage of dual water systems constructed by 'Ewa developers. <ul style="list-style-type: none"> ○ The Pearl Harbor aquifer is the most cost effective and accessible water resource of potable quality on O'ahu, and it is needed to support the existing and future domestic potable water uses described in the development plans. ○ To minimize the risk of impacts to our precious potable water sources, the use of recycled water reclaimed from wastewater effluent and brackish waters as nonpotable irrigation sources in the coastal caprock area such as the 'Ewa Plain should be given high priority. ○ Significant demand exists for nonpotable water for golf courses, landscape irrigation, and industrial uses on the 'Ewa Plain. ○ In addition to the compatibility of the source to the demand in the area, the infrastructure to distribute the recycled water in that area is being planned and developed by the Board of Water Supply. ○ Recycled water from the Honouliuli Water Recycling Facility and brackish water should, therefore, be used to meet demand in the 'Ewa Plain where there are no adverse consequences to the drinking water resources. 	X				
b.	Require nonpotable water used for irrigation above Pearl Harbor aquifer to be low in chlorides and total dissolved solids to protect the quality of drinking water withdrawn from wells located down-gradient of the application. Experiences with increasing chloride, nitrate, and pesticide contamination of groundwater indicate that activities on the surface of the land can have a detrimental effect on the quality of drinking water.					X

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	S	N/S	N/A
<p>c. Use of Wai'āhole Ditch Water – Request that the State Commission on Water Resource Management consider all sources of water in making allocations. A sufficient amount of water is needed to meet the diversified agricultural needs for 'Ewa and Central O'ahu along with providing for high quality recharge of the Pearl Harbor aquifer. A number of potential sources are identified in Table 4.2, including: caprock, surface water, spring waters, Wai'āhole Ditch Water, and recycled water recovered from wastewater effluent. The amount of water available and the potential use of each of these sources vary according to location.</p>			X
<p><i><u>Discussion:</u> Recent correspondence with BWS in 2023 regarding the availability of non-potable water stated that plans for a new non-potable well source for the area has advanced. Given this commitment and progress, BWS has indicated that they may review and approve building permits for the planned non-potable uses needed for the Project. A letter from BWS confirming this condition was requested by G70 in late 2023 and is currently pending. Since the projected non-potable water demand for the Project is expected to remain consistent with that of the existing development, the need for an additional non-potable water resource is not anticipated at this time. However, BWS has indicated that water conservation measures are still required for non-potable irrigation systems. The Applicant is studying the use of a blackwater system for The Cove intended to recycle water from all onsite plumbing fixtures to R1 level per the requirements of HDOH. This water would be used for various approved purposes, including irrigation. Further discussion is provided in Section 4.8.3.</i></p>			
Alternative Water Supplies			
<p>a. Where practical, develop alternative water supplies using new technologies in water reclamation, membrane and distillation desalination and deep ocean water applications to ensure adequate supply for planned uses.</p>			X
<p>b. Encourage use of technologies conserving water and using renewable energy that could support alternative water supplies, such as seawater air conditioning, photovoltaics, efficient plumbing and lighting fixtures, wave energy, and bio-fuels.</p>	X		
<p><i><u>Discussion:</u> The Project will integrate sustainable design features, which may include water conservation features and the incorporation of solar-ready design elements. Final design features will be determined as the Project progresses (Section 4.12).</i></p>			
Chapter 4.3: Wastewater Treatment – General Policies			
<p>a. Require all wastewater produced by new developments in 'Ewa to be connected to a regional or municipal sewer service system.</p>	X		
<p>b. Where feasible, use recycled water recovered from wastewater effluent for irrigation and other uses below the Underground Injection Control (UIC) line of the State Department of Health and the "No-Pass" Line of the Board of Water Supply</p>			X
<p>c. Locate wastewater treatment plants in areas shown as planned for industrial use and away from residential areas.</p>			X
<p>d. Use a City review and approval process, which provides adequate public notice and input, complete technical analysis of the project by the DPP, and approval by the City Council, for any major new private wastewater treatment plant. Other system elements, such as pump stations and mains, should not require such comprehensive review and policy approval.</p>			X
<p><i><u>Discussion:</u> The Project will result in a long-term increase of wastewater flow (Section 4.8.3). Ongoing coordination with the City has indicated that the Cove Property must adhere to wastewater flow limitations established in the Engineering Report for the Kapolei Interceptor Sewer (2003, Community Planning, Inc.). Coordination with the City is ongoing. As the Project progresses, on-site wastewater infrastructure will be designed to meet the City's Wastewater Design Standards. The Applicant has coordinated with the City to increase the allocation of sewer capacity for The Cove Property within the master planned tributary area. In accordance with the Kapolei Interceptor Sewer Assessment Agreement, Kapolei Properties LLC, an affiliate of the James Campbell Company LLC, exercised its assignment right under the agreement to reassign 52,000 gpd of unused and unneeded sewer allocation from Kapolei Harborside (TMK (1) 9-1-014: 085) to the Cove Property. Combined with the existing allocation of 25,000 gpd, the updated sewer allocation for The Cove now totals 77,000 gpd. Subsequently, a Sewer Connection Application for the Project was submitted to the City and approved on November 14, 2024 (File No. 2024/SCA-1132).</i></p> <p><i>Mitigation measures such the use of gray water blackwater and other BMPs to minimize wastewater increases will be implemented, as appropriate. The Applicant is studying the use of a blackwater system for The Cove intended to recycle water from all onsite plumbing fixtures to R1 level per the requirements of HDOH. The R1 water would be reused on site to flush toilets, urinals and irrigation per 2021 United Plumbing Code, Chapter 16. A proposed blackwater system for The Cove would collect wastewater from toilets, sinks, urinals, and kitchen waste (post-grease interceptor) and process it through a multi-step treatment system. The treated R1 water would be reused through a distinct piping system. The system would be designed to process and recycle an estimated 60,000 gallons of blackwater daily. The feasibility and final design of a blackwater system will be determined as the Project progresses.</i></p>			

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Chapter 4.4: Electrical Power Development – General Policies				
a.	Analyze and approve system improvements -- such as development of a new power generating plant and/or major new transmission lines – based on island wide studies and siting evaluations.			X
b.	Give strong consideration to placing any new transmission lines underground where possible under criteria specified in State law.			X
c.	Locate electrical power plants in areas shown as planned for Industrial use and away from residential areas.			X
d.	Consider any proposed major new electrical power plant through a City review and approval process which provides public notification and opportunity to comment and public agency analysis of impacts and mitigations.			X
<i>Discussion: While the Applicant supports general policies with regards to electrical power development, these specific policies are not directly applicable to the Project.</i>				
Chapter 4.5: Solid Waste Handling and Disposal – General Policies				
a.	Do not develop the Makāiwa Gulch area identified by the Mayor's Advisor Committee in December 2003 as a landfill. It is in an area planned for residential use and is adjacent to the Ko Olina Resort, which plays an important role in job creation for 'Ewa.			X
b.	Analyze and approve siting and/or expansion of sanitary landfills based on island-wide studies and siting evaluations.			X
c.	For master-planned communities, plan, in consultation with the Department of Environmental Services, for how solid waste will be handled, to include estimates of solid waste to be generated by the communities, provisions for collection of solid waste, and provisions for and encouragement of recycling.			X
<i>Discussion: While the Applicant supports general policies with regards to solid waste handling, these specific policies are not directly applicable to the Project. As discussed in Section 4.8.4, The Project will not have a significant impact on the City's waste stream and disposal to the H-POWER Plant. During construction, materials resulting from demolition activity may be re-used or recycled, to the extent possible. In the long term, The Cove may implement recycling efforts minimize solid waste, including, but not limited to, the recycling of glass, plastic bottles, cardboard, aluminum, and paper; the use of compostable or alternative disposable cutlery, like cups and silverware made from cornstarch or bamboo; and, recycling of food waste. Recycling may will also be encouraged through the use of trash cans with recycling containers.</i>				
Chapter 4.6: Drainage Systems – General Policies				
a.	Design drainage systems to emphasize flood control and minimization of non-point source pollution and the retention and/or detention of storm water on-site and in appropriate open space and wetland areas.	X		
b.	Use storm water as a potential irregular source of water for recharge of the aquifer that should be retained for absorption rather than quickly moved to coastal waters.			X
c.	Use natural and man-made vegetated drainageways and retention basins as the preferred solution to drainage problems wherever they could promote water recharge, help control non-point source pollutants, and provide passive recreation benefits. However, concrete-lined channels can be permitted, despite their potential adverse environmental impacts, if there is no other reasonable alternative to meet specific design challenges.	X		
<i>Discussion: As discussed in Section 4.8.1, improvements to the Project is site are anticipated to decrease stormwater runoff on the Cove Property, <u>representing an improvement from existing conditions</u>. During construction, the Project will comply with the conditions of the City grading permit and applicable provisions of HAR, Sections 11-54 and 11-55. In the long term, LID measures, such as bioswales, rain gardens, planter boxes, sand filters, or permeable pavement, may be integrated into project design where feasible.</i>				
Chapter 4.7: School Facilities – General Policy				
a.	Project Review and Approval Assessment - As new residential developments are reviewed as part of the project application review and approval process, request that the DOE report to the DPP whether the DOE will be able to provide adequate school facilities, either at existing schools or at new school sites, so that needs from the proposed development can be met.			X
b.	Faire Share Provisions - Require developers to comply with DOE school impact fees requirements and pay their fair share of all costs needed to provide adequate school facilities for the children living in their developments.			X

Table 5.8: ‘Ewa Development Plan (Amended 2020) – Objectives and Policies			
S = Supportive, N/S = Not Supportive, N/A = Not Applicable			
	S	N/S	N/A
<i>Discussion: While the Applicant supports general policies with regards to school facilities, these policies are not directly applicable to the Project.</i>			
Chapter 4.8: Public Safety Facilities – General Policy			
a. Provide adequate staffing and facilities to ensure public safety.	X		
b. Approve new development only if staffing and facilities will be adequate to provide fire and police protection and emergency medical service when development is completed.	X		
c. Survey and retrofit, as appropriate, DOE and other public buildings to make up the shortfall in hurricane resistant shelters.			X
d. Require new City buildings which are “critical facilities used for public assembly and able to perform as shelters” to be designed and built to withstand a Category 3 hurricane.			X
e. Provide incentives for private organizations to create hurricane resistant shelter areas in their facilities and for homes to include hurricane resistant “safe rooms.”			X
<i>Discussion: Existing public services are sufficient to serve the planned Project. Long-term operation of The Cove may incorporate standard operating procedures for employees and visitors in the event of emergencies. During operation, additional private security on the property will be evaluated and considered, as needed. Planned structures will be built in accordance with IBC, State, and City building code standards to promote public safety.</i>			

5.3.3 Urban Design Provisions for ‘Ewa, West Beach Special Area / Ko Olina Resort

As noted in Section 1.7, Condition No. 3 of Ordinance No. 89-27 (effective February 23, 1989) that rezoned the Cove Property provides that the Project site would be developed “consistent with adopted urban design provisions and considerations for Ko Olina (West Beach) to include a 40-foot-wide strip along the seaward property boundary which shall be open and free of structures and improvements.”

At the time the Cove rezoning was enacted in 1989, commercial use of the Cove Property had been ongoing for at least a decade. At that time, the Development Plan for ‘Ewa contained specific urban design principles and controls for the “West Beach Special Area.” See ‘Ewa DP, Ordinance No. 81-80, as amended by Ordinance Nos. 83-26, 84-57, 85-61. That DP has been updated by the City over the years. The current version is the ‘Ewa DP (Ordinance No. 20-46, effective December 9, 2020), which continues to provide policies and guidelines for development within the Ko Olina Resort area. For the purposes of the ‘Ewa DP, the Ko Olina Resort includes the Cove Property. See Figure 1.6 for a copy of the “Ko Olina Land Use Map” from the ‘Ewa DP, depicting the Cove Property.

With respect to Ko Olina Resort, a consistency analysis of the relevant policies and guidelines under the 2020 ‘Ewa DP incorporates an analysis of the provisions of the “West Beach” (now known as Ko Olina Resort) urban design provisions that were required under the approximately 642-acre rezoning of West Beach, approved by Ordinance No. 86-09 (effective March 11, 1986) and its UA and Declaration for Conditional Zoning. The ‘Ewa DP explains the history as follows:

The ‘Ewa Development Plan prior to 1997 included specific development objectives, planning principles, and standards for Ko Olina Resort, under its former name of West Beach. The Unilateral Agreement to the 1986 zoning ordinance for the Resort [Ordinance No. 86-09] includes detailed conditions regarding the master plan of the resort, building design, design of the public shoreline area, and public access to the shoreline.

Development of the Resort can proceed based on the existing zoning and Unilateral Agreement. This section incorporates key elements for Ko Olina from the former Development Plan and the Unilateral Agreement.

'Ewa DP (2020), p. 3-62 (emphasis added).

Identical language is found within the immediately prior version of the 'Ewa DP (July 2013); substantially similar language is within the prior iteration of the 'Ewa DP (August 1997).

The relevant condition imposed under the West Beach/Ko Olina rezoning UA cited in the 'Ewa DP required West Beach, as a large master-planned community, to submit an urban design plan to the City for approval.² The urban design provisions required under the West Beach rezoning UA were approved by the City in August 1986.³ As long ago determined by the City, the key elements of those design provisions were incorporated into the Ko Olina Resort section of the 'Ewa DP.

To clarify, the Ko Olina Resort rezoning ordinance (Ordinance No. 86-09) did not rezone the Cove Property nor has that Unilateral Agreement ever been an encumbrance on the Cove Property. See Figure 5.1 which is a copy of the Ko Olina zoning map attached to Ordinance No. 86-09, showing the vast area rezoned and showing that the Cove Property (and the adjacent Lanikūhonua property) were not rezoned by that Ordinance. However, in the interest of furthering informational disclosure to decision-makers (see, e.g., HAR § 11-200.1-28, providing acceptability criteria for a FEIS), and to respond to comments received during the Draft EIS public comment period, this expanded consistency analysis of urban design provisions is being provided.⁴

² Condition 8 of the West Beach/Ko Olina Resort rezoning Ordinance No. 86-09 and its UA required in relevant part as follows:

An urban design plan for West Beach shall be submitted to the Department of Land Utilization for approval. The urban design plan for the area covered by the Special Management Area Permit shall be submitted to the Department of Land Utilization for approval prior to or concurrent with an application for a Special Management Area Permit. The urban design plan for the remaining area shall be submitted prior to tentative subdivision approval. In addition, at each phase of development as determined in Paragraph 3 [Paragraph 3 of the UA being a requirement that the West Beach developer following the development schedule attached to Ordinance No. 86-09], the Declarant shall submit site plans and conceptual architectural drawings for the development to the Department of Land Utilization for review and approval in order to insure that the Development Plan urban design objectives for West Beach are carried out, and that the development phases adhere to the urban design plan

Condition 8 then continues with certain height and setback limitations.

³ As explained by DPP, "An urban design plan is typically required as a condition of a zone change approval for larger areas of land (master planned communities, large scale developments, etc.). The urban design plan provides a basic framework for site planning, land use, circulation and infrastructure." See DPP Urban Design Plans at <<https://www.honolulu.gov/dpp/planning/planning-documents/urban-design-plans.html>> (last visited October 2024).

⁴ Certain written comments received during the Draft EIS public comment period were directed to the purely private urban design provisions that were imposed by the City Council on the West Beach SMA development pursuant to Resolution 86-61. SMA Resolution No. 86-61 authorized development within the SMA area of the master-planned Ko Olina Resort. SMA Resolution No. 86-61 is not applicable to the Cove Property and did not authorize development within the Cove Property. Moreover, the language of the provisions cited in the public comments appears to be nearly identical to provisions found in the Ko Olina Resort urban design provisions required under the West Beach rezoning UA (Ordinance No. 86-09) were approved by the City in August 1986. For that reason, and to avoid overwhelming the reader with redundant and excessive material, this consistency analysis does not address the design provisions under SMA Resolution No. 86-61.

As done in prior evaluations of the Cove Property, such as during the City's review of the Property in connection with the 1993 SMA Use Permit authorizing the last major redevelopment of the Cove Property, this consistency analysis takes into consideration the unique features and status of the Property.

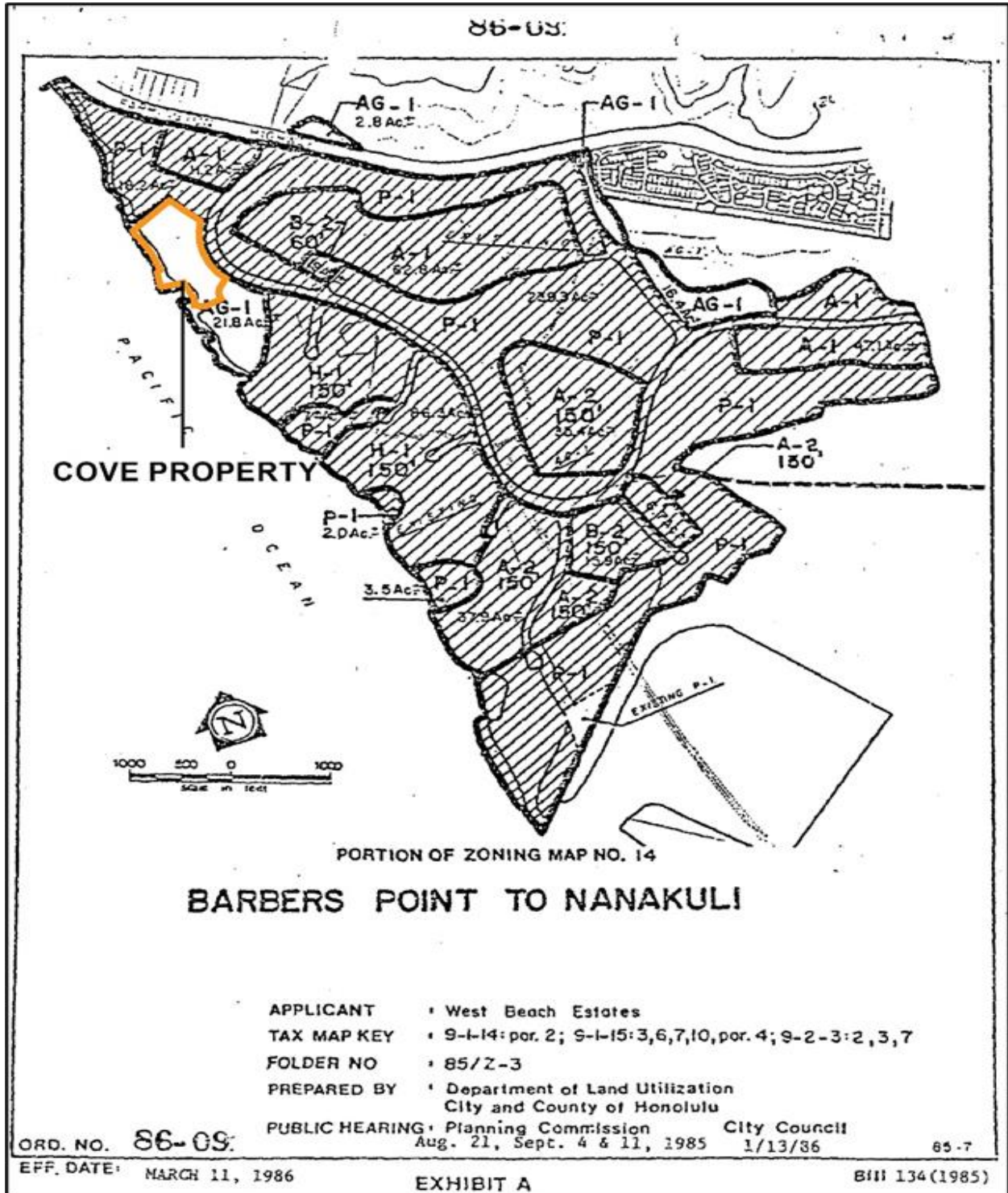


Figure 5.1: West Beach / Ko Olina Resort Ordinance No. 86-09 Rezoning Map

Table 5.9: West Beach / Ko Olina Resort Objectives, Policies, and Design Guidelines

	'Ewa Development Plan, Ordinance No. 81-80, as amended by Ordinance Nos. 83-26, 84-57, 85-61 Principles and Controls for West Beach Special Area	Urban Design Provisions for West Beach, May 1986	'Ewa Development Plan, Ordinance No. 20-46, December 2020
I.	GENERAL, VIEWS & VISTAS		
I.A.	<p>West Beach Special Area</p> <p><u>The West Beach Special Area shall be an integral part of the central core of the West Beach-Makakilo Secondary Urban Center. The area, containing approximately 640 acres of land, lies on the shoreline between Kahe Point Beach Park and the site of the Barbers Point Deep Draft Harbor.</u></p> <p><u>It shall be a water-oriented residential and resort community containing a mixture of Low Density Apartment, Medium Density Apartment, Resort, Commercial (comprised of a major shopping complex and a smaller neighborhood shopping area), Public Facility, Park, and Preservation uses, as indicated on the land use map.</u></p> <p><u>A marina in the area adjoining the deep draft harbor shall also be established.</u></p>	<p>Design Objectives</p> <p><u>Establish West Beach as a first-class destination resort and residential community.</u></p> <p><u>To create a unique tropical oasis as the unifying theme for West Beach, with emphasis placed on water features and lush tropical landscaping as a carpet of blue and green; with building design to be complement the tropical oasis theme.</u></p> <p><u>To establish harmonious relationships between West Beach and surrounding areas by the following means:</u></p> <p><u>Establish a transition to the rural Leeward coast by locating parks and open space to provide continuous shoreline open space from Kahe Point to the West Beach lagoons and marina. The Hawaiian Cultural Center and Paradise Cove will also be part of the continuous open space. In addition, low density uses will be sited at the Kahe end of West Beach. Therefore, views from Farrington Highway at Kahe Point toward the West Beach shoreline will be preserved by continuous parks and open space.</u></p> <p><u>To establish a quality resort and residential environment through a comprehensive plan which will coordinate and unify development; provide plentiful recreation amenities; and provide an efficient and pleasant circulation system composed of roads, walkways, and a continuous shoreline pathway system.</u></p> <p><u>To heighten the perception and enjoyment of West Beach by maintaining views to the ocean and other amenities such as the golf course, marina, and mountain backdrop of Waianae and Koolau Mountains.</u></p>	<p>3.11 Ko Olina Resort</p> <p><u>Ko Olina Resort is designated in the General Plan as one of four "secondary" resort destinations, which are part of an overall strategy to relieve growth pressure on Waikiki. The resort is located on 640 acres between Kahe Point Beach Park and the Kalaeloa Barbers Point Deep Draft Harbor. When developed, Ko Olina Resort should be a water oriented residential and resort community with at least 4,000 visitor units in hotels and resort condominiums and 5,200 residential units.</u></p> <p><u>Ko Olina is master-planned to incorporate recreational features in addition to visitor accommodations. Recreational facilities include a golf course, a small boat marina, and four man-made swimming lagoons. Development of the golf course and the swimming lagoons, and installation of roads and utilities are completed.</u></p>
IA	<p>Discussion: <u>The Project is consistent with these objectives. Commercial use at the Cove Property pre-dates the first Development Plan for 'Ewa and any urban design plans for the master-planned Ko Olina Resort (formerly known as West Beach). Trustees Under the Will and of the Estate of James Campbell, Deceased (Campbell Estate), owned all of the land that is now known as Ko Olina Resort and also owned the Cove Property and the adjacent Lanikūhonua property. As such, Campbell Estate was closely involved in authorizing the overall planning and design vision for the Resort. At that time, commercial use at the Cove Property was already ongoing.</u></p>		

Table 5.9: West Beach / Ko Olina Resort Objectives, Policies, and Design Guidelines

	'Ewa Development Plan, Ordinance No. 81-80, as amended by Ordinance Nos. 83-26, 84-57, 85-61 Principles and Controls for West Beach Special Area	Urban Design Provisions for West Beach, May 1986	'Ewa Development Plan, Ordinance No. 20-46, December 2020
	<p><i>The proposed Cove Project will support the comprehensive resort/residential/recreational objectives for this area by updating the existing commercial lū'au show and re-establishing the Cove Property as an authentic Hawaiian outdoor recreation facility and community gathering place for kama'āina (Hawai'i residents) and visitors that honors and reflects history, culture, and connection to place. Design of the structures will be inspired by both contemporary and Hawaiian architecture to provide a welcoming and authentic setting, and the Project will enhance the existing environment while maintaining its tropical, resort-like setting, consistent with the objective for the surrounding area.</i></p> <p><i>The Cove Property will be enhanced by pockets of thoughtfully designed open space consisting of lush landscaping, shading, and natural pathways to create an inviting experience that highlights the beauty of the surrounding coastal area. The integration of open space throughout the Cove Property to create an immersive and relaxing experience, and landscaping will be enhanced and thoughtfully designed to complement new structures, pedestrian pathways, and outdoor seating areas. Special attention will be given to the selection and utilization of native, Polynesian-introduced, and tropical plants (Figures 3.16 and 3.17). The existing trees along Ali'inui Drive will remain in place and will continue to screen the Cove Property. To enhance the ocean views afforded throughout the Cove Property, the structures to be constructed will be open-air structures and pavilions consisting of clean, natural, and textured materials.</i></p> <p><i>The Project is consistent with the objective of providing continuous shoreline open space from Kahe Point to the Ko Olina lagoons and marina. In compliance with the conditions of the Cove Property UA (Ordinance No. 89-27), the Property is subject to a 40-foot-wide strip along the seaward property boundary which must be left open and free of structures and improvements. Through the Cove Redevelopment Project, the Property will become subject to the City's new Ordinance 23-03, which requires a 60 foot shoreline setback.</i></p> <p><i>The Project will also be supportive of open space through the limitation of no more than 30 percent lot coverage pursuant to the Cove's rezoning Ordinance No. 89-27. Normally, a parcel of this size and with this zoning (B-1 Neighborhood Business District) would be entitled to a lot coverage of approximately 470,448 square feet. However, the 30 percent lot coverage limitation means that at this Property, lot coverage is limited to approximately 141,827 square feet. As discussed elsewhere in the EIS (see Table 3.1), the preliminary design for the Project is even more modest, at approximately 13.84 percent lot coverage.</i></p> <p><i>As discussed in Section 4.11, the Project will not adversely impact views from Farrington Highway toward the shoreline. New structures at The Cove will have a low building profile, with heights limited to 40 feet in compliance with zoning and, as previously mentioned, the new structures will be set back at least 60 feet from the shoreline, ensuring that shoreline open space is preserved. Preserving open space along the shoreline will help retain lateral coastal views along the Wai'anae coast and views of significant features, such as Pu'u o Hulu Kai.</i></p> <p><i>The Cove Project does not include any golf courses, boat harbors, or man-made swimming lagoons. Those improvements are part of the master-planned Ko Olina Resort.</i></p>		
I.B.	<p><u>A new secondary urban center shall be gradually developed in the West Beach-Makakilo area in order to accommodate most of the expected influx of population into the area between 1980 and the year 2000.</u></p>		<p>3.11.1 General Policies</p> <p><u>Develop Ko Olina Resort as an integral part of the Secondary Urban Center.</u></p> <p><u>Develop Ko Olina to provide substantial waterfront areas for public use. The entire shoreline should be natural open space, softened by landscaping, and should focus on the beach and swimming lagoons.</u></p> <p><u>Design the built environment to avoid adverse impacts on natural resources or processes in the coastal zone.</u></p>

Table 5.9: West Beach / Ko Olina Resort Objectives, Policies, and Design Guidelines

	'Ewa Development Plan, Ordinance No. 81-80, as amended by Ordinance Nos. 83-26, 84-57, 85-61 Principles and Controls for West Beach Special Area	Urban Design Provisions for West Beach, May 1986	'Ewa Development Plan, Ordinance No. 20-46, December 2020
<i>I.B.</i>	<p><i>Discussion:</i> <i>The Project is consistent with these policies. As previously discussed, Campbell Estate, predecessor to the current owner of the Cove Property and also the adjacent Lanikūhonua property, owned all of the land that is now known as master-planned Ko Olina Resort. Campbell Estate was closely involved in authorizing the overall vision for the area as a resort area integral to the O'ahu's Secondary Urban Center. As that planning was brought into place and development was eventually pursued in accordance with that planning, commercial use at the Cove Property was already ongoing.</i></p> <p><i>Although the manmade swimming lagoons and development of formal constructed open space along the shoreline are components of the Ko Olina Resort, and not applicable to the Cove Property, the Project is nevertheless consistent with the objective of providing continuous shoreline open space east of Kahe Point. In compliance with the conditions of the Cove Property UA (Ordinance No. 89-27), the Project will adhere to the 30 percent lot coverage limit (Table 3.1), and new structures at the Project will be set back at least 60 feet from the shoreline, ensuring that shoreline open space is preserved.</i></p> <p><i>As discussed in more detail in Section 4.0, the Project is designed to avoid adverse impacts on natural resources or processes in the coastal zone, such as by Sections 5.2.8 and 5.3.4.</i></p>		
<i>I.C.</i>	<p>The land use map defines the boundary of 'Ewa. It depicts a land use pattern that is consistent with the objectives and policies of the general plan and is used as the basis for public facility planning. It shows the existing and planned locations of residential, apartment, commercial and industrial land uses and the locations of existing schools, parks, libraries, government and other public buildings and sites, and existing major land using elements of the transportation, water, sewer, and other utility systems.</p>		<p>3.11.2 Land Use Map (Exhibit 3.6)</p> <p>Resort sites are located along the shoreline and should have hotels, apartments, and accessory commercial and recreational facilities for resort use.</p> <p>The Lanikūhonua Cultural Center, located at the northern end of the resort area, should be principally open space with accessory structures as needed to support the cultural center use.</p> <p>The Paradise Cove site, located between Lanikūhonua and the park, should be used for resort commercial purposes.</p>
<i>I.C.</i>	<p><i>Discussion:</i> <i>The Project is consistent with the Ko Olina Land Use Map under the 'Ewa DP and the related land use policies. As depicted in Figure 1.6, the Property is at the northern end of the master-planned Ko Olina Resort area. It is designated for "Resort" uses under the 'Ewa DP. Consistent with the 'Ewa DP Map and applicable policy text, the Project will continue the use of the Property for resort commercial purposes.</i></p>		
II	URBAN FORM		
<i>II.A.</i>		<p>The overall urban form of West Beach shall project a feeling of spaciousness within a tropical oasis, and orientation to the shoreline and recreational/open space amenities.</p>	<p>3.11.3 Guidelines, Urban Form</p> <p>Appropriate Scale and Siting – Minimize the visibility of large building volumes and elements from waterfront and residential areas through building envelope restrictions, site planning, and landscaping.</p> <p>Resort Center: Allow development of a resort destination area containing at least 4,000 visitor units in the area designated for Resort use on Exhibit 3.6.</p>

Table 5.9: West Beach / Ko Olina Resort Objectives, Policies, and Design Guidelines

	'Ewa Development Plan, Ordinance No. 81-80, as amended by Ordinance Nos. 83-26, 84-57, 85-61 Principles and Controls for West Beach Special Area	Urban Design Provisions for West Beach, May 1986	'Ewa Development Plan, Ordinance No. 20-46, December 2020
II.A.	<p><i>Discussion: The Cove Property is and will remain consistent with these principles. The Property is designated as Resort on Exhibit 3.6 of the 'Ewa DP. See Figure 1.6. The Cove Redevelopment Project will create a spacious, tropical environment that is oriented towards the shoreline and integrates recreational and open space amenities, consistent with the above objectives. The Project will enhance the sense of spaciousness through the thoughtful integration of open spaces and lush landscaping throughout. These elements will be designed to complement the site's natural coastal environment, creating an inviting gathering place for residents and visitors that embodies the tropical oasis envisioned for the area. Lot coverage on the site will be limited to 30 percent in compliance with the UA, maximizing open space and contributing to the feel of spaciousness throughout the property (Table 3.1).</i></p> <p><i>Planned structures will be set back at least 60 feet from the shoreline, maintaining and enlarging lateral public beach access and ocean views from the shoreline. As shown in the preliminary site plan (Figure 3.3), structures will continue to be oriented towards the shoreline, optimizing coastal views and access to the shoreline.</i></p> <p><i>The Cove Property is not planned for visitor lodging and the Project does not propose such uses.</i></p>		
B.	<p>(D) General height limits for the area shall be as provided in Section 15.1.c, as follows:</p> <ul style="list-style-type: none"> • Preservation – 25 feet • Agricultural – 25 feet • Residential – 25 feet • Low-Density Apartment – 30 feet • Medium-Density Apartment, West Beach Special Area – 150 feet • Medium-Density Apartment, All other areas – 60 feet • Commercial, West Beach Special Area major shopping complex – 150 feet • Commercial, All other areas – 60 feet • Industrial – 60 feet • Resort – 150 feet 	<p>Building Height: Encourage variations in height to afford privacy, create view corridors, and enhance the visual experience along the shoreline and throughout West Beach. To achieve a transition in scale, low, smaller-scale building forms should generally be sited at the edges of parcels with higher building forms toward the center.</p> <p>General height limits shall be provided in Section 1.c. of the 'Ewa Development Plan as amended (Ordinance No. No. 83-26).</p>	<p>Allow variation in building heights near the shoreline and along the marina frontage, particularly to preserve long views and minimize the perception of building bulk from the shoreline, beach, and marina frontage.</p> <p>Limit building heights at Lanikūhonua and Paradise Cove to no more than 40 feet in height.</p>
II.B.	<p><i>Discussion: From a planning perspective, as a formerly Commercial designated parcel, the Cove Property would be subject to a 60 foot height limit. However, building heights on the Property are more restrictive. Heights are limited to 40 feet pursuant to the applicable zoning, B-1, Neighborhood Business District, which is consistent with the principles set forth above.</i></p>		
C.	<p>(c) Compatibility of uses and design integration shall be encouraged at the boundaries separating different use areas.</p>	<p>Building Bulk: The appearance of buildings should be compatible with the spaciousness of the shoreline setting. Building form should have appropriately scaled horizontal dimensions which favor slender construction for higher building forms and articulation of bulk into smaller building elements where possible to allow penetrating views.</p>	<p>Encourage compatibility of uses and design integration at the boundaries separating different use areas.</p>

Table 5.9: West Beach / Ko Olina Resort Objectives, Policies, and Design Guidelines

	'Ewa Development Plan, Ordinance No. 81-80, as amended by Ordinance Nos. 83-26, 84-57, 85-61 Principles and Controls for West Beach Special Area	Urban Design Provisions for West Beach, May 1986	'Ewa Development Plan, Ordinance No. 20-46, December 2020
<i>II.C.</i>	<p><i>Discussion:</i> <i>The Property is bounded by in Lanikūhonua Cultural Center to the south and a vacant lot planned for Makaīwa Beach Park to the north; to the east it is bounded by Aliinui Drive and to the west is the shoreline. The Property is designated as Resort on Exhibit 3.6 of the 'Ewa DP (Figure 1.6). The Cove Redevelopment Project will create a spacious, tropical environment that is oriented towards the shoreline and integrates recreational and open space amenities, consistent with the above objectives. The Project will enhance the sense of spaciousness through the thoughtful integration of open spaces and lush landscaping throughout. These elements will be designed to complement the site's natural coastal environment, creating an inviting gathering place for residents and visitors that embodies the tropical oasis envisioned for the area. Lot coverage on the site will be limited to 13.84 percent of the property (65,413 sf), well under the 30 percent limit required by the UA (Ordinance No. 89-27), maximizing open space and contributing to the feel of spaciousness throughout the property (Figure 3.18 and Table 3.1).</i></p> <p><i>Planned structures will be set back at least 60 feet from the shoreline, maintaining and enlarging lateral public beach access and ocean views from the shoreline. As shown in the preliminary site plan (Figure 3.3), structures will continue to be oriented towards the shoreline, optimizing coastal views and access to the shoreline.</i></p> <p><i>The Project encourages compatibility of uses and promotes design integration at its boundaries, incorporating open spaces, landscaping, and the shoreline setback at appropriate locations to create a cohesive transition between commercial, recreational, and natural areas on the Property and with the adjacent areas.</i></p> <p><i>New Structures are planned with heights ranging from approximately 13.0 feet to 36.5 feet, adhering to the 40-foot height limit of the B-1, Neighborhood Business District. Existing structures on the Cove Property that are remaining in place (i.e., the chapel and its support building) have a height of approximately 34.8 feet high. New structures at The Cove will be compatible with the spaciousness of the site's coastal setting. As discussed, and shown throughout Section 3.0, the overall Project design will predominately consist of open structures and the inclusion of outdoor terrace seating (covered and uncovered) that will allow visitors to the Property to immerse in the coastal setting. Open areas will be incorporated throughout to preserve views and create a relaxed setting.</i></p>		
<i>II.D.</i>		<p><u>Building Orientation:</u> <u>Generally, on those land parcels with the major axis perpendicular the shoreline, the long dimensions of buildings should be perpendicular to the shoreline to afford view corridors to the ocean. The narrower dimension of buildings should face the shoreline and setbacks should be varied to avoid a wall effect along the shoreline.</u></p>	<p><u>Orient hotel, commercial, and apartment buildings perpendicular to the shoreline to maximize mauka and makai views.</u></p>

Table 5.9: West Beach / Ko Olina Resort Objectives, Policies, and Design Guidelines

	'Ewa Development Plan, Ordinance No. 81-80, as amended by Ordinance Nos. 83-26, 84-57, 85-61 Principles and Controls for West Beach Special Area	Urban Design Provisions for West Beach, May 1986	'Ewa Development Plan, Ordinance No. 20-46, December 2020
<i>II.D.</i>	<i>Discussion:</i> <i>The Cove Project is consistent with these principles in that it will maximize views to the shoreline and mauka. Building placement and architectural treatments have been designed with this purposes in mind. Moreover, the new structures to be constructed as part of the Cove Project generally follow the same building orientation as the existing structures, continuing to avoid any wall effect along the shoreline. The Project's considerable open space (lot coverage is limited to no more than 30 percent of the Property) will further the intent of these principles. The Property, at approximately 10.85 acres (approximately 472,757 square feet), would be entitled to a lot coverage of approximately 470,448 square feet. However, pursuant to Ordinance No. 89-27, the lot coverage of the Cove Property is limited to no more than 30%. That means lot coverage is limited to approximately 141,827 square feet. Even with this significant limitation on development, the Cove Redevelopment Project proposes a lot coverage well under the 30 percent limitation. The preliminary design for the Project as described in the EIS contemplates a project that is approximately 13.84percent lot coverage (approximately 65,413 square feet). The major axis of the Property is not perpendicular to the shoreline. The Property dimensions, approximately 1,164 feet by 655 feet at its furthest reaches, and its major axis (approximately 979 feet) is roughly parallel to the shoreline.</i>		
<i>II.E.</i>	<u>Building Surfaces:</u> Encourage the articulation of building surfaces to soften their appearance and reduce mass. Architectural elements such as lanais, sunshades and fenestration projections and recesses are encouraged and shall be employed to avoid the visual impacts resulting from highly reflective surfaces. Smooth-skin architecture or buildings with highly reflective glass surfaces are to be discouraged.		
<i>II.E.</i>	<i>Discussion:</i> <i>The Project is consistent with this principle. The overall Project design will include the use of modern and natural materials that are reflective of contemporary Hawaiian architecture and will blend with the surrounding area. Shading devices or canopies are expected to be integrated throughout the site to enhance the natural, lush setting and create a comfortable experience. Each restaurant is expected to include outdoor terrace seating (covered and uncovered) to allow property visitors to enjoy the coastal setting.</i>		
<i>II.F.</i>	<u>Building Siting:</u> Individual buildings and complexes should be sited so that open spaces are an integral part of the design to create soft edges. Buildings should appear to be sited within a tropical, spacious setting.		
<i>II.F.</i>	<i>Discussion:</i> <i>Open areas will be incorporated throughout The Cove to preserve views and create an open, spacious, and tropical setting. A cultural pavilion with stage and open-air activity lawn areas will be integrated throughout the Cove Property, enhancing the spacious feeling on site, and serving as multifunctional spaces for programming, community gathering, or relaxing (Figure 3.3). The site layout will enhance existing views of the ocean for visitors by locating key gathering areas along the coast while incorporating landscaping to create a lush, relaxing environment consistent with the surrounding area's tropical oasis theme and favoring open-air structures and pavilions consisting of clean, natural, and textured materials to complement the Cove Property's natural beauty and provide an immersive experience.</i>		
<i>II.G.</i>	<u>All structures within parcels makai of the Primary Loop Road and adjacent to the shoreline and marina shall be set back a</u>		

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		<p>minimum of 100 feet from the primary loop road parcel boundary.</p> <p>Generally, the 150-foot-high building envelopes are surrounded by the 40-foot-high building envelopes along the parcels edge.</p>	
<i>II.G.</i>	<p><i>Discussion:</i> As has been the case for decades, existing structures at the Cove Property are set back approximately 40 to 60 feet away from Ali'inui Road. This condition will be maintained with the redevelopment of the site and construction of new buildings associated with The Cove. The Cove will not include structures taller than 40 feet; as such, this principle is not applicable to the Project.</p>		
III.	NATURAL ENVIRONMENT		
<i>III.A.</i>			<p>3.11.3 Guidelines, Natural Environment</p> <p>Locate and operate uses that generate high noise levels in a way that keeps noise to an acceptable level in existing and planned residential areas.</p>
<i>III.A.</i>	<p><i>Discussion:</i> The amphitheater will be relocated to a new area on the property that may result in a reduced buffer area and increased spillover of sound to adjacent residential areas, primarily Kai Lani at Ko Olina. To ensure that amplified sound remains comparable to existing conditions, the new amphitheater's sound amplification system is being designed to achieve the three to four dBA reduction while maintaining current maximum program sound levels within the audience seating area. This mitigation measure will ensure that the new amphitheater will maintain the existing sound levels of the current lū'au show. The final design of the sound system will be determined as the Project progresses. Further discussion on anticipated noise impacts and a summary of the Acoustic Study are provided in Section 4.9 of the EIS.</p>		
<i>III.B.</i>			<p>To retain a sense of place, design the resort and recreation areas to incorporate natural features of the site and utilize landscape materials that are indigenous to the area where feasible.</p>
<i>III.B.</i>	<p><i>Discussion:</i> Landscaping will play a valuable role in expressing culturally resonant themes and experiences throughout The Cove and will consist of native, Polynesian-introduced, or tropical trees and shrubs of varying sizes, consistent with the tropical oasis theme of the surrounding area.</p>		

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III.C.	<p>All structures shall generally be set back a minimum distance of 300 feet from the shoreline. Lesser (or greater) setbacks may be permitted upon design review and approval by the Department of Land Utilization.</p>	<p>Structures shall generally be set back a distance of 300 feet from the existing, certified shoreline and the water's edge of the man-made lagoons. Structures related to recreation uses may be exempted from this requirement upon approval of the Department of Land Utilization. Recreation structures located between 100 feet and 200 feet landward of the existing, certified shoreline and the water's edge of the man-made lagoons shall not exceed 15 feet in height. Public comfort stations and showers shall be located a minimum distance of 100 feet landward from the existing, certified shoreline or the water's edge of the man-man lagoon, and adjacent to the public walkway.</p> <p>For areas between 200 feet and 300 feet landward of the existing, certified shoreline and the water's edge of the man-made lagoons, there shall be a maximum building to land coverage ratio of ten percent (10 percent) of the land. The ten percent (10 percent) land coverage ratio shall be based on the area between 300 feet landward of the existing, certified shoreline and the water's edge of the man-made lagoons. An exception shall be made for the proposed beach club, located on Parcel 19, for which the building to land coverage ratio shall be twenty percent (20 percent), to be calculated as specified herein, with a height limit for said Parcel not to exceed 40 feet.</p> <p>Structures located in the area between 200 feet and 300 feet landward of the existing, certified shoreline shall not exceed heights of 50 feet plus one foot for each one foot of setback beyond 200 feet.</p>	<p>Set back all structures a minimum distance of 300 feet from the shoreline. Lesser (or greater) setbacks may be permitted upon design review and approval by the DPP.</p>

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III.C.	<p>Discussion: <i>Although the long-standing general principle with respect to setbacks in the master-planned Ko Olina Resort calls for 300 foot setbacks, starting prior to the enactment of any of the aforementioned plans, the Cove Property has been developed subject to a 40-foot setback. The proposed Project will exceed that setback by some 20 feet, resulting in no structures being located closer than 60 feet from the shoreline. In this way, the Cove Project will provide greater setbacks from the shoreline than is currently found on the Property.</i></p> <p><i>As long recognized by the City, the intent of these policies regarding setback provisions is to provide pedestrian access and allow lateral movement and to provide open space along the coastline. For the greater master-planned Ko Olina Resort development, a setback of 300 feet was deemed appropriate. Whereas, for the small and relatively narrow parcel that is the Cove Property, with its width varying from approximately 250 to 650 feet wide, the appropriate setback was determined to be 40 feet. That setback was recommended by the Planning Director and approved by the City Council and is within the conditions imposed on the 1989 Cove rezoning (Ordinance No. 89-27, requiring a 40-foot wide strip along the seaward property boundary which shall be open and free of structures and improvements). The 40-foot setback was retained through the last significant permitting for the Property in 1993 (i.e., SMA Use Permit Resolution 93-318 and CUP, Type 2 (93/CUP2-7)). Land coverage of the entire Property is limited to 30 percent under the Cove rezoning Ordinance No. 89-27 and its Unilateral Agreement.</i></p>		
III.D.	<p>Protect the existing coastal environment against potential negative impacts associated with increased recreational use and public access to the shoreline.</p>		
III.D.	<p>Discussion: <i>The Project does not propose modifications to the natural shoreline or to the cove adjacent to the property. To protect the adjacent beach and natural cove, the current level of access and parking for beachgoers will be maintained throughout construction and long-term operation of The Cove. In the long-term, safe lateral access to the shoreline will be maintained. Additionally, the landowner will continue to maintain the public beach access. The Project will provide uses on site related to a Hawaiian Theme Park and commercial lū'au, which may not result in a proportional increase in beach usage. The redevelopment includes ancillary amenities such as dining options, retail, and event space. These amenities are intended to attract visitors to the Cove Property itself, potentially reducing the direct pressure on the beach. Currently, access to the Cove Property is only provided to those attending the lū'au show.</i></p>		
III.E.	<p>Discourage further modification to the shoreline, including the man-made lagoons, unless required either to meet the conditions of existing approvals or to address demonstrated deterioration to the quality of coastal resources.</p>		

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III.E.	<p><i>Discussion: Although the long-standing general principle with respect to setbacks in the master-planned Ko Olina Resort calls for 300 foot setbacks, starting prior to the enactment of any of the aforementioned plans, the Cove Property has been developed subject to a 40-foot setback. The Cove Property will be redeveloped and therefore exceed that setback by approximately 20 feet in accordance with ROH, Chapter 26, resulting in no structures being located closer than 60 feet from the shoreline. In this way, the Cove Project will provide greater setbacks from the shoreline than is currently found on the Property.</i></p> <p><i>As long recognized by the City, the intent of these policies regarding setback provisions is to provide pedestrian access and allow lateral movement and to provide open space along the coastline. For the greater master-planned Ko Olina Resort development, a setback of 300 feet was deemed appropriate. Whereas, for the small and relatively narrow parcel that is the Cove Property, with its width varying from approximately 250 to 650 feet wide, the appropriate setback was determined to be 40 feet. That setback was recommended by the DPP Planning Director and approved by the City Council and is within the conditions imposed on the 1989 Cove rezoning (Ordinance No. 89-27, requiring a 40-foot-wide strip along the seaward property boundary which shall be open and free of structures and improvements). The 40-foot setback was retained through the last significant permitting for the Property in 1993 (i.e., SMA Use Permit Resolution 93-318 and CUP, Type 2 (93/CUP2-7)). Land coverage of the entire Property is limited to 30 percent under the Cove rezoning (UA, Ordinance No. 89-27).</i></p> <p><i>As noted previously, the Project does not propose modifications to the natural shoreline or to the cove adjacent to the property. The current level of safe lateral access to the shoreline will be maintained. Additionally, the landowner will continue to maintain the public beach access.</i></p>		
IV.	SHORELINE ACCESS		
IV.A.			<p>3.11.3 Guidelines, Shoreline Access</p> <p><u>Provide a continuous public walkway along the entire shoreline fronting the resort, anchored at either end by public beach parks. Public access should be provided along the shoreline fronting Lanikūhonua and Paradise Cove, but not in as formal a manner as that provided on the shoreline frontage of the adjacent hotel, apartment, and commercial Ko Olina resort sites.</u></p>
IV.A.	<p><i>Discussion: The Project retains consistency with this guideline. While the Cove Property has always been recognized as separate and different from the larger master-planned Ko Olina Resort area, public access to the shoreline fronting the Cove will be maintained. To protect the adjacent beach and natural cove, the current level of access and parking for beachgoers will be maintained throughout construction and long-term operation of The Cove. In the long-term, safe lateral access to the shoreline will be maintained. Additionally, the landowner will continue to maintain the public beach access.</i></p>		
IV.B.	<p><u>In addition to the public park sites designated on the land use map, a series of privately-owned and maintained parks encompassing a minimum of 20 acres of land shall be provided along the shoreline and be open to use by the general public. All shoreline park areas shall be linked by a continuous shoreline public pedestrian way.</u></p>		<p><u>In addition to the public parks at each end of the resort, provide a series of privately-owned and maintained parks encompassing a minimum of 20 acres of land along the shoreline. These private parks should be open to use by the general public and</u></p>

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			<u>accessible from the continuous shoreline public walkway.</u>
<u>IV.B.</u>	<p><i><u>Discussion: The continuous public walkway, four man-made swimming lagoons, public access easements, and associated amenities described in the above provisions apply to the Ko Olina Resort and are not applicable to the Cove Property.</u></i></p> <p><i><u>Shoreline access is currently provided from the Cove Property to the adjacent beach and will be retained with the Project. The shoreline setback area will be maintained as continuous open space in compliance with the conditions of the UA (Ordinance No. 89-27). Fifteen off-street parking stalls on the adjacent Lanikūhonua site will continue to be available for public beach parking use. Wayfinding signage will be included throughout the site to facilitate access and internal circulation across the property to the adjacent shoreline area.</u></i></p>		
<u>IV.C.</u>	<p><u>In addition to the public park sites at the Kahe Point and harbor ends of the development, a minimum of four public parking areas and pedestrian access-ways to the shoreline park system shall be provided.</u></p>	<p><u>Public Shoreline Easement. Access to and along the shoreline and the swimming lagoons shall be provided by a public shoreline easement. This easement shall be a minimum of 20 acres with the land area at least 100 feet landward from the existing, certified shoreline and the water's edge of the man-made lagoons. A 12-foot-wide continuous walkway shall provide access along the shoreline and connect the public parking lots containing 20 stalls each at the ends of the cul-de-sac roadways. The easement area will be landscaped to further the design theme and to be compatible with the natural shoreline setting.</u></p> <p><u>A minimum of four public comfort stations as well as other necessary improvements shall be provided along the shoreline easement area. The comfort stations shall be located to minimize disruption of views and be a minimum distance of 100 feet landward from the existing, certified shoreline or the water's edge of the man-made lagoons. Signage and other improvements shall be designed and installed to facilitate public access.</u></p>	<p><u>Provide a public access easement, parking lot, restrooms, and showers at each of the four swimming lagoons.</u></p>
<u>IV.C.</u>	<p><i><u>Discussion: These provisions do not appear to be applicable to the Cove Property. None of the 4 man-made swimming lagoons and their showers are located at the Cove Property. They are all within the Ko Olina Resort master planned community. Similarly, the shoreline public access easement described in these provisions is located entirely within the Ko Olina Resort master planned community and not applicable to the Cove Property.</u></i></p> <p><i><u>Shoreline access is currently provided at the Cove Property and that condition will be retained in connection with the Project. Access will be retained with the Project. The shoreline setback area will be maintained as continuous open space in compliance with the conditions of the UA (Ordinance No. 89-27). Fifteen off-street parking stalls on the adjacent Lanikūhonua site will continue to be available for public beach parking use. Wayfinding signage will be included throughout the site to facilitate access and internal circulation across the property to the adjacent shoreline area.</u></i></p>		
<u>V</u>	<u>VIEWS AND VISTAS</u>		

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V.A.	<u>Views from public streets and thoroughfares to the mountains and sea shall be preserved and enhanced wherever possible.</u>	<p><u>View Protection: Define view corridors to all significant natural and man-made features to provide a strong sense of place and orientation to the West Beach environment.</u></p> <p><u>View Corridors: Regulate the placement of buildings and site improvements to afford views and vistas from public roadways and other public places.</u></p> <p><u>Graphics: Signage and street graphics should be in character with the surrounding area and tastefully designed to enhance the visual environment.</u></p>	<p>3.11.3 Guidelines, Views and Vistas</p> <p><u>Preserve and enhance views from public streets and thoroughfares to the mountains and sea wherever possible.</u></p>
V.A.	<p><i><u>Discussion: The Cove is consistent with the policy objectives for views and vistas as discussed in detail in Section 4.11. Specifically, Table 4.19 discusses the potential impacts to each of the public views articulated in the 'Ewa DP. Redevelopment of the site will maintain visual links with surrounding areas through the preservation and enhancement of landscaping along Ali'inui Drive. The Project will preserve and enhance significant views by setting structures back at least 60 feet from the shoreline, allowing for unobstructed lateral views of the Wai'anae Coast and Pu'u o Hulu Kai. As shown in Figure 4. 21, pedestrian-level views of the ocean at the entrance are currently obstructed by the existing development and landscaping along Ali'inui Drive. This condition will remain with redevelopment of the property for The Cove. As such, makai (seaward) views from Farrington Highway are not anticipated to be adversely impacted by the Project.</u></i></p> <p><i><u>Existing buildings on the Cove Property are configured generally parallel to the orientation of the shoreline (Figure 3.2). New structures associated with The Cove Redevelopment follow the same building orientation (Figure 3.3). This will maintain the existing intermittent views of the ocean from Ali'inui Drive.</u></i></p> <p><i><u>Preserving open space along the shoreline (all planned structures will be set back at least 60 feet from the shoreline) will help retain lateral coastal views along the Wai'anae coast and views of significant features, such as Pu'u o Hulu Kai. Views of the Cove Property from the beach looking towards the mountains will be renewed with the replacement of existing structures and construction of a more contemporary and authentic Hawaiian gathering place. Landscaping will be integrated throughout the Cove Property, which will also enhance views of the site. The plant palette is expected to consist of native, Polynesian-introduced, or tropical trees, shrubs, and ground cover of varying sizes. The Cove's signage and street graphics will be designed with careful consideration to ensure harmony with the surrounding environment. The design, color palette, and materials used for the signage will reflect the aesthetic of the coastal setting and the broader area, maintaining visual consistency and enhancing the overall atmosphere of the site. Signage will be strategically placed to guide visitors without overwhelming the natural landscape or the built environment. By using high-quality materials and adhering to a design language that resonates with the surrounding area, the signage will contribute to the visual appeal of the property while ensuring clear and effective communication.</u></i></p>		
V.B.		<p><u>Ocean Views:</u> The design of West Beach has the primary objective of maximizing overall views of the ocean amenities which are the focal point of the development.</p> <p><u>Views along the shoreline should remain unobstructed. This will be accomplished by the building envelope requirements which generally site buildings 300 feet from the shoreline and permit only limited improvements within the shoreline easement.</u></p>	<p><u>Although the design of Ko Olina may have a distinct identity and entry, link Ko Olina with surrounding areas through the use of connecting roadways, walkways, landscape, or architectural design.</u></p> <p><u>Protect important views of landforms along the Wai'anae Coast, the ridgeline of the Wai'anae Range, and the ocean, including but not limited to the following:</u></p>

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			<ul style="list-style-type: none"> • <u>Makai view from Farrington Highway at the entrance to Ko Olina.</u> • <u>Makai view from Ko Olina coastal roadways makai of Farrington Highway.</u> • <u>Views of the Wai'anae Coast from the shoreline at Ko Olina, and</u>
<i>V.B.</i>	<p><i><u>Discussion: While long-standing general principle for shoreline setbacks within the master-planned Ko Olina Resort calls for 300 foot setbacks, the Cove Property, which was developed long before the establishment of the Resort, and redeveloped several years after the establishment of the Resort, has been developed pursuant to a 40-foot setback as recommended by the Planning Director and approved by the City Council under the Cove Property rezoning Ordinance No. 89-27.</u></i></p> <p><i><u>As a small parcel (when compared to the Ko Olina Resort parcels) with its width varying from approximately 250 to 650 feet wide, the appropriate setback was determined to be 40 feet. The proposed Project will exceed that setback by some 20 feet, resulting in no structures being located closer than 60 feet from the shoreline. The 40-foot setback was retained through the last significant permitting for the Property in 1993 (i.e., SMA Use Permit Resolution 93-318 and CUP, Type 2 (93/CUP2-7)). This setback supports the goal of view preservation. Additionally, land coverage of the entire Property is limited to 30 percent under the Cove rezoning Ordinance No. 89-27 and the UA. As previously discussed, this 30 percent limitation is a significant restriction on the lot coverage allowed by right in similarly zoned B-1 properties. Also, a previously discussed, the current estimated Project programing remains significantly below this already restrictive 30 percent lot coverage limitation, further supporting the policies of open space and view preservation.</u></i></p>		
<i>V.C.</i>	<p><u>Marina Views: The Marina area will provide a major visual amenity. Views of the marina should be maintained for residential, commercial and recreation uses along its borders. Public access to the marina edge will permit panoramic and distant views toward the ocean. Views from Farrington Highway toward the shoreline will be preserved by locating park and golf course open space along the highway and permitting only low-density building forms (30-foot-high building envelope) close to the highway, thus allowing overview toward the ocean. Overall views from within the development should be oriented mauka and makai from the Primary Loop Road. Each cul-de-sac along the makai side of the loop road will be maintained as public access and view corridors toward the lagoons and the ocean. Within the development parcels, higher building forms should be set back from each other to provide adequate separation for privacy and views of the ocean.</u></p> <p><u>The majority of buildings adjacent to the ocean amenities should be oriented perpendicular rather than parallel to the shoreline. This will afford the greatest flexibility for ocean</u></p>		<p><u>Protect important views of landforms along the Wai'anae Coast, the ridgeline of the Wai'anae Range, and the ocean, including but not limited to the following:</u></p> <ul style="list-style-type: none"> • <u>Mauka and lateral views of Ko Olina from the Small Boat Harbor and the Deep Draft Harbor.</u>

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		<p><u>views from the surrounding areas. To further enhance ocean views from individual buildings through adjacent sites, shorefront buildings should be designed with varying setbacks from the ocean and the lagoons. Long buildings, whenever possible, should be articulated into smaller elements to allow view through sites.</u></p>	
<i>V.C.</i>	<p><i>Discussion:</i> <i>The Marina is not currently visible from the Cove Property or the adjacent beach; as such, the Project will not impact views of the Ko Olina marina and provision addressing building siting and placement with respect to maintaining Marina views are not applicable.</i></p> <p><i>Existing buildings on the Cove Property are configured generally parallel to the orientation of the shoreline rather than perpendicular (Figures 3.2). New structures associated with the Cove Redevelopment follow the same building orientation (Figure 3.3). This will maintain the intermittent views of the ocean from Ali'inui Drive.</i></p> <p><i>Preserving open space along the shoreline (all planned structures will be set back at least 60 feet from the shoreline) will help retain lateral coastal views along the Wai'anae coast and views of significant features, such as Pu'u o Hulu Kai. Views of the Cove Property from the beach looking towards the mountains will be renewed with the replacement of existing structures and construction of a more contemporary and authentic Hawaiian gathering place.</i></p>		
<i>V.D.</i>		<p><u>Graphics:</u> <u>Visual continuity throughout West Beach will be enhanced by a coordinated system of signs employing the highest design standards. A signage program will assure continuity and compatibility of design, shape, color, lettering style, materials, illumination, and placement of signs throughout the West Beach. The signage program for common areas will include resort entry signs on Farrington Highway and information ground signs along the primary loop road at its intersection with cul-de-sac roads to identify the major resort developments and public rights-of-way to the shoreline. Specific signage guidelines for the project will be available in a separate document.</u></p>	
<i>V.E.</i>	<p><i>Discussion:</i> <i>The Cove Project is not part of the master planned "West Beach" nka "Ko Olina Resort". Nevertheless, Cove's signage and street graphics will be designed with careful consideration to ensure harmony with the surrounding environment. The design, color palette, and materials used for the signage will reflect the aesthetic of the coastal setting and the broader area, maintaining visual consistency and enhancing the overall atmosphere of the site. Signage will be strategically placed to guide visitors without overwhelming the natural landscape or the built environment. By using high-quality materials and adhering to a design language that resonates with the surrounding area, the signage will contribute to the visual appeal of the property while ensuring clear and effective communication.</i></p>		
<i>V.F.</i>		<p><u>Exterior Lighting:</u> <u>To provide enjoyment of the West Beach environment at night, a judicious lighting system will be provided to dramatize and highlight the landscape and</u></p>	<p><u>General Policies:</u> <u>Reduce light pollution's adverse impact on wildlife and human health and its unnecessary consumption of energy by using, where</u></p>

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		<p><u>improve safety and security. Fixtures should be scaled to the surrounding area and avoid spillover effects to adjacent areas.</u></p> <p><u>Overhead fixtures would be used at street intersections, hotel entrances, and parking areas. Low-scale fixtures would be used along pedestrian paths and the shoreline walkways.</u></p> <p><u>Exterior lights shall be designed and limited to provide safety and security along pedestrian pathways within the shoreline easement. Exterior lights shall be shielded, and general illumination of the beach and ocean shall not be permitted, except within the man-made lagoon.</u></p>	<p><u>sensible, fully shielded lighting fixtures using lower wattage.</u></p>
<u>V.F.</u>	<p><i><u>Discussion: The Project is consistent with this policy. Lighting will be provided at the Project to enhance its attractiveness and safety. Required lighting for the nightly lū'au shows will be on a similar scale to the current operation. Lighting will be designed to avoid spillover effects to adjacent areas. Potential increases in lighting will be carefully calibrated to enhance visibility and safety without compromising the existing ambiance of the area. Additionally, updates to the Property will result in the use of more energy efficient lighting technology. Design of lighting on buildings near the beach will be fully shielded to minimize and avoid disorientation to biological resources such as monk seals, sea turtles, and seabirds.</u></i></p>		
<u>VI.</u>	<p><u>CIRCULATION SYSTEM AND TRANSPORTATION FACILITIES</u></p>		
<u>VI.A.</u>		<p><u>Circulation Principles</u></p> <p><u>Roadway Hierarchy: Visually distinguish between primary, secondary, and minor roadways by the use of distinct features, such as landscaping and scale. In addition to coconut palms, medium size canopy form trees should be provided along pedestrian paths and sidewalks to provide shade, visual relief, and variety.</u></p> <p><u>Entry: The primary and secondary entries to West Beach should be designed to accent and announce a sense of arrival through distinct design and landscape treatment.</u></p> <p><u>Relationships to Uses: Areas of resort and residential use should be separated from the higher volume primary roadways by generous setbacks and open space.</u></p> <p><u>Public Parking Areas: Access to public parking areas serving shoreline recreation areas should be clearly delineated.</u></p> <p><u>Pedestrian Walkways: A system of pleasant walking environments should be provided which affords safe and</u></p>	<p><u>3.11.3 Guidelines, Circulation System and Transportation Facilities</u></p> <p><u>Establish an integrated bikeway and pedestrian circulation network throughout the resort, with bicycle lanes and routes and sidewalks along major roadways, lined with shade trees.</u></p>

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		<p><u>continuous means of access to major activity areas, with particular emphasis on a shoreline public walkway system.</u></p>	
<u>VI.A.</u>	<p><u>Discussion:</u> <i>These principles are applicable to the master-planned Ko Olina Resort, as the developer of the overall roadway and pedestrian access systems within the Resort. The Cove Property, being outside of the master-planned community, has no ability to alter the Resort's roadways, or to establish or modify existing bike or pedestrian paths.</i></p> <p><i>With that established, we nevertheless note that the existing canopy of trees located along Ali'inui Drive, which runs along the front of the Property and is the main thoroughfare of the Ko Olina Resort, will remain in place and will continue to screen the site even after completion of the Redevelopment Project. At present, structures and other constructed uses at the Cove Property are setback approximately 120 to 130 feet away from Ali'inui Drive. That condition will remain under the proposed Redevelopment Project. Consistent with existing land use entitlements for the Cove, 15 public parking spaces are currently provided on the Lanikūhonua property for public beachgoers (see Zone 4 noted in Figure 4.15). This parking will be retained for beachgoers with the planned Cove Redevelopment Project.</i></p>		
<u>VI.B.</u>	<p><u>Vehicular Access:</u> <i>The connections to Farrington Highway will become the major entry points to West Beach, designed to convey the overall design theme of spaciousness and tropical oasis. The primary loop road and secondary entry road will continue the overall design theme with generous landscape treatment, which provides shade and color, frames vistas to the shoreline and other open spaces, and provides a sense of orientation.</i></p> <p><i>Access to all shoreline parcels will be provided by cul-de-sac roads which intersect the primary loop road. Points of access will be limited for each adjoining parcel. A minimum of twenty public parking spaces shall be provided at each cul-de-sac which provides access to the shoreline lagoons.</i></p> <p><i>Public parking will also be provided at the shoreline parks for convenient access to the shoreline. A minimum of 70 public parking spaces shall be provided at the shoreline public park access points. Parking areas will be visually screened from adjoining properties and common areas by walls, fences, earth mounds, or landscaping.</i></p>		
<u>VI.B.</u>	<p><u>Discussion:</u> <i>To the extent applicable, the Project is consistent with these principles, however public parking and access requirements have and will continue to be addressed through conditions and subsequent recorded agreements between the landowner and the City. The Cove will include new pathways to improve circulation within the site and enhance connection to the adjacent beach and surrounding area. Access to the Cove Property is facilitated via two driveways along Ali'inui Drive. A one-way driveway at the north end of the site is designated for incoming traffic to the Cove Property. Vehicles may also exit</i></p>		

Table 5.9: West Beach / Ko Olina Resort Objectives, Policies, and Design Guidelines

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	<p><i>the site via a driveway situated at the south end of the property. A one-way driveway connection within the Cove Property facilitates direct circulation to the adjoining Lanikūhonua site. The planned redevelopment will maintain this existing traffic pattern at the Cove Property.</i></p> <p><i>Regarding access to the shoreline and parking, the Property is not located at a cul-de-sac or at either of the public parks. Instead, the Property has been required to provide access to the existing 10-foot-wide public beach easement, safe lateral shoreline access fronting the Paradise Cove property, and no less than public parking spaces that are located on the Lanikūhonua site. These are encumbrances that run with the land pursuant to the UA for the Cove Property (Ordinance No. 89-27).</i></p> <p><i>Fifteen vehicle stalls are currently provided on the Lanikūhonua property for public beachgoers (see Zone 4 noted in Figure 4.15). This parking will be retained for beachgoers with the planned redevelopment of The Cove. To mitigate the concern of beach parking misuse, time limits may be considered to limit the amount of time vehicles can be parked. In addition, the beach parking supply could be incorporated within the total parking supply of the Project and managed under a ticketed system by the valet program. A final decision on parking management strategies, which are presented in Section 4.7.3, will be determined as the Project progresses.</i></p>		
VI.C.		<p><u>Pedestrian Access: Public walkways shall be provided throughout West Beach along the primary loop road, secondary entry road, cul-de-sacs, and public shoreline easement. Walkways may meander along roadways with landscaping provided, where possible, to separate walkways from the pavement. Walkways will incorporate appropriate street furniture, such as seating and trash receptacles, and provide barrier-free access. The shoreline walkway system will connect to public parking areas and provide convenient access to shoreline recreation resources and resort facilities.</u></p>	
VI.C.	<p><u>Discussion: This provision does not appear applicable to the Cove Property. The shoreline walkway system referred to is the extensive constructed public access walkway stretching along the coastline of Ko Olina Resort. While the Cove Property does not directly connect to this system within the adjacent resort, which is under a separate ownership, The Cove will include new pathways to improve circulation within the site and enhance connection to the adjacent beach and surrounding area. Nevertheless, to the extent applicable, the Project will continue to be consistent with these principles. The public sidewalks along Ali'inui Drive will continue to provide primary pedestrian access to the Cove Property. The existing trees along Ali'inui Drive will remain in place and will continue provide screening of the property, provide shade for pedestrians, contribute to a comfortable pedestrian experience, and maintain the Resort's theme of a tropical oasis. Direct access to and along the shoreline fronting the Cove Property is provided for site visitors through the property, and public access is provided via an existing 10-foot-wide public beach easement. Public beach access will continue to be provided and maintained by the landowner in connection with the planned redevelopment of the Cove Property. New pathways will be provided throughout the property to provide a seamless experience within the Project site itself and enhance the connection to the adjacent beach. Signage will be provided throughout to guide visitors to the beach and other uses on the site.</u></p>		
VI.D.	<p><u>An open space corridor shall be maintained along the abandoned OR&L right-of-way for future transportation (pedestrian, bike, and/or public transit) use.</u></p>	<p><u>All structures shall be setback a minimum of 40 feet from the railroad right-of-way</u></p>	<p><u>Reserve the OR&L right-of-way for a bikeway and historic railroad train service for historic and educational rides between Nānākuli, Ko Olina,</u></p>

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			Kapolei, and 'Ewa Villages, and for a bikeway continuing on from 'Ewa Villages to Waipahū and 'Aiea as part of the Pear Harbor Historic Trail.
<i>V.I.D.</i>	<i>Discussion:</i> This guidelines is not applicable to the Cove Project. The entire OR&L right-of-way alignment runs northeast/northwest of the Property. At its closest point, it is approximately 14 feet from the Property boundary. The portion of the OR&L right-of-way that is in this vicinity is used to conduct historical tours.		
VII.	LANDSCAPING		
VII.A.		Continuity. Landscape continuity should be achieved by establishing landscape character zones along the shoreline, streetscape, and inland. The shoreline zone is characterized by coconut palms, informal massing, and waterscape features. The streetscape zone is to be characterized by tall palms at entry points to the project, canopy trees and flowering shrubs along primary roads, and a single species of canopy tree for each cul-de-sac parkway and palms in the center median. The inland zone is characterized by the coconut palms, greenery, waterscape features and open space of the 18-hole championship golf course.	3.11.3 Guidelines, Landscape Treatment Provide generous landscaped open spaces throughout the resort area to promote tropical beauty and provide visual relief and a feel of spaciousness.
<i>VII.A.</i>	<i>Discussion:</i> The Cove Property is and will continue to be consistent with these principles. Landscaping will play a valuable role in expressing culturally resonant themes and experiences throughout The Cove and will consist of native, Polynesian-introduced, or tropical trees and shrubs of varying sizes, consistent with the tropical oasis theme of the surrounding area. Due to concerns about the invasive coconut rhinoceros beetle spreading on O'ahu, which fatally damages coconut and oil palm trees, the State of Hawaii Department of Agriculture has, as of July 1, 2022, restricted the planting of any new coconut palm trees. Additionally, DPP has indicated that landscaping plans for this Project should not include new coconut palm trees. As such, only healthy coconut trees on the Cove Property may be relocated following redevelopment of the site, and no new coconut trees will be planted. <i>Landscaping will complement open spaces, which are integrated throughout The Cove consistent with the above-mentioned principle with regards to informal massing and to promote tropical beauty and provide visual relief and a feel of spaciousness. Landscaping at The Cove will play a significant role in expressing culturally resonant themes and contribute to the unique tropical environment of the surrounding area. Special attention will be given to the selection and utilization of native, Polynesian-introduced, and tropical plants (Figures 3.23 and 3.24).</i> <i>The major waterscape at the Property is the ocean. To enhance the ocean views afforded throughout the Cove Property, open-air structures and pavilions consisting of clean, natural, and textured materials will be constructed. The existing public beach access along the southern end of the Property will remain in place and continue to be maintained by the landowner.</i>		
VII.B.		Soft Edges: Landscaping should be used to visually soften the appearance of hotel, commercial and residential	Use landscaping to provide continuity between residential, resort, marina, and commercial areas and

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		<u>structures with vertical and horizontal plant elements yet permit visibility into and from development parcels.</u>	<u>the recreational areas at the shoreline, parks, and golf courses.</u>
VII.B.	<i><u>Discussion: The Project supports these objectives. Landscaping at the Cove Property will visually soften and complement the appearance of the planned commercial structures and will play a valuable role in expressing culturally resonant themes and experiences. The preliminary landscaping plan consists of native, Polynesian-introduced, or tropical trees and shrubs of varying sizes, consistent with the tropical oasis theme of the surrounding area. Screening of the site will continue to be provided by trees along Ali'inui Road, which permit visibility into and from the Property.</u></i>		
VII.C.		<u>View Corridors: The placement and selection of plant materials should enhance and preserve view corridors</u>	
VII.C.	<i><u>Discussion: The Project supports these objectives. The landscaping design will carefully integrate lush vegetation that complements the surrounding natural environment and reflects culturally appropriate themes. Landscaping is expected to consist of native, Polynesian-introduced, and tropical trees and shrubs of varying sizes strategically placed to preserve and enhance view corridors, ensuring that key sightlines to the coastline and other natural features remain unobstructed. Shading devices or canopies may be incorporated to further enhance the lush setting while maintaining clear views. The main arrival area will also serve as a wayfinding element, guiding visitors through the site while seamlessly integrating with the overall landscape design.</u></i>		
D.		<u>Function: Landscape amenities should create functional solutions to the environment such as privacy, screening, shade, and temperature control.</u> <u>Character: Landscape treatment should be compatible in scale and style with the development of each parcel, the landscape character zones, as defined in paragraph B.I.A., and the design theme.</u>	<u>Use xeriscaping (the use of native landscape materials with low water demand), non-potable water for irrigation, and efficient irrigation systems wherever possible to conserve groundwater resources.</u>
VII.D.	<i><u>Discussion: The Project supports these objectives. The Cove will provide a relaxing setting enhanced by lush landscaping, shade canopies, and outdoor seating, creating an inviting gathering place for visitors to the Property. A diverse palette of native, Polynesian-introduced, and tropical canopy trees accented by understory foliage and groundcover consistent with the surrounding environment will be used to provide natural shade, privacy, and temperature control on the property. Landscaping elements will elevate the overall visual appeal of the property, reinforcing its identity as a premier gathering place for both kama'āina and visitors. Additionally, The Cove includes xeriscaping techniques to support the conservation of groundwater resources.</u></i>		
VIII.	IMPLEMENTATION REVIEW		
VIII.A.		<u>Design Review. The Estate of James Campbell, as the landowner, retains design review and approval authority over all development at West Beach.</u> <u>The DRC, to be established for the West Beach project, will be a multidisciplinary group whose sole function is to review and approve individual development projects for conformance to the design objectives and guidelines, and</u>	<u>Provide substantial waterfront areas for public use and retain the shoreline as natural open space softened by landscaping and focused on the beach and swimming lagoons.</u> <u>Avoid adverse impacts on natural resources or processes in the coastal zone.</u>

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		<p><u>generally seek to implement a quality destination by the guidelines. The guidelines for creating and operating the design review committee will be contained in the project's declaration of covenants.</u></p> <p><u>DLU will be part of the design review process for each development project at West Beach. DLU is responsible for review and approval of site plans and conceptual architectural plans at each phase of development to ensure adherence to the Development Plan urban design review objectives, the Urban Design Provisions for West Beach, and SMP and Zoning conditions of approval.</u></p> <p><u>DLU may act in an advisory capacity to the DRC, if so desired by the DRC. DLU's role in the design review process is to ensure compliance with the Urban Design Provisions in the processing of applications for clusters, planned developments, subdivision and building permits. DLU's review process shall occur after the DRC and Campbell Estate have completed their review process.</u></p>	<p><u>Follow best practices with respect to urban form, natural environment, shoreline access, views and vistas, circulation system and transportation facilities, water conservation, and landscaped treatment.</u></p> <p><u>DPP as Regulator.</u></p>
<i>VIII.A.</i>	<p><i>Discussion:</i> <i>DPP has review and approval authority for developments at the Cove Property. Additionally, the landowner, Campbell Hawaii Investor, LLC, and its manager entity, James Campbell Company LLC, as the landowner of the Property, has the authority to determine the acceptability of any proposed plans. Nothing within rezoning Ordinance, 80-27 and the UA that rezoned the Cove Property requires the Property to be developed pursuant to the design review provisions established under the private West Beach design review system. As stated previously, the Cove Property is not within the master-planned Ko Olina (West Beach) Resort; in fact, the Cove Property and the adjacent Lanikūhonua property were deliberately excluded from the master plan coverage. However, even if it were included, Campbell Hawaii Investor, LLC, and its manager entity, James Campbell Company LLC, would have sole authority to review and approve the design plans because these entities are successors to the Trustees Under the Will and of the Estate of James Campbell, Deceased ("Campbell Estate"), which held absolutely authority over any and all development within the master planned Ko Olina Resort (formerly known as West Beach).</i></p> <p><i>Relevant here, however, for the purposes of approving plans and granting authority to construct, the pertinent design reviewer is the DPP, as the regulatory authority. Additionally, because the Project requires a SMA Use Permit (Major), approval from the City Council will be required in the form of an approved SMA Resolution. Through that process, DPP will ensure that the Project is consistent with measures that retain open space at the shoreline, avoid adverse impacts on natural resources or processes, and follows best practices, all as more fully discussed in Table 5.6 and also in Section 5.2.8.</i></p>		

5.3.4 City and County of Honolulu Land Use Ordinance

The purpose of the LUO (ROH, Chapter 21) is to regulate land use in a manner that will encourage orderly development in accordance with adopted land use policies, including the City General Plan and the 'Ewa DP. In fulfillment of this purpose, the LUO establishes zoning districts across the City and County of Honolulu, and identifies appropriate uses. Additionally, the LUO articulates development and design standards for each zoning district that are applicable to the location, height, bulk and size of structures, yard areas, off-street parking facilities, and open spaces.

The Project site is located within the B-1, Neighborhood Business District, which is intended to provide relatively small areas that serve the daily retail and other business needs of a surrounding population. This district is generally applied to areas within or adjacent to urban residential areas or along local and collector streets.

Within the B-1, Neighborhood Business District, outdoor amusement facilities are permitted with the approval of a Conditional Use Permit (CUP) Major by the DPP. Further standards for outdoor amusement facilities are provided in Article 5 of the LUO. In addition, and as mentioned in Section 1.7, change in zone that was enacted for the Cove Property in 1989 (Ordinance No. 89-27), commercial activity on the Project site is limited to restaurants and retail activity associated with a Hawaiian Theme Park and a commercial lū'au operation. Use of the Cove Property for an outdoor amusement facility (lū'au) was established in the late 1970s (DPP Files No. 79/CUP-15 and No. 90/CUP-2-5). Subsequently, a wedding chapel, which is defined by the LUO as a personal service, was added to the site (DPP File No. 1999/CLOG-5429, minor modification to File No. 93/SMA-32). Personal services are permitted within the B-1, Neighborhood Business District.

Bill 64 (2023) proposes amendments to ROH, Chapter 21, LUO which would affect the Master Use Table, use development standards, and use definitions. One of the proposed changes includes replacing the category of "Amusement Facilities" with "Recreation, General Outdoor," which will require a CUP Major in the B-1, Neighborhood Business District. As a result, should Bill 64 (2023) be enacted, the Project would still require a CUP, Major.

***Discussion:** The planned redevelopment will not alter the property's long-standing existing uses. Under the Project, use of the Cove Property for a recreation, general outdoor amusement facilities facility and personal services will continue, and new uses, including ancillary eating and drinking establishments and retail establishments, will be added. These uses will complement the site's existing uses to create a contemporary, authentic Hawaiian gathering place with unique entertainment, dining, and retail experiences for residents and visitors alike.*

In compliance with LUO requirements, the Applicant will seek a CUP Major approval for the Project. Existing structures will be demolished and replaced with new buildings that will adhere to the development standards for the B-1, Neighborhood Business District. New structures will range from approximately 13.0 feet to 36.5 feet, which is under the ~~not exceed~~ 40-foot feet in height limit, and adequate and appropriate setbacks will be provided. The Project will have a lot coverage of approximately 13.84 percent, well under ~~adhere to the~~ 30 percent lot coverage limit required by the UA (Ordinance No. 89-27), and landscaped open space will continue to be provided and enhanced.

5.3.5 City and County of Honolulu Special Management Area

It is the policy of the City to preserve, protect, and to restore the natural resources of the coastal zone of Hawai'i. The SMA designation places special controls on development within an area along the

shoreline to avoid permanent loss of valuable resources and to ensure that adequate public access is provided to publicly-owned or used beaches, recreation areas, and natural reserves. Development within the SMA requires the approval of an SMA Use Permit. Within the City, the SMA Use Permit application review is administered by the DPP, and the decision on its issuance is rendered by the City Council. The Project is located in the designated SMA and valued at over \$500,000 (Figure 1.76); therefore, an SMA Use Permit (Major) is required.

Issuance of the SMA Use Permit (Major) is based on the consistency of the Project with the policies and objectives specified in the CZM Law (Table 5.6) and ~~the objectives, policies, and review~~ guidelines articulated in ROH, Chapter 25. Table 5.109 discusses the Project’s compliance with the SMA review guidelines (ROH, Sections 25-3.1 and 25-3.2):

Table 5.109: Special Management Area (ROH, Chapter 25) – Objectives and Policies			
S = Supportive, N/S = Not Supportive, N/A = Not Applicable			
	S	N/S	N/A
25-3.1 Objectives, policies, and guidelines			
The objectives, policies, and guidelines of this chapter are those contained in HRS § 205A-2 and 205A-26(1). The objectives, policies, and guidelines summarized below are the basis for analysis of uses, activities, or operations within the special management area.			
(a) Recreational resources. Development within the SMA should provide coastal recreational opportunities to the public. Adequate access, by dedication or other means, to beaches, coastal dunes, recreation areas, and natural reserves must be provided to the extent consistent with sound conservation principles. Adequate and properly located public recreation areas and wildlife preserves must be preserved.	X		
<p>Discussion: The Project will steward the use of and/or effectively protect land-based, shoreline, and marine resources. The current level of beach access and parking will continue to be maintained at current levels to protect the natural cove and lagoon. Public use of the beach/cove adjacent to the Project site will continue to be limited to certain activities pursuant to the SMA Use Permit approved in 1993 (File No. Resolution 93-318). This will help to maintain a balance between public enjoyment and conservation of the beach. The existing public beach access along the southern end of the property will remain in place and continue to be maintained by the landowner.</p> <p>The Project will improve access to coastal recreational opportunities. The renewed site program will allow visitors to enjoy increased access to the coastal site at various hours of the day. The Cove will enhance existing recreational opportunities on the property and the wider area by providing on-site programming and open space in a contemporary and authentic Hawaiian setting. Lush landscaping will be integrated throughout the Cove Property to create an immersive and relaxing experience. Landscaping will be intentionally designed to complement new structures, open space areas, pedestrian pathways, and outdoor seating throughout The Cove, enhancing the overall atmosphere and visual environment of the property. Pedestrian pathways will be incorporated throughout the Cove Property to foster connectivity throughout the site and to the adjacent beach and resort area.</p>			
(b) Historic and cultural resources. Development within the SMA should protect, preserve, and restore natural or human-made historical and cultural resources.	X		
<p>Discussion: As discussed in Section 4.1, a draft AIS was prepared for the Project, which confirmed two previously-identified historic properties within the Cove Property (SIHP Nos. -03362 and -04968) and identified new portions of SIHP No. -03362. Additionally, the burial preserve for SIHP No. -04968 was designated “CSH 2” during the course of the AIS. To ensure the preservation of historic resources, the AIS proposes two primary mitigation measures which consist of archaeological monitoring (a form of data recovery) and preservation through avoidance, including a Archaeological monitoring of all ground-disturbing activities will be conducted in accordance with an accepted AMP. With regard to the preservation of SIHP No. -04968, consultation with the signatories of the 1995 Burial Agreement, as well as known cultural and lineal descendants of the area has been initiated and is ongoing as of publication of this Final EIS. This consultation is regarding the specifics for the interim and long-term protection measures which will be outlined in the BSCPP document. As requested by SHPD, a buffer zone larger than the existing buffer zone is being considered and will be presented to recognized lineal and cultural descendants for their consideration. It is currently unclear if SIHP No. -04968 was recorded with the Bureau of Conveyances. However, the landowner will verify this, and if not, will record the burial preserve area (CSH 2) for SIHP No. -04968. The burial preserve area shall remain in perpetuity to preserve the ivi kūpuna, and dedication of the existing burial preserve area (SIHP No. 4968) in perpetuity. Consultation with SHPD and cultural descendants of the area is ongoing.</p>			

Table 5.109: Special Management Area (ROH, Chapter 25) – Objectives and Policies			
S = Supportive, N/S = Not Supportive, N/A = Not Applicable			
	S	N/S	N/A
<p>(c) Scenic and open space resources. Development within the SMA should protect, preserve, and whenever desirable, restore or improve the quality of coastal scenic and open space resources. Alterations to existing land forms and vegetation, other than for the cultivation of coastal dependent crops, must be limited so they result in minimum adverse impacts on water resources, beaches, coastal dunes, and scenic or recreational amenities. Development that is not dependent on the coast is encouraged to locate mauka of the SMA.</p>	X		
<p>Discussion: Redevelopment of the Cove Property will improve the quality of coastal scenic and open space resources, and fit with the character of the surrounding area. Open space will continue to be preserved on the site consistent with the conditions of the UA. Lush vegetation will be integrated throughout the Cove Property to complement the surrounding natural environment and reflect culturally appropriate themes. Landscaping is expected to consist of native, Polynesian-introduced, or tropical trees, and shrubs of varying sizes. Existing aging structures on the Cove Property will be demolished and replaced with new structures inspired by both contemporary and Hawaiian architecture, consistent with the legacy of the site and the character of the surrounding area. The 60-foot setback area will be maintained as open space, enhancing existing views of the shoreline and providing a natural buffer to mitigate potential flooding.</p>			
<p>(d) Coastal ecosystems. Development within the SMA should protect valuable coastal ecosystems, including reefs, beaches, and coastal dunes from disruption, and minimize adverse impacts on all coastal ecosystems. Solid and liquid waste treatment and disposition must be managed to minimize adverse impacts on SMA resources.</p>	X		
<p>Discussion: Redevelopment of the Cove Property will protect valuable coastal ecosystems. To mitigate potential impacts to water quality during construction, the Project will comply with the conditions of the City grading permit and applicable provisions of HAR, Sections 11-54 and 11-55. In the long-term, LID measures, such as bioswales, rain gardens, planter boxes, sand filters, or permeable pavement, may be integrated into the Project design, as feasible. Additionally, to protect the adjacent beach and natural cove in the long term, the current level of access and parking for beachgoers will be maintained throughout construction and long-term operation of The Cove.</p>			
<p>(e) Economic uses. Development within the SMA should consist of facilities and improvements important to the State's economy, and ensure that coastal-dependent development and coastal-related development are located, designed, and constructed to minimize exposure to coastal hazards and adverse social, visual, and environmental impacts within the SMA.</p>	X		
<p>Discussion: The Cove Property has been used for commercial activities for 40 years, and the planned improvements will be the first major enhancement of existing amenities in over 25 years. The Project will continue the commercial use of the property, while providing enhancements in alignment with the State and City's vision for the 'Ewa region. The long-term economic productivity of the site will be enhanced by the Project. As discussed in Section 4.10, operation of the Project is estimated to create <u>approximately 583 (484 FTE) direct jobs on site, in addition to 121 (100 FTE) indirect and 113 (94 FTE) induced jobs, for an estimated total of 817 total jobs (678 FTE jobs), and The Project is also estimated to generate approximately \$34.5 million annually in labor income and approximately \$100.0 million in economic output. In the long-term, the State government is estimated to accrue approximately \$4.6 million per year annually, while the City government may accrue approximately \$2.1 million per year annually.</u></p> <p>The Cove will be designed to minimize exposure to coastal hazards by locating new structures at least 60 feet from the shoreline and ensuring that finished floor elevations are above the 3.2-foot SLR-XA (see Table 3.1 for estimated floor elevations). Potential adverse social, visual, and environmental impacts will be minimized through the implementation of mitigation measures as summarized in Table 1.1 and discussed throughout Chapter 4.0.</p>			
<p>(f) Coastal hazards. Development within the SMA should reduce impacts of coastal hazards on life and property, and must be designed to minimize impacts from landslides, erosion, sea level rise, siltation, or failure in the event of earthquake.</p>	X		
<p>Discussion: The Cove will be designed to minimize exposure to coastal hazards, as discussed throughout Section 4.4. New structures will be located at least 60 feet from the shoreline and finished floor elevations will be above the 3.2-foot SLR-XA (see Table 3.1 for estimated floor elevations). Structures will be built in accordance with IBC, State, and City building code standards to promote public safety, and LID measures to mitigate potential flooding at the site will be incorporated where feasible and will be determined as the design progresses (Section 4.8).</p> <p>The Project site is located in FEMA Flood Zones D and VE, which is considered a SFHA and is subject to development standards articulated in ROH, Chapter 21A. The Project will comply with ROH, Chapter 21A as required.</p>			

Table 5.109: Special Management Area (ROH, Chapter 25) – Objectives and Policies		S	N/S	N/A
S = Supportive, N/S = Not Supportive, N/A = Not Applicable				
(g) Managing development and public participation. The development review process should stimulate public awareness, education, and participation in coastal management.	X			
<p>Discussion: A EISPN was published by the ERP in The Environmental Notice on June 23, 2021 to notify agencies, organizations, and individuals that a Draft EIS would be prepared for the Project. Publication of the EISPN was followed by a 30-day public comment period to solicit guidance on the scope of the studies to be prepared and to gather input on important topics to be covered in the Draft EIS. A total of 18 agencies and individuals provided responses during the public comment period. In addition, an EIS public scoping meeting was held virtually on July 7, 2021 to collect further input. See Chapter 7.0 <u>Table 7.1</u> for a listing of those who provided comments, input received during the EIS public scoping meeting and public comment period, and responses provided.</p> <p><u>Subsequently, a First Draft EIS for the Project was published in TEN on May 8, 2024 and a Second Draft EIS was published in TEN on June 8, 2024. Comments received during the 45-day public comment period for the First Draft EIS and the Second Draft EIS have been considered. A total of 46 agencies, organizations, and individuals provided comments on the Draft EIS (Table 7.1). Copies of each comment letter are provided in Appendix A-2. A summary of comments received and associated responses is provided in Table 7.3, which is organized by major topics.</u></p> <p>Agencies, organizations, and individuals notified of the EISPN and Draft EIS will be notified of the Draft Final EIS <u>publication and the 45-day comment period.</u></p> <p>Following the environmental review period, an SMA Use Permit (Major) will be filed with the DPP. This process will involve further public participation through a neighborhood board meeting, DPP public hearing, and City Council public hearings.</p>				
(h) Beach and coastal dune protection. Development within the SMA should facilitate beach management and protection by safeguarding beaches and coastal dunes for public use and recreation, the benefit of ecosystems, and use as natural buffers against coastal hazards. New structures should be located mauka of the shoreline setback line to conserve open space, minimize interference with natural shoreline processes, and minimize the loss of improvements due to erosion.	X			
<p>Discussion: While the Project will enhance access to the Cove Property, the existing level of access to the adjacent beach and parking will be maintained to ensure the ongoing protection and stewardship of this valued natural and recreational resource. Planned structures at the site will be set back 60 feet from the certified shoreline. The Project will not involve shoreline hardening or grading or damage to coastal dunes. The Applicant will continue to maintain vegetation on the Cove Property so as to not interfere or encroach upon the adjacent beach transit corridor.</p>				
(i) Marine and coastal resources. Development within the SMA should promote the protection, use, and development of marine and coastal resources to ensure that these resources are ecologically and environmentally sound and economically beneficial. Impacts on water resources, beaches, coastal dunes, and scenic or recreational amenities resulting from the construction of structures must be minimized. Development within wetland areas should be limited to activities that are dependent on or enhance wetlands, or are otherwise approved by appropriate State and federal agencies. Examples include traditional Hawaiian agricultural uses such as wetland taro production aquaculture, and fishpond management, as well as activities that clean and restore traditional wetland areas or create new wetlands in appropriate areas.	X			X
<p>Discussion: Redevelopment of the Cove Property will ensure that coastal resources are used in a manner that is environmentally sound and economically beneficial. To protect the adjacent beach/Lagoon, the current level of access and parking for beachgoers will be maintained throughout construction and long-term operation of The Cove.</p> <p>Redevelopment of the Cove will provide various beneficial economic benefits. Once in operation, planned retail shops and the potential marketplace/retail space may feature a curated selection of goods, including those made in Hawai'i, supporting local entrepreneurship. The new restaurants will support the economy and community by featuring local culinary talent and prioritizing the use of fresh, Hawai'i-grown produce when possible. Renewed programming at the site will provide opportunities for local entertainers, cultural practitioners, and educators to share their talents. As discussed in Section 4.10, operation of the Project is estimated to create <u>approximately 583 (484 FTE) direct jobs on site, in addition to 121 (100 FTE) indirect and 113 (94 FTE) induced jobs, for an estimated total of 817 total jobs (678 FTE jobs), and</u> and. <u>The Project is also estimated to generate approximately \$34.5 million annually in labor income and approximately \$100.0 million in economic output. In the long-term, the State government is estimated to accrue approximately \$4.6 million per year annually, while the City government may accrue approximately \$2.1 million per year annually.</u></p>				

Table 5.109: Special Management Area (ROH, Chapter 25) – Objectives and Policies			
S = Supportive, N/S = Not Supportive, N/A = Not Applicable			
	S	N/S	N/A
(j) Cumulative impact or significant effect and compelling public interest. Development within the SMA should not have any cumulative impact or significant effect, unless minimized to the extent practicable and clearly outweighed by public health, safety, or other compelling public interest.			X
<i>Discussion: The redevelopment of The Cove will not result in significant adverse cumulative impacts. As discussed in Section 4.13, the Project aligns with compelling public interests such as economic growth, job creation, the enhancement of resident and visitor amenities, and protection/stewardship of natural resources. By providing construction jobs in the short term and sustainable operational employment opportunities in the long term, the Project contributes positively to the socioeconomic health of the region. Additionally, the creation of a new gathering place with dining, retail, and recreational opportunities enriches the quality of life for residents and the overall attractiveness of the Project vicinity. The benefits of the planned Project outweigh potential adverse effects, and mitigation measures will be employed to minimize potential impacts to the extent practicable, as summarized in Table 1.1 and discussed in detail throughout Chapter 4.0.</i>			
(k) Consistency with plans and regulations. Development within the SMA must be consistent with the general plan, development plans, sustainable communities plans, and zoning ordinances: provided that a finding of inconsistency does not preclude concurrent processing of amendments to applicable plans or a zone change.	X		
<i>Discussion: The Project is consistent with the City General Plan and 'Ewa DP, as discussed in Sections 5.3.1 and 5.3.2. The Project parcel is zoned B-1, Neighborhood Business District, and will not require amendments to the City General Plan or a Zone Change.</i>			
25-4.1 Permit review guidelines.			
(a) No development may be approved unless the agency or the council has first found:			
1) That the development is consistent with the objectives, policies, and guidelines set forth in this chapter and will not have any significant adverse environmental or ecological effect, except as such for situations in which the adverse effect is minimized to the extent practicable and clearly outweighed by public health, safety, or a compelling public interest. Adverse effects include, but are not limited to, the potential cumulative impact of individual developments, each one of which taken by itself might not have a significant adverse effect. Adverse effects may also involve development that would eliminate future planning options.	X		
<i>Discussion: As discussed in Sections 5.2.8 and 5.3.4, the Project is consistent with the <u>objectives, policies, and guidelines</u> policies and objectives set forth in HRS, Chapter 205A and ROH, Chapter 25, respectively. The redevelopment of The Cove will not result in substantial adverse impacts. Identified potential long-term impacts and recommended mitigation measures are discussed throughout Chapter 4.0.</i>			
(b) The agency or council shall seek to minimize, whenever reasonable:			
i. Dredging, filling or otherwise altering any bay, estuary, salt marsh, wetland, river mouth, slough or lagoon, except for restoration purposes;			X
ii. Any development that would reduce the size of any beach, coastal dune, or other area usable for public recreation;	X		
iii. Any development that would reduce or impose restrictions upon public access to tidal and submerged lands, beaches, coastal dunes, portions of rivers and streams, and the mean high tide line where there is no beach;	X		
iv. Any development that would substantially interfere with or detract from the line of sight toward the ocean from the State highway nearest the coast;	X		
v. Any development that would adversely affect water quality, existing areas of open water free of visible structures, existing and potential fisheries and fishing grounds, coastal ecosystems, wildlife habitats, or potential or existing agricultural uses of land; and,	X		
vi. Risk to development from sea level rise and other coastal hazards, which may be accomplished by siting habitable structures outside of the sea level rise exposure area if feasible, or if not feasible adapting habitable structures within the sea level rise exposure area to accommodate sea level rise.			X

Table 5.109: Special Management Area (ROH, Chapter 25) – Objectives and Policies S = Supportive, N/S = Not Supportive, N/A = Not Applicable	S	N/S	N/A
<p>Discussion: Development of the Project will not involve dredging or filling and will not adversely impact public access and usage of coastal resources, wildlife preserves, coastal views, and water quality. Project improvements will not reduce or impose restrictions upon public access to tidal and submerged lands, beaches, portions of rivers and streams within the SMA. The Project will maintain the current level of beach access and parking to protect the beach and natural cove/lagoon.</p> <p>The Cove will continue to be screened by landscaping and will not affect views towards the ocean from Farrington Highway (Section 4.11). Furthermore, open space will be maintained on-site and a 60-foot shoreline setback will preserve the natural shoreline environment.</p> <p>The Project will incorporate site-specific BMPs to protect water quality and prevent stormwater runoff and sediment discharge from the site. No adverse effects are anticipated to water quality, open water, fisheries or fishing grounds, wildlife habitats, or potential or existing agricultural uses of the land.</p> <p>The Cove will be designed to minimize exposure to coastal hazards, as discussed throughout Section 4.4. New structures will have finished floor elevations above the 3.2-foot SLR-XA (see Table 3.1 for estimated floor elevations).</p>			

5.3.6 City and County of Honolulu Shoreline Setback

To accomplish the objectives of HRS, Chapter 205A discussed in Section 5.2.8, shoreline setback areas were established and defined as the area of land between the shoreline and the shoreline setback line, which is certified by the DLNR. Counties are authorized to develop and administer permitting systems to control development within the shoreline setback area. Shoreline Setback standards rules for the City and County of Honolulu are defined in ROH, Chapter 26 and its implementing regulations pursuant to HRS, Chapter 205A and are regulated by the City DPP. As stated in ROH Section 26-1.2, it is the primary policy of the city to:

- “(1) Reduce exposure to coastal hazards and increase the resilience of the community;*
- (2) Protect and preserve the natural shoreline, coastal zone environments, and associated ecosystems, especially sandy beaches, coastal dunes, wetlands, and reefs;*
- (3) Protect and preserve public pedestrian access laterally along the shoreline and to the sea;*
- (4) Maintain, protect, and preserve open space and coastal scenic resources; and*
- (5) Prohibit shoreline hardening unless necessary for coastal restoration or where it would result in a clear public benefit.”*

The City and County of Honolulu, ROH, Chapter 26 establishes standards that generally prohibit within the shoreline area any construction or activity which may adversely affect beach processes, public access along the shoreline, or shoreline open space. However, allowances are permitted for specific structures and circumstances with the approval of a variance.

Until recently, on O’ahu Under the City’s current rules, the shoreline setback line was established ~~was~~ 40 feet inland from and parallel to the certified shoreline. As a response to predicted SLR and coastal erosion, Ordinance No. 23-3, which established a new shoreline setback line ranging from 60 feet to 130 feet from the certified shoreline effective ~~, was enacted on March 9, 2023.~~ Specifically, ~~beginning on July 1, 2024,~~ Now, the shoreline setback line will be established at 60 feet from the shoreline on zoning lots within the Primary Urban Center (PUC). For lots outside of urban Honolulu, the shoreline setback line may range from 60 to a maximum of 130 feet inland from the certified shoreline.

On lots where historical erosion data has either (1) not been collected for the Hawai'i Shoreline Study, or (2) where the data shows an annual coastal erosion rate of 0, the shoreline setback line will be established at 60 feet inland from the certified shoreline.

Discussion: *As shown in the Hawai'i Shoreline Study online web application, the Project site does not have historical erosion data. As such, the shoreline setback line is established at 60 feet inland from the shoreline.*

In alignment with ROH, Chapter 26, planned structures at the site will be set back at least 60 feet from the certified shoreline. The 60-foot setback area will be maintained as open space, preserving the natural shoreline environment and lateral public pedestrian access to the beach. The current level of beach access and parking will be maintained to protect the beach and natural cove/lagoon.

As part of the redevelopment, the majority of existing structures will be demolished, including structures within the shoreline setback area (Figure 3.2). Following demolition, portions of the Cove Property will require grading and filling with native soil and topsoil to establish vegetation and restore the site to its pre-existing condition prior to the commencement of construction. A portion of the existing amphitheater that is planned for demolition is located within the 60-foot shoreline setback (Figure 3.2). As such DPP has confirmed that, an SSV may be is not required to perform the restoration work. Once the site is restored, there will be no structures located within the shoreline setback area and the land may be used for gathering or as activity lawns.

To provide screening of the property, fencing will be installed at the northern boundary of the Cove Property, a portion of which is within the shoreline setback area. Pursuant to DPP Administrative Rules, Part 2, Chapter 15, a Minor Shoreline Structure Permit may be issued for minor structures within the shoreline area, including open-work (i.e. 50 percent open) metal, wood, or vinyl (or similar synthetic material) fences no more than six feet in height. Accordingly, the Applicant will submit a Minor Shoreline Structure Permit application to DPP concurrently with the submittal of the CUP, Major application. Additionally, portions of the landscaped lawns and pedestrian pathways may be located within the shoreline setback area (Figure 3.3). Pathways may require limited grading and would be comprised of permeable materials such as gravel or crushed coral that would not disturb shoreline processes. The pathways will enhance connectivity throughout the site and complement access to recreational resources. The Applicant will continue to consult with DPP and a final determination on the need for an SSV will be made as the Project progresses.

5.3.7 City and County of Honolulu, Flood Hazard Areas

ROH, Chapter 21A, Flood Hazards, establishes SFHAs and regulates development within these areas. These restrictions are necessary to qualify the City and County of Honolulu for participation in the federal flood insurance program. DPP is responsible for granting or denying development permits in accordance with the provisions of ROH, Chapter 21A.

Based on the 2011 FEMA FIRM maps, the majority of the Cove Property is within Flood Zone D, which indicates unstudied areas where flood hazards are undetermined, but flooding is possible. A small portion of the Project site adjacent to the beach and natural cove is within Zone VE (Figure 1.87). Zone VE is defined as a coastal flood zone with high velocity hazard (wave action). The BFE for Flood Zone VE is 12 feet. Pursuant to ROH, Chapter 21A, Zone VE is considered a Coastal High Hazard Area and is considered an SFHA in the City and County of Honolulu where flood insurance is mandatory.

Discussion: The majority of the Project site is located within Flood Zone D. The portion of the Cove Property designated as Flood Zone VE will remain as open space, and no construction or permanent structures are proposed.

Planned structures at The Cove will be set back at least 60 feet from the shoreline and may be elevated eight to 19.5 feet above msl to proactively consider the potential impacts of SLR, such as flooding. The shoreline setback area will be maintained as open space, while landscaped, permeable areas will be integrated throughout. LID measures may be integrated where feasible to reduce surface stormwater runoff, promote infiltration, manage stormwater, improve water quality, and enhance overall resilience to extreme weather events. The site will be graded to allow stormwater runoff and potential coastal flooding to flow through the site.

5.3.8 City and County of Honolulu Ola O’ahu Resilience Strategy

The Office of Climate Change, Sustainability, and Resiliency (OCCSR) was established by the City Charter in 2016 and tasked with tracking climate change science and its potential impacts. As a part of this task, the office was responsible for developing O’ahu’s first resilience strategy. OCCSR published *Ola: Resilience Strategy* on May 31, 2019. The strategy identifies 44 actions which directly address the challenge of long-term affordability and the impacts of climate change. Actions are organized in the following four pillars: 1) Remaining Rooted, 2) Bouncing Forward, 3) Climate Security, and 4) Community Cohesion.

The 44 Actions includes a description, resilience co-benefits, lead City agency and partners involved, timeframe, measures of success, and a spotlight which offers a story of the action already implemented. Actions are described in relation to the Aloha+ Challenge sustainability goal(s) and the UN Sustainable Development Goal(s) that align with the action.

The Project’s compliance with relevant objectives and guidelines identified in the Ola O’ahu Resilience Strategy are discussed in *Table 5.110*.

Table 5.110: City and County of Honolulu Ola O’ahu Resilience Strategy	S	N/S	N/A
S = Supportive, N/S = Not Supportive, N/A = Not Applicable			
Pillar I. Remaining Rooted			
Goal 1: Support Affordable Housing Development			
Action 1: Reduce empty homes and increase affordable housing funding			X
Action 2: Return illegal vacation rental units to local housing			X
Action 3: Develop alternative, affordable housing options for O’ahu residents			X
Action 4: Expand affordable housing funding by implementing progressive property taxes			X
Action 5: Implement a guaranteed security program to support local housing ownership			X
<i>Discussion: The Applicant supports the plan’s goals for affordable housing; however, the Project is not directly applicable to affordable housing development.</i>			
Goal 2: Reduce Additional Cost Burdens			
Action 6: Expand housing and energy transformation by accelerating the permitting process			X
Action 7: Reduce utility costs for residents through transparency and disclosure			X
Action 8: Implement a guaranteed security program to support local home ownership			X

Table 5.1110: City and County of Honolulu Ola O’ahu Resilience Strategy			
S = Supportive, N/S = Not Supportive, N/A = Not Applicable			
	S	N/S	N/A
<i>Discussion: The Applicant supports the plan’s goals for reduction of cost burdens for housing; however, the indicated actions are not directly applicable Project.</i>			
Goal 3: Improving Economic Opportunity			
Action 9: Foster an innovation economy through the City’s Office of Economic Development			X
Action 10: Promote new agricultural models for economic and food security			X
<i>Discussion: The Applicant supports the plan’s goals for improving economic opportunity; however, the indicated actions are not directly applicable Project. The Project will increase economic opportunities for residents of O’ahu. The Project is estimated to provide approximately 1,429 jobs (1,386 FTE) short-term jobs related to construction, as well as approximately 583 (484 FTE) direct jobs on site, in addition to 121 (100 FTE) indirect and 113 (94 FTE) induced jobs, for an estimated total of 817 total jobs (678 FTE jobs) in the long-term related to operation. Locating jobs within the ‘Ewa district will provide opportunities for employees to reduce their commute times, enhancing their quality of life. Furthermore, entertainment and programming experiences at The Cove will feature local artists supporting the local economy. Planned retail shops and the potential marketplace/retail space may feature a curated selection of goods, including those made in Hawai’i, and the restaurants may feature local culinary talent and prioritize the use of fresh, Hawai’i-grown produce when possible.</i>			
Pillar II: Bouncing Forward			
Goal 1: Pre-Disaster Preparation			
Action 11: Protect lives and property by updating building codes			X
Action 12: Launch residential hurricane retrofit program to strengthen properties vulnerable to hurricanes			X
Action 13: Increase flood insurance affordability for O’ahu residents			X
Action 14: Establish future conditions climate resilience design guidelines	X		
<i>Discussion: The Project supports the goals of pre-disaster preparation through resilient design features intended to mitigate potential impacts related to SLR, such as coastal flooding. Planned structures at The Cove will be set back at least 60 feet from the shoreline and may be elevated eight to 19.5 feet above msl to proactively consider the potential impacts of SLR, such as flooding. The shoreline setback area will be maintained as open space, while landscaped, permeable areas will be integrated throughout. LID measures may be integrated where feasible to reduce surface stormwater runoff, promote infiltration, manage stormwater, improve water quality, and enhance overall resilience to extreme weather events. The site will be graded to allow stormwater runoff and potential coastal flooding to flow through the site.</i>			
Goal 2: Effective Disaster Response			
Action 15: Develop a network of community resilience hubs			X
Action 16: Establish an O’ahu emergency food supply and storage strategy			X
Action 17: Ensure access to fuel suppliers to aid disaster response recovery			X
Action 18: Increase O’ahu’s preparedness utilizing scenario modeling and artificial intelligence			X
<i>Discussion: The Applicant supports the plan’s goals for effective disaster response; however, the identified actions are not directly related to the Project. Long-term operation of The Cove may incorporate standard operating procedures for employees and visitors.</i>			
Goal 3: Successful Disaster Recovery			
Action 19: Develop and implement a long-term disaster recovery plan for O’ahu			X
<i>Discussion: The Applicant supports the plan’s goals for successful disaster response; however, the identified actions are not directly related to the Project. Long-term operation of The Cove may incorporate standard operating procedures for employees and visitors.</i>			
Pillar III: Climate Security			
Goal 1: Clean Energy Economy			

Table 5.1110: City and County of Honolulu Ola O’ahu Resilience Strategy S = Supportive, N/S = Not Supportive, N/A = Not Applicable	S	N/S	N/A
Action 20: Reduce taxpayer expense and increase renewable energy through a city-wide emergency performance contract			X
Action 21: Establish an energy benchmarking standard for O’ahu commercial buildings			X
Action 22: District cooling: tap the ocean to cool our buildings			X
Action 23: Expand opportunities for methane capture and re-use			X
<i>Discussion: The Applicant supports the plan’s goals for climate security; however, the identified actions are not directly related to the Project. The Cove plans to incorporate sustainability practices into its overall design and operations. Planned design and operational measures are discussed in Section 4.12 and may include, but not be limited to, the construction of covered open air structures throughout to reduce reliance on air conditioning and conserve energy. Additionally, new structures may be designed to be solar-ready.</i>			
Goal 2: Clean Ground Transportation			
Action 24: Expand electric vehicle charging infrastructure island-wide	X		
Action 25: Accelerate carbon-free new mobility options			X
Action 26: Ensure equal access to sustainable transportation options and cost savings	X		
Action 27: Transform the city’s public fleet to 100 percent renewable fuel by 2035			X
<i>Discussion: The Project will include improvements to pedestrian facilities within the Cove Property such as including pathways throughout the Cove Property, to create a safe and attractive environment and to support connectivity throughout the area. Bicycle parking stalls consistent with LUO standards will be provided on-site to support cyclists. EV charging consistent with City standards will be provided.</i>			
Goal 3: Climate Resilient Future			
Action 28: Chart a climate resilient future by creating and implementing a climate adaptation strategy			X
Action 29: Protect beaches and public safety with revised shoreline management rules	X		
Action 30: Protect coastal property and beaches through innovation and partnerships	X		
Action 31: Establish a storm water enterprise fund to better finance storm water management			X
Action 32: Deploy sustainable roof systems to manage urban heat and rainfall			X
Action 33: Keep O’ahu cool by maintaining and enhancing the community forest			X
Action 34: Minimize economic and property risk within the Ala Wai watershed			X
<i>Discussion: As discussed in Section 5.3.5, the Project will adhere to the recently adopted 60-foot shoreline setback, and no structures are proposed within the shoreline setback area. The current level of beach access and parking will be maintained to protect the beach and natural cove/lagoon. Educational signage and guidelines may be posted around the Cove Property to encourage thoughtful care for the site and the surrounding environment.</i>			
Pillar IV. Community Cohesion			
Goal 1: Empower Grassroots Resilience Champions			
Action 35: Increase coordination with neighborhood emergency preparedness groups			X
Action 36: Increase city-community relationships through volunteerism			X
Action 37: Weave a tighter community with neighborhood gatherings			X
Action 38: Empower neighborhoods to co-design safe and complete streets			X
<i>Discussion: The Applicant supports the plan’s goals for empowering grassroots resilience champions; however, the identified actions are not directly related to the Project. The Applicant will continue to explore opportunities for programming that highlight relevant community-based organizations.</i>			

Table 5.1110: City and County of Honolulu Ola O’ahu Resilience Strategy S = Supportive, N/S = Not Supportive, N/A = Not Applicable	S	N/S	N/A
Goal 2: Communicate and Affirm Island Values			
Action 39: Celebrate O’ahu’s resilience past and future through public art			X
Action 40: Life up positive examples of island values in action			X
Action 41: Launch a place-based resilience training program for city leadership			X
Action 42: Foster shared understanding of climate change island-wide through an outreach campaign			X
<i>Discussion: The Applicant supports the plan’s goals for communicating and affirming island values; however, the identified actions are not directly related to the Project. The Applicant will continue to explore opportunities for educational and cultural arts programming.</i>			
Goal 3: Island-Wide Alignment			
Action 43: Ensure city partnerships in O’ahu’s collective impact resilience efforts			X
Action 44: Create a city-community liaison to leverage non-profit and volunteer assets			X
<i>Discussion: The Applicant supports the plan’s goals for island-wide alignment; however, the identified actions are not directly related to the Project. The Applicant supports the island’s wider resilience efforts, as reflected in the planning, design, and preliminary operational plans for the Project. Planned structures at The Cove will be set back at least 60 feet from the shoreline and may be elevated eight to 19.5 feet above msl to proactively consider the potential impacts of SLR, such as flooding. The shoreline setback area will be maintained as open space, while landscaped, permeable areas will be integrated throughout. LID measures may be integrated where feasible to reduce surface stormwater runoff, promote infiltration, manage stormwater, improve water quality, and enhance overall resilience to extreme weather events. The site will be graded to allow stormwater runoff and potential coastal flooding to flow through the site.</i>			
<i>The Cove plans to incorporate sustainability practices into its overall design and operations. Planned design and operational measures are discussed in Section 4.12 and may include, but not be limited to, the construction of covered open air structures throughout to reduce reliance on air conditioning and conserve energy, the implementation of recycling programs, and educational signage and guidelines may be posted around the Cove Property to encourage thoughtful care for the site and the surrounding environment.</i>			

5.3.9 City and County of Honolulu Climate Action Plan 2020-2025

The City Climate Action Plan (CAP) was prepared by OCCSR as a strategy for O’ahu to address climate change and fossil fuel emissions. The CAP presents nine strategies with 47 specific actions for the City to pursue to reduce GHG emissions from ground transportation, electricity, and waste. While the CAP recommends actions for the government to pursue, the Project supports several key strategies and actions, as discussed in *Table 5.1211*:

Table 5.1211: City and County of Honolulu Climate Action Plan 2020-2025: Strategies and Actions S = Supportive, N/S = Not Supportive, N/A = Not Applicable	S	N/S	N/A
Strategy 1: Encourage Density and Mixed Land Use in Strategic Areas			
1.1 Continue to adopt policies that support greater housing affordability located near transit and in areas in proximity to job centers and key destinations.			X
1.2 Continue revising the City’s land use and zoning regulations to allow for mixed-use development across O’ahu to support “complete communities.”			X
1.3 Work with private sector to provide connectivity and streetscape infrastructure in new developments to support complete streets principles.	X		

Table 5.1211: City and County of Honolulu Climate Action Plan 2020-2025: Strategies and Actions			
	S	N/S	N/A
S = Supportive, N/S = Not Supportive, N/A = Not Applicable			
<i>Discussion: The Project will include improvements to pedestrian facilities <u>within the Cove Property</u> such as, including pathways throughout the Cove Property, to create a safe and attractive environment and to support connectivity throughout the area.</i>			
Strategy 2: Enable and Provide Multiple Modes of Green Transportation			
2.1 Implement the O'ahu Bike Plan and continue to build out protected bikeways for all ages and abilities with safe connections between existing bike lanes.			X
2.2 Develop a City-focused Transportation Demand Management (TDM) program and consider updating the telework policy			X
2.3 Complete the O'ahu Pedestrian Plan and implement high priority pedestrian projects			X
2.4 Plan and plant trees as part of roadway rehabilitation projects to provide shade for pedestrian, bicycle, and transit infrastructure and promote comfort for frequent trips.			X
2.5 Repurpose general travel and parking lanes for multimodal and active transportation use.			X
2.6 Increase non-vehicular mode share in new multi-family housing and commercial developments through TDM programs.			X
2.7 Identify candidate projects and develop dedicated bus lanes along high occupancy transit corridors.			X
2.8 Launch integrated transit fare card (Holo) to include a fare-capping program for relevant daily, monthly, and annual rates			X
2.9 Hire a Mobility Manager to leverage opportunities to increase micromobility services.			X
2.10 Create a universal trip planning and fare app to improve the connectivity of multimodal transportation options.			X
2.11 Seek innovative business solutions to deliver VMT reduction services.			X
<i>Discussion: The Applicant supports the CAP's strategy for enabling green transportation; however, the indicated actions are not directly applicable Project. The Project site is not located in an area well-served by public transportation, and no high-priority pedestrian projects in the vicinity are identified in the O'ahu Pedestrian Plan. However, guests of the surrounding resorts will be able to take advantage of the Project's close proximity and utilize non-vehicular modes of transportation, thus mitigating potential impacts to traffic and aligning with State and City sustainable mobility policies. The Project will include improvements to pedestrian facilities <u>within the Cove Property</u> such as, including pathways throughout the Cove Property, to create a safe and attractive environment and to support connectivity throughout the area. Bicycle parking stalls consistent with LUO standards will be provided on-site to support cyclists. EV charging consistent with City standards will be provided.</i>			
Strategy 3: Encourage Mode Shift through Parking Efficiency			
3.1 Allow for flexibility in the provision of parking by eliminating minimum off-street parking requirements.			X
3.2 Encourage unbundling of the sale or rent of multi-dwelling housing units from parking in Transit-Oriented Development (TOD) and other suitable neighborhoods.			X
3.3 Develop curb management systems within TOD and other high-demand areas			X
3.4 Maximize efficiency of public parking at City-owned lots and parking spaces in destinations with high transportation alternatives. Implement dynamic metering rates.			X
3.5 Repurpose underutilized public parking in preference to multimodal transportation infrastructure, urban greenery, and public-serving spaces.			X

Table 5.1211: City and County of Honolulu Climate Action Plan 2020-2025: Strategies and Actions			
	S	N/S	N/A
S = Supportive, N/S = Not Supportive, N/A = Not Applicable			
<i>Discussion: The Applicant supports the CAP's strategy for encouraging mode shift through parking efficiency; however, the indicated actions are not directly applicable Project. Existing stalls at Cove Property will be reconfigured to support parking efficiency and anticipated demand. Parking management strategies will be implemented to meet projected demand, and may consist of the following: parking charge, mandatory valet, transportation network company incentives, promotion of other transportation modes, and beach parking management. Management strategies will be finalized as the Project progresses and may be adjusted during operation based on need.</i>			
Strategy 4: Electrify the City Fleet and Support High Efficiency Vehicles			
4.1 Develop and adopt an electric bus purchasing policy for the City's bus fleet to reach 100% renewable-powered city fleet goal by 2035.			X
4.2 Develop a plan and implement City passenger vehicle fleet transition to achieve 100% clean fleet goal by 2035.			X
4.3 Develop, for EV buses and other City owned EVs, charging protocols such that it facilitates integration of intermittent renewable energy			X
4.4 Expand EV charging infrastructure for the City EV fleet by tripling public charging capacity on City facilities; enable electricity cost recovery			X
4.5 Provide private car sharing with high fuel efficiency vehicles priority access parking to enable point-to-point service in high usage areas.			X
<i>Discussion: The Applicant supports the CAP's strategy for electrifying the City Fleet and supporting high efficiency vehicles; however, the indicated actions are not directly applicable Project. EV charging consistent with City requirements may be provided on-site.</i>			
Strategy 5: Reduce Energy Demand by Increasing Energy Efficiency			
5.1 Put in place a system to regularly update relevant building code ordinances, adopt State codes as required, and consider adopting further local standards to reduce greenhouse gas emissions over time.			X
5.2 Develop a "lead by example" municipal energy and water benchmarking program for covered City facilities along with data transparency, reporting, and building performance standards. Develop internal and publicly-available dashboard with energy and water data reporting protocols.			X
5.3 Develop a building energy benchmarking program, building performance standards, and transparent reporting mechanisms for large covered commercial and multi-family buildings.			X
5.4 Deploy a Healthy and Resilient Buildings program in response to COVID-19.			X
<i>Discussion: The Applicant supports the CAP's strategy for reducing energy demand; however, the indicated actions are not directly applicable Project. To address energy efficiency, covered open air structures will be integrated throughout to reduce reliance on air conditioning and conserve energy, low flow plumbing fixtures to encourage water efficiency, and structures may be designed to be solar-ready.</i>			
Strategy 6: Maximize Energy Efficiency and Renewable Energy throughout City Operations and Assets			
6.1 Retrofit City buildings, facilities, and operations to be more energy efficient.			X
6.2 Leverage City rooftops, parking lots, and other previously developed lands to increase on-site and City-owned renewable energy generation by 200%.			X
6.3 Continue to pilot and implement flexible energy demand response programs for City operations.			X
6.4 Facilitate and invest in energy efficiency for City-owned housing.			X
<i>Discussion: The Applicant supports the CAP's strategy for maximizing energy efficiency throughout City operations; however, the Project does not involve City operations or assets and the indicated actions are not directly applicable Project.</i>			
Strategy 7: Expand Renewable Energy Planning and Expedite Permitting			

Table 5.1211: City and County of Honolulu Climate Action Plan 2020-2025: Strategies and Actions S = Supportive, N/S = Not Supportive, N/A = Not Applicable	S	N/S	N/A
7.1 Proactively engage with State partners in land use and community planning for large-scale renewable energy projects and assess City lands and facilities for additional utility-scale energy projects.			X
7.2 Streamline permitting for solar PV (including distributed battery technologies) on commercial, multifamily, and townhome rooftops through use of online platforms.			X
7.3 Continue to advocate before the PUC for fair and efficient regulation around the renewable energy transition.			X
7.4 Launch a Solarize O'ahu pilot to increase residential solar access for low- to moderate-income households.			X
<i>Discussion: The Applicant supports the CAP's strategy for expanding renewable energy planning and expediting permitting; however, the indicated actions not directly related to the Project.</i>			
Strategy 8: Promote Waste Prevention			
8.1 Continue to eliminate single-use plastics and expand multiple-use foodware and serviceware in food distribution and sale.	X		
8.2 Establish a Sustainable (Low GHG) Procurement Policy for the City.			X
8.3 Strengthen infrastructure and partnerships for edible food recovery			X
8.4 Advance development of a volume-based residential refuse pickup program that appropriately prices refuse pickup services for customers.			X
8.5 Expand the location of public drinking water fountains and retrofit existing public drinking fountains to include devices capable of refilling reusable water flasks, cups and containers.			X
8.6 Establish a building deconstruction reuse and recycling program; enable reuse, recycling, and repair systems.	X		
8.7 Develop end-of-life requirements for solar PV and other relevant renewable energy technologies, including battery storage.			X
<i>Discussion: The Project will promote the CAP's goal of waste prevention. During construction, materials resulting from demolition activity may be re-used or recycled, to the extent possible. During operation, the following solid waste management practices may be implemented: recycling of glass, plastic bottles, cardboard, aluminum, and paper; the use of compostable or alternative disposable cutlery, like cups and silverware made from cornstarch or bamboo; and recycling of food waste. Recycling may will also be encouraged through the use of trash cans with recycling containers. Educational signage and guidelines may be posted around the Cove Property to encourage thoughtful care for the site and the surrounding environment.</i>			
Strategy 9: Maximize Waste Resource Efficiency			
9.1 Implement methane collection systems at landfill and wastewater treatment facilities, where feasible, that would allow the City or others to benefit from methane capture and reuse.			X
9.2 Explore the feasibility of adding an anaerobic digester capacity or other resource recovery project to the City's solid waste and wastewater processing and treatment infrastructure.			X
9.3 Based on lifecycle GHG analysis, assess the benefits of flow of materials to out of-State recycling instead of H-POWER.			X
9.4 Explore new public-private partnerships to increase the diversion of food and other organic materials from the waste stream through composting and/or other solutions.			X
<i>Discussion: The Applicant supports the CAP's strategy for maximizing waste resource efficiency; however, the indicated actions not directly related to the Project.</i>			

5.4 EIS Significance Criteria

The potential impacts of the Project have been fully examined and discussed in this ~~Draft~~-EIS. The following is an assessment of Project's impacts based on the 13 significance criteria established in HAR 11-200.1-13.

(1) *Irrevocably commit a natural, cultural, or historic resource;*

Discussion: The Project does not involve a significant loss or irrevocable commitment of natural or cultural resources. To protect the adjacent beach and natural cove/~~lagoon~~, the current level of beach access and parking will be maintained throughout construction and long-term operation of The Cove. BMPs will be implemented during construction to prevent sedimentation and pollution that could adversely affect the surrounding natural environment, including the nearshore waters and marine ecosystems. In the long-term, redevelopment of the Cove Property will require improvements to existing drainage conditions and is therefore anticipated to decrease the total stormwater runoff generated on site, representing an improvement from existing conditions. Stormwater runoff will be properly treated on site in accordance with applicable State and City rules and standards, including the City's Rules Relating to Water Quality (Section 4.8.1).

The Project will not irrevocably commit significant historic sites or cultural resources. As discussed in Section 4.1, a draft AIS was prepared for the Project, which confirmed two previously-identified historic properties within the Cove Property (SIHP Nos. -03362 and -04968) and identified new portions of SIHP No. -03362. Additionally, the burial preserve for SIHP No. -04968 was designated "CSH 2" during the course of the AIS. To ensure the preservation of historic resources, the draft AIS proposes two primary mitigation measures which consist of archaeological monitoring (a form of data recovery) and preservation through avoidance., including a Archaeological monitoring of all ground-disturbing activities will be conducted in accordance with an accepted AMP. With regard to the preservation of SIHP No. -04968, consultation with the signatories of the 1995 Burial Agreement, as well as known cultural and lineal descendants of the area has been initiated and is ongoing as of publication of this Final EIS. This consultation is regarding the specifics for the interim and long-term protection measures which will be outlined in the BSCPP document. As requested by SHPD, a buffer zone larger than the existing buffer zone is being considered and will be presented to recognized lineal and cultural descendants for their consideration. It is currently unclear if SIHP No. -04968 was recorded with the Bureau of Conveyances. However, the landowner will verify this and, if not, will record the burial preserve area (CSH 2) for SIHP No. -04968. The burial preserve area shall remain in perpetuity to preserve the iwi kūpuna. Furthermore, the Project will maintain access to the shoreline, which supports various traditional cultural practices such as gathering of limu, fish, and salt. The Cove will include educational programming that will honor the legacy of the property and perpetuate Hawaiian culture.

(2) *Curtail the range of beneficial uses of the environment;*

Discussion: The range of beneficial uses of the environment will not be significantly curtailed by the planned Project. The Project site has been operating as an outdoor recreation facility and entertainment venue for over 25 years. The Applicant proposes to maintain the commercial lū'au as the focal point of the site and to redevelop the Cove Property with a new entertainment venue/amphitheater. The planned redevelopment will include ancillary uses such as retail and restaurants, which will support the lū'au show, complement the surrounding resort uses, and support the wider vision of a secondary urban center in West O'ahu. Redevelopment of The Cove is consistent with the objectives of the 'Ewa DP, the B-1, Neighborhood Business District, and current land uses.

The planned improvements will enhance the underutilized site and create an authentic Hawaiian community gathering place for residents and visitors that honors and reflects the history, culture, and connection to this place.

- (3) *Conflict with the State's environmental policies or long-term environmental goals established by law;*

Discussion: The Project is consistent and supportive of State and City long-term goals related to the environment, as discussed throughout this chapter (Section 5.0). The Cove Property is already developed. The planned redevelopment will adhere to the conditions of the UA, which limits building area on the site to 30 percent of the lot (141,827 sf of the 472,757-sf lot). The Project will have a lot coverage of approximately 13.84 percent (approximately 65,413 sf), well under the 30 percent limit required by the UA (Ordinance No. 89-27). The remainder of the site will be maintained as landscaped open space and may incorporate LID measures as required, effectively potential stormwater runoff and control the overall urban heat island effect. To preserve the natural beauty and quality of the nearshore area, planned structures will be set back at least 60 feet from the shoreline, and public access to the beach and natural cove/lagoon will continue to be maintained at current levels.

Sustainable design practices and BMPs as discussed throughout Section 4.0 and summarized in Table 1.1 are anticipated to minimize potential environmental impacts of The Cove on the surrounding area. The Cove plans to incorporate sustainability practices into its overall design and operations. Planned design and operational measures are discussed in Section 4.12 and may include, but not be limited to, the construction of covered open air structures throughout to reduce reliance on air conditioning and conserve energy, the implementation of recycling programs, and educational signage and guidelines may be posted around the Cove Property to encourage thoughtful care for the site and the surrounding environment. Additionally, improvements to on-site pedestrian facilities and the provision of bicycle parking may encourage the use of alternative modes of transportation.

- (4) *Have a substantial adverse effect on the economic welfare, social welfare, or cultural practices of the community and State;*

Discussion: The planned improvements at the Cove Property will positively benefit the community and State's economic welfare. Operation of the Project is estimated to create approximately 583 (484 FTE) direct jobs on site, in addition to 121 (100 FTE) indirect and 113 (94 FTE) induced jobs, for an estimated total of 817 total jobs (678 FTE jobs), and The Project is also estimated to generate approximately \$34.5 million annually in labor income and approximately \$100.0 million in economic output. In the long-term, the State government is estimated to accrue approximately \$4.6 million per year annually, while the City government may accrue approximately \$2.1 million per year annually.

The additional jobs generated with The Cove will increase employment opportunities in the West O'ahu region thereby supporting the growth of the secondary urban center. Locating jobs with the 'Ewa region will provide opportunities for employees to reduce their commute times, enhancing their quality of life. Moreover, fully operating, The Cove will provide residents and visitors with a gathering place that offers a unique mix of experiences characteristic of a Hawaiian-themed outdoor recreation facility in an immersive coastal setting.

Once in operation, renewed programming at the site will provide opportunities for local entertainers, cultural practitioners, and educators to share their talents. The Project will support local entrepreneurship through the planned retail shops and the potential marketplace/retail space, which may feature a curated selection of goods, including those made in Hawai'i. The planned restaurants will support the economy and community by featuring local culinary talent and prioritizing the use of

fresh, Hawai'i-grown produce when possible. The Project presents an opportunity to expose visitors to authentic local brands and products, expands support for Hawai'i-made goods, and supports the relationship between producers and consumers.

(5) *Have a substantial adverse effect on public health;*

Discussion: The redevelopment of the Cove Property is consistent with existing land uses and will not substantially affect public health. Solid waste and wastewater collection and disposal services will meet regulatory requirements to maintain public health standards. Long-term adverse impacts to air, water quality, and noise are not anticipated as a result of The Cove (Sections 4.2.2, 4.3.2, and 4.9).

Preventing the introduction and spread of the Coconut Rhinoceros beetle will help protect the ecosystem, preserving conditions that contribute to public health by supporting clean air, stable soils, and natural resources. To mitigate the potential introduction and spread of Coconut Rhinoceros beetle, an invasive species management plan will be implemented, as detailed in Section 4.3.3. The management plan will include both observation and treatment measures before and during construction, including, but not limited to, cleaning equipment, materials, and personnel of excess soil and debris, as well as consulting with DLNR and the O'ahu Invasive Species Committee to implement best practices in invasive species management.

(6) *Involve adverse secondary impacts, such as population changes or effects on public facilities;*

Discussion: The Cove is not anticipated to result in substantial secondary impacts, such as effects on public facilities or population changes (Sections 4.6 and 4.10). The Cove will not provide overnight accommodations, precluding impacts to population. However, long-term operation of The Cove may increase the de facto service population on site, which may impact the need for public services. This potential increase would be intermittent and limited to hours of operation.

Existing water, power, and wastewater systems have been evaluated and will accommodate the Project, as discussed throughout Section 4.8. The Applicant will continue to coordinate with the City to ensure that utilities are designed in accordance to the appropriate standards. It is anticipated that necessary relocation of utilities will not take place within the City ROW; therefore, no short-term impacts are anticipated.

(7) *Involve a substantial degradation of environmental quality;*

Discussion: The Project will not involve a substantial degradation of environmental quality on-site or in the surrounding environment. Construction impacts related to noise and air quality are temporary and will be minimized by implementing erosion control BMPs, as described throughout Section 4.0 of this EIS. Long-term significant impacts to air and water quality, noise, and natural resources are not anticipated. Drainage improvements to the Cove Property are anticipated to decrease the total stormwater runoff generated on site and to properly treat potential runoff in accordance with applicable State and City rules and standards, including the City's Rules Relating to Water Quality. The Project will integrate sustainable design features to protect water quality, such as LID measures and the use of water conservation measures, which will be determined as the design progresses.

(8) *Be individually limited but cumulatively have substantial adverse effect upon the environment or involves a commitment for larger actions;*

Discussion: The Project is not anticipated to have substantial cumulative adverse impacts on the environment and is not intended as a commitment to a larger action by the Applicant. This EIS serves as a full disclosure of the redevelopment of The Cove.

The Project directly responds to the State and the City's expressed objectives and policies for the area as identified in the 'Ewa DP. Redeveloping the Cove Property will create an authentic Hawaiian community gathering place for residents and visitors that honors and reflects the history, culture, and connection to this place. The Project supports a diversified economy in the 'Ewa region by introducing a dynamic mix of experiences characteristic of a Hawaiian-themed outdoor recreation facility and distinct from other offerings in the 'Ewa region. The planned improvements are within an existing developed area that is served by existing utilities, thereby reducing potential impacts to public infrastructure and the surrounding environment.

(9) Have a substantial adverse effect on a rare, threatened, or endangered species, or its habitat;

Discussion: The Project site does not include known rare, threatened, or endangered species or critical habitat. Mitigation measures as discussed in Section 4.3.4 and summarized in Table 1.1 may be implemented to address potential impacts to the marine ecosystem, Hawaiian hoary bat, Hawaiian green sea turtle, Hawaiian monk seal, and migratory birds or Hawaiian seabirds that may overfly the area. No long-term impacts are anticipated.

(10) Have a substantial adverse effect on air or water quality or ambient noise levels;

Discussion: Potential impacts to air quality, water quality, and noise are identified and discussed in Sections 4.2.2, 4.3.2, 4.8.1, and 4.9 of this EIS. Short-term effects on air, water quality/stormwater runoff, and ambient noise levels during construction will be mitigated through adherence to State and City regulations and mitigation measures, as summarized in Table 1.1.

No detrimental long-term impacts to air or water are anticipated from the Project. There may be a minimal increase of traffic noise levels with the Project; however, noise levels will remain within the acceptable standard. Amplified sound from the events at the amphitheater/performing arts venue may spill over to adjacent areas. However, with the implementation of mitigation measures that are currently being designed, amplified sound is anticipated to remain comparable to existing conditions (Section 4.9).

(11) Have a substantial adverse effect on or be likely to suffer damage by being located in an environmentally sensitive area such as a flood plain, tsunami zone, sea level rise exposure area, beach, erosion-prone area, geologically hazardous land, estuary, fresh water, or coastal waters;

Discussion: The Cove Property is within the tsunami evacuation zone, the 3.2-foot SLR-XA, and a designated SFHA (Zone VE). As such, planned structures at The Cove will be set back at least 60 feet from the certified shoreline and may be elevated eight to 19.5 feet above msl to proactively consider the potential impacts of SLR. No structures are planned within the SFHA. To mitigate potential flooding at the site, LID measures, such as bioswales, rain gardens, planter boxes, sand filters, or permeable pavement, may be integrated into Project design, where feasible.

(12) Have a substantial adverse effect on scenic vistas and view planes, during day or night, identified in county or State plans or studies; or

Discussion: Short-term impacts to visual resources related to construction of The Cove will be mitigated by the use of fencing and confining equipment to work areas. In the long-term, no adverse

impacts to public views articulated in the 'Ewa DP are anticipated (*Section 4.11*). The Project will enhance the visual environment of the site by replacing the existing structures with The Cove, which will be designed to reflect both contemporary and Hawaiian architecture. Lush landscaping will be incorporated throughout to enhance the surrounding visual environment, and is expected to consist of native, Polynesian-introduced, or tropical trees, and shrubs of varying sizes. Existing landscaping along Ali'inui Drive used for screening, including tall canopy trees and hedges, will remain in place throughout construction and operation. Structures will range in height from approximately 13.0 feet to 36.5 feet, under the not exceed 40-foot feet limit for the B-1, Neighborhood Business District.

(13) Require substantial energy consumption or emit substantial greenhouse gases.

Discussion: The Project will not require substantial energy consumption or emit substantial greenhouse gases. Covered open air structures will be integrated throughout to reduce reliance on air conditioning and conserve energy. Additionally, structures may be designed to be solar-ready.

While stationary and mobile sources of emissions may slightly increase as a result of the Project, there will be no significant adverse impact on air quality (*Section 4.2.2*). The Project will promote alternative, non-polluting modes of transportation. The Project will include improvements to pedestrian facilities throughout the Cove Property such as, including pathways throughout the Cove Property, to create a safe and attractive pedestrian environment ~~and to support connectivity throughout the area~~. Bicycle parking stalls consistent with LUO standards will be provided on-site to support cyclists. EV charging consistent with City standards will also be provided.

Alternatives to the Proposed Action



Section 6

Alternatives to the Proposed Action

The EIS assesses viable alternatives to the Proposed Action so that the decision-makers and the Applicant may consider all impacts, benefits, and mitigative measures to make an informed decision on the best path forward to meeting the Project goal and objectives. In developing reasonable alternatives for this EIS, the Applicant also considered comments gathered during consultation and outreach process. As a result, four alternatives to the Proposed Action are described and evaluated in this section. Additionally, each alternative is given an evaluation rating on its ability to satisfy the Project's goal and objectives, as described below, and in response to comments received on the Draft EIS, a further presentation of the environmental impacts associated with each alternative has been provided.

6.1 Evaluation Overview

As discussed in *Section 2.0*, the overall goal of the Project is the following:

Achieve a balanced development that honors the history of these 'Ewa lands and the power of place and Hawaiian culture, while achieving an acceptable financial return by transforming the property into a contemporary, authentic Hawaiian gathering place with unique entertainment, dining, and retail experiences for local kama'āina and visitors alike.

In order to accomplish the goal of the Project, the following redevelopment objectives (Project Objective) have been established:

Project Objectives

1. Create an authentic community gathering place for locals and visitors that honors and reflects the history, culture, and connection to place.
2. Optimize the potential of the property by activating the site during both the day- and nighttime through restaurants, retail, and dynamic programming.
3. Strengthen the 'Ewa region as the Secondary Urban Center by providing quality jobs to support residents' quality of life, stimulate local spending, and increase revenues to the State's tax base.
4. Indirectly support local businesses through the purchase and sale of goods and services.
5. Plan for the future by implementing sustainable practices and adaptive and resilient design features, and minimizing environmental impacts.
6. Maintain and enhance the quality of the near-shore coastal environment and preserve access to public recreational resources.
7. Retain the natural beauty of the property by enhancing existing open space and landscaping.

Evaluation Rating

As a part of this EIS, ratings were developed to evaluate each alternative in terms of satisfying each Project Objective. Each Project Objective is assigned a rating of “Good,” “Fair,” or “Poor” based on the extent to which the alternative aligns with the objective. Refer to *Table 6.1* for the definitions corresponding to each rating category.

Alternatives Evaluated

Four alternatives to The Cove Redevelopment, in addition to the Preferred Alternative (the Proposed Action or Project) were evaluated and assessed for their ability to achieve the Project Objectives. The alternatives analyzed include the following:

1. No-Action
2. Delayed Action
3. Alternative Design
4. Alternative Use
5. Preferred Alternative (Proposed Action)

6.2 No-Action Alternative

The No-Action Alternative would maintain the existing substandard structures in place until expiration of the current commercial lease (scheduled to terminate in 2025), at which point they would be removed, consistent with the restoration provision in the lease. This approach would result in a prolonged vacancy of the Cove Property, impeding the realization of site improvements, including the addition of new retail and restaurants, new activities and programming, enhanced circulation within the site, and ~~enhanced~~ continued access to the shoreline area from within the Project site.

Under the No-Action Alternative, short-term construction-related impacts related to demolition may occur, including potential impacts to air quality, noise, stormwater runoff, and traffic. However, impacts related to construction of a new Project would be avoided, and, Under this alternative, other short-term site improvements, such as regularly scheduled, minimal landscaping maintenance or infrastructure improvements, could continue to be made to prevent the buildup of debris and overgrowth. However, this fragmented approach would not achieve an effective, cohesive, and holistic revitalization of the property.

Prolonged vacancy of the site may reduce the aesthetic appeal of the Cove Property, resulting in adverse impacts to the surrounding visual environment. Reduced activity levels would lead to fewer potential hazards or emergencies, lessening the burden on public service resources in the area. However, vacant sites have the potential to attract unauthorized access or other activities that could pose risks to public safety and neighboring properties. As such, security would continue to be maintained on the Cove Property to prevent unauthorized entry and ensure the safety of the community. Public access to the beach would be maintained; however, access to the vacant Cove Property would not be permitted, thus limiting the potential use by locals and visitors alike. Under this alternative, the installation of drainage improvements on the Cove Property would not occur and existing patterns of stormwater runoff would continue.

The TIR conducted for the Cove Redevelopment analyzed Without Project conditions under Year 2027 (Section 4.7.1). These conditions could be compared with the No-Action alternative. Under Year 2027 Without Project conditions, traffic operations are expected to remain similar to baseline conditions (Table 4.4). The cessation of entertainment shows at the site could potentially lead to a reduction in traffic and parking demands would decrease. Without the need to accommodate vehicles, the existing parking lot would become an underutilized space, failing to maximize the property's potential. Additionally, the removal of structures and reduction in site use could leave the site lacking in vibrancy, creating a vacant appearance along the main thoroughfare of Ali'inui Drive.

As applied to the Cove Property, the No-Action Alternative implies that no HRS, Chapter 343 review or discretionary permitting, such as an SMA (Major) Use Permit, would be required. Under HRS, Chapter 343, an "action" is a program or project to be initiated by an applicant. An "applicant" is "any person who, pursuant to statute, ordinance, or rule, officially requests approval for a proposed action." And an "approval" is "a discretionary consent required from an agency prior to actual implementation of an action." As discussed in Section 5.2.1, this EIS is prepared because the proposed Project will require approval of a SMA (Major) Use Permit pursuant to ROH, Chapter 25, which requires preparation of an EA or EIS before permitting decisions can be made. Under a No-Action scenario, these requirements would likely not be triggered.

Sections 5.2.8 and 5.3.5 present the myriad of objectives, policies, and guidelines that must be considered in connection with a request for an SMA Use Permit (Major). That is because, as explained in HRS § 205A-21, "The legislature finds that, special controls on developments within an area along the shoreline are necessary to avoid permanent losses of valuable resources and the foreclosure of management options, and to ensure that adequate access, by dedication or other means, to public owned or used beaches, recreation areas, and natural reserves is provided. The legislature finds and declares that it is the state policy to preserve, protect, and where possible, to restore the natural resources of the coastal zone of Hawaii."

However, as a general matter, the State and County legislatures have determined that the demolition or removal of structures (except for structures located on any historic site as designated in national or State registers) is not considered to be development, and therefore, as a general matter, are not activities that require approval of an SMA Use Permit or the concomitant special controls and guidelines applicable within the SMA (Sections 5.2.8 and 5.3.5). Without the need for an SMA Use Permit (Major), it is not apparent that any environmental review would be required or undertaken for the property.

Some commentors on the Draft EIS suggested that, rather than honoring the terms of the lease and the purpose, need, and stated objectives of the Project (which have been developed over several years to reflect the legacy of Alice Kamokilaikawai Campbell) (See Sections 2.2 and 2.3), their preferred approach to the No-Action Alternative would be one where the lease was renegotiated and extended for some unstated period of time and the property left essentially as-is. As with the initial depiction of the No-Action Alternative, this scenario would also avoid any requirement for environmental review under HRS, Chapter 343 and any requirement for an SMA Use Permit (Major). The existing use could continue under the SMA Use Permit (Major) that was authorized in 1993 without considerations given to updated regulatory requirements, such as Honolulu's recently enacted shoreline setback law, and the present day's environmental standards. Moreover, this approach is contrary to the objectives of the Project (Section 2.0) and is therefore not reasonable and does not warrant further analysis.

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Table 6.1: Project Objective Rating Definitions

Rating	1. Create an authentic community gathering place for locals and visitors that honors and reflects the history, culture, and connection to place.	2. Optimize the potential of the property by activating the site during both the day- and nighttime through restaurants, retail, and dynamic programming.	3. Strengthen the 'Ewa region as the Secondary Urban Center by providing quality jobs to support residents' quality of life, stimulate local spending, and increase revenues to the State's tax base.	4. Indirectly support local businesses through the purchase and sale of goods and services.	5. Plan for the future by implementing sustainable practices and adaptive and resilient design features, and minimizing environmental impacts.	6. Maintain and enhance the quality of the near-shore coastal environment and preserve access to public recreational resources.	7. Retain the natural beauty of the property by enhancing existing open space and landscaping.
GOOD	Alternative successfully establishes a unique and authentic gathering place that meets the demands of both locals and visitors. Design takes care to reflect the history, culture, and connection to place.	Alternative effectively optimizes the property's potential in an appropriate manner by activating the site at different times of the day through well-planned restaurants, retail, and dynamic programming. Planned programming is engaging and meet the desires of locals and visitors.	Action successfully contributes to strengthening the 'Ewa region by providing quality jobs, supporting residents' quality of life, stimulating local spending, and increasing revenues to the State's tax base.	Action effectively supports local businesses through the marketing, purchase, and sale of goods and services (e.g., local entertainment artists), positively impacting the local economy.	Alternative proactively plans for the potential impacts of climate change and SLR by implementing sustainable practices, adaptive design features, and minimizing environmental impacts.	Alternative effectively maintains and enhances the quality of the near-shore coastal environment through thoughtful planning and the implementation of BMPs. Access to public recreational resources is preserved and , maintained, and enhanced.	Alternative retains the property's existing level of open space and increases the amount of landscaping provided.
FAIR	Alternative maintains the existing design and programming of the property or defers the creation of an authentic community gathering place to a later, undetermined time. Moderate upgrades to existing structures may be made.	Alternative involves either a minimal change to existing operating hours or defers property optimization to a later, undetermined time. Improvement is needed to activate the site and diversify offerings.	Alternative either maintains the existing volume and quality of jobs or contributes to the creation of new quality jobs at a later time. Action results in either a fair increase in local spending and revenues to the State's tax base or defers increased spending/revenues to a later, undetermined time.	Action supports a moderate number of local businesses, or support is provided at a later, undetermined time.	Alternative does the minimum to plan for the potential future impacts of climate change and SLR.	Alternative is likely to have no effect on the surrounding coastal environment through the implementation of required BMPs. Access to public recreational resources is maintained.	Alternative retains existing level of open space and provides adequate landscaping.
POOR	Alternative falls short or does not meet the demand and expressed needs of the community or visitors. Design is not appropriate with the surrounding context or does not reflect history, culture, and connection to place.	Action reduces the hours of property activation, failing to optimize the property's potential. Or, property optimization is conducted in a manner that is inappropriate with the context of the surrounding region or contrary to the desires of the community.	Action does not provide jobs, thereby lacking significant contributions to job quality, resident support, local spending, and revenue increase.	Alternative does not consider hosting made in Hawai'i goods or utilizing local services.	Alternative may potentially be adversely affected by the predicted impacts of climate change and SLR.	Alternative may result in adverse impacts to the coastal environment or limit public access to recreational resources.	Alternative substantially reduces available open space. Minimal landscaping is provided.

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The Cove Property would remain vacant and unused with the No-Action Alternative, which would consequently reduce the number of operational entertainment destinations on O'ahu. The property has been operating as a Hawaiian-themed outdoor recreation facility and an entertainment venue since the late 1970's, which is consistent with the land use designation in the 'Ewa DP. The No-Action Alternative is therefore inconsistent with the property's Resort/Recreation Area land use designation and with the City's vision and objective of establishing a Secondary Urban Center in the 'Ewa District.

Furthermore, the No-Action Alternative would negate the creation of new short- and long-term employment opportunities in the 'Ewa District. Off-site businesses in the region and across Hawai'i that could have provided goods and services to the Project would not benefit, and potential positive impacts on the economy and community would not be realized.

The No-Action Alternative does not achieve the stated Project Objectives and, in general, scores poorly across each evaluation rating, as described below (see also *Table 6.2 of Section 6.7*).

1. Create an authentic community gathering place for locals and visitors that honors and reflects the history, culture, and connection to place. Poor: The Cove Property would be vacant for a prolonged period of time, and the creation of an authentic community gathering place would not be realized.
2. *Optimize the potential of the property by activating the site during both the day- and nighttime through restaurants, retail, and dynamic programming.* Poor: Taking no action to redevelop the Cove Property would lead to an extended period of vacancy. Consequently, day- and nighttime activation through restaurants, retail, and dynamic programming would not be realized.
3. *Strengthen the 'Ewa region as the Secondary Urban Center by providing quality jobs to support residents' quality of life, stimulate local spending, and increase revenues to the State's tax base.* Poor: The No-Action Alternative would not result in the positive benefit of new short- and long-term employment opportunities in the 'Ewa District. Moreover, this alternative is inconsistent with the City's land use designation for the property articulated in the 'Ewa DP and the stated objective of establishing a Secondary Urban Center in the 'Ewa District.
4. *Indirectly support local businesses through the purchase and sale of goods and services.* Poor: The No-Action Alternative would deny off-site businesses in the region and across Hawai'i of potential opportunities to provide goods and services to the Project. Consequently, potential positive impacts on the economy and broader community would not be realized.
5. *Plan for the future by implementing sustainable practices and adaptive and resilient design features, and minimizing environmental impacts.* Poor: Upon expiration of the current commercial lease, existing structures would be removed without the implementation of sustainable practices or resilient design features.
6. *Maintain and enhance the quality of the near-shore coastal environment and preserve access to public recreational resources.* Fair: Existing access to the shoreline area would be retained and the existing quality of near-shore coastal environment would be preserved, but not enhanced due to the lack of site improvements to address stormwater runoff.
7. *Retain the natural beauty of the property by enhancing existing open space and landscaping.* Poor: Following the restoration of the site to its original condition, existing landscaping would be preserved and/or maintained, but not enhanced. While the vacant site may potentially create more open space, the access to this open space at the Cove Property would be diminished.

Although this alternative may not result in significant short-term environmental impacts, no action taken at the Cove Property would hinder the realization of the Project's positive and beneficial impacts. Additionally, allowing the property to remain vacant may ultimately result in overall detrimental long-term impacts on the future of the property and the 'Ewa District. Considering these factors, the No-Action Alternative is deemed impractical for the Applicant's long-term plans for the Cove Property and the objectives outlined in the 'Ewa DP, ~~and, as such, is dismissed from further consideration.~~

6.3 Delayed Action

The Delayed Action Alternative contemplates deferring the redevelopment of the Cove Property to a future date. Under this scenario, either the existing substandard structures may be removed at the end of the current commercial lease, or they may remain in place until the Applicant proceeds with redevelopment of property at a later date. Under both scenarios, regularly scheduled landscaping maintenance could continue ~~and/or infrastructure improvements could be constructed.~~

Should the Applicant choose to retain the existing structures and infrastructure until a later date, limited commercial operations at the site could continue and may generate temporary benefits; however, no site improvements would occur. Similarly, at least in the short term it is unlikely that HRS, Chapter 343 environmental review or any discretionary permitting, such as an SMA Use Permit (Major) would be required.

The Cove Property would continue to be underutilized, as existing structures could not accommodate the planned variety of programming or activation of the site for day-time activities as proposed with the Preferred Alternative. The structural integrity of the existing buildings or infrastructure may deteriorate, potentially posing a risk to the safety of visitors. Deterioration of the existing buildings would be a liability for the Applicant and could result in higher overall costs. Furthermore, choosing to retain the existing 20-year-old structures may reduce the attractiveness of the property to locals and visitors, and would impede the construction of more contemporary, sustainable, and resilient structures.

Under the Delayed Action Alternative, the opportunity to enhance programs, activities, and offerings at the site would not be realized in a timely manner, failing to meet the social and economic needs of the growing 'Ewa District. Delaying construction would prolong the amount of time the Cove Property would remain vacant or underutilized, thus impeding the provision of an authentic community gathering space intended to improve residents quality of life and the visitor experience. Employment and other economic opportunities for kama'āina and locally-owned businesses would be postponed. The escalating costs of construction materials due to inflation would further complicate the achievement of redevelopment goals and ongoing costs of maintaining the property while underutilized or vacant would not be an efficient allocation of resources. Additionally, the proactive redevelopment necessary to address the anticipated impacts of climate change and SLR would be deferred.

As the Delayed Alternative does involve eventual construction of the Project, the stated Project Objectives are eventually achieved. However, delaying redevelopment of the property scores fairly or poorly across each evaluation rating overall, as described below (see also *Table 6.2 of Section 6.7*):

1. *Create an authentic community gathering place for locals and visitors that honors and reflects the history, culture, and connection to place.* Fair: The creation of an authentic community gathering place would be realized at a later, undetermined time.

2. *Optimize the potential of the property by activating the site during both the day- and nighttime through restaurants, retail, and dynamic programming.* Fair: If existing structures remain in place, the existing commercial use of the property could be maintained to a certain extent; however, the program and offerings envisioned under the Project could not be accommodated and property's potential would not be optimized. Full optimization of the property would be realized at a later, undetermined time.
3. *Strengthen the 'Ewa region as the Secondary Urban Center by providing quality jobs to support residents' quality of life, stimulate local spending, and increase revenues to the State's tax base.* Fair: If existing structures remain in place and the site is in limited operation, minimum employment could be maintained. Long-term employment opportunities for kama'āina would be postponed.
4. *Indirectly support local businesses through the purchase and sale of goods and services.* Fair: If existing structures remain in place and the site is in limited operation, a moderate number of local businesses may be supported. More impactful, long-term economic opportunities for locally-owned businesses would be postponed.
5. *Plan for the future by implementing sustainable practices and adaptive and resilient design features, and minimizing environmental impacts.* Poor: Sustainable practices and resilient design features would be deferred and would not be implemented in the short-term; therefore, the Cove Property may be adversely affected by the predicted impacts of climate change and SLR.
6. *Maintain and enhance the quality of the near-shore coastal environment and preserve access to public recreational resources.* Fair: Existing access to the shoreline area and the quality of near-shore coastal environment would be maintained, ~~but not enhanced.~~ Site improvements to address stormwater runoff would be delayed.
7. *Retain the natural beauty of the property by enhancing existing open space and landscaping.* Fair: Existing levels of open space and landscaping could be maintained, but not enhanced.

Delaying the Project would hinder timely delivery of positive and beneficial impacts. Although limited commercial operations could continue after the current tenant's lease ends, these activities would not provide the same level of economic or community benefits as a redevelopment. Additionally, allowing the Cove Property to remain vacant or underutilized after the current tenant's lease ends may eventually result in overall adverse environmental and economic impacts to the surrounding resort area and the 'Ewa District. The Delayed Alternative is impractical for the Applicant's long-term plans and vision for the Cove Property ~~and is consequently dismissed from further consideration.~~

6.4 Alternative Design

Under this alternative, existing structures would be demolished and the Project program would be constructed and comprised of structures characterized by increased density and up to 40 feet in height. The lot coverage on the site would reach the maximum of 30 percent allowed under the UA (Ordinance No. 89-27) and zoning, in contrast to the approximately 13.84 percent proposed under the Preferred Alternative. To achieve the maximum building area, setbacks ~~may~~ would be minimized on the property, which would result in decreased open space and the creation of larger structures with increased massing. Consequently, planned gathering/open-air lawns would be substantially reduced. This expanded building footprint ~~may~~ would likely demand additional parking that could only be accommodated in a multi-level parking structure. The intensified density would also contribute to increased adverse impacts related to traffic, noise, GHG emissions, and air quality, and would increase

infrastructure demand. Additionally, the introduction of more massive structures would adversely impact viewsheds on the site.

The Alternative Design could include structures within the shoreline setback area, which would require the Applicant to pursue an SSV approval from the DPP. However, development within the shoreline setback area could pose a safety risk due to vulnerability to flooding and wave action during storms. Furthermore, development within this area may result in adverse impacts to natural resources or processes in the coastal zone. The intensified density and use of the Cove Property may also impact the quality of near-shore coastal environments in the short-term during construction and during long-term operations.

It is critical that redevelopment of the site is consistent with the particular and unique context of the Cove Property, and the wider 'Ewa District. While the Project site is located in an area envisioned by the 'Ewa DP for Resort/Recreation Area uses, an Alternative Design maximizing the allowed building area would not fit the character and setting of the surrounding area and would not set the area apart from other visitor destinations such as Waikīkī. More massive structures would result in adverse impacts to the surrounding visual environment. Most significantly, initial discussions with legacy families and public outreach conducted for the Project indicate a general disapproval of maximized density at the Cove Property, which favors a balanced approach to redevelopment. An Alternative Design that maximizes density would be inconsistent with the Project's purpose to provide an authentic gathering place that honors Native Hawaiian culture and connection to place. The 13.84 percent of building area proposed in the Preferred Alternative represents a careful balance between site activation and open space preservation, offering new programming opportunities while respecting the Cove Property's natural beauty and aligning with the guiding policy plans for the site.

This alternative would not achieve the full range of stated Project Objectives and scores poorly under the majority of the evaluation ratings, as discussed below (see also *Table 6.2 of Section 6.7*).

1. *Create an authentic community gathering place for locals and visitors that honors and reflects the history, culture, and connection to place.* Poor: Initial public outreach indicates that maximized density at the site is undesirable. More massive structures does not align with the Project's core objective of providing an authentic gathering place that honors Native Hawaiian culture and connection to place.
2. *Optimize the potential of the property by activating the site during both the day- and nighttime through restaurants, retail, and dynamic programming.* Poor: The Cove Property would accommodate an increased number of restaurants, retail, and dynamic programming if development potential were to be maximized. However, maximizing the allowed building area would not optimize the property. Doing so would not fit the character and setting of the surrounding area and would run contrary to the feedback received from the community.
3. *Strengthen the 'Ewa region as the Secondary Urban Center by providing quality jobs to support residents' quality of life, stimulate local spending, and increase revenues to the State's tax base.* Good: Developing the Project under this alternative would likely generate quality jobs at the Cove Property.
4. *Indirectly support local businesses through the purchase and sale of goods and services.* Good: Developing the Project under this alternative would likely support local businesses.
5. *Plan for the future by implementing sustainable practices and adaptive and resilient design features, and minimizing environmental impacts.* Poor: Redeveloping the Cove Property to its maximum allowable density would significantly increase infrastructure and energy demands, posing challenges for sustainable resource management and resilience over time. In order to

maximize the development potential of the Cove Property, this alternative could include new structures within the shoreline setback area. This would require the Applicant to pursue an SSV approval. However, development within the shoreline setback area pose future safety risks, as this area is vulnerable to flooding and wave action during storms. Additionally, development within this area may result in adverse impacts to natural resources or processes in the coastal zone.

6. *Maintain and enhance the quality of the near-shore coastal environment and preserve access to public recreational resources.* ~~Poor~~ Fair: Intensified density on and use of the Cove Property may also impact the quality of the near-shore coastal environment in the short-term during construction but would be mitigated through the implementation of construction. In the long-term, drainage improvements to the Cove Property consistent with the City's Drainage and Storm Water Quality Standards would still be made, presenting an improvement over the site's existing condition. However, a higher-density development than what is proposed for the Project would increase the frequency and intensity of site use, thereby increasing the overall potential for stormwater runoff and pollutant loads.
7. *Retain the natural beauty of the property by enhancing existing open space and landscaping.* Poor: To achieve the maximum building area, the potential for dedicated open space and gathering/open-air activity lawns would be substantially reduced.

Under this scenario, the expressed desires and needs of local kama'āina and visitors would not be met. The reduction of open space at the site may result in greater impacts to the surrounding natural environment.

6.5 Alternative Use

Under the UA, permissible commercial activities on the property are limited to restaurants and retail activity associated with a "Hawaiian Theme Park" and a commercial lū'au operation. ~~and a recreation/amusement facility.~~ Use of the site for these purposes has been long established since the late 1970s.

The Alternative Use scenario contemplates construction of a resort hotel at the Cove Property, acknowledging that such a use is currently prohibited under the UA. ~~which is not allowed under the UA and implementing this alternative~~ would therefore require an amendment to the existing UA through a Zone Change approval. The Zone Change would seek to rezone the Cove Property from the B-1, Neighborhood Business District to the Resort District. This process would entail a comprehensive review and approval process that would involve the City Planning Commission and City Council and would potentially take up to three years. During this evaluation period, the Cove Property would be vacant and underutilized, causing a delay in redevelopment and deferring the generation of the Project's anticipated benefits.

In analyzing a resort hotel as an alternative, the purpose is to evaluate the range of potential impacts of a higher-density use that is consistent with surrounding properties in the resort area. However, it is understood that such development would differ substantially from the intended character of the Cove Property and would introduce significant environmental and infrastructural demands. Construction of a resort hotel would increase the building footprint, height, and density at the Cove Property. While this development may fit with the character of the surrounding resort area and would create more jobs than the Preferred Alternative, it may result in comparably significant environmental impacts, including increased traffic and noise. The visual character of the property would be adversely impacted by towering hotel structures, and the larger building footprint would reduce open space at the site. The

infrastructure needed for operations of a resort hotel development would also be substantially higher than that required to implement the Proposed Action. Similar to the Alternative Design, a multi-level parking structure may be required to accommodate the needs of hotel guests.

A resort hotel may result in increased adverse impacts to the surrounding natural environment. The inherently resource-intensive nature of new resort hotel development, coupled with potential environmental impacts, runs contrary to the Project's resilience and sustainability objectives. The beach and natural cove/lagoon adjacent to the Cove Property could be stressed by a higher level of leisurely use by hotel guests. Increased visitor activities at the beach could impact the quality experience currently enjoyed by residents.

While new retail, restaurant, and entertainment experiences could be provided, construction of a resort hotel at the Cove Property would not align with the expressed desire of the community and purpose of the Project to provide an authentic gathering place that honors Native Hawaiian culture and connection to place.

The Alternative Use does not meet the stated Project Objectives and scores poorly under the majority of the evaluation ratings, as summarized below (see also *Table 6.2 of Section 6.7*).

1. *Create an authentic community gathering place for locals and visitors that honors and reflects the history, culture, and connection to place.* Poor: While a resort hotel is consistent with the surrounding uses, redevelopment of the Cove Property from a Hawaiian-themed outdoor recreation facility to a resort hotel would not honor the site's cultural and historic legacy, Native Hawaiian culture, and connection to place.
2. *Optimize the potential of the property by activating the site during both the day- and nighttime through restaurants, retail, and dynamic programming.* Poor: While new retail, restaurant, and entertainment experiences could be provided, construction of a resort hotel at the Cove Property would not align with the expressed desire of the community and would therefore be considered inappropriate.
3. *Strengthen the 'Ewa region as the Secondary Urban Center by providing quality jobs to support residents' quality of life, stimulate local spending, and increase revenues to the State's tax base.* Fair: The Alternative Use scenario would require the approval of a Zone Change, a process that could take up to three years. Potential short- and long-term quality jobs that are expected to be generated by the Project would be delayed. Although these jobs would be postponed, this alternative is likely to create a greater number of both immediate and sustained employment opportunities than the Preferred Alternative, which would provide economic benefits to the community over time.
4. *Indirectly support local businesses through the purchase and sale of goods and services.* Fair: The construction and operation of a resort hotel would indirectly support local businesses through the purchase and sale of goods and services. However, due to the Zone Change that would be required, realization of these benefits would be delayed. this support would come at a later, undetermined time.
5. *Plan for the future by implementing sustainable practices and adaptive and resilient design features, and minimizing environmental impacts.* Poor: The inherently resource-intensive nature of new resort hotel development, coupled with potential environmental impacts, runs contrary to the Project's long-term resilience and sustainability objectives.
6. *Maintain and enhance the quality of the near-shore coastal environment and preserve access to public recreational resources.* Poor: A resort hotel may result in increased adverse impacts to the surrounding natural environment due to its expanded footprint and higher number of

visitors. The lagoon beach and natural cove adjacent to the Cove Property could become stressed by a higher level of leisurely use by hotel guests. Increased foot traffic along the shoreline could lead to greater disturbance of beach and intertidal areas, possibly affecting marine species that depend on these habitats. Increased visitor use at the beach could impact the quality experience currently enjoyed by locals. An increase in impermeable surfaces, such as paved walkways, parking areas, and building structures, may potentially result in greater discharges of stormwater that would need to be treated on site.

7. *Retain the natural beauty of the property by enhancing existing open space and landscaping.*
Poor: The larger building footprint of a new resort hotel would reduced open space at the site.

Overall, the process required to amend the UA and rezone the property for resort hotel use would result in substantial delays for redevelopment of the site, thereby deferring the Project's anticipated benefits. Furthermore, the intensified nature of constructing and operating a resort hotel at the Cove Property considerably contrasts with the current use of the site for commercial activities. Water and sewer requirements to support a resort hotel would be far greater than what is currently available. For these reasons, the Alternative Use was eliminated from further consideration.

6.6 Preferred Alternative/Proposed Action

The Preferred Alternative is redevelopment of the Cove Property as described in Section 3.0. This alternative will continue commercial uses on the property, including maintaining the lū'au show as the focal point of the site. Ancillary improvements will include the addition of restaurants showcasing local cuisine and agricultural products, a Village Walk consisting of small-scale retail shops, a marketplace hosting goods including those made in Hawai'i, and attractive, engaging common areas. The existing wedding chapel and support building will remain in place and may be renovated.

It is envisioned that the redevelopment will modernize the Cove Property to create an authentic Hawaiian community gathering place for residents and visitors that honors and reflects the history, culture, and connection to this place, consistent with the conditions of the UA. The Project will complement the surrounding area, and represents a new phase of redevelopment in the 'Ewa region. This alternative meets the Project purpose and need discussed in Section 2.0, and directly aligns with the public policy vision for the area articulated in the 'Ewa DP.

The Preferred Alternative meets the stated Project Objectives and scores "Good" under the majority of the evaluation ratings, as summarized below (see also Table 6.2 of Section 6.7).

1. *Create an authentic community gathering place for locals and visitors that honors and reflects the history, culture, and connection to place.* Good: The Proposed Action will create an authentic community gathering place for locals and visitors that honors and reflects the history, culture, and connection to place.
2. *Optimize the potential of the property by activating the site during both the day- and nighttime through restaurants, retail, and dynamic programming.* Good: The Proposed Action will activate the site during both the day- and nighttime through restaurants, retail, and dynamic programming.
3. *Strengthen the 'Ewa region as the Secondary Urban Center by providing quality jobs to support residents' quality of life, stimulate local spending, and increase revenues to the State's tax base.* Good: The Proposed Action will strengthen the 'Ewa region as the Secondary Urban Center by providing quality jobs to support residents' quality of life, stimulate local spending, and increase revenues to the State's tax base. As discussed in Section 4.10, operation of the

Project is estimated to create 817 total jobs (678 FTE jobs), and generate approximately \$34.5 million annually in labor income and approximately \$100.0 million in economic output. In the long-term, the State government is estimated to accrue approximately \$4.6 million per year annually, while the City government may accrue approximately \$2.1 million per year annually.

4. *Indirectly support local businesses through the purchase and sale of goods and services.* Good: The Proposed Action will indirectly support local businesses through the purchase and sale of goods and services. Retail will host goods, including those made in Hawai'i, while the restaurants may feature local ingredients to the extent practicable. The new entertainment show will feature and support local artists.
5. *Plan for the future by implementing sustainable practices and adaptive and resilient design features, and minimizing environmental impacts.* Good: The Proposed Action will plan for the future by implementing operational practices that promote sustainability, incorporating adaptive and resilient design features, and minimizing environmental impacts as described throughout Section 4.0.
6. *Maintain and enhance the quality of the near-shore coastal environment and preserve access to public recreational resources.* Good: The Proposed Action will maintain and enhance the quality of the near-shore coastal environment and preserve access to public recreational resources. The current level of beach access and parking will be maintained to protect the beach and natural cove/lagoon, which is a valuable natural resource in the area. Drainage improvements to the Cove Property consistent with the City's Drainage and Storm Water Quality Standards will be made, reducing the total stormwater runoff generated on site and presenting a long-term improvement over the site's existing condition.
7. *Retain the natural beauty of the property by enhancing existing open space and landscaping.* Good: The Proposed Action will retain the natural beauty of the Cove Property by enhancing existing open space and incorporating lush landscaping throughout.

6.7 Summary Evaluation of Alternatives: Alignment with Project Objectives & Impacts

A summary of the ratings assigned to each evaluated alternative is provided in *Table 6.2*, which follows. In addition, in response to comments received on the Draft EIS, *Table 6.3* has been prepared to provide a further analysis of environmental impacts associated with each alternative. The resources analyzed correspond with those reviewed in *Section 4.0* of the EIS.

In summary, the Preferred Alternative (Proposed Action) best aligns with Project Objectives for the Cove Property discussed in *Section 6.1*. By revitalizing the property, which has long been used for recreational and entertainment purposes, the Preferred Alternative creates a gathering place for both local residents and visitors that honors the site's history and supports the local economy. While anticipated short- and long-term environmental impacts are discussed in *Section 4.0* of this EIS, these impacts will be mitigated by the implementation of BMPs and are considered to be outweighed by the anticipated long-term benefits. The Preferred Alternative is considered the most balanced approach to redevelopment of the Cove Property.

The No-Action and Delayed Action alternatives offer minimal immediate environmental impacts by leaving the property largely vacant and unchanged in the short term. However, these alternatives fall short of meeting the Project Objectives. The No-Action Alternative would result in a prolonged period of vacancy, missing opportunities for gathering, recreation, and economic development. The Delayed

Action Alternative would postpone job creation and other economic benefits and property enhancements, deferring much-needed site improvements that could otherwise support the wider 'Ewa region.

The Alternative Design (Increased Density) and Alternative Use (Resort Hotel) represent viable alternatives that examine potential high-density options. The Alternative Design would be consistent with the zoning parameters of the Cove Property and the surrounding resort uses, while the Alternative Use would be possible with the approval of a Zone Change pursuant to the LUO (ROH, Chapter 21). However, both alternatives present significant challenges. While these alternatives may generate higher economic benefits than the Preferred Alternative, these higher-density options would demand greater infrastructural resources and could potentially result in adverse impacts to the near-shore environment, scenic views, and traffic.

Overall, the Preferred Alternative is the most comprehensive option, balancing cultural and environmental considerations with long-term economic benefits. The alternatives considered offer viable scenarios to redevelop the Cove Property; however, the Preferred Alternative achieves the best alignment with long-term goals for revitalizing the property in a manner that minimizes potential adverse impacts to the environment, benefits both local residents and visitors, and aligns with the City's policies and long-term vision for the site.

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Table 6.2: Summary Evaluation of Alternatives: Alignment with Project Objectives

Alternative	1. Create an authentic community gathering place for locals and visitors that honors and reflects the history, culture, and connection to place.	2. Optimize the potential of the property by activating the site during both the day- and nighttime through restaurants, retail, and dynamic programming.	3. Strengthen the 'Ewa region as the Secondary Urban Center by providing quality jobs to support residents' quality of life, stimulate local spending, and increase revenues to the State's tax base.	4. Indirectly support local businesses through the purchase and sale of goods and services.	5. Plan for the future by implementing sustainable practices and adaptive and resilient design features, and minimizing environmental impacts.	6. Maintain and enhance the quality of the near-shore coastal environment and preserve access to public recreational resources.	7. Retain the natural beauty of the property by enhancing existing open space and landscaping.
<p>1. No-Action</p> <p>Upon expiration of the current commercial lease, existing structures would be removed.</p>	<p>POOR</p> <p>The Cove Property would be vacant for a prolonged period of time, and the creation of an authentic community gathering place would not be realized.</p>	<p>POOR</p> <p>Taking no action to redevelop the Cove Property would lead to an extended period of vacancy. Consequently, day- and nighttime activation through restaurants, retail, and dynamic programming would not be realized.</p>	<p>POOR</p> <p>The No-Action Alternative would not result in the positive benefit of new short- and long-term employment opportunities in the 'Ewa District. Moreover, this alternative is inconsistent with the City's land use designation for the property articulated in the 'Ewa DP and the stated objective of establishing a Secondary Urban Center in the 'Ewa District.</p>	<p>POOR</p> <p>The No-Action Alternative would deprive off-site businesses in the region and across Hawai'i of potential opportunities to provide goods and services to the Project. Consequently, potential positive impacts on the economy and broader community would not be realized.</p>	<p>POOR</p> <p>Upon expiration of the current commercial lease, existing structures would be removed without the implementation of sustainable practices or resilient design features.</p>	<p>FAIR</p> <p>Existing access to the shoreline area would be retained and the existing quality of near-shore coastal environment would be preserved, but not enhanced <u>due to the lack of site improvements to address stormwater.</u></p>	<p>POOR</p> <p>Following the restoration of the site to its original condition, existing landscaping would be preserved and/or maintained, but not enhanced. While the vacant site may potentially create more open space, the access to this open space at the Cove Property would be diminished.</p>
<p>2. Delayed Action</p> <p>Existing structures may either be removed at the end of the current commercial lease or remain in place until the Applicant proceeds with the Project at a later time.</p>	<p>FAIR</p> <p>The creation of an authentic community gathering place would be realized at a later, undetermined time.</p>	<p>FAIR</p> <p>If existing structures remain in place, the existing commercial use of the property could be maintained to a certain extent; however, the program and offerings envisioned under the Project could not be accommodated and property's potential would not be optimized. Full optimization of the property would be realized at a later, undetermined time.</p>	<p>FAIR</p> <p>If existing structures remain in place and the site is in limited operation, minimum employment could be maintained. Long-term employment opportunities for kama'āina would be postponed.</p>	<p>FAIR</p> <p>If existing structures remain in place and the site is in limited operation, a moderate number of local businesses may be supported. More impactful, long-term economic opportunities for locally-owned businesses would be postponed.</p>	<p>POOR</p> <p>Sustainable practices and resilient design features would be deferred and would not be implemented in the short-term; therefore, the Cove Property may be adversely affected by the predicted impacts of climate change and SLR.</p>	<p>FAIR</p> <p>Existing access to the shoreline area and the quality of near-shore coastal environment would be maintained, but not enhanced. <u>Site improvements to address stormwater runoff would be delayed.</u></p>	<p>FAIR</p> <p>Existing levels of open space and landscaping could be maintained, but not enhanced.</p>
<p>3. Alternative Design</p> <p>The existing structures on the Cove Property would be demolished and replaced with new structures characterized by increased density (up to 30 percent lot coverage) and up to 40 feet in height, as permissible by current zoning development standards.</p>	<p>POOR</p> <p>Initial public outreach indicates that maximized density at the site is undesirable. More massive structures does not align with the Project's core objective of providing an authentic gathering place that honors Native Hawaiian culture and connection to place.</p>	<p>POOR</p> <p>The Cove Property would accommodate an increased number of restaurants, retail, and dynamic programming if development potential were to be maximized. However, maximizing the allowed building area would not fit the character and setting of surrounding resort area and would run directly contrary to the feedback received from the community.</p>	<p>GOOD</p> <p>Developing the Project under this alternative would likely generate quality jobs at the Cove Property.</p>	<p>GOOD</p> <p>Developing the Project under this alternative would likely support local businesses.</p>	<p>POOR</p> <p>In order to maximize the development potential of the Cove Property, this alternative could include new structures within the shoreline setback area. This would require the Applicant to pursue an SSV approval. However, development within the shoreline setback area could be a safety risk, as this area is vulnerable to flooding and wave action during storms. Additionally, development within this area may result in adverse impacts to natural resources or processes in the coastal zone.</p>	<p>POORFAIR</p> <p>Intensified density on and use of the Cove Property may also impact the quality of the near-shore coastal environment in the short-term during construction and during long-term operation. Potential construction impacts would be mitigated through BMPs. <u>In the long-term, drainage improvements to the Cove Property consistent with the City's Drainage and Storm Water Quality Standards would still be made, presenting an improvement over the site's existing condition. However, a higher-density development than what is proposed for the Project would increase the frequency and</u></p>	<p>POOR</p> <p>To achieve the maximum building area, the potential for dedicated open space and gathering/open-air activity lawns would be substantially reduced.</p>

Table 6.2: Summary Evaluation of Alternatives: Alignment with Project Objectives

Alternative	1. Create an authentic community gathering place for locals and visitors that honors and reflects the history, culture, and connection to place.	2. Optimize the potential of the property by activating the site during both the day- and nighttime through restaurants, retail, and dynamic programming.	3. Strengthen the 'Ewa region as the Secondary Urban Center by providing quality jobs to support residents' quality of life, stimulate local spending, and increase revenues to the State's tax base.	4. Indirectly support local businesses through the purchase and sale of goods and services.	5. Plan for the future by implementing sustainable practices and adaptive and resilient design features, and minimizing environmental impacts.	6. Maintain and enhance the quality of the near-shore coastal environment and preserve access to public recreational resources.	7. Retain the natural beauty of the property by enhancing existing open space and landscaping.
						<u>intensity of site use, thereby increasing the overall potential for stormwater runoff and pollutant loads</u>	
4. Alternative Use The Alternative Use scenario contemplates construction of a resort hotel at the property, which would require a Zone Change.	POOR While a resort hotel is consistent with the surrounding uses, redevelopment of the Cove Property from a commercial/entertainment gathering place to a resort hotel would not honor the site's cultural and historic legacy, Native Hawaiian culture, and connection to place. Additionally, use of the Cove Property for a hotel is not permitted under the UA.	POOR While new retail, restaurant, and entertainment experiences could be provided, construction of a resort hotel at the Cove Property would not align with the expressed desire of the community and would therefore be considered inappropriate.	FAIR The Alternative Use scenario would require the approval of a Zone Change, a process that could take up to three years. Potential short- and long-term quality jobs that are expected to be generated by the Project would be delayed.	FAIR The construction and operation of a resort hotel would indirectly support local businesses through the purchase and sale of goods and services. However, due to the Zone Change that would be required, this support would come at a later, undetermined time.	POOR The inherently resource-intensive nature of new resort hotel development, coupled with potential environmental impacts, runs contrary to the Project's long-term resilience and sustainability objectives.	POOR A resort hotel may result in increased adverse impacts to the surrounding natural environment. <u>The lagoon-beach and natural cove adjacent to the Cove Property could be stressed by a higher level of leisurely use by hotel guests. Increased visitor use at the beach could impact the quality of the experience currently enjoyed by locals. An increase in impermeable surfaces, such as paved walkways, parking areas, and building structures, may potentially result in greater discharges of stormwater that would need to be treated on site.</u>	POOR The larger building footprint of a new resort hotel would reduce open space at the site.
5. Preferred Alternative – Proposed Action Redevelopment of the Cove Property as described in <i>Section 3.0</i> .	GOOD The Proposed Action will create an authentic community gathering place for locals and visitors that honors and reflects the history, culture, and connection to place.	GOOD The Proposed Action will activate the site during both the day- and nighttime through restaurants, retail, and dynamic programming.	GOOD The Proposed Action will strengthen the 'Ewa region as the Secondary Urban Center by providing quality jobs to support residents' quality of life, stimulate local spending, and increase revenues to the State's tax base. Operation of the Project is estimated to create 817 total jobs (678 FTE jobs), and generate approximately \$34.5 million annually in labor income and approximately \$100.0 million in economic output. In the long-term, the State government is estimated to accrue approximately \$4.6 million per year annually, while the City government may accrue approximately \$2.1 million per year annually.	GOOD The Proposed Action will indirectly support local businesses through the purchase and sale of goods and services. Retail will feature goods, including those made in Hawai'i, while the restaurants may feature local ingredients to the extent practicable. The new entertainment show will feature and support local artists.	GOOD The Proposed Action will plan for the future by implementing operational practices that promote sustainability, incorporating adaptive and resilient design features, and minimizing environmental impacts as described throughout <i>Section 4.0</i> .	GOOD The Proposed Action will maintain and enhance the quality of the near-shore coastal environment and preserve access to public recreational resources. The current level of beach access and parking will be maintained to protect the beach and natural cove/lagoon, which is a valuable natural resource in the area. <u>Drainage improvements to the Cove Property consistent with the City's Drainage and Storm Water Quality Standards will be made, reducing the total stormwater runoff generated on site and presenting a long-term improvement over the site's existing condition.</u>	GOOD The Proposed Action will retain the natural beauty of the property by enhancing existing open space and incorporating lush landscaping throughout.

Table 6.3: Comparative Environmental Impact Overview

Resource	1. No-Action	2. Delayed Action	3. Alternative Design	4. Alternative Use	5. Preferred Alternative –Proposed Action
	<p>Upon expiration of the current commercial lease, existing structures would be removed.</p>	<p>Existing structures may either be removed at the end of the current commercial lease or remain in place until the Applicant proceeds with the Project at a later time.</p>	<p>The existing structures on the Cove Property would be demolished and replaced with new structures characterized by increased density (up to 30 percent lot coverage) and up to 40 feet in height, as permissible by current zoning development standards.</p>	<p>The Alternative Use scenario contemplates construction of a resort hotel at the property, which would require a Zone Change.</p>	<p>Redevelopment of the Cove Property as described in <i>Section 3.0</i>.</p>
<p>Archaeological, Cultural, and Historic Resources</p>	<p>No adverse environmental impact or, for purposes of HRS, Chapter 6E-42, an effect determination of “Effect with Mitigation Commitments.” Ground disturbance is required for removal of existing structures and restoration of the site. As such, an AMP would likely be required to mitigate potential construction impacts. In the long term, the Applicant would still move forward with establishing the burial preserve area (CSH 2) in accordance with the 1995 Burial Agreement.</p>	<p>If the Project is delayed, there would be no adverse environmental impact or, for purposes of HRS, Chapter 6E-42, the effect determination could still be “Effect with Mitigation Commitments.” Eventually, ground disturbance would be required under the Delayed Action alternative for removal of existing structures and restoration of the site, and an AMP would likely be required to mitigate potential construction impacts. In the long term, the Applicant would still move forward with establishing the burial preserve area (CSH 2) in accordance with the 1995 Burial Agreement.</p>	<p>Increased density under this alternative would result in additional ground disturbance thus increasing the likelihood of impacting unidentified historic properties at the Project site. For purposes of HRS, Chapter 6E-42, the effect determination could still be “Effect with Mitigation Commitments.” Increased density and taller structures on the Cove Property would result in increased ground disturbance, which would require an AMP. An Alternative Design would be required to adhere to the 1995 Burial Agreement to mitigate potential impacts to SIHP No. -04968.</p>	<p>Development of a resort hotel on the property would likely result in additional ground disturbance thus increasing the likelihood of impacting unidentified historic properties at the Project site. For purposes of HRS, Chapter 6E-42, the effect determination could still be “Effect with Mitigation Commitments.” Significant ground disturbance due to hotel construction would result in increased ground disturbance. An AMP and continued adherence to the 1995 Burial Agreement would be required to mitigate potential impacts.</p>	<p>No adverse environmental impact or, for purposes of HRS, Chapter 6E-42, the effect determination is proposed to be “Effect with Mitigation Commitments.” Ground disturbance is required for removal of existing structures and restoration of the site, and an AMP would likely be required to mitigate potential construction impacts. In the long term, the Applicant will move forward with establishing the burial preserve area (CSH 2) in accordance with the 1995 Burial Agreement. See <i>Section 4.1</i> for further discussion.</p>
<p>Atmospheric and Meteorological Environment</p>	<p>Construction-related fugitive dust and equipment emissions are expected during demolition of existing structures. Since no new development or activity would occur, there would be no long-term emissions or changes to air quality. The atmospheric and meteorological conditions would remain unchanged.</p>	<p>Construction-related fugitive dust and equipment emissions are expected during demolition of existing structures. There would be no emissions or changes to air quality as long as the property remains undeveloped. As such, the atmospheric and meteorological conditions would remain unchanged until development begins. With the delayed, future redevelopment of the Cove Property, impacts would be similar to the Proposed Action as discussed in <i>Section 4.2</i>.</p>	<p>Increased density under this alternative would lead to greater construction activities, which would generate greater short-term emissions of dust (particulate matter) and pollutants from construction equipment. During operation, the higher number of buildings, commercial activities, and associated traffic would result in increased emissions from vehicles and energy use (e.g., HVAC systems, generators). However, the extent of these emissions would depend on the use of sustainable construction methods and energy-efficient systems. Incorporating renewable energy sources and green building standards could help mitigate these impacts.</p> <p>With increased density and up to 30 percent lot coverage, there is potential for an urban heat island effect, where dense development with less vegetation and more paved surfaces retains heat and raises local temperatures. This could alter the microclimate, making the site warmer, especially during the day.</p> <p>Taller buildings (up to 40 feet) could alter local wind patterns. Depending on the site orientation and design, the increased building height could obstruct natural airflow and create wind tunnels or eddies around the structures. These changes may have minor effects on local comfort and air circulation but would not significantly affect the broader meteorological environment.</p>	<p>A resort hotel would lead to a large increase in construction-related emissions, including dust, particulate matter, and vehicle emissions. Once operational, the hotel would generate additional emissions related to energy-intensive hospitality operations. Furthermore, hotel visitors would contribute to vehicular traffic, increasing local air pollution.</p> <p>Depending on the resort’s design and management, implementing energy-efficient technologies, sustainable building materials, and encouraging the use of electric or hybrid vehicles could reduce long-term emissions. However, the increase in overall traffic and energy demand may lead to a net increase in emissions compared to the current use.</p> <p>As a large-scale structure with substantial lot coverage and reduced open space, a resort hotel would also contribute to the heat island effect, which could be mitigated with landscape buffers, green spaces, and energy-efficient building.</p> <p>A resort hotel, particularly if it includes high-rise buildings, could have a more noticeable impact on local wind patterns. Tall structures could block prevailing winds and create areas with reduced ventilation or concentrated wind gusts. These effects would mostly be localized but could impact the surrounding areas.</p>	<p>Construction-related fugitive dust and equipment emissions are anticipated during construction. Construction work related activities will be conducted in compliance with HAR, Chapter 11-59 and 11-60. Construction equipment and vehicles will be maintained in proper working order to reduce air emissions, and a construction dust control plan will be prepared for the Project.</p> <p>In the long-term, a slight increase in stationary and mobile sources of emissions is anticipated; however significant adverse impacts are not expected. The Project will encourage TDM strategies to reduce emissions related to increased vehicular traffic on site, including the promotion of walking and strategies outlined in the PMP (<i>Section 4.7.3</i>).</p>
<p>Terrestrial and Marine Environment</p>	<p>Ground disturbance from demolition activities could cause minor short-term impacts, such as soil erosion, which would be mitigated through</p>	<p>If structures remain, there would be limited impact on the terrestrial environment in the short term, as no immediate ground disturbance would occur.</p>	<p>An Alternative Design with 30 percent of building area would require ground disturbance for construction. This would lead to increased soil</p>	<p>The scale of a resort hotel development would require significant clearing of vegetation, possibly altering the</p>	<p>Land-disturbing activities, such as grading, have the potential to cause soil erosion. However, compliance with the conditions of the City grading</p>

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	<p>City-required erosion control measures and BMPs. However, since the site would not be redeveloped, long-term impacts would be minimal. Vegetation could naturally regenerate over time, potentially restoring some vegetation to the site.</p> <p>With no further development or construction, the installation of drainage improvements on the Cove Property would not occur and existing patterns of stormwater runoff would continue. This may result in potential impacts to the nearshore coastal environment.</p> <p>The continued use of the beach by the public would result in some level of impact on both terrestrial and marine environments and species attributed to human activity. These impacts would be mitigated through standard BMPs.</p>	<p>However, if structures are demolished later, minor impacts (e.g., soil erosion) would result from the removal process and would be mitigated through City-required erosion control measures and BMPs. In either case, redevelopment at a later time would introduce similar construction-related impacts.</p> <p>The impacts on the marine and terrestrial environment would be similar to those of the No-Action alternative until construction begins. There would be no immediate adverse impacts on water quality or marine life. Long-term site improvements to address stormwater runoff would be delayed.</p> <p>If redevelopment occurs later, potential long-term impacts would be similar to the Proposed Action (see <i>Section 4.3</i>). Drainage improvements to the site would mitigate potential impacts related to stormwater runoff and maintain the quality of nearshore waters.</p> <p>The continued use of the beach by the public means that there would still be some level of impact on both terrestrial and marine environments and species attributed to human activity. These impacts would be mitigated through standard BMPs.</p>	<p>erosion and disturbances to local flora, which would be mitigated through City-required erosion control measures and BMPs. Landscaping consisting of native plants could be installed, restoring vegetation in the limited areas of open space on the site.</p> <p>In the long-term, drainage improvements to the Cove Property consistent with the City's Drainage and Storm Water Quality Standards would still be made, presenting an improvement over the site's existing condition. However, a higher-density development than what is proposed for the Project would increase the frequency and intensity of site use, thereby increasing the potential for stormwater runoff and pollutant loads and potentially impacting the adjacent marine environment</p> <p>A larger-scale development with more capacity for visitors would potentially attract more people to the area and result in increased beach use. This would increase potential human impact on the terrestrial and marine environments, including greater pressure on species, habitats, and water quality.</p>	<p>topography and increasing soil erosion during construction.</p> <p>Given the size and potential amenities of a resort hotel, there could be less open space and more paved or developed areas. Landscaping for the resort could mitigate some of these impacts by incorporating native plants, but the overall impact on the terrestrial environment would be more substantial than under other alternatives.</p> <p>The resort hotel would likely have more pronounced impacts on the marine environment due to its larger scale and increased guest activity. Increased foot traffic along the shoreline could lead to greater disturbance of beach and intertidal areas, possibly affecting marine species that depend on these habitats. An increase in impermeable surfaces, such as paved walkways, parking areas, and building structures, may potentially result in greater discharges of stormwater that would need to be treated on site. Proper environmental management, including stormwater management, and controlled beach access, would be essential to minimize these impacts.</p>	<p>permit and applicable provisions of HAR, Sections 11-54 and 11-55 will be employed to mitigate potential adverse impacts and to prevent discharge of pollutants into the marine environment. Erosion control measures and BMPs will include, but not be limited to, phased construction, use of temporary silt fencing, and replacing ground cover in disturbed areas. Post-construction stabilization will involve the use of vegetative ground cover to secure disturbed soil.</p> <p>The movement of plant or soil material between worksites may impact native species. BMPs, including equipment and personnel cleaning protocols, will be enforced to mitigate these potential impacts. Should any Federal- or State-listed threatened or endangered plant species be discovered, appropriate avoidance buffers will be established.</p> <p>Existing trees, including the monkeypod and banyan trees in the center of the property, will be carefully preserved to the extent practicable. Where necessary, other healthy trees may be relocated on site. An invasive species management plan will be prepared to mitigate the spread of pests like the Coconut Rhinoceros Beetle.</p> <p>Construction activities near the beach may pose risks to protected species, including the Hawaiian hoary bat, Hawaiian monk seal, and Hawaiian green sea turtle. Comprehensive discussion on the measures to mitigate these risks are discussed in <i>Section 4.3</i> and summarized in <i>Table 1.1</i>.</p> <p>While the Project will attract more visitors to the site and potentially increase beach use, the public beach access will continue to be maintained, and existing free beach parking will not be expanded in order to limit potential impacts on natural resources. The redevelopment includes ancillary amenities such as dining options, retail, and event space, which are intended to attract visitors to the Cove Property itself, potentially reducing the direct pressure on the beach. Educational signage and guidelines may be posted around the</p>

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					<p><u>property to encourage thoughtful care for the site and the surrounding environment.</u></p>
Natural Hazards	<p><u>With no further development or construction, the current vulnerabilities and risks associated with natural hazards, such as SLR or flooding, remain unchanged. Coastal erosion, flooding from heavy rains, and storm surges will continue to affect the area at the same levels, as no measures are taken to either mitigate or worsen these risks.</u></p> <p><u>With no new development or improvements, there would be no efforts to enhance the area's resilience, such as improving drainage or designing flood-resistant structures.</u></p>	<p><u>The Delayed Action would result in no change to the existing vulnerabilities or risks associated with natural hazards, such as SLR or flooding. The current exposure of the area to these hazards would remain unchanged and the risks posed by such events would persist at the same levels.</u></p> <p><u>Over time, existing structures or infrastructure may deteriorate, potentially posing a risk to the safety of visitors. Deterioration of the existing structures would pose a significant hazard, especially in environments prone to natural disasters. As buildings age, their structural integrity weakens, making them more vulnerable to damage from forces like high winds, flooding, or seismic activity. Issues such as weakened foundations, rusting supports, or cracks in walls and roofs increase the risk of collapse or structural failure during adverse conditions. In coastal areas, exposure to saltwater and rising sea levels could accelerate wear on buildings, making them more susceptible to storm damage or flooding. Deteriorating structures may also not withstand seismic activity, endangering the safety of occupants and surrounding structures. Failing to address these issues through regular maintenance and repairs can lead to costly damages, increased safety risks, and reduced disaster preparedness.</u></p> <p><u>Ultimately, if not properly maintained, deteriorating structures can collapse resulting in injuries, loss of life, making disaster response and recovery efforts more challenging.</u></p>	<p><u>Denser development near the shoreline increases vulnerability of SLR and flooding as more infrastructure, buildings, and people are concentrated in areas at high risk from natural hazards. As sea levels continue to rise due to climate change, coastal areas face a greater likelihood of flooding, both from regular tidal movements and from storm surges during extreme weather events. Densely built developments near the shoreline have increased vulnerability to coastal erosion, storm surges, and flooding, leading to greater damage to property, higher repair costs, and potential displacements of businesses. In response, buildings in vulnerable areas would need to be elevated to consider SLR and other design mitigation measures would need to be considered.</u></p> <p><u>Maximum development of the Cove Property would result in less permeable open space and landscaped area which could increase risks for flooding and the urban heat island effect.</u></p> <p><u>This alternative could include new structures within the shoreline setback area. This would require the Applicant to pursue an SSV approval. However, development within the shoreline setback area pose future safety risks, as this area is vulnerable to flooding and wave action during storms. Additionally, development within this area may result in adverse impacts to natural resources or processes in the coastal zone.</u></p>	<p><u>A resort hotel near the shoreline may have increased exposure to natural hazards such as SLR and flooding, which could significantly impact infrastructure and operations. SLR may lead to coastal erosion, permanent loss of land, and increased flooding, affecting the resort's facilities and accessibility. Hurricanes could bring destructive high winds, heavy rainfall, and storm surges, which could damage buildings, disrupt services, and endanger the safety of guests and staff. In response, buildings in vulnerable areas would need to be elevated to consider SLR and other design mitigation measures would need to be considered.</u></p> <p><u>Development of a resort hotel would result in a more intensive use of the property and built environment providing less permeable open space and landscaped area which could increase risks for flooding and the urban heat island effect.</u></p>	<p><u>New structures and proposed site plans for the redevelopment of the Cove Property will be designed in accordance with State and City building codes, including specific standards to ensure structures withstand the potential impacts of natural disasters, such as hurricanes, earthquakes, SLR or flooding.</u></p> <p><u>The Project will encourage planning for natural hazards with resilient infrastructure design and sustainable land-use practices to minimize the risk of SLR and flooding.</u></p> <p><u>Landscaped, permeable open space will be integrated throughout to mitigate potential flooding and the urban heat island effect. The open spaces will reduce surface runoff, promote infiltration, manage stormwater, improve water quality, and enhance overall resilience to extreme weather events.</u></p> <p><u>No structures will be built within the Flood Zone VE of the Project site. To mitigate flooding risks, planned buildings will be set back at least 60 feet from the shoreline, with the nearshore area maintained as open space to act as a natural buffer. The coastline will be landscaped to function as a vegetated buffer. The Cove's structures will be elevated 8 to 19.5 feet above sea level to address potential future impacts from SLR and flooding.</u></p>
Hazardous Wastes and Materials	<p><u>No generation of new hazardous waste and materials would occur under the No-Action Alternative. If hazardous materials are already existing within the structures, they will be managed appropriately during the removal or demolition process. The handling, transportation, and disposal of these materials would be handled appropriately in accordance with Federal, State, and City regulations.</u></p>	<p><u>With the Delayed Action, the existing structures would remain and no significant changes to the existing use or generation of hazardous wastes and materials would occur until the Project moves forward. Once the Project proceeds, the scale of these impacts would depend upon specific activities related to construction, such as excavation, building materials, use of hazardous materials and handling. At that point, mitigation measures and regulatory compliance would be required.</u></p>	<p><u>Increased density would likely result in the increased use of hazardous materials during construction and operation, which can pose significant risks to the environment and public health if not properly managed. During construction, hazardous materials could include chemicals such as solvents, paints, adhesives, fuels, lubricants, and construction debris which can be toxic, flammable, or harmful to human health and ecosystems. Mitigating these risks would require strict compliance with safety protocols.</u></p>	<p><u>The more extensive use of hazardous materials during construction and hotel operations would occur with the development of a resort hotel which would increase the potential for environmental and safety risks. During construction, hazardous materials might include chemicals such as solvents, paints, adhesives, fuels, lubricants, and construction debris which can be toxic, flammable, or harmful to human health and ecosystems.</u></p> <p><u>In the operational phase, hazardous materials could be related to the ongoing maintenance of buildings and</u></p>	<p><u>No hazardous materials have been identified on the Cove Property, and no adverse impacts are anticipated. If hazardous materials are identified during demolition and construction, materials will be handled appropriately in accordance with Federal, State, and City regulations. The existing structures will be inspected prior to demolition for asbestos, lead-based paint, fluorescent lights and ballasts, and other indoor environmental quality concerns. Should asbestos be identified on site, the Applicant will coordinate with the HDOH</u></p>

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			regulations, and best practices for handling, storage, and disposal of hazardous materials.	infrastructure, including cleaning agents, pesticides, fuels, or materials used in mechanical systems like HVAC units. Mitigating risks would require strict compliance with safety protocols, regulations, and best practices for handling, storage, and disposal of hazardous materials.	Asbestos Abatement Office of the Noise, Radiation and Indoor Air Quality Branch prior to demolition, and work with contractors who are specifically trained in abatement of asbestos containing materials to safely remove these hazardous materials and limit potential exposure. In the long-term, development of the Project will remove potential hazardous materials from the site, resulting in a safer environment.
Public Services	As the site becomes vacant, the demand on public services such as police, fire, and emergency services are expected to decrease significantly. Without active operations and with fewer people on-site, there would be fewer incidents requiring emergency response, such as fires, accidents, or criminal activities, thereby decreasing the demand for police, fire, or ambulance services. Overall, reduced activity levels would lead to fewer potential hazards or emergencies, lessening the burden on public service resources in the area. However, ongoing maintenance and security of the vacant site would still be important to prevent potential issues like illegal dumping or squatting, which could require attention from public services.	Under this alternative, the site would continue to be patrolled by private security. A temporary reduction in demand for public services such as police, fire, and emergency medical services would occur while the site remains vacant or until development begins. During this time, the absence of active operations would significantly reduce incidents that typically require public services, such as crime, medical emergencies, or fires. However, this reduction is only temporary. Once development begins, the demand for public services is likely to increase to current levels.	Increased density under this alternative would lead to greater demand for police, fire, and emergency medical services. The influx of people, especially in commercial or entertainment areas, could require additional patrols and more frequent responses to incidents. This alternative would likely require increased security on site. Additionally, operational protocols to address emergencies on site while awaiting first responders would be required.	The larger guest volume and extensive operations of a resort could lead to a significant increase in demand for public services, including police, fire, and emergency medical services. Increased private security would likely be required to complement HPD operations. Fire services could also experience increased demand due to larger infrastructure and higher occupancy. Emergency medical services would likely face increased demand with more guests and staff leading to higher likelihood of medical emergencies on site while awaiting first responders would be required. Additionally, maintenance of public utilities may be required more frequently due to the increase in guest numbers.	Although the proposed redevelopment will increase the de facto on-site population during operating hours, the Preferred Alternative is not anticipated to result in higher demand for public police or fire services. During the Draft EIS public comment period, HPD and HFD did not express concerns with regards to the Proposed Action. During operation of The Cove, additional private security on the property will be evaluated and considered, as needed. Coordination with BWS and HFD will be ongoing to ensure that the water supply provided on-site is capable of meeting required fire flow for fire protection needs. To ensure the provision of adequate fire apparatus access per the requirements of the NFPA One fire code, construction drawings will be submitted to HFD for review. Additionally, new structures will be adequately equipped with fire protection equipment to ensure safety. See <i>Section 4.6</i> for further discussion. Long-term operation of The Cove may impact the need for emergency medical services. Operations at The Cove will incorporate protocols to address emergencies on site while awaiting first responders.
Roadways and Circulation	The TIR conducted for the Project analyzed Without Project conditions under Year 2027 (<i>Section 4.7.1</i>). These conditions could be compared with the No-Action alternative. Under Year 2027 Without Project conditions, traffic operations are expected to remain similar to baseline conditions (<i>Table 4.4</i>).	The TIR conducted for the Project analyzed Without Project conditions under Year 2027 (<i>Section 4.7.1</i>). These conditions could be compared with the property vacancy phase of the Delayed Action alternative. Under Year 2027 Without Project conditions, traffic operations are expected to remain similar to baseline conditions (<i>Table 4.4</i>). While the property is vacant, traffic levels in the surrounding would, in general, remain similar to existing conditions. The cessation of entertainment	The relationship between density and traffic impacts is influenced by several factors, such as the types of activities or services offered within the new structures, the capacity of existing roadways, and the effectiveness of parking and traffic management strategies. A building area of up to 30 percent – over double of what is proposed at 13.84 percent – could involve higher-capacity venues, restaurants, or retail spaces, which may result in a higher volume of visitors, employees, and service	Increased traffic from hotel guests and staff would likely occur due to an overall increase in the number of users on the existing roadways. In addition, ongoing operational services for a development of this scale would likely require increased deliveries and maintenance activities which could cause an increase in traffic. A more specific study of the proposed program would be needed to determine the potential traffic impacts.	Upon completion of construction in 2027, the redevelopment of The Cove is not anticipated to adversely affect traffic operations in the vicinity of the Project area. Traffic operations in the vicinity of the Project area are generally expected to remain similar to baseline and Without Project conditions. Based on the analysis of the traffic data, the TIR recommends the preparation of a robust Traffic Management Plan along with TDM measures as

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	The cessation of entertainment shows at the site could potentially lead to a reduction in traffic.	shows at the site could potentially lead to a reduction in existing traffic. Prior to the start of the Project, a traffic study would be needed to adjust the horizon year of the redevelopment and determine the level of potential impacts and, if appropriate, recommend mitigation measures.	deliveries, thus potentially causing a more substantial increase in traffic. A more specific study of the proposed program would be needed to determine the potential traffic impacts. In addition, higher density may result in potential secondary impacts, such as increased air pollution from vehicle emissions and noise pollution from traffic. Under this alternative, mitigation measures would be needed to manage the increased traffic and maintain safe and efficient circulation. This would require more in-depth study.	This increase in traffic may also introduce several environmental concerns. Higher vehicle emissions could contribute to reduced air quality in the area, particularly during peak traffic hours. Additionally, increased noise pollution from the continuous flow of vehicles could disturb the surrounding natural environment and nearby residential areas. A resort hotel would likely require construction of a parking facility, which could result in increased surface runoff from additional paved areas. Under this alternative, mitigation measures would be needed to manage the increased traffic and maintain safe and efficient circulation. This would require more in-depth study.	discussed in <i>Section 4.7.1</i> be incorporated into the final Project design. A determination on the appropriate measures will be made as the Project progresses. The new amphitheater/performing arts venue is expected to house lū'au events similar to existing uses with a maximum capacity similar to the average nightly attendance of the current lū'au show. As such the new amphitheater/performing arts venue is not anticipated to generate additional new trips to the Project site. In addition, synergy between the existing and proposed uses within the surrounding area is anticipated, with a significant portion of trips associated with the ancillary restaurant and retail uses expected to be made via non-motorized modes given the availability of improved pedestrian facilities in the vicinity of the Project area. Although traffic operations are generally expected to remain similar to Without Project conditions, the TIR recommends preparation of a parking and loading management plan to identify management strategies to address potential issues with parking and loading operations. Accordingly, a PMP has been prepared and is discussed in <i>Section 4.7.3</i> . In addition, since a high portion of trips to the Project site is expected to be made via non-motorized modes, consideration should also be given to incorporating pedestrian and bicycle improvements to increase pedestrian visibility while traversing the Project site. With the implementation of the aforementioned recommendations, the proposed Project is not expected to have a significant impact on the surrounding roadway network. Comprehensive discussion on the measures to mitigate these risks are discussed in <i>Section 4.7</i> and summarized in <i>Table 1.1</i> .
Parking	With the cessation or reduction of activities on-site, parking demands would decrease, resulting in minimal or non-existent parking needs. The No-Action alternative would have a	If the site remains vacant or underutilized for an extended period, the need for parking would be minimal or non-existent. When the site is redeveloped, future projects, regardless of the	With increased density of up to 30 percent, parking demands would rise significantly, which could potentially impact local circulation, traffic patterns, and the overall functionality of the surrounding	The construction of a resort hotel would potentially significantly increase parking demand due to the influx of hotel guests, visitors, and staff. Substantial improvements to parking infrastructure would likely be	The Proposed Action proposes to retain and reconfigure the existing parking serving the Cove Property. As such, no environmental impacts related to stormwater runoff, urban heat island

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	<p>noticeable impact on the use of space, traffic pattern and overall site functionality, as the previously necessary infrastructure for accommodating vehicles would no longer be required at the same capacity. Without the need to accommodate vehicles, the existing parking lot would become an underutilized space, failing to maximize the property's potential. Additionally, the removal of structures and reduction in site use could leave the site lacking in vibrancy, creating a vacant appearance along the main thoroughfare of Ali'inui Drive.</p>	<p>timeline, would still need to effectively manage parking. Similar to the Proposed Action, mitigation measures to ensure that the Project supplies adequate parking to meet demand would be required.</p>	<p>transportation infrastructure. While the Proposed Action at 13.84 percent building area can effectively meet parking demand through the use of well-planned management strategies, parking required for a development with 30 percent building area would not be able to be accommodated on the site in its current configuration. Accommodating this increased density would likely require substantial parking upgrades, such as construction of a multi-level parking structure, which would be inconsistent with the character of the shoreline area. This could potentially reduce open space on the property. A higher density design would potentially involve considerable alterations to the site's parking infrastructure to effectively meet the demands of higher activity levels.</p>	<p>required, potentially requiring the development of a multi-level parking structure to accommodate the expected volume. Adverse environmental impacts attributed to a large parking structure include increased impervious surface and related stormwater runoff concerns, increased contribution to urban heat island effect, habitat disruption, and visual impacts. Other potential considerations, such as off-site parking facilities, would be needed but would not be possible. The anticipated increase in parking demand from hotel guests and staff would likely negatively impact the surrounding area.</p>	<p>effect, or visual resources are anticipated, as the environmental conditions will be similar. The anticipated parking demand for the Project is discussed in <i>Section 4.7.3</i>. The estimated peak parking demand of 475 stalls exceeds the proposed supply of 396 stalls. As such, to mitigate potential environmental impacts related to parking congestion, parking management strategies will be implemented and may include, but not be limited to, parking charges, mandatory valet, incentives for rideshare services, promoting alternative transportation, and managing beach parking. These strategies will be finalized and adjusted as the Project progresses based on operational needs. The anticipated parking demand was estimated using industry best practices and available information. A determination on the parking management strategies to be implemented will be made as the Project progresses. As the PMP notes, parking demand at the Project site will depend on the popularity of the establishments and visitor experiences. As such, demand may change based on a variety of factors. The benefit of applying the recommended strategies is that they provide a series of levers that can manage demand through parking charge modifications and supply management. It is anticipated that the Project sponsor will need to adjust the parking program after the introductory valet period and throughout the Project operations to achieve a balance between demand and visitor satisfaction. As operation of the Project progresses, the Applicant reserves the flexibility to make adjustments to this strategy as needed. Additionally, because of the lack of on-street parking and access restrictions in the adjacent resort area, spillover into adjacent neighborhoods is not feasible given the security of gated communities and surrounding properties. With the implementation of parking management strategies, Project parking demand is expected to be accommodated within the proposed parking supply.</p>

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Infrastructure and Utilities	With the No-Action alternative infrastructure demands would decrease from the existing condition, resulting in minimal or non-existent use of utility services such as water, electricity, wastewater, and waste management. Overall, the cessation of operations at the site would lead to a decline in the demand for utilities and infrastructure services, minimizing both the cost and environmental impact associated with maintaining these systems. In the absence of activity the site would require minimal infrastructure support, if any.	The impact on infrastructure and utilities will remain minimal until the development progresses. When there is little to no active construction or operational occupancy, the need for infrastructure and utilities will be low and similar to the No-Action alternative. Once the redevelopment moves forward and becomes operational, the demand for infrastructure and utilities would increase and be commensurate with the indicated program.	Increased density on the site would likely attract a larger number of visitors to the Cove Property. Accordingly, this traffic will generate more waste and higher demand on utilities such as water, sewer, wastewater, and electrical systems. These services are crucial for support of day-to-day operations and increased usage will place additional strain on existing infrastructure. To support the increased demand for utilities, infrastructure upgrades may be required. The water supply system may need enhancements to ensure adequate pressure and volume for increased usage. Similarly, additional density on the Cove Property would result in greater wastewater flows, potentially exceeding the limitations set under the Kapolei Interceptor Sewer Assessment Agreement. Unlike what is possible for the Preferred Alternative, re-allocation of sewer capacity within the master planned tributary area to such a development is unlikely to be accommodated. As such, upgrades to the sewer system might be necessary to accommodate the increased flows and avoid potential overflow issues or disruptions in service. The higher lot coverage (up to 30 percent) means more paved and built-up surfaces, which could lead to increased stormwater runoff that would need to be managed on site. Without proper stormwater management infrastructure, there is a risk of flooding, erosion, and water quality issues. Additional LID measures would need to be designed to mitigate the impact of increased runoff and protect coastal resources. Overall, the Alternative Design would impose higher demands on existing infrastructure, including water supply, wastewater systems, solid waste management, electricity, traffic flow, and stormwater management. To support the increased density, significant infrastructure upgrades and careful planning would be essential.	The construction of a resort hotel includes various programmatic elements such as guest accommodations, amenities (e.g., swimming pools, spas, restaurants), and around-the-clock operations. This program would generate a significantly higher demand for infrastructure. Such demand on utilities and infrastructure would likely require significant capacity upgrades to ensure that service can meet the needs of the expanding demand. Resorts typically require substantial resources to operate effectively, especially as they cater to large number of guests, employees, and facilities, often at all hours of the day. Resorts, especially those with amenities such as swimming pools, spas, restaurants, and landscaped grounds, have an especially high demand for water. Guests also require water for basic activities such as bathing, drinking, and recreational uses, while resort operations depend on water for laundry, irrigation, kitchen facilities, and cleaning. Higher volumes of wastewater would also be expected, as the expected wastewater flows would exceed limitations allotted under the Kapolei Interceptor Sewer Assessment Agreement. Re-allocation of sewer capacity within the master planned tributary area to such a development is unlikely to be accommodated; therefore, development of a resort hotel would therefore likely require sewer system upgrades. Resorts also generate large amounts of solid waste requiring proper waste management infrastructure and disposal services. In addition, operating a resort would require considerable electricity, particularly for HVAC systems, lighting, entertainment facilities, kitchens, elevators, and various guest amenities. Existing electrical infrastructure would likely need upgrades to ensure consistent power supply and prevent outages. A resort hotel would likely result in higher lot coverage of the property which could lead to increased stormwater runoff that would need to be managed on site. Without proper stormwater management infrastructure, there is a risk of flooding, erosion, and water quality issues. Additional LID measures would need to be designed to mitigate the impact of increased runoff and protect coastal resources.	Redevelopment of the Cove Property would increase utility and infrastructure demands as discussed in <i>Section 4.8</i> , but impacts would be manageable with appropriate planning. BWS verified water availability and confirmed that the City system could accommodate the Project's anticipated water needs. Non-potable or irrigation water demand is not anticipated to increase from the existing conditions for the Project. Wastewater demand is anticipated to increase. To meet the anticipated wastewater demand for the Project, the Applicant is coordinating with the City to update the sewer connection application and allocation of sewer capacity within the master planned tributary area, as allowed under the Kapolei Interceptor Sewer Assessment Agreement. Additionally, the following design features may be considered to reduce the projected wastewater demand flows, including, but not limited to: <ul style="list-style-type: none"> • Implement black water and gray water systems in accordance with City and State regulations (gray water system could account for up to 50% of the total wastewater generation) • Consider restaurant occupancy rate factor • Establish restaurant dining times (breakfast, lunch, & dinner versus lunch & dinner only) • Reduce restaurant seat density factor • Reduce restaurant size • Consider low flow fixtures to reduce wastewater generation rates In the short-term, solid waste will be generated from demolition and construction activities. Long-term the Project will not have a significant impact on the City's waste stream and disposal to the H-POWER Plant. The Cove will implement recycling efforts to minimize solid waste. Electrical and telecommunications demand is not anticipated to increase significantly. Based on the existing service, electrical service is anticipated to be

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				Overall, developing the Cove Property as a resort hotel would not only require substantial infrastructure improvements but would also create significant ongoing operational demands on water, wastewater, solid waste, and electricity systems. The feasibility of this alternative would heavily depend on the property's ability to accommodate the necessary utility upgrades and the associated costs and impacts.	provided from Ali'inui Drive and may utilize the existing on-site electrical system
Noise	Noise levels would decrease due to the absence of commercial activities, including the lū'au, and visitors. Traffic-related noise adds to the overall sound environment. Without the flow of visitors and associated vehicular traffic, the Project site and vicinity would be expected to become quieter than the existing condition and less congested during peak show hours.	Under this alternative, if the current commercial lū'au ceases operations, there would be an immediate reduction in noise levels in the surrounding area. Noise levels in the area would remain relatively constant until construction or new operational activities begin. If construction or new operational activities are initiated at a later date, temporary noise impacts attributed to construction activities, which typically tend to generate substantial noise through the use of heavy machinery, equipment, and increased traffic, would occur. Potential noise impacts would be mitigated through the implementation of standard construction BMPs and compliance with local noise regulations articulated in HAR, Title 11, Chapter 46. Following construction, the introduction of new activities on the site would increase noise levels, likely to same level as exists with the current operation. However, the degree of noise impact would depend on the nature and intensity of the new operations. The impact of increased noise can be managed through proper planning and noise mitigation measures.	Construction activities and higher-density use of a site would lead to increased noise levels than the current condition, which encompasses approximately 4.97 percent of lot area. During construction, noise levels would likely increase due to the operation of heavy machinery, equipment, and tools used in building and site preparation. Potential noise impacts would be mitigated through the implementation of standard construction BMPs and compliance with local noise regulations articulated in HAR, Title 11, Chapter 46. Once the development is completed, noise levels would likely remain elevated due to the higher-density use of the site. In areas with higher-density, more noise would be expected. This alternative would require long-term noise management strategies to minimize the impact on surrounding areas. Potential long-term solutions could include sound barriers, thoughtful scheduling/operational control, and soundproofing measures.	Construction and operation of a resort hotel would increase noise levels in the area, especially during peak guest periods. The noise from construction can be particularly disruptive. Potential noise impacts would be mitigated through the implementation of standard construction BMPs and compliance with local noise regulations articulated in HAR, Title 11, Chapter 46. Once construction is complete and the hotel is operational, noise levels would remain elevated due to the continuous nature of hotel activities. Hotels are bustling environments, with guests arriving and departing, staff performing daily operations, and maintenance crews attending to routine tasks. Guest arrivals and departures contribute to increased vehicle noise. Outdoor events with amplified sound, pool areas, and restaurants often generate additional noise. During peak times, the noise generated by these activities can disrupt the surrounding community. To mitigate the impact of the elevated noise levels during peak hotel periods, sound management measures would be necessary. Effective noise mitigation strategies, including sound barriers, thoughtful scheduling/operational control, and soundproofing measures, would be needed to manage the increased noise and minimize its impact.	Unavoidable, but temporary, noise impacts may occur during construction of the Project. Because construction activities are predicted to be audible at neighboring and properties beyond, the quality of the acoustic environment may be temporarily degraded. However, these anticipated construction noise levels are not extreme and are similar to existing background noise levels measured along Ali'inui Drive. Prior to the start of construction, a noise permit will be obtained from HDOH in accordance HAR, Title 11, Chapter 46. As discussed in <i>Section 4.9</i> , long Ali'inui Drive, predicted increases in traffic noise levels are not considered to be significant. The most significant acoustical change from existing conditions will be the replacement of the existing amphitheater and lū'au show stage with a new amphitheater at the northwest corner of the site. Amplified sound from the planned lū'au show at the new amphitheater/ performing arts venue may continue to spill over to adjacent areas, potentially impacting noise sensitive receptors (i.e., residential areas) in the surrounding neighborhood. Given the reduced buffer distances between the planned amphitheater and Kai Lani at Ko Olina, a three to four dBA reduction of spillover sound levels will be required to mitigate the potential noise impacts and ensure that amplified sound remains comparable to existing conditions. The new amphitheater's sound amplification system is being designed to achieve the three to four dBA reduction while maintaining current maximum program sound levels within the audience seating area. This mitigation measure will ensure that the new amphitheater will maintain the existing sound levels of the current

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					<p><u>lū'au show. The final design of the sound system will be determined as the Project progresses.</u> Preservation-zoned land to the north and east of the Cove Property will continue to mitigate the potential increase in noise levels by acting as a buffer between the site and the residential areas of Kai Lani at Ko Olina and The Coconut Plantation – Ko Olina. Given the relocation of the amphitheater, it is estimated that the planned commercial entertainment shows will be approximately 11 dBA quieter along the south property line. Sound abatement may be integrated into the venue to mitigate potential noise impacts on the surrounding area. See <i>Section 4.9</i> for further discussion.</p>
Socio-Economic Conditions	<p><u>If the No-Action alternative is pursued, meaning that no new development or project occurs, no new jobs would be created, leading to the loss of potential short- and long-term employment opportunities associated with redevelopment of the Cove Property. The No-Action Alternative would also result in missed opportunities for generating additional tax revenue and would reduce potential consumer spending. A vacant or underutilized site could detract from the area's visual appeal and vibrancy, potentially affecting the perception of the overall region.</u></p>	<p><u>However, the long-term potential for new employment opportunities would be available once the development is completed. As construction progresses and the new facilities are near completion, a range of new jobs would likely be created. The economic effect of job creation can stimulate the local community and benefit the economy. Proactive planning and support for displaced workers during the delay of the project would be key to ensuring a smooth transition and maximizing the benefits of new job creation.</u></p>	<p><u>The redevelopment of the Cove Property would lead to significant job creation, driving positive economic impacts for both the local community and the broader region. With a higher-density development covering up to 30 percent of building area, a wide range of employment opportunities would become available during short-term construction and long-term operation. Job creation would not only benefit individuals seeking work but also stimulate broader economic growth. Positive economic impacts include increased consumer spending, business growth, and local tax revenue. The multiplier effect further stimulates additional job creation and economic activity.</u></p>	<p><u>Construction of a resort hotel at the property would likely bring significant employment opportunities across various sectors, such as hospitality, food and beverage, maintenance, customer service, management, and event coordination, boosting the overall number of jobs in the community. The hotel would generate a variety of jobs, both during the construction phase and operational phase. In addition, the hotel would attract visitors contributing to the local economy through increased spending at the hotel, restaurants, and businesses.</u></p>	<p><u>The development of the Cove Property would lead to significant job creation and offer considerable local economic benefits. The benefits extend beyond the immediate hiring opportunities to include long-term positive impacts on the local economy, such as increased spending, business growth, and enhanced tax revenues. In addition to the commercial success of the Project, the development of the Cove Property would balance economic benefits with community integration by ensuring local culture, values, and quality of life are maintained.</u></p> <p><u>Over an estimated 24-month construction period, the Proposed Action is anticipated to generate or sustain approximately 900 (873 FTE) direct jobs in addition to 152 (148 FTE) indirect and 377 (366 FTE) induced jobs for an estimated total of 1,429 jobs (1,386 FTE).</u></p> <p><u>Once in operation, the Project is anticipated to generate or sustain approximately 583 (484 FTE) direct jobs, in addition to 121 (100 FTE) indirect and 113 (94 FTE) induced jobs, for an estimated total of 817 jobs (678 FTE) annually.</u></p> <p><u>Approximately \$4.6 million in State of Hawai'i government revenue is estimated to be generated or sustained from Project operations, annually. Additionally, Approximately \$2.1 million in City</u></p>

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					<p>government revenue is estimated to be generated or sustained during Project operation.</p> <p>The commercial success and economic benefits of the Proposed Action would be balanced with the needs and values of the local community. By showcasing “Made in Hawai’i” products and promoting local artisans, the Project aims to foster economic growth that benefits the entire region. In addition, the Cove Property will present opportunities for local businesses to integrate into the commercial environment.</p> <p>The redevelopment of the Cove Property would lead to significant job creation and provide substantial economic benefits. By supporting small businesses the Project can enhance both the economic and social fabric of the community. Balancing economic success with community integration is essential and would not only drive commercial success but also foster long-term community support and sustainable growth, benefiting both the development and the surrounding region.</p>
Visual Resources	<p>The removal of existing structures would open the landscape, creating more open space and remove minor obstructions in the visual environment. This might initially seem beneficial; however, once the structures are removed, the vacant land may not be a visually appealing as an actively developed site, leading to aesthetic.</p> <p>The absence of structures could leave the land looking barren, particularly if there is no immediate plan to redevelop the property or transform it into a functional space. Empty lots without landscaping or purposeful use may appear desolate, and overgrown, lacking the vibrancy that an active development brings. Moreover, vacant lots could attract undesirable activities, further detracting from the appeal of the site.</p>	<p>Under this alternative, demolition of existing structures would open the landscape, creating more open space, and remove minor obstructions in the visual environment. Should demolition of existing structures take place at a later time under the Delayed Action alternative there would be no immediate visual changes to the landscape, as the site would remain in its existing state without new development or construction activity. As such, the area’s visual character, including its skyline, site appearance, and general aesthetic, would stay the same.</p> <p>Eventual redevelopment of the Cove Property would result in similar potential impacts to the Proposed Action (see <i>Section 4.11</i>).</p>	<p>A denser development covering up to 30 percent of the lot area could significantly alter the visual landscape, potentially impacting scenic views and the overall aesthetic of the area. More prominent structures could transform the visual identity of the area by introducing new taller vertical elements that stand out against the existing skyline, disrupting the visual continuity and contrasting with the surrounding environment.</p> <p>With a denser development, more structures would occupy the property, significantly increasing the built environment while reducing the amount of open space. The expanded footprint of buildings could overshadow natural areas, leaving less room for open vistas. Landscaping may not be able to adequately screen the development impacting the visual character of the area.</p>	<p>The development of a resort hotel would significantly and visibly alter the existing landscape, potentially transforming the character of the Cove Property. This type of large-scale development would require a Zoning Change to accommodate the resort’s larger footprint and height. A resort hotel, especially one featuring multiple stories, large guest capacities, and expansive amenities such as pools, restaurants, and event spaces, would introduce a major new visual element to the area. The construction of such a facility would likely significantly impact sightlines in the surrounding environment.</p> <p>Overall, the construction of a resort hotel has the potential to significantly alter the visual landscape, impacting the skyline, obstructing scenic views, and changing the character of the area.</p>	<p>The Cove will consist of a low building profile. Structures will range from 13.0 to 36.5 feet height, adhering to the 40-foot height limit of the B-1, Neighborhood Business District. Redevelopment of The Cove is not anticipated to adversely impact significant views identified in the ‘Ewa DP, as summarized in <i>Table 4.19</i></p> <p>The Proposed Action plans for a lot coverage of approximately 13.84 percent of the parcel, well under to the 30 percent lot coverage limit. As such, and open space will continue to be preserved and maintained at the Project site. Planned structures will be set back at least 60 feet from the shoreline, helping to retain lateral coastal views along the Wai’anae coast and views of significant features, such as Pu’u o Hulu Kai.</p> <p>Views of the Cove Property from the beach side will be renewed with the construction of a more contemporary and authentic Hawaiian gathering place. The redevelopment of the Cove Property includes improved landscaping and a culturally sensitive design inspired by both contemporary</p>

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					<p><u>and Hawaiian architecture to provide a welcoming and authentic setting. To enhance the ocean views afforded throughout the Cove Property, open-air structures and pavilions consisting of clean, natural, and textured materials will be constructed. By thoughtfully integrating the development into its natural and cultural environment, these design strategies can mitigate the visual impact of new buildings and create a harmonious relationship between the built environment and the surrounding area. This approach preserves the character and identity of the Cove Property while also fostering a sense of place that resonates with both local residents and visitors.</u></p> <p><u>Open spaces and pedestrian-friendly areas will be incorporated to creating a cohesive and inviting gathering space.</u></p> <p><u>Landscaping will play a significant role in expressing culturally resonant themes and experiences throughout The Cove Redevelopment. The use of native plants and drought-resistant species in the landscaping will not only enhance visual appeal but also support sustainability. Existing landscaping along Ali'inui Drive used for screening will remain in place to continue to screen the site.</u></p> <p><u>The planned redevelopment is not expected to adversely impact views of the ocean from Farrington Highway. The Cove occupies a small portion of the overall viewshed, and the existing landscaping and surrounding resort structures will continue to effectively screen The Cove.</u></p>

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Agencies and Parties Consulted

Section 7

Agencies and Parties Consulted

7.1 Consultation List

The EISPN was published by the ERP in *The Environmental Notice* on June 23, 2021 to notify agencies, organizations, and individuals that a Draft EIS would be prepared for the Project. Publication of the EISPN was followed by a 30-day public comment period to solicit guidance on the scope of the studies to be prepared and to gather input on important topics to be covered in the Draft EIS. *Table 7.1* lists those agencies, organizations, and individuals that received notification of the EISPN publication. A total of 18 agencies and individuals provided responses during the EISPN public comment period.

Subsequently, ~~those listed in *Table 7.1* will also be~~ were notified of the availability of ~~this the~~ Draft EIS in conjunction with the publication of *The Environmental Notice*. *Table 7.1* has been updated to reflect those agencies, organizations, and individuals that provided written comments during the public comment period for the Draft EIS. A total of 46 agencies, organizations, and individuals provided comments on the Draft SEIS (*Table 7.1*). Copies of each comment letter are provided in *Appendix A-2* and responses to the comments are provided in *Table 7.3* of *Section 7.5*.

Table 7.1: Agencies, Organizations and Individuals Receiving Copies of the Draft EIS				
Respondents and Distribution	Early Consultation	Received Early Consultation EISPN Comments	Receiving Received Draft EIS Notification	Draft EIS Comments Received
Federal Agencies				
U.S. Fish and Wildlife Service (USFWS)	X	X	X	<u>X</u>
State of Hawai'i Agencies				
Department of Agriculture			X	
Department of Accounting and General Services (DAGS)	X	X	X	<u>X</u>
Department of Business, Economic Development & Tourism (DBEDT)	X		X	
DBEDT, Energy Division	X		X	
DBEDT, Office of Planning and Sustainable Development	X		X	
Department of Defense	X		X	<u>X</u>
Department of Education	X	X	X	<u>X</u>
Department of Hawaiian Homelands (DHHL)	X		X	

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Respondents and Distribution	Early Consultation	Received Early Consultation EISPN Comments	Receiving Received Draft EIS Notification	Draft EIS Comments Received
Department of Health (HDOH) ¹	X	X	X	
Department of Human Services (DHS)	X	X	X	<u>X</u>
Department of Labor and Industrial Relations	X		X	
Department of Land and Natural Resources (DLNR) ²				
<u>Commission on Water Resource Management (CWRM)</u>	<u>X</u>		<u>X</u>	<u>X</u>
<u>Division of Aquatic Resources (DAR)</u>	<u>X</u>		<u>X</u>	<u>X</u>
<u>Division of Forestry and Wildlife (DOFAW)</u>	<u>X</u>	<u>X</u>	<u>X</u>	<u>X</u>
<u>Engineering Division</u>	<u>X</u>	<u>X</u>	<u>X</u>	<u>X</u>
<u>Office of Conservation and Coastal Lands (OCCL)</u>	<u>X</u>	<u>X</u>	<u>X</u>	<u>X</u>
<u>DLNR, State</u> Historic Preservation Division	X		X	<u>X</u>
Department of Transportation (HDOT)	X	X	X	<u>X</u>
Hawaii Tourism Authority	X		X	
Office of Hawaiian Affairs	X		X	<u>X</u>
University of Hawai'i, West O'ahu	X		X	
City and County of Honolulu Agencies				
Board of Water Supply (BWS)	X	X	X	<u>X</u>
Department of Community Services (DCS)	X	X	X	<u>X</u>
Department of Design and Construction (DDC)	X	X	X	<u>X</u>
Department of Environmental Services (ENV)	X		X	
Department of Facility Maintenance (DFM)	X	X	X	<u>X</u>
Department of Planning and Permitting (DPP)	X	X	X	<u>X</u>
Department of Parks and Recreation (DPR)	X	X	X	
Department of Transportation Services (DTS)	X	X	X	
Honolulu Fire Department (HFD)	X		X	<u>X</u>
Honolulu Police Department (HPD)	X	X	X	<u>X</u>
Wai'anae Coast Neighborhood Board No. 24	X		X	
Kapolei/Makakilo/Honokai Hale Neighborhood Board No. 34	X		X	
Office of Climate Change, Sustainability, and Resiliency			X	

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Respondents and Distribution	Early Consultation	Received Early Consultation EISPN Comments	Receiving Received Draft EIS Notification	Draft EIS Comments Received
Elected Officials				
U.S. Senator Brian Schatz			X	
U.S. Senator Mazie Hirono			X	
U.S. Representative Ed Case, First Congressional District			X	
State Senator Maile Shimabukuro, District 21	X		X	
State House Representative Kanani Souza, District 43 ³	X		X	
Mayor Rick Blangiardi and Managing Director Michael Formby	X		X	
City Council District Representative Andria Tupola, District 1	X		X	
City Council Chair Tommy Waters, District 4			X	
City Council Committee on Planning and Economy Chair Esther Kia'āina, District 3 ⁴			X	
City Council Committee on Zoning Chair Calvin K.Y. Say, District 5 ⁴			X	
Libraries				
Kapolei Public Library	X		X	
Hawai'i Documents Center, Hawai'i State Main Library	X		X	
Native Hawaiian Groups and Descendant Groups				
Cultural Descendants ⁵			X	
Native Hawaiian Chamber of Commerce			X	
Native Hawaiian Hospitality Association			X	
O'ahu Island Burial Council			X	
Individuals and Organizations				
Blue Zones 'Ewa-Kapolei	X		X	
Council for Native Hawaiian Advancement	X		X	X
Hawai'i Chamber of Commerce	X		X	
Hawai'i Hotel Association	X		X	
Hawai'i Lodging and Tourism Association	X		X	
Honolulu Star Advertiser	X		X	

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Respondents and Distribution	Early Consultation	Received Early Consultation EISPN Comments	Receiving Received Draft EIS Notification	Draft EIS Comments Received
Kapolei Chamber of Commerce	X		X	
<u>Kai Lani Association of Apartment Owners (AOAO)</u>				X
<u>Ko Olina Community Association, Inc. (KOCA) and Ko Olina Resort Operators Association, Inc. (KORA)</u>		X	X	X
<u>Ko Olina Development LLC</u>				X
<u>Ko Olina Marina</u>				X
<u>Kuleana Coral Restoration</u>				X
<u>Marriott Vacation Club</u>				X
Native Hawaiian Hospitality Association	X		X	
<u>Sierra Club</u>				X
Ulu A'e Learning Center Kapolei	X		X	
Wai'anae High School, Seariders Productions	X		X	
Wai'anae Rotary Club	X		X	
Wai'anae Coast Economic Development Council	X		X	
<u>Carla L. Kozak</u>				X
<u>Cornel Catuna</u>				X
<u>Dale Fishell</u>				X
<u>Douglas Meller</u>				X
<u>Eileen and Steve Meuris and Marguerite Casillas</u>				X
<u>Elizabeth and Richard Rubinstein</u>				X
<u>Greg Nichols, Ko Olina Golf Club</u>				X
<u>J. Kimo Alama Keaulana</u>				X
<u>Kamaki A. Kanahele</u>				X
Karen Messick		X	X	X
Kathryn N.		X	X	
<u>Marilyn Harvey-Heinz and Don Heinz</u>				X
<u>Nicolas Politsch</u>				X
<u>Peter Togawa</u>				X
<u>Pieter and Claire van Wingerden</u>				X
<u>Veronique Jones</u>				X
<u>Warren Miles</u>				X

Table 7.1: Agencies, Organizations and Individuals Receiving Copies of the Draft EIS				
Respondents and Distribution	Early Consultation	Received Early Consultation EISPN Comments	Receiving Received Draft EIS Notification	Draft EIS Comments Received
<u>William and Sara Barnes</u>				X
Utilities				
Hawaiian Electric Company			X	X
Hawaiian Telcom			X	
Spectrum			X	

- ¹ Individual comments provided by the HDOH Clean Air Branch.
- ² Individual comments provided by following DLNR divisions: Commission on Water Resource Management, Engineering Division, Division of Aquatic Resources, Division of Forestry and Wildlife, Engineering Division, and Office of Conservation and Coastal Lands, and the State Historic Preservation Division.
- ³ Early consultation was conducted in June 2021 with former Representative Stacelynn Kehaulani Eli.
- ⁴ Early consultation was conducted in June 2021 with former Council Member Brandon Elefante. At the time, Council Member Elefante was the Chair of the former Planning and Zoning Committee. In 2023, the Planning and Zoning Committee was replaced with two committees: the Committee on Planning and the Economy and Committee on Zoning. As such, consultation will resume with the current chairs of these two committees.
- ⁵ See Section 4.2 for detailed information regarding consultation with cultural descendants as part of the CIA.

7.2 EIS Public Scoping Meeting

Publication of the EISPN in *The Environmental Notice* was followed by a public scoping meeting held on July 7, 2021. The meeting was held virtually in alignment with State and City orders related to the COVID-19 pandemic that were in place at the time. Twelve members of the public attended. Community questions and concerns were primarily related to the following: traffic, access, and the environmental review process. The following comments and questions were raised, and received verbal responses:

- 1. Traffic and Pedestrian Safety:** A participant residing in the Ko Olina Resort expressed concern about traffic in the area due to the planned increase of operating hours and use of the property. In particular, the left turn traveling west onto Ali'inui Drive from the adjacent Lanikūhonua parking lot was identified as difficult; as such, a traffic light might be considered at this location.

Following the meeting, a TIR was conducted for the Project. Short-term related construction for the redevelopment of The Cove will increase automobile traffic travelling to and from the site. However, BMPs will be implemented to mitigate the increase in traffic during construction. Upon completion of the improvements, traffic operations in the vicinity of the Project area are generally expected to remain similar to existing traffic conditions. Given the existing resort area, it is anticipated that a significant portion of trips associated with The Cove will be made via non-motorized modes given the improved pedestrian and bicycle facilities. Furthermore, improvements to accommodate on-site vehicular parking, valet services, and tour bus and other ride share programs will adequately accommodate operations at The Cove.

- 2. Access to the surrounding resort:** Two participants expressed concern about existing access to the adjacent resort area, which is currently served by one entrance and exit point at Ali'inui Drive. One of the participants asked about the timeline of development for a proposed second access point to the resort near Honokai Hale, and what impact this would have on traffic traveling further west.

The existing access to the wider resort area is outside the scope of the Project. A TIR conducted for the Project found that traffic operations in the vicinity of the Project area are generally expected to remain similar to existing baseline traffic conditions. Planned pedestrian and parking improvements on site are also anticipated to adequately accommodate operations at The Cove.

- 3. Environmental Review Process:** One participant asked how long the property has been studied for redevelopment, and about the length of the environmental review and permitting process. The Applicant anticipates completing environmental review and obtaining the necessary permitting in early to mid-2025.

7.3 EISPN Comment Letter Summary

A total of 18 agencies and individuals provided comments during the 30-day public EISPN comment period. A summary of comments received and associated responses is provided in *Table 7.2*. Comments are organized by major topics. Copies of each comment letter or email are provided in *Appendix A-1*.

Table 7.2: EISPN Summary of Comments and Responses

Comments	Commenter	Responses
Project Description		
Project Setting and Description: Provide a more detailed description of the "wide range of events." Note that Condition 1 of the Unilateral Agreement (UA), Ordinance No. 89-27, states that the site is limited to "restaurants and retail activity associated with a Hawaiian Theme Park and a commercial lū'au operation."	DPP	The Applicant acknowledges the conditions of the UA (Ordinance No. 89-27). Planned programming, as discussed in <i>Section 3.0</i> , is consistent with the conditions of the agreement.
Development Schedule: Include a timeline and describe any proposed phased development of the Project.	DPP	<i>Section 3.4</i> provides an anticipated timeline for the planned improvements. Redevelopment of the property is expected to commence upon receipt of necessary permits and approvals. Improvements are planned to start as early as 2025 and may be completed by 2027, subject to market conditions.
Biological Resources: Mammalian, Reptilian, and Avian Species		
Federally-listed Threatened or Endangered species that may occur in the project area: Hawaiian hoary bat (<i>Lasiurus cinereus semotus</i>), green sea turtle/honu (<i>Chelonia mydas</i>); band-rumped storm-petrel Hawai'i DPS/'akē'akē (<i>Oceanodroma castro</i>), Hawaiian petrel/'ua'u (<i>Pterodroma sandwichensis</i>), Newell's shearwater/'a'o (<i>Puffinus auricularis newelli</i>), and the wedge-tailed shearwater/'ua'u kani (<i>Ardenna pacificus</i>).	USFWS	The Applicant acknowledges the possibility for these species to occur within or in the vicinity of the Project site.
The State listed Hawaiian hoary bat or 'Ōpe'ape'a (<i>Lasiurus cinereus semotus</i>) has the potential to occur in the vicinity of the project area and may roost in nearby trees. If any site clearing is required this should be timed to avoid disturbance during the bat birthing and pup rearing season (June 1 through September 15). During this period, woody plants greater than 15 feet (4.6 meters) tall should not be disturbed, removed, or trimmed.	DLNR DOFAW	Construction BMPs as recommended by DLNR DOFAW will be implemented to minimize the potential for short-term impacts to the Hawaiian hoary bat. See <i>Section 4.3.4</i> .
The state endangered Hawaiian monk seal (<i>Monachus schauinslandi</i>) and threatened Green Sea Turtle (<i>Chelonia mydas</i>) may potentially occur or haul out on shore within the vicinity of the proposed project site. If either species is detected within 100 meters of the project area all nearby construction operations should cease and not continue until the focal animal has departed the area on its own accord.	DLNR DOFAW	Mitigation measures as recommended by DLNR DOFAW and discussed in <i>Section 4.3.4</i> will be employed if either species is identified at the Project site during the construction period.

Table 7.2: EISPN Summary of Comments and Responses

Comments	Commenter	Responses
<p>The State threatened white tern (<i>Gygis alba</i>) or manu o kū may occur in the vicinity of the proposed Project site. If frequent activity of white terns is observed in trees at the site, DOFAW recommends a qualified biologist survey for the presence of nests and/or nesting behavior prior to any action that could disturb the trees, such as trimming or tree removal. White tern pairs lay their single egg in a branch fork with no nest. The eggs and chicks can be easily dislodged by construction equipment that nudges the trees. If a nest is discovered, DOFAW staff should be notified at (808) 587-0166 for assistance.</p>	<p>DLNR DOFAW</p>	<p>Construction BMPs as recommended by DLNR DOFAW will be implemented to minimize the potential for short-term impacts to the white tern (<i>Section 4.3.4</i>).</p>
<p>Artificial lighting can adversely impact seabirds that may pass through the area at night by causing disorientation. This disorientation can result in collision with manmade artifacts or grounding of birds. For nighttime lighting that might be required, DOFAW recommends that all lights be fully shielded to minimize impacts. Nighttime work that requires outdoor lighting should be avoided during the seabird fledging season from September 15 through December 15. This is the period when young seabirds take their maiden voyage to the open sea. For illustrations and guidance related to seabird-friendly light styles that also protect the dark, starry skies of Hawai'i please visit: https://dlnr.hawaii.gov/wildlife/files/2016/03/DOC439.pdf. If nighttime work is needed, we understand downward and shielded lights will be used. We recommend a monitor be present and if any seabirds are observed circling lights, they should be turned off immediately. Any grounded seabirds should be brought to a permitted rehabber and DOFAW should be notified.</p>	<p>DLNR DOFAW</p>	<p>Construction BMPs as recommended by DLNR DOFAW will be implemented to minimize the potential for short-term impacts to seabirds. See <i>Section 4.3.4</i>.</p>
<p>The HDOT-A requires that the proposed landscaping does not create a wildlife hazard attractant. Please review the FAA Advisory Circular (AC) 150/5200-33C Hazardous Wildlife Attractants On or Near Airports for guidance. If the project results in a wildlife attractant, these effects shall be immediately mitigated by the developer upon notification by the HDOT-A and/or FAA.</p>	<p>HDOT Airports</p>	<p>The Project site is located in the dry 'Ewa region of O'ahu. In order to reduce the risk of potential wildfire hazard, landscaping at the site will be regularly maintained. Landscaping is expected to consist of native, Polynesian-introduced, or tropical trees, palms, shrubs, and ground cover of varying sizes (<i>Figure 3.15</i>).</p>

Table 7.2: EISPN Summary of Comments and Responses

Comments	Commenter	Responses
Biological Resources: Flora		
<p>Federally-listed Endangered plant species that may occur in the Project area: pu'uka'a (<i>Cyperus trachysanthos</i>); dwarf naupaka (<i>Scaevola coriacea</i>); and 'ōhai (<i>Sesbania tomentosa</i>).</p>	<p>USFWS</p>	<p>The listed plant species are not known to exist within the Project site. However, if the noted plant species are identified at the Project site during construction, appropriate BMPs, such as the establishment of buffers, may be implemented as required.</p> <p>The landscaping plan preliminarily includes several native plant species (<i>Figures 3.16 and 3.17</i>). Reintroducing native plant species to the Project site will enhance the coastal setting of The Cove.</p>
<p>DOFAW recommends minimizing the movement of plant or soil material between worksites, such as in fill. Soil and plant material may contain invasive fungal pathogens, vertebrate and invertebrate pests (e.g., Little Fire Ants, Coconut Rhinoceros Beetles), or invasive plant parts that could harm our native species and ecosystems. We recommend consulting the O'ahu Invasive Species Committee at (808) 266-7994 in planning, design, and construction of the project to learn of any high-risk invasive species in the area and ways to mitigate spread. All equipment, materials, and personnel should be cleaned of excess soil and debris to minimize the risk of spreading invasive species.</p>	<p>DLNR DOFAW</p>	<p>Contractors will employ BMPs identified and proposed in <i>Section 4.3.3</i> to mitigate the spread of invasive fungal pathogens, vertebrate, and invertebrate pests or invasive plant parts at the Project site.</p>
<p>DOFAW recommends using native plant species for landscaping that are appropriate for the area (i.e., climate conditions are suitable for the plants to thrive, historically occurred there, etc.). Please do not plant invasive species. DOFAW recommends consulting the Hawai'i -Pacific Weed Risk Assessment website to determine the potential invasiveness of plants proposed for use in the project (https://sites.google.com/site/weed_risk_assessment/home).</p>	<p>DLNR DOFAW</p>	<p>Landscaping at the site is expected to consist of native, Polynesian-introduced, or tropical trees, palms, shrubs, and ground cover of varying sizes (<i>Figures 3.15 and 3.17</i>). See <i>Section 3.3.9</i> for further discussion. Plants have been carefully selected to complement the 'Ewa region and create a lush setting that reflects the cultural heritage of the site.</p>
Construction Air Quality Impacts and BMPs		
<p>If your project requires an Air Pollution Control Permit: You must obtain an air pollution control permit from the Clean Air Branch and comply with all applicable conditions and requirements. If you do not know if you need an air pollution control permit, please contact the Permitting Section of the Clean Air Branch.</p>	<p>HDOH Clean Air Branch (CAB)</p>	<p>The Project does not involve construction or operation of a stationary air pollution source as articulated in HAR, Section 11-60.1-62; therefore, an Air Pollution Control Permit is not anticipated to be required. However, if required, a permit will be obtained (<i>Section 4.2.2</i>).</p>

Table 7.2: EISPN Summary of Comments and Responses

Comments	Commenter	Responses
<p>If your project includes construction or demolition activities that involve asbestos: You must contact the Asbestos Abatement Office in the Indoor and Radiological Health Branch.</p>	<p>HDOH CAB</p>	<p>The Project includes the demolition of existing structures, which are not expected to consist of asbestos. Should asbestos be identified on site, the Applicant will coordinate with the HDOH Asbestos Abatement Office of the Noise, Radiation and Indoor Air Quality Branch prior to demolition, and work with contractors specifically trained in the abatement of asbestos-containing materials to ensure safe removal and limit potential exposure on site (<i>Section 4.5</i>).</p>
<p>You must control the generation of all airborne, visible fugitive dust. Note that construction activities that occur near to existing residences, business, public areas and major thoroughfares exacerbate potential dust concerns. It is recommended that a dust control management plan be developed which identifies and mitigates all activities that may generate airborne, visible fugitive dust. The plan, which does not require Department of Health approval, should help you recognize and minimize potential airborne, visible fugitive dust problems.</p>	<p>HDOH CAB</p>	<p>The Applicant acknowledges the comment. A dust control management plan will be developed and implemented during the construction phase. BMPs will include, but not be limited to, those recommended by the HDOH CAB (<i>Section 4.2.2</i>).</p>

Table 7.2: EISPN Summary of Comments and Responses

Comments	Commenter	Responses
<p>Construction activities must comply with the provisions of Hawaii Administrative Rules, §11-60.1-33 on Fugitive Dust. In addition, for cases involving mixed land use, we strongly recommend that buffer zones be established, wherever possible, in order to alleviate potential nuisance complaints.</p> <p>You should provide reasonable measures to control airborne, visible fugitive dust from the road areas and during the various phases of construction. These measures include, but are not limited to, the following:</p> <ol style="list-style-type: none"> a. Planning the different phases of construction, focusing on minimizing the amount of airborne, visible fugitive dust-generating materials and activities, centralizing on-site vehicular traffic routes, and locating potential dust-generating equipment in areas of the least impact; b. Providing an adequate water source at the site prior to start-up of construction activities; c. Landscaping and providing rapid covering of bare areas, including slopes, starting from the initial grading phase; d. Minimizing airborne, visible fugitive dust from shoulders and access roads; e. Providing reasonable dust control measures during weekends, after hours, and prior to daily start-up of construction activities; and f. Controlling airborne, visible fugitive dust from debris being hauled away from the project site. <p>If you have questions about fugitive dust, please contact the Enforcement Section of the Clean Air Branch.</p>	<p>HDOH CAB</p>	<p>Construction will comply with the provisions of HAR, Section 11-60.1-33. A dust control management plan will be developed and implemented during the construction phase. BMPs will include, but not be limited to, those recommended by the HDOH CAB (<i>Section 4.2.2</i>).</p>
<p>Vehicular Traffic, Multimodal Facilities, and Access</p>		
<p>Based on review of the provided project information, we anticipate potential adverse impact to State highways. Submit a TIAR prepared and stamped by a licensed engineer. The TIAR and Draft EIS should include:</p> <ol style="list-style-type: none"> a. A description of existing traffic conditions and use of multimodal routes in the study area. 	<p>HDOT</p>	<p>A TIR was prepared for the Project and is provided as <i>Appendix D</i>. The TIR includes a description of existing traffic and multimodal conditions, forecasted traffic and multimodal conditions, analysis on potential Project-related impacts, and recommended mitigation for potential impacts.</p> <p>Overall, the TIR found that that there may be temporary increases in construction-related traffic, particularly during mobilization and</p>

Table 7.2: EISPN Summary of Comments and Responses

Comments	Commenter	Responses
<p>b. Forecasted traffic and multimodal conditions in the horizon year (year at full project build-out), with and without the project, and including trips generated by planned developments in the study area.</p> <p>c. An analysis of project related direct, indirect, and cumulative transportation impacts, including impacts associated with multimodal transportation and safety.</p> <p>d. Recommended mitigation for impacts to transportation.</p>		<p>demobilization of the construction area. There are no anticipated long-term significant impacts to traffic or multimodal facilities related to operation of the Project. Traffic conditions are generally expected to remain similar to baseline and Year 2027 Without Project conditions. See <i>Sections 4.7.1 and 4.7.2</i> for a summary of the report.</p>
<p>Transportation Impact Assessment (TIA). The applicant should perform a TIA to examine the vehicle, pedestrian, bicycle, and public transit stress and comfort levels at the nearby intersections and driveways with corresponding improvements to mitigate these impacts by applying Complete Streets principles. The applicant shall discuss the future year growth rate, trip distribution, mode split, and route assignment assumptions used in the TIA.</p>	DTS	<p>The TIR assesses existing and proposed vehicle, pedestrian, bicycle, and public transit conditions at nearby intersections. The report also discusses the future year growth rate, trip generation and distribution, mode split, and route assignment assumptions that were used to inform the results and recommendations. Further, mitigation measures are proposed to address potential impacts. See <i>Sections 4.7.1 and 4.7.2</i> for further discussion.</p>
<p>The TIA should identify an appropriate speed limit for the streets adjacent to the project by analyzing conflict density and activity level, among other contextual factors, to determine the speed limit that will best minimize the risk of a person being killed or seriously injured. The National Association of City Transportation Officials Safe Speed Study methodology is recommended. A Safe Speed Study should be conducted for the longest relevant segment of a street corridor affected by the project.</p>	DTS	<p>The Project is located along Ali'inui Drive, which is privately owned by Ko Olina Development LLC. The Applicants will coordinate with the landowner as needed.</p>
<p>The applicant shall submit all native files (e.g., Synchro, Excel, etc.) for the raw multi-modal counts and accompanying analyses to the Regional Planning Branch at dtsplanningdiv@honolulu.gov. Please refer to the DTS TIA Guide for multimodal assessment tools and recommended analyses. The TIA Guide can be found at http://www4.honolulu.gov/docushare/dsweb/View/Collection-7723.</p>	DTS	<p>Native files for multi-modal counts and accompanying analyses will be provided to the DTS Regional Planning Branch upon publication of the EIS.</p>
<p>Disability and Communication Access Board (DCAB). Project plans (vehicular and pedestrian circulation, sidewalks, parking and pedestrian pathways, vehicular ingress/egress, etc.) should be reviewed and approved by DCAB to ensure full compliance with Americans with Disabilities Act requirements.</p>	DTS	<p>Design of the Project will be in conformance with the ADA and finalized plans will be submitted to DCAB for review and approval.</p>

Table 7.2: EISPN Summary of Comments and Responses

Comments	Commenter	Responses
<p>Comment 2.b: There is one entry and exit point into the Ko Olina community that the Proposed project will share. As part of our commitment to the community, Ko Olina requires Aloha Team, contracted by KOCA for security services, to operate 24-hour front gate greeting services to ensure efficient traffic flow and to answer resort-related security and safety inquiries. This creates a premiere resort experience for all guests at first contact point. Guests of the new JCC project will also enjoy this experience.</p> <p>The proposed Project however, will cause increased congestion at the resort's entry making it difficult for the Aloha Team to keep traffic flowing safely while continuing to provide a unique arrival experience for Ko Olina's residents and guests. The Draft EIS should address any potential conflicts between the two uses since the proposed improvements and activities are intended to be open and activated during daytime hours.</p>	<p>KOCA</p>	<p>The Applicant acknowledges that KOCA has elected to open only one entry/exit point into the surrounding area. The Applicant further notes that the Property has reserved access and roadway rights over all existing and planned roads within the resort.</p> <p>A TIR was prepared for the Project and is provided as <i>Appendix D</i>. The TIR includes a description of existing traffic and multimodal conditions, forecasted traffic and multimodal conditions, analysis on potential Project-related impacts, and recommended mitigation for potential impacts.</p> <p>Overall, the TIR found that that there may be temporary increases in construction-related traffic, particularly during mobilization and demobilization of the construction area. BMPs as described in <i>Sections 4.7.1 and 4.7.2</i> will be implemented to mitigate potential construction-related impacts and may include, but not be limited to, the transfer of construction materials/equipment during off-peak traffic hours to minimize potential disruption to traffic on adjacent streets, erosion control measures, and designated parking for construction-related vehicles.</p> <p>There are no anticipated long-term significant impacts to traffic or multimodal facilities related to operation of the Project. Traffic conditions are generally expected to remain similar to baseline and Year 2027 Without Project conditions. As such, the Project is not anticipated to adversely impact the Aloha Team's long-term operation. See <i>Sections 4.7.1 and 4.7.2</i> for a summary of the report.</p>

Table 7.2: EISPN Summary of Comments and Responses

Comments	Commenter	Responses
<p>I noticed on the proposed site plan only one traffic entrance/ exit. This could present a traffic flow problem. Obviously with retail and other commercial interests of all day activity, deliveries, and patrons I would suggest a turn lane into the new Cove area, otherwise the two main lanes on Ali'inui Drive will back up. In addition, suggest a left turn signal at both the exit/entrance to the New Cove, as well as a left turn signal at Olani St. and Ali'inui Drive.</p>	<p>Karen Messick</p>	<p>The Applicant acknowledges the comment. The TIR prepared for the Project (<i>Appendix D</i>) concluded that there are no significant long-term impacts to traffic or multimodal facilities related to operation of the Project. Traffic conditions are generally expected to remain similar to baseline and Year 2027 Without Project conditions. See <i>Section 4.7.1</i> for further discussion.</p> <p>Congestion on site is not anticipated and parking is expected to sufficiently serve the planned uses. As part of the redevelopment, on-site parking will be improved to accommodate operations. Planned improvements may include reconfiguration of existing off-street parking stalls to accommodate additional vehicular parking, valet operations, tour bus parking, and ride share programs. Additionally, parking management strategies discussed in <i>Section 4.7.3</i>, will be employed to actively manage parking during peak periods of visitation at The Cove. With the proposed improvements, additional roadway improvements are not anticipated to be required.</p>
<p>Traffic flow is a major concern to keep residential traffic flowing. Rush hours returning home is pretty heavy and when there could be a significant problem.</p>	<p>Karen Messick</p>	<p>The Applicant acknowledges the comment. A TIR was prepared by Wilson Okamoto Corporation and is attached as <i>Appendix D</i>. Traffic conditions were analyzed during morning peak hours and afternoon peak hours. The study found that the Project is not anticipated to significantly affect traffic conditions in the Project area. Traffic is expected to remain similar to existing traffic conditions and conditions without the Project.</p>
<p>Parking</p>		
<p>Parking. If the Project intends to increase the number of on-site parking stalls substantially, a discussion regarding the generation and accommodation of parking demand should be included in the Environmental Impact Statement.</p>	<p>DTS</p>	<p>The Project plans to reconfigure the existing on-site parking lot, which will preliminarily result in a total of 396 guest and employee parking stalls and eight bus stalls. A PMP was prepared by Fehr & Peers and is attached as <i>Appendix E</i>. The plan recommends strategies to manage on-site parking demand including the implementation of time limits to vehicle parking, tiered pricing for self-parking, and valet parking. See <i>Section 4.7.3</i> for a summary of the Parking Management Plan. The Applicant will determine the appropriate strategies to be implemented on-site as the Project progresses.</p>

Table 7.2: EISPN Summary of Comments and Responses

Comments	Commenter	Responses
Controlling parking for beach access will also be an issue, as it is now for the marketplace.	Karen Messick	Currently, 15 off-street parking stalls within the parking lot on the neighboring Lanikūhonua Cultural Institute are designated for public beach parking. The stalls will remain with construction and operation of the Project. A PMP was prepared by Fehr & Peers (<i>Appendix E</i>) to evaluate strategies to accommodate parking demand on the Property and at the off-site public beach parking lot. Strategies will be evaluated for implementation as the Project progresses.
Parking for delivery vehicles needs to be created because if there is none and the delivery trucks park on Ali'inui Drive, like they do now on Olani Street while servicing the market and restaurants, it will be a traffic nightmare.	Karen Messick	To support the planned activities, loading areas have been designated at the north and southeast of the Cove (<i>Figure 3.3</i>). The loading areas will meet requirements articulated in the LUO and will include loading stalls designated for large commercial vehicles and stalls designated for smaller vehicles . Delivery management strategies, including enforcement of parking restrictions and management of loading/unloading times, use of additional attendants or security, and the development of a delivery schedule program may be employed to alleviate congestion in specific loading areas. The Applicant will determine the appropriate strategies to be implemented on-site as the Project progresses.
Proximity to Kalaeloa Airport		
The proposed Project is approximately 3.42 miles from Kalaeloa Airport (JRF). All projects within 5 miles from Hawaii State airports are advised to read the Technical Assistance Memorandum (TAM) for guidance with development and activities that may require further review and permits. The TAM can be viewed at this link: http://files.hawaii.gov/dbedt/op/docus/TAM-FAA-DOT-Airports_08-01-2016.pdf	HDOT	The Applicant acknowledges receipt of the memorandum. Given the Project site's distance from the Kalaeloa Airport (JRF) and planned design, adverse impacts to airport operations are not anticipated and related permits are not expected to be required. The Applicant will review the technical guidance provided as part the detailed design of the Project.
The proposed Project is approximately 18,190 feet from the end of Runway 29 at JRF. Federal Aviation Administration (FAA) regulation requires the submittal of FAA Form 7460-1 Notice of Proposed Construction or alteration pursuant to the Code of Federal Regulations, Title 14, Part 77.9, if the construction or alteration is within 20,000 feet of a public use of military airport which exceeds a 100:1 surface from any point on the runway of each airport with its longest runway more than 3,200 feet. Construction	HDOT	The Applicant will submit a Notice of Proposed Construction or Alteration to the FAA when required.

Table 7.2: EISPN Summary of Comments and Responses

Comments	Commenter	Responses
<p>equipment and staging area heights, including heights of temporary construction cranes, shall be included in the submittal. The form and criteria for submittal can be found at the following website: https://oeaaa.faa.gov/oeaaa/external/portal.jsp</p>		
<p>Due to the proximity to the airport, the developer should be aware of potential noise from aircraft operations. There is also potential for fumes, smoke, vibrations, odors, etc. resulting from occasional aircraft flight operations over or near the Project location. These impacts may increase or decrease over time and depend on airport operations.</p>	<p>HDOT</p>	<p>The Applicant acknowledges the comment and potential impacts the site's proximity to the Kalaeloa Airport may have on the Project.</p>
<p>Utilities</p>		
<p>The parcel has an existing nonpotable water meter. However, as of the submittal of this Environmental Impact Statement Preparation Notice, the Barbers Point Nonpotable Wells pumping exceeds State Permitted Use and could be in Violation of the State Water Use Permit. We understand that Ko Olina Resort is planning an additional nonpotable well to accommodate future irrigation demands, however, the exploratory well has not been constructed to date. A commitment and schedule for the construction and connection of the nonpotable well is required before the Board of Water Supply (BWS) will approve building permits for the Ko Olina Resort. BWS Rules & Regulations require the use of nonpotable water for irrigation of large landscaped areas, if available. The developer of this project is required to coordinate with Ko Olina Resort for the development of the new nonpotable source. A source development plan should be submitted for BWS review. Confirmation on the adequacy of the wells yield and chloride content are also required before building permits will be approved.</p>	<p>BWS</p>	<p>Recent correspondence with BWS in 2023 regarding the availability of non-potable water indicates that plans for a new non-potable well source (by others) for the Ko Olina area has advanced. Given this commitment and progress, BWS has indicated that they may review and approve building permits for the planned non-potable uses needed for the Project. A letter from BWS confirming this condition was requested by G70 in late 2023 and is currently pending.</p> <p><u>Following the publication of the EISPN and receipt of these comments, the Applicant coordinated with BWS to further clarify water system requirements for the Project. Since the projected non-potable water demand for the Project is expected to remain consistent with that of the existing development, the need for an additional non-potable water resource is not anticipated at this time. However, BWS has indicated that water conservation measures are still required for non-potable irrigation systems.</u></p> <p><u>The Applicant is also studying the use of a blackwater system for The Cove intended to recycle water from all onsite plumbing fixtures to R1 level per the requirements of HDOH. This water would be used for various approved purposes, including irrigation. Further discussion is provided in <i>Section 4.8.3.</i></u></p>

Table 7.2: EISPN Summary of Comments and Responses

Comments	Commenter	Responses
<p>The existing potable water system is adequate to provide off-site fire protection and accommodate the domestic demands of the proposed development. However, please be advised that this information is based upon current data, and therefore, the BWS reserves the right to change any position or information stated herein up until the final approval of the building permit application. The final decision on the availability of water will be confirmed when the building permit application is submitted for approval.</p>	<p>BWS</p>	<p>The Applicant acknowledges that a final decision on the availability of water will be confirmed upon submittal and approval of the building permit application. See <i>Section 4.8.2</i> for further discussion regarding water requirements for the Project.</p>
<p>Water conservation measures are required for all proposed developments. These measures include the selection of Water Sense labeled ultra-low-flow plumbing fixtures and toilets, utilization of nonpotable water for irrigation using rain catchment and chiller/air handler condensate, cooling tower conductivity meters and water softening recycling systems, drought and salt tolerant plants, and xeriscaping principles in all landscaping. We recommend installing efficient irrigation systems, such as drip irrigation, and incorporating moisture sensors to avoid operating the irrigation system in the rain and/or if the ground has adequate moisture.</p>	<p>BWS</p>	<p>Water conservation measures may be implemented in design of The Cove redevelopment and may include, but not be limited to, the following: efficient irrigation systems such a drip system and moisture sensors, utilization of nonpotable water for irrigation, drought tolerant plants, and the use of Water Sense-labeled ultra-low flow water fixtures and toilets (<i>Section 4.8.2</i>).</p>
<p>The proposed Project is subject to BWS Cross-Connection Control and Backflow Prevention requirements prior to the issuance of the Building Permit Applications.</p>	<p>BWS</p>	<p>The Applicant understands the comment and will adhere to BWS Cross-Connection Control and Backflow Prevention requirements prior to the issuance of building permit applications.</p>
<p>The on-site fire protection requirements should be coordinated with the Fire Prevention Bureau of Honolulu Fire Department.</p>	<p>BWS</p>	<p>The Applicant consulted with HFD during the early consultation phase of this EIS and will continue to coordinate on-site fire protection requirements with the agency as design progresses.</p>

Table 7.2: EISPN Summary of Comments and Responses

Comments	Commenter	Responses
<p>Comment 2: The EISPN document states that “Existing civil infrastructure will also be evaluated” in the forthcoming Draft EIS. The project site is served by private infrastructure (i.e., roadways, drainage, wastewater, potable and non-potable water, street cleaning, sidewalk and lighting maintenance, etc.) also utilized by other developments within the Ko Olina Resort area. The scope of development proposed under the EISPN is not in alignment with the overall program of development outlined and approved for Ko Olina Resort. We request JCC consider the impacts of the proposed project on infrastructure systems in the area and ask that the following concerns also be addressed:</p> <p>Comment 2.a: The Draft EIS should address increased demand on resort infrastructure and safety as a result of the proposed project. The JCC should also include proposals to ensure equitable responsibility with KOCA regarding the procurement of security services, infrastructure repairs and continued maintenance of the resort’s common areas and agreement to collaborate with KORA with regards to project sales and marketing to ensure brand consistency.</p>	<p>KOCA</p>	<p><i>Section 4.7</i> evaluates the Project’s potential impacts to surrounding roadways and circulation, and <i>Section 4.8</i> evaluates potential impacts to infrastructure and utilities. As discussed, The Cove is anticipated to connect to the City’s sewer and water systems and coordination with the City is ongoing. The Cove Property is not subject to the service or assessment mechanisms established for the Ko Olina Resort. Additionally, since the Cove Property is not part of the KOCA and has access and infrastructure service rights that pre-date the Ko Olina Resort, it bears no responsibility to or with KOCA for services that KOCA provides to its members. Lastly, the Cove Project is not part of the Resort “brand” and therefore collaboration with KORA on project sales and marketing is inappropriate.</p> <p>The Applicant will continue to provide on-site security to address safety comments concerns, and drainage will continue to be discharged into the storm drainage system in Ali’iunui Drive. As discussed in <i>Section 4.8.1</i>, redevelopment of the Project site is expected to slightly decrease the total stormwater runoff compared to its existing condition.</p>
<p>Flood Zone</p>		
<p>The rules and regulations of the National Flood Insurance Program (NFIP), Title 44 of the Code of Federal Regulations (44CFR), are in effect when development falls within a Special Flood Hazard Area (high-risk areas). State projects are required to comply with 44CFR regulations as stipulated in Section 60.12. Be advised that 44CFR reflects the minimum standards as set forth by the NFIP. Local community flood ordinances may stipulate higher standards that can be more restrictive and would take precedence over the minimum NFIP standards.</p>	<p>DLNR Engineering Division</p>	<p>As discussed in <i>Section 4.4.3</i>, the Project is located primarily within FEMA Flood Zones D, while a small portion adjacent to the coast is within Zone VE, which is considered a SFHA. The BFE at this portion of the Project site has been determined to be 12 feet. No structures will be located in Flood Zone VE. Furthermore, design of the Project will adhere to City development standards for the SFHA articulated in ROH Chapter 21A.</p>
<p>The owner of the project property and/or their representative is responsible to research the Flood Hazard Zone designation for the project. Flood Hazard Zones are designated on FEMA’s Flood Insurance Rate Maps (FIRM), which can be viewed on our Flood Hazard Assessment Tool (FHAT) (http://gis.hawaiiinfip.org/FHAT).</p>	<p>DLNR Engineering Division</p>	<p>As discussed in <i>Section 4.4.3</i>, the Project is located primarily within FEMA Flood Zones D, while a small portion is within Zone VE.</p>

Table 7.2: EISPN Summary of Comments and Responses

Comments	Commenter	Responses
Cultural and Historic Resources		
<p>Comment 3: The EISPN document outlines that an Archaeological Inventory Survey (AIS) of the Project site was conducted in February 2020 and that a Cultural Impact Assessment (CIA) will be prepared in accordance with the regulatory requirements of HRS Chapter 343. It is anticipated that these AIS and CIA documents will be included and assessed within the forthcoming Draft EIS. Nonetheless, the Project site lies within a region of Archaeological and Cultural Significance, and there are a number of known archaeological and cultural sites within the boundary of the project site. It is advised that the EIS closely consider and evaluate potential impacts to these archaeological and cultural sites. Future design and programming efforts for the project should appropriately align to the context and presence of archaeological and cultural sites and resources.</p>	<p>KOCA</p>	<p>The AIS (<i>Appendix B</i>) and CIA (<i>Appendix C</i>) are discussed in <i>Section 4.1</i>. The Project has the potential to affect two historic properties (SIHP No. 3362 and SIHP No. 4968) identified within the Project area. The Applicants have conducted consultation with SHPD and cultural descendants to determine appropriate mitigation. The AIS recommends archaeological monitoring and preservation of the existing burial preserve area as mitigation commitments for the Project. The AIS is currently in review by SHPD.</p> <p>The planned redevelopment of The Cove is envisioned to create authentic gathering place that reflects history, culture, and connection to place. New structures will reflect both contemporary and Hawaiian architecture and will be complemented by native, Polynesian-introduced, or tropical landscaping. Potential programming on the lawns may include educational and cultural workshops and/or activities that highlight the sense of place and fit appropriately within the coastal setting or coordinated events and programs with the neighboring Lanikūhonua Cultural Institute.</p>
Economy and Tourism		
<p>Comment 4: The EISPN states that development of the project will support the local economy and stimulate economic recovery in the project region. It highlights significant economic impacts resulting from the COVID-19 pandemic. However, tourism in the state of Hawai‘i is recuperating. According to the Hawai‘i Tourism Authority (HTA), approximately 30,000 travelers are now flying into the state of Hawai‘i each day, approximately 80% of the number of 2019 visitor arrivals at this time.</p> <p>The proposed draft references the “cultural significance of the location and we acknowledge that this is an important part of JCC’s heritage. The current project plans, however, are indiscriminate. They generally intend to activate the site during both day- and nighttime hours, with facilities for entertainment, dining and retail. It is unclear from the draft document whether the proposed plan will promote the regenerative tourism goals of HTA and the Ko Olina community. Historically, the project site operated</p>	<p>KOCA</p>	<p>The Cove Property has been used as an outdoor recreation facility and entertainment venue since the late 1970s. The proposed improvements will be the first major enhancement of the Cove Property in over 25 years. As described in <i>Section 1.2</i>, the Cove Property reflects the rich legacy of Alice Kamokilaikawai Campbell. As such, planned improvements have been refined over several years with input by legacy families with the intention of modernizing the Cove Property to create an authentic Hawaiian community gathering place for residents and visitors that honors and reflects the history, culture, and connection to this place.</p> <p>Currently, programming at the site includes a nightly lū‘au, commercial weddings, and occasional daytime events on two lawn areas. Revitalization of the property will maintain the lū‘au show as the focal point of the property and provide a unique mix of ancillary entertainment, dining, and retail experiences in an immersive coastal setting. <i>Section</i></p>

Table 7.2: EISPN Summary of Comments and Responses

Comments	Commenter	Responses
<p>during the evening hours. It provided entertainment catered towards visitors that attend an evening event for 2-3 hours and then depart. The proposed project will significantly intensify the use of the site during all hours of the day and there is no reference to the quality or quantity of the activities and experiences. There is also the potential that Increased use will Interfere with the existing natural environment, including the natural shoreline, and potentially disturb cultural artifacts at the site.</p> <p>The volume of visitors travelling "o Ha'ai'i Is presently overwhelming existing infrastructure and degrading the natural environment. It is understood that HTA, in partnership with local communities, the state of Hawai'i and the City and County of Honolulu, is currently in the process of developing the O'ahu Destination Management Action Plan (O'ahu DMAP), with planned publication in August 2021. The O'ahu DMAP will propose tourism strategies intended to redefine, rebuild and reset the direction of tourism over a three-year period. A key component of the O'ahu DMAP is regenerative tourism. This is an important shift away from exploitative tourism toward contributory tourism. This means the hospitality industry will target visitors interested in ecotourism, agritourism, volunteer-tourism and authentic cultural experiences. Ko Olina has made this sustainable tourism model a priority. It is critical that JCC also commit to this model to support our efforts. JCC should also consult with regenerative tourism experts and partner with experienced and relevant community-based organizations.</p> <p>Comment 6.b: Given the expansive social and environmental impacts of "over-tourism" during the post-pandemic era, we are concerned about the potential for commercial over- saturation and over-development of the Ko Olina Resort area. We ask that the EIS consider, evaluate and speak to the appropriate management of tourism and tourism related impacts and that the suggested activities, retail and entertainment complement, rather than impede, those already in operation or planned for at Ko Olina.</p>		<p><i>3.0</i> details each component of the Project. Potential programming may be expanded to include daytime activities that fit appropriately within the coastal setting, commercial activities highlighting the sense of the place, cultural workshops, or coordinated events and programs with the neighboring Lanikūhonua Cultural Institute, an established and recognized organization and venue dedicated to the promotion of Hawaiian culture. The Applicant will continue to explore opportunities for programming that highlight relevant community-based organizations.</p> <p>Redevelopment of the Cove Property will complement and enhance existing resort and recreational opportunities. There is currently no property that consolidates a performing arts venue, restaurants, retail, and educational activity programming onto one location designed to provide experiences for residents and visitors alike throughout the day. Guests of the surrounding resorts will be able to take advantage of the Project's close proximity and utilize non-vehicular modes of transportation, thus mitigating potential impacts to traffic. As an added benefit, revitalization of the Cove Property will provide an inviting pedestrian experience that supports connectivity within the wider area.</p> <p>The Project is not anticipated to significantly intensify the use of the site, and over-saturation is not anticipated. Building area on the Project site will be limited to 30 percent of the property pursuant to the conditions of the UA (Ordinance No. 89-27), thus preserving a majority of the site for open space, which for the first time in over 40 years, will be available for use to the public throughout the day.</p> <p>Further, the performing arts venue will be downsized from its current maximum capacity of approximately 1,200 visitors at one time to a capacity of approximately 650 visitors at one time. Reducing the size of the performing arts show's attendance will lessen visitor traffic on the site at one time, minimize potential adverse impacts to resources, and make more efficient use of the facility. Mitigation measures to address potential impacts to historic features will be implemented and may include archaeological monitoring and preservation of the existing burial preserve area (<i>Section 4.1</i>).</p> <p>As discussed in <i>Section 5.2.7</i>, the Project is consistent with several State objectives described in the O'ahu DMAP (2021-2024), which aims to</p>

Table 7.2: EISPN Summary of Comments and Responses

Comments	Commenter	Responses
		<p>address the potential impacts of over-tourism. As is currently envisioned, The Cove will be a gathering place for residents as well as visitors. Potential programming at the Project includes educational and cultural workshops and/or activities for residents and visitors that highlight the sense of place and fit appropriately within the coastal setting or coordinated events and programs with the neighboring Lanikūhonua Cultural Institute. The Project will further evaluate opportunities to implement the O’ahu. We note that KORA’s Director of Destination Marketing participated in the steering committee that assisted with the preparation of the O’ahu DMAP. We look forward to receiving information regarding actions that the Ko Olina Resort has taken to shift toward contributory tourism, as there may be opportunity for the Project to complement these actions.</p>
<p>Comment 7.c: The EIS should also contain a detailed review of potential economic impacts and demand for the Project, as proposed.</p>	<p>KOCA</p>	<p>An EIR was conducted for the Project by Environment and Economics LLC and is provided as <i>Appendix #1</i>. Consistent with the requirements under HAR, Section 11-200.1-24, <i>Section 4.10</i> summarizes the report, which includes a general description of the Project’s economic characteristics and assesses the potential economic and fiscal impacts it may have on the surrounding environment.</p>
<p>I saw the recent article in Midweek about the possible plans for the cove at Ko Olina. As a resident of Kapolei I frequent the area and have enjoyed the temporary relief of an excessive amount of tourists over the last year. Now that tourism is in full effect once again, it is sad to see how all of our beaches including those in Ko Olina have been inundated with visitors who are not mindful respectful of our wildlife or ‘āina. I see trash on the beach and people harassing the Hawaiian sea turtles.</p> <p>On a recent trip when I was watching the gorgeous fish in the water and group of people jumped into the water next to me. Immediately a film of oil covered the top of the water from sprayed on sunscreen. It honestly breaks my heart. I’m sure that this letter will not sway any planned development but our hidden gems like the Cove is slowing fading away. As much as you may try to “embrace the Hawaiian culture and respect the history of the place” the more you attract the more will be extracted until we are left with places like Waikiki. We all know that that is not true Hawaii.</p>	<p>Kathryn N.</p>	<p>The Applicant acknowledges the comment and prioritizes the protection of the natural and cultural environment. As discussed in <i>Section 2.0</i>, the overall goal of the Project is to create a contemporary, authentic Hawaiian outdoor recreation facility and community gathering place with unique entertainment, dining, and retail experiences for residents and visitors alike. The planned improvements have been refined over several years with input by cultural descendants of the area, and from education, natural resource management, and cultural practitioner stakeholders with the intention of modernizing the Cove Property to create an authentic Hawaiian community gathering place for residents and visitors that honors and reflects the history, culture, and connection to this place.</p>

Table 7.2: EISPN Summary of Comments and Responses

Comments	Commenter	Responses
Visual Impacts		
<p>Comment 5: The Project site lies within Ko Olina Resort, a fully master planned resort and residential community. The resort continues to be developed under previously approved design guidelines. The EIS should address the potential impacts of the proposed project on visual resources and environment.</p> <p>Ko Olina's design committee currently reviews proposals and plans to ensure that any new development complies with Ko Olina's design guidelines and is constructed in harmony with the environment and aesthetics of the Ko Olina community.</p>	KOCA	<p><i>Section 4.11</i> discusses potential impacts the Project may have on surrounding visual resources. The Cove redevelopment is not anticipated to adversely impact views protected by the 'Ewa DP. Planned one-story structures at the site and off-street parking areas will be substantially hidden or screened through the installation of landscaping. As required by the UA, redevelopment of The Cove will adhere to the 30 percent lot coverage limit and several open space features will continue to be preserved and maintained at the Project site. The western portion of the Cove Property fronting the shoreline will be maintained as open space to provide a natural buffer and gradual transition to the beach.</p> <p>To clarify, the Cove Property is not within the jurisdiction of the Ko Olina Resort's private covenants, including the design guidelines referenced in the comment. As such, the Project does not require review and/or approval by the Ko Olina design committee.</p> <p>The Cove Property is located, however, within the jurisdiction of the 'Ewa DP. Under the 'Ewa DP, the Cove Property is designated for Resort/Recreation Area uses. As such, the redevelopment of the Cove Property is assessed for consistency with the guidelines under the 'Ewa DP in <i>Section 5.3.2</i> of the EIS.</p>
Shoreline Survey		
<p>Project Information: Include a shoreline survey and plans that identify and label the proposed distance from the shoreline.</p>	DPP	<p>A preliminary shoreline survey will be coordinated, as required by the SMA Use Permit (Major) application. The shoreline survey will be submitted to the DLNR for certification, as and when required by applicable law.</p>
Coastal Impacts and Shoreline Access		
<p>We have no comments. Not in conservation district.</p>	DLNR OCCL	<p>The Applicant acknowledges the comment.</p>

Table 7.2: EISPN Summary of Comments and Responses

Comments	Commenter	Responses
<p>Comment 2.c: The Draft EIS should discuss specific plans to manage public access to the shoreline and beach areas including vehicle parking, public pathways and beach and water activities. We are concerned with the potential cumulative and secondary impacts to the environment and public access resulting from increased activity along the pristine shoreline, a noted sanctuary for endangered marine life. It is critical for JCC to ensure the preservation of the shoreline area which is especially significant to West O'ahu communities. Providing adequate infrastructure to support increased shoreline use, including, but not limited to, restrooms, refuse and recycling containers and posted guidelines to ensure care for the area, is also essential.</p>	<p>KOCA</p>	<p>The Applicant concurs with the importance of the preservation of the shoreline area fronting the Cove Property as well as the greater shoreline area fronting the Ko Olina Resort property. As discussed in <i>Section 2.2</i>, a stated objective of the Project is to maintain and enhance the quality of the near-shore coastal environment and preserve access to public recreational resources. The current SMA approval for the Cove Property (File No. 93/SMA 32 (Res. 93-318)) includes conditions for beach access, public parking, and limits on beach activities. No significant changes to these existing conditions are planned, and the current level of beach access will be maintained to protect the natural cove. Existing off-street parking for beachgoers will continue to be available to the public. See <i>Sections 3.3.10.2 and 4.7.3</i> for strategies to manage public parking. Beach activities will continue to be limited as required by the SMA approval.</p> <p>As discussed in <i>Section 4.3.4</i>, there is no Federally-designated Critical Habitat on the Cove Property. However, proposed critical habitat for the green sea turtle is identified within the beach/natural cove adjacent to the Project site. Additionally, the Hawaiian monk seal may potentially utilize the beach and natural cove adjacent to the Cove Property for nesting. BMPs discussed in <i>Section 4.3.4</i> will be implemented during construction and operation to minimize the potential for short- and long-term impacts to these species.</p> <p><i>Section 4.13</i> discusses cumulative environmental impacts and potential secondary effects with the planned Project. The Project is not anticipated to result in cumulative adverse environmental impacts nor will the Project have detrimental secondary effects.</p> <p>Adequate infrastructure to support anticipated shoreline use will continue to be provided. <u>In addition, restrooms within The Cove will be available for public use representing a significant improvement over existing conditions. Existing public restrooms for beachgoers at the southern portion of the site will continue to be maintained.</u> Educational signage and guidelines may be posted around the Cove Property to encourage thoughtful care for the site and the surrounding environment. Recycling may also be encouraged through the use of trash cans with recycling containers.</p>

Table 7.2: EISPN Summary of Comments and Responses

Comments	Commenter	Responses
Consistency with Public Policies		
<p>Land Use Plans, Policies and Controls: Include details on lot coverage and provision of the 40-foot-wide strip as required by Conditions 2 and 3 of the UA.</p>	DPP	<p>The Applicant will adhere to the conditions of the UA. As discussed in Section 3.3, the planned structures will cover approximately 15.20 percent of the 10.85-acre lot, which complies with the UA’s 30 percent lot coverage limit. Furthermore, 60 feet of the nearshore portion of the site will be maintained as open space, providing a natural buffer to mitigate potential impacts related to flooding and preserve scenic views. Structures will not be located within this setback area.</p>
Consistency with the Ko Olina Resort and Master Plan (Private)		
<p>Comment 1: As you are aware, Ko Olina Resort is an approximately 642-acre master planned resort and residential community – for which entitlements, planning, and environmental reviews were completed and approved decades ago. By contrast, upon review of the project description outlined in the EISPN, it is evident that scope of the proposed project is not aligned with the Ko Olina Resort Master Plan. Consequently, we are concerned with the potential for cumulative and secondary environmental impacts that may arise from the increased use of the Project site (which lies within the geographic footprint of Ko Olina Resort).</p> <p>Comment 5: The Project site lies within Ko Olina Resort, a fully master planned resort and residential community. The resort continues to be developed under previously approved design guidelines. The EIS should address the potential impacts of the proposed project on visual resources and environment.</p> <p>Ko Olina’s design committee currently reviews proposals and plans to ensure that any new development complies with Ko Olina’s design guidelines and is constructed in harmony with the environment and aesthetics of the Ko Olina community.</p> <p>Comment 7: The EISPN suggests that the Project will meet the City’s vision for the ‘Ewa Region from a resort commercial development standpoint. As discussed previously, Ko Olina Resort is a fully master planned resort and residential community. The additional commercial activities and uses proposed within the EISPN do not align with the vision and program set forth under the master plan for Ko Olina Resort.</p>	KOCA	<p>The operative Ko Olina Resort Master Plan has its roots in the declaration prepared and recorded by the Trustees Under the Will and of the Estate of James Campbell, Deceased (“Campbell Estate”) in 1986, against the land that would then become the Ko Olina Resort. Campbell Estate’s vision was for the resort to become a first-class destination resort/residential community. Master planning was part of that vision.</p> <p>To clarify, the Ko Olina Resort Master Plan is a private, i.e., non-governmental, plan for the development of the adjacent Ko Olina Resort. This plan does not encompass the Cove Property or the neighboring Lanikūhonua property, as they are not subject to the original Ko Olina Declaration of Conditions, Covenants and Restrictions recorded by Campbell Estate in 1986.</p> <p>The Cove Property has been used for commercial lū’au and other events since the late 1970s. As such, these activities and uses at the Cove Property pre-date the establishment of the Ko Olina Resort and were existing background conditions during its development. Several years after the start of operation at the Cove Property (but prior to the opening of the Ihilani at the Ko Olina Resort), the Cove Property was rezoned to allow for a greater range of commercial activities, such as restaurants, retail, and a commercial lū’au operation permitted in the B-1, Neighborhood Business zoning district. Currently, operations at the Cove Property take place seven days a week. The commercial lū’au dinner and show operate every evening and a range of other events, such as commercial weddings, are held during the day. A similar pattern of day</p>

Table 7.2: EISPN Summary of Comments and Responses

Comments	Commenter	Responses
<p>Comment 7.a: As stated in the EISPN, the "addition of new retail and restaurants at the site" is anticipated to "activate the site during day- and nighttime hours, attracting both locals and visitors to enjoy new, authentic experiences in the Ko Olina Resort." To be clear the proposed project site lies within the geographic borders of Ko Olina Resort but the proposed activation of the site during both day- and nighttime hours is out of character for its existing use, and is not compatible with the program outlined under Ko Olina Resort's master plan, which fully anticipated and contemplated the commercial needs of the community.</p>		<p>and evening commercial activities at the Cove Property has been ongoing since 1980.</p> <p>With respect to the planned daytime activation of the Cove Property, the Project intends to optimize the potential of the site for residents and visitors alike, and will add new or expand allowable uses, such as retail and dining. The planned redevelopment will replace outdated structures and programming with an authentic and modern gathering place for both locals and visitors that is reflective of the Native Hawaiian culture, history, and connection to the place. The EIS is prepared in order to analyze the potential impacts of this redevelopment.</p> <p>As the Cove Property is not governed by the Ko Olina Resort Master Plan, the Project does not require review, approval, or consistency with any action taken by the Ko Olina design committee. Additionally, consistency with the Ko Olina Resort Master Plan program is not required.</p> <p>Commercial use of the Cove Property predates the Ko Olina Resort's development.</p> <p>Cumulative and secondary impacts of the Project are assessed within <i>Section 4.13</i> of this EIS in accordance with HRS, Chapter 343 and HRS, Chapter 205A.</p>
<p>Community Consultation and Notification</p>		
<p>A check on DHS' internal data system and Google Maps found several licensed Before and After School Child Care Facilities and one Group Child Care Center located within a one (1) mile radius of the area that may be affected during the construction phase.</p>	<p>DHS</p>	<p>The Applicant acknowledges the comment. Construction BMPs as described in Sections 4.7 and 4.9 will be employed to minimize traffic and noise impacts to surrounding educational and childcare facilities.</p>
<p>The area representatives, neighborhood board, as well as the area residents, businesses, emergency personnel (fire, ambulance, and police), Oahu Transit Services, Inc. (TheBus and TheHandi-Van), etc., should be kept apprised of the details and status throughout the project and the impacts that the project may have on the adjoining local street area network.</p>	<p>DTS</p>	<p>Construction BMPs as described in Section 4.7 will be employed to minimize traffic impacts on the surrounding area. The Applicant will keep area representatives, the designated neighborhood board, residents, businesses, emergency personnel, and Oahu Transit Services, Inc. apprised of the Project.</p>
<p>Comment 1: We request that JCC designate a representative(s) to serve as a liaison(s) to KOCA and KORA throughout the length of the construction process, as well as during tenant improvements. We also request that in anticipation of construction, project presentations be made available to</p>	<p>KOCA</p>	<p><i>Section 4.7</i> addresses the Project's potential traffic and parking impacts and proposes measures to mitigate these effects.</p>

Table 7.2: EISPN Summary of Comments and Responses

Comments	Commenter	Responses
<p>these entities in the form of in-person and/or virtual events scheduled at various times to provide ample opportunity for participation. The ICC should also regularly provide the community with a schedule of periodic communication updates, which could include a quarterly newsletter, contact information and community opportunities for in-person and/or virtual events to address questions or concerns regarding the progress of the project.</p> <p>Comment 2.d: Regular consultation with our team at KOCA should be undertaken to coordinate infrastructure related improvements, operations, logistical demands and any changes that impact resort common areas.</p> <p>Comment 6: We request further consultation regarding project security, pedestrian and vehicle traffic, parking operations and any anticipated impacts (both during and after construction).</p> <p>Close: We look forward to reviewing the forthcoming Draft EIS document and participating in the project community engagement and public comment process. It is further requested that the project Team engage and formally consult with both the Ko Olina Community Association and the Ko Olina Resort Operators Association in conjunction with and pursuant to the on-going EIS process for the proposed project.</p>		<p>The Applicant will continue to consult with KOCA and/or KORA as the Project progresses.</p>
Alternatives		
<p>The EIS should also discuss and comparatively evaluate alternatives to the proposed project, in alignment with the requirements of Chapter 343, HRS.</p>		<p>As required under HRS, Chapter 343 and HAR, Chapter 11-200.1, <i>Section 6.0</i> evaluates the Proposed Action in addition to several alternatives including No-Action, Delayed Action, Alternative Design, and Alternative Use.</p>

7.4 Makakilo-Kapolei-Honokai Hale Neighborhood Board No. 34

A presentation of the Project was provided to the Makakilo-Kapolei-Honokai Hale Neighborhood Board No. 34 on May 22, 2024. Notification of the presentation was mailed to adjoining property owners on May 15, 2024. Approximately 13 members of the public provided comments both virtually and in person. Here follows a summary of the issues raised during that meeting, many of which were also raised in written comments provided on the Draft EIS, for which written responses are provided in Table 7.3.

- **Site Layout and Program:** A board member recommended that “natural play equipment” or nature-based play areas (e.g., splash pads) in the open lawn areas be incorporated to provide children a focused recreational area so as to not disturb other users of the site. The Applicant referred to an open lawn area envisioned for cultural and educational demonstrations and for gathering where interpretive play equipment could be considered.
- **Community outreach process/Lack of communication:** Comments were raised about the community outreach process, particularly regarding the lack of participation and consultation with the Ko Olina Resort and overall adjacent resort community. There was an expressed desire for the Applicant to update the community and sustain its conversations over the course of the planning process.

Various community members also expressed concern about not being notified nor consulted prior to the release of the EIS. Another community member emphasized the importance of communication and collaboration between KOCA and KORA, who they believe should serve as long-term stakeholders in the Project to ensure alignment with the aesthetic/operational/community standards of Ko Olina Resort.

Refer to the response to Comments Y.1. through Y.10. in Table 7.3.

- **Archaeological and Historic Resources:**
 - A board member recommended that archaeologist on-site during construction.
 - Community members inquired about the plan to protect historic sites on the Cove Property. Concerns were raised about the nightmarchers’ pathway and known ‘iwi (ancestral remains) under the banyan tree, as well as tunnels on the property.
 - Regarding consultation with cultural descendants and NHOs, it was noted that homestead associations in the neighboring Wai’anae community had not been consulted about the Project. A community member also claimed that the legacy family would oppose the Project’s design.
 - Cultural Deposits and Water Impact: Concerns were expressed about the impact on cultural deposits in the marshland area and the subterranean water, questioning shoreline access maintenance.
 - One community member highlighted an irony, pointing out that while Ko Olina claims to protect natural resources, it has previously altered the shoreline and excluded Honokai Hale from development discussions.

Refer to the response to Comments D.1. through D.17 in Table 7.3.

- **Parking:**
 - Various participants commented that ongoing parking concerns will be significantly exacerbated with the redevelopment of The Cove. A community member expressed concern about the Cove Property not having adequate space and parking to sustain the anticipated volume of traffic that the redevelopment will bring.
 - One community member noted that there are currently 15 parking stalls available for the public beach access at this location and that more are needed. Another community member highlighted that 55 percent of the resort's visitors arrive by vehicle, some by bus (percent unspecified by commentor), and only 10 percent arrive by foot.
 - One community member also expressed concerns about how this redevelopment could affect not only legal parking, but also illegal parking.

Refer to the responses to Comments K.1. to K.15. in Table 7.3.

- **Traffic:** Several participants expressed concerns of increased traffic and congestion at the front gate entrance of the Ko Olina Resort, especially during daytime hours due to the new restaurants, retail, and commercial areas.

Refer to the responses to Comments J.1. to J.17. in Table 7.3.

- **Potential impacts to the adjacent beach and wildlife:** Several participants raised comments about the beach adjacent to the property being a sensitive wildlife habitat for Hawaiian monk seals and sea turtles. Several community members shared comments about stormwater runoff and impacts to water quality, as well as general comments about impacts to the adjacent beach. There were also comments raised regarding the potential for increased foot traffic on the beaches as a result of expanded access to the property, which may potentially further impact beaches and disrupt wildlife. A community member also expressed the need for public restrooms to serve beachgoers.

Refer to the responses to Comments E.1. through E.23. and I.1.

- **Potential adverse impacts on neighboring residential communities:** Several participants raised comments about how this redevelopment may impact neighboring residential communities, including increased light pollution, visual impacts, and noise. One community member from Kai Lani at Ko Olina highlighted that plans for moving the amphitheater to the other side of the property would more directly affect the surrounding community.

Several comment letters which comprehensively detail comments from residents of the surrounding area were provided. Responses provided in Table 7.3 address the numerous comments related to potential impacts on the neighboring residential communities.

- **Employees of the current lessee (Paradise Cove):** A community member and board member questioned if there was a plan for the approximately 210 employees who currently work at Paradise Cove.

The Applicant responded that discussions with the current lessee have been conducted. The Applicant recognizes the importance of the current operations and will consider solutions that will minimize disruption during redevelopment.

- In addition to the above, a representative of the Ko Olina Community Association shared several thoughts in opposition to the plan, including the lack of financial contribution to the maintenance of Ko Olina Resort infrastructure, the lack of clarity on the proposed uses, the necessity for retail and restaurant development given existing services in the resort, and the increased liability to the Ko Olina Resort.

Refer to the responses to the comprehensive comments provided by KOCA, KORA, and Ko Olina Development in Table 7.3.

7.5 Draft EIS Comment Letter Summary

A Draft EIS for the Project was published in the May 8, 2024 edition of TEN. The Draft EIS, as had the 2021 EISPN, tilted the Project as The Cove at Ko Olina Redevelopment. On May 10, 2024 the Applicant was informed by Ko Olina Development, LLC and Ko Olina Intangibles, LLC that “Ko Olina” is a registered trademark and not a generic Hawaiian place name and could not be used without permission from Ko Olina Intangibles LLC. In response, the Applicant had an addendum to the Draft EIS submitted to the OPSD-ERP on May 20, 2024 as a clerical correction to the unintended use of the trademarked term “Ko Olina,” which had been used in the EISPN and Draft EIS as a place name identifier. The Second Draft EIS corrected this clerical error by ceasing to use the phrase “at Ko Olina” as a descriptor for the Project, which was henceforth referred to as “The Cove.” No substantive changes to the Project and Draft EIS were made.

The Second Draft EIS was published by ERP in the June 8, 2024 edition of TEN and was followed by a 45-day public comment period. Written comments received during the 45-day public comment period for both the First Draft EIS and the Second Draft EIS have been considered. A total of 46 agencies, organizations, and individuals provided comments on the Draft SEIS (Table 7.1). Copies of each comment letter are provided in Appendix A-2. A summary of comments received and associated responses is provided in Table 7.3, which is organized by major topics. The major topics include the following:

- A. EIS Process
- B. Project Compliance with the Unilateral Agreement
- C. Redevelopment Program/Uses and Design
- D. Archaeological, Historic, and Cultural Resources
- E. Biological Resources
- F. Shoreline Survey and Setback Area
- G. Climate Change and Sea Level Rise Implications
- H. Police Protection
- I. Recreational Resources and Beach Access/Protection
- J. Access, Traffic, and Circulation
- K. Parking
- L. Airports

- M. Utilities (in general)
- N. Stormwater, Drainage, and Water Quality
- O. Water Supply
- P. Wastewater Treatment and Disposal
- Q. Solid Waste Management
- R. Noise Impacts
- S. Operations and Local Economy
- T. Visual Impacts
- U. Sustainability Features
- V. Consistency with Ko Olina Resort and Master Plan
- W. Financial Contribution to Ko Olina Resort
- X. Alternatives Analysis
- Y. Community Outreach Process
- Z. Neighboring Communities
- AA. Project Support
- BB. No Comment

Table 7.3: Draft EIS Summary of Comments and Responses

No.	Comments	Commenter	Responses
A.	EIS Process		EIS Section 1.3
A.1.	<p><u>I. The EIS is Defective</u> <u>KOCA and KORA object to the continued processing of the Environmental Impact statement for the Project because the applicant, initially James Campbell Company, LLC ("JCC") and now Cove Campbell Kobayashi, LLC ("CCK" and collectively with JCC, the "Applicant"), has changed between the filing of the initial Environmental Impact Statement Preparation Notice for the Project ("EISPN") and the EIS, which is not permitted by Hawai'i Administrative Rules ("HAR") §11-200.1.</u></p>	<p><u>Ken Williams, Ko Olina Community Association (KOCA) & Ko Olina Resort Operators Association (KORA)</u></p>	<p><u>When the EISPN was published (June 23, 2021), James Campell Company, LLC was identified as the Applicant. When the First Draft EIS was published (June 8, 2024), the Applicant was clearly identified as Cove Campbell Kobayashi LLC (CCK). An explanation for the change was provided in the First Draft EIS as follows: "The Environmental Impact Statement Preparation Notice (EISPN) published for the Project on June 23, 2021 identified James Campbell Company LLC as the Applicant. Subsequently, a new development partnership, Cove Campbell Kobayashi LLC, was formed to develop the Project. As such, they are now the Applicant." The same statement was included in the Second Draft EIS (Section 1.1).</u> <u>The comment fails to identify what section of HAR Chapter 11-200.1 has been violated and does not explain substantively how the disclosure provided in the Draft EIS of the change to the Applicant entity violated HAR Chapter 11-200.1. The EIS has been prepared consistent with all applicable requirements under HRS Chapter 343 and HAR Chapter 11-200.1.</u></p>
A.2.	<p><u>I. The EIS is Defective</u> <u>HAR §11-200.1 defines the term "Applicant" as "any person that, pursuant to statute, ordinance, or rule, officially requests approval from an agency for a proposed action."</u></p>	<p><u>Ken Williams, KOCA & KORA</u></p>	<p><u>The Applicant agrees that the definition of "Applicant" provided in the comment is as found in HAR, Chapter 11-200.1 (and more specifically, in HAR § 11-200.1-2). It is further noted that HAR § 11-200.1-2 defines "Person" as including "any individual, partnership, firm, association, trust, estate, private corporation, or other legal entity other than an agency." That same section of HAR, Chapter 11-200.1 defines "Agency" as "any department, office, board, or commission of the state or county government that is part of the executive branch of that government."</u> <u>CCK is not an agency (nor was James Campbell Company, LLC). As such, for the purposes of environmental review under HRS, Chapter 343, CCK is the "Applicant."</u></p>
A.3.	<p><u>I. The EIS is Defective</u> <u>The identity of the applicant is an important feature of the environmental review process, as it permits agencies and the public to assess the reputation, or lack thereof, of the applicant, and the likelihood that the project at issue will be completed as described. Issues as to the identity of the applicant could then be raised at the public scoping meeting and addressed in the draft EIS.</u></p>	<p><u>Ken Williams, KOCA & KORA</u></p>	<p><u>Under the law, there are two different tracks for the preparation and processing of an EIS. An EIS can be prepared and processed either as an agency action EIS or an applicant action EIS.</u> <u>For an agency action EIS, see HRS § 343-5(b), (c), and (d), which provides preparation and processing steps for an agency action EIS, and HAR §11-200.1-8 and §11-200.1-14(a) regarding preparation and processing of environmental review document and analysis for agency actions. For the preparation and processing of an applicant action EIS, see HRS § 343-5(e), (f) (providing preparation and processing steps for an applicant EIS) and HAR §11-200.1-9 and §11-200.1-14(b) (analysis and processing steps applicable to applicant action environmental review). From the start, the subject EIS process has correctly been identified as an applicant action environmental review.</u> <u>In response to the concern about whether a project presented in an EIS would be completed as described, please see HAR § 11-200.1-30, explaining that, should an action as presented in an accepted EIS change in some significant way, i.e., significant changes in size, scope, intensity, use, location, or timing, a supplemental EIS may be required. As such, the focus is on the proposed action itself.</u></p>
A.4.	<p><u>I. The EIS is Defective</u> <u>In this instance, the initial Applicant was JCC, in its capacity as the owner of record of the property on which the Proposed Action will occur ("Property"), as shown in the EISPN. However, the EIS was submitted by CCK. The EIS does not disclose the reason for the change in the applicant, or what interest CCK has in the property. From the public record, it does not appear that a conveyance of fee simple title has occurred, but whether CCK will hold a lease, license or other interest, and the duration of such interest, is unknown. Nothing in HAR 11-200.1 permits the change in the applicant once the initial submittal has occurred.</u></p>	<p><u>Ken Williams, KOCA & KORA</u></p>	<p><u>As noted in response A.3. above, the Draft EIS provided notice of the name of the Applicant. Additionally, as discussed in response A.1., the comment did not identify the specific section or sections of HAR Chapter 11-200.1 that is alleged to have been violated. Nor does the comment provide an explanation as to how the Draft EIS' disclosure of the change to the applicant entity violated HAR Chapter 11-200.1. The EIS has been prepared consistent with all applicable requirements under HRS Chapter 343 and HAR Chapter 11-200.1.</u> <u>For clarification, JCC is not the owner of the Cove Property. When the EISPN was published, the owner of the Cove Property was identified as Campbell Hawaii Investor LLC. As of this date, Campbell Hawai'i Investor, LLC remains the owner of the Project property. The name of the owner has been added to Section 1.1 of the Final EIS.</u></p>
A.5.	<p><u>I. The EIS is Defective</u> <u>The EIS and EISPN should be withdrawn, and the applicant (once JCC and CCK have determined the correct party) should submit corrected documents that conform with the requirements of Hawaii Revised Statutes ("HRS") Chapter 343 and HAR §11-200.1.</u></p>	<p><u>Ken Williams, KOCA & KORA</u></p>	<p><u>Please see responses to A.1. through A.4. Accordingly, the Applicant will not be withdrawing the subject EIS.</u></p>
A.6.	<p><u>I. The EIS is Defective</u> <u>In the event processing of the EIS continues, KOCA and KORA also hereby submit their substantive comments to the EIS, which makes clear that the Proposed Action¹, is ill advised, has numerous primary, secondary, and cumulative impacts on the environment that require additional study, and is of a size and scope that is inappropriate for its location.</u></p>	<p><u>Ken Williams, KOCA & KORA</u></p>	<p><u>It is unclear what specific deficiencies are being referring to. In accordance with HAR § 11-200.1-24, the data and analyses in an EIS shall be commensurate with the importance of the potential impacts. The Draft and Final EIS contain the appropriate data and analysis of the matters of environmental relevance to the planned Project. As discussed in the EIS, the Cove Property has primarily been used for commercial lū'aus, weddings, and entertainment since the late 1970's. The first major redevelopment of the Cove Property occurred in the early 1990s. The proposed revitalization of the site will include a new performing arts venue for the lū'au shows, in</u></p>

Table 7.3: Draft EIS Summary of Comments and Responses

No.	Comments	Commenter	Responses
	¹ Capitalized terms not otherwise defined herein shall have the meanings given in the EIS.		addition to ancillary restaurants, retail, and programming. The Project will create an authentic Hawaiian community gathering place that honors and reflects the history, culture, and connection to place.
A.7.	I. The EIS is Defective <u>KOD objects to the continued processing of the Environmental Impact statement for the Project because the applicant, initially James Campbell Company, LLC ("JCC") and now Cove Campbell Kobayashi, LLC ("CCK" and collectively with JCC, the "Applicant"), has changed between the filing of the initial Environmental Impact Statement Preparation Notice for the Project ("EISPN") and the EIS, which is not permitted by Hawai'i Administrative Rules ("HAR") §11-200.1.</u>	Kendall Kim, Ko Olina Development LLC (KOD)	When the EISPN was published (June 23, 2021), James Campbell Company, LLC was identified as the Applicant. When the First Draft EIS was published (June 8, 2024), the Applicant was clearly identified as Cove Campbell Kobayashi LLC (CCK). An explanation for the change was provided in the First Draft EIS as follows: "The Environmental Impact Statement Preparation Notice (EISPN) published for the Project on June 23, 2021 identified James Campbell Company LLC as the Applicant. Subsequently, a new development partnership, Cove Campbell Kobayashi LLC, was formed to develop the Project. As such, they are now the Applicant." The same statement was included in the Second Draft EIS (<i>Section 1.1</i>). The comment fails to identify what section of HAR Chapter 11-200.1 has been violated and does not explain substantively how the disclosure provided in the Draft EIS of the change to the applicant entity violated HAR Chapter 11-200.1. The EIS has been prepared consistently with all applicable requirements under HRS Chapter 343 and HAR Chapter 11-200.1.
A.8.	I. The EIS is Defective <u>HAR §11-200.1 defines the term "Applicant" as "any person that, pursuant to statute, ordinance, or rule, officially requests approval from an agency for a proposed action."</u>	Kendall Kim, KOD	The Applicant agrees that the definition of "Applicant" provided in the comment is as found in HAR, Chapter 11-200.1 (and more specifically, in HAR § 11-200.1-2). It is further noted that HAR § 11-200.1-2 defines "Person" as including "any individual, partnership, firm, association, trust, estate, private corporation, or other legal entity other than an agency." That same section of HAR, Chapter 11-200.1 defines "Agency" as "any department, office, board, or commission of the state or county government that is part of the executive branch of that government." CCK is not an agency (nor was James Campbell Company, LLC). As such, for the purposes of environmental review under HRS, Chapter 343, CCK is the "Applicant."
A.9.	I. The EIS is Defective <u>The identity of the applicant is an important feature of the environmental review process, as it permits agencies and the public to assess the reputation, or lack thereof, of the applicant, and the likelihood that the project at issue will be completed as described. Issues as to the identity of the applicant could then be raised at the public scoping meeting and addressed in the draft EIS.</u>	Kendall Kim, KOD	Under the law, there are two different tracks for the preparation and processing of an EIS. An EIS can be prepared and processed either as an agency action EIS or an applicant action EIS. For an agency action EIS, see HRS § 343-5(b), (c), and (d), which provides preparation and processing steps for an agency action EIS, and HAR §11-200.1-8 and §11-200.1-14(a) regarding preparation and processing of environmental review document and analysis for agency actions. For the preparation and processing of an applicant action EIS, see HRS § 343-5(e), (f) (providing preparation and processing steps for an applicant EIS) and HAR §11-200.1-9 and §11-200.1-14(b) (analysis and processing steps applicable to applicant action environmental review). From the start, the subject EIS process has correctly been identified as an applicant action environmental review. In response to the concern about whether a project presented in an EIS would be completed as described, please see HAR § 11-200.1-30, which explains that, should an action as presented in an accepted EIS change in some significant way, i.e., significant changes in size, scope, intensity, use, location, or timing, a supplemental EIS may be required. As such, the focus is on the proposed action itself.
A.10.	I. The EIS is Defective <u>In this instance, the initial Applicant was JCC, in its capacity as the owner of record of the property on which the Proposed Action will occur ("Property"), as shown in the EISPN. However, the EIS was submitted by CCK. The EIS does not disclose the reason for the change in the applicant, or what interest CCK has in the property. From the public record, it does not appear that a conveyance of fee simple title has occurred, but whether CCK will hold a lease, license or other interest, and the duration of such interest, is unknown. Nothing in HAR 11-200.1 permits the change in the applicant once the initial submittal has occurred.</u>	Kendall Kim, KOD	As noted in response A.9. above, the Draft EIS provided notice of the name of the Applicant. Additionally, as discussed in response A.1., the comment did not identify the specific section or sections of HAR Chapter 11-200.1 that is alleged to have been violated. Nor does the comment provide an explanation as to how the Draft EIS' disclosure of the change to the applicant entity violated HAR Chapter 11-200.1. The EIS has been prepared consistently with all applicable requirements under HRS, Chapter 343 and HAR, Chapter 11-200.1. For clarification, JCC is not the owner of the Cove Property. When the EISPN was published, the owner of the Cove Property was identified as Campbell Hawai'i Investor, LLC. As of this date, Campbell Hawai'i Investor, LLC remains the owner of the Project property. The name of the owner has been added to <i>Section 1.1</i> of the Final EIS.
A.11.	I. The EIS is Defective <u>The EIS and EISPN should be withdrawn, and the applicant (once JCC and CCK have determined the correct party) should submit corrected documents that conform with the requirements of Hawaii Revised Statutes ("HRS") Chapter 343 and HAR §11-200.1.</u>	Kendall Kim, KOD	Please see responses to Comments A.7 through A.10. Accordingly, the Applicant will not be withdrawing the subject EIS.
A.12.	I. The EIS is Defective <u>In the event processing of the EIS continues, KOD also hereby submit their substantive comments to the EIS, which makes clear that the Proposed Action¹, is ill advised, has numerous primary,</u>	Kendall Kim, KOD	It is unclear what specific deficiencies are being referring to. In accordance with HAR § 11-200.1-24, the data and analyses in an EIS shall be commensurate with the importance of the potential impacts. The Draft and Final EIS contains the appropriate data and analysis of the matters of environmental relevance to the planned Cove Redevelopment Project. As discussed in the EIS, the Cove Property has primarily been used for commercial lū'aus, weddings, and entertainment since the late 1970s. The first major redevelopment of the Cove Property occurred in the early 1990s. The proposed revitalization of the site will include a new performing

Table 7.3: Draft EIS Summary of Comments and Responses

No.	Comments	Commenter	Responses
	<p><u>secondary, and cumulative impacts on the environment that require additional study, and is of a size and scope that is inappropriate for its location.</u></p> <p>¹ Capitalized terms not otherwise defined herein shall have the meanings given in the EIS.</p>		<p><u>arts venue for the lū'au shows, in addition to ancillary restaurants, retail, and programming. The Project will create an authentic Hawaiian community gathering place that honors and reflects the history, culture, and connection to place.</u></p>
<p>A.13.</p>	<p>III. Conclusion</p> <p><u>An Environmental Impact Statement will be upheld as adequate only if:</u></p> <p><u>it has been compiled in good faith and sets forth sufficient information to enable the decision-maker to consider fully the environmental factors involved and to make a reasoned decision after balancing the risks of harm to the environment against the benefits to be derived from the proposed action, as well as to make a reasoned choice between alternatives.</u></p> <p><u>Price v. Obayashi Hawaii Corp., 81 Hawai`i 171, 183, 914 P.2d 1364, 1376 (1996)</u></p>	<p><u>Ken Williams, KOCA & KORA</u></p>	<p>The Applicant acknowledges that the language quoted in the comment comes from the Hawai'i Supreme Court's 1996 opinion <i>Price v. Obayashi Hawaii'i Corp.</i>, 81 Hawai'i 171, 914 P.2d 1364 (1996). For context, in that case the court held:</p> <p><u>the sufficiency of an environmental impact statement is a question of law, which is properly addressed through the summary judgment procedure. This is because the only question presented is whether the EIS complies with applicable statutory mandates, such as HRS chapter 343 and EIS Rules chapter 200. There are no factual determinations to be made regarding EIS adequacy.</u></p> <p><u>Price, 81 Hawai'i at 182, 914 P.2d at 1375 (1996)</u></p> <p>The court then articulated the "rule of reason" as the proper standard of review when making the aforementioned determination. The more complete quotation that includes the excerpt cited in the comment is as follows:</p> <p><u>In making such a determination the court is guided by the "rule of reason," under which an EIS need not be exhaustive to the point of discussing all possible details bearing on the proposed action but will be upheld as adequate if it has been compiled in good faith and sets forth sufficient information to enable the decision-maker to consider fully the environmental factors involved and to make a reasoned decision after balancing the risks of harm to the environment against the benefits to be derived from the proposed action, as well as to make a reasoned choice between alternatives.</u></p> <p><u>Price, 81 Hawai'i at 182, 914 P.2d at 1375 (footnote omitted).</u></p> <p>These standards were recently confirmed by the Hawai'i Supreme Court in <i>Kaupiko v. Board of Land & Natural Resources</i>, SCAP-22-0000557, 2024 Haw. LEXIS 141 (Haw. Sup. Ct. Aug. 28, 2024). The subject EIS for The Cove has been and will continue to be prepared and processed in accordance with all applicable legal standards and requirements.</p>
<p>A.14.</p>	<p>III. Conclusion</p> <p><u>In this instance, there are numerous deficiencies to the EIS, and given the lack of actual analysis of the alternatives, the EIS does not comply with the standards set forth above. Additionally, given the procedural deficiencies, it is clear that the Applicant should recommence the process by issuing a new EIS Preparation Notice containing the correct information.</u></p>	<p><u>Ken Williams, KOCA & KORA</u></p>	<p><u>Regarding the assertion about the EIS legal standards, please see response A.13. above.</u></p> <p><u>The general statement in the comment letter alleging "procedural deficiencies" is unclear. Based on the overall content of the comment, it is assumed that this comment is a repeat of the several comments previously made regarding the name of Applicant. Please see responses to Comments A.1. through A.5. above for responses to that concern.</u></p> <p><u>Regarding the general statement alleging lack of actual analysis of alternatives, please see the response to Comment X.1. of this Table 7.3 for substantive comments and responses on the issue of the alternatives analysis.</u></p>
<p>A.15.</p>	<p>III. Conclusion</p> <p><u>An Environmental Impact Statement will be upheld as adequate only if:</u></p> <p><u>it has been compiled in good faith and sets forth sufficient information to enable the decision-maker to consider fully the environmental factors involved and to make a reasoned decision after balancing the risks of harm to the environment against the benefits to be derived from the proposed action, as well as to make a reasoned choice between alternatives.</u></p> <p><u>Price v. Obayashi Hawaii Corp., 81 Hawai`i 171, 183, 914 P.2d 1364, 1376 (1996)</u></p>	<p><u>Kendall Kim, KOD</u></p>	<p>The Applicant acknowledges that the language quoted in the comment comes from the Hawai'i Supreme Court's 1996 opinion <i>Price v. Obayashi Hawaii'i Corp.</i>, 81 Hawai'i 171, 914 P.2d 1364 (1996). For context, in that case the court held:</p> <p><u>the sufficiency of an environmental impact statement is a question of law, which is properly addressed through the summary judgment procedure. This is because the only question presented is whether the EIS complies with applicable statutory mandates, such as HRS chapter 343 and EIS Rules chapter 200. There are no factual determinations to be made regarding EIS adequacy.</u></p> <p><u>Price, 81 Hawai'i at 182, 914 P.2d at 1375 (1996)</u></p> <p>The court then articulated the "rule of reason" as the proper standard of review when making the aforementioned determination. The more complete quotation that includes the excerpt cited in the comment is as follows:</p> <p><u>In making such a determination the court is guided by the "rule of reason," under which an EIS need not be exhaustive to the point of discussing all possible details bearing on the proposed action but will be upheld as adequate if it has been compiled in good faith and sets forth sufficient information to enable the decision-maker to consider fully the environmental factors involved and to make a reasoned decision after balancing the risks of harm to the environment against the benefits to be derived from the proposed action, as well as to make a reasoned choice between alternatives.</u></p> <p><u>Price, 81 Hawai'i at 182, 914 P.2d at 1375 (footnote omitted).</u></p> <p>These standards were recently confirmed by the Hawai'i Supreme Court in <i>Kaupiko v. Board of Land & Natural Resources</i>, SCAP-22-0000557, 2024 Haw. LEXIS 141 (Haw. Sup. Ct. Aug. 28, 2024). The subject EIS for The Cove has been and will continue to be prepared and processed in accordance with all applicable legal standards and requirements.</p>

Table 7.3: Draft EIS Summary of Comments and Responses

No.	Comments	Commenter	Responses
A.16.	<p>III. Conclusion</p> <p><u>In this instance, there are numerous deficiencies to the EIS, and given the lack of actual analysis of the alternatives, the EIS does not comply with the standards set forth above. Additionally, given the procedural deficiencies, it is clear that the Applicant should recommence the process by issuing a new EIS Preparation Notice containing the correct information.</u></p>	Kendall Kim, KOD	<p><u>Regarding the assertion about the EIS legal standards, please see response A.15. above.</u></p> <p><u>The general statement in the comment letter alleging “procedural deficiencies” is unclear. Based on the overall content of the comment, it is assumed that this comment is a repeat of the several comments previously made regarding the name of Applicant. Please see responses to Comments A.1. through A.5. above for responses to that concern.</u></p> <p><u>The comment letter makes unsubstantiated and non-substantive assertions that the Draft EIS lacks “actual analysis of the alternatives” but does not provide any specific concerns about the alternatives assessed in the Draft EIS. Please see Section 6.0 of the Draft EIS (Alternatives to the Proposed Action), which provides a comparative analysis of the proposed Project (i.e., the Proposed Action) and four other alternative uses for the Cove Property. This analysis meets the requirements of the environmental review process. See also response X.1. addressing more specific comments about the alternatives analysis.</u></p>
B.	Project Compliance with the Unilateral Agreement		EIS Section 3.0
B.1.	<p><u>4. The Draft EIS complies with the objectives and conditions of the General Plan, the ‘Ewa Development Plan and the unilateral agreement (UA) in Ordinance 89-27 (File No. 881Z-2).</u></p> <p><u>a. General Plan --The Project would support the objective of a secondary resort area at Ko ‘Olina and help maintain a successful visitor industry that respects Hawaiian culture.</u></p> <p><u>b. ‘Ewa Development Plan --The Project would support Ko ‘Olina’s role as an integral part of O’ahu’s Secondary Urban Center. It is consistent with the Resort/Recreation designation on the ‘Ewa Development Plan Land Use Map.</u></p> <p><u>c. Ordinance 89-27 – The Project complies with UA conditions to limit commercial activity to restaurants and retail activity associated with a Hawaiian Theme Park and a commercial Lū’au operation; limit lot coverage to 30 percent; maintain a 40-foot shoreline setback area free from structures; and connect to the Ko ‘Olina public sewer system.</u></p>	Department of Planning and Permitting (DPP)	<p><u>The Applicant acknowledges the comment and confirmation that the Project complies with the Honolulu General Plan, ‘Ewa Development Plan, and the UA (Ordinance No. 89-27). Further discussion of the Project’s consistency with these objectives, policies, and conditions is provided in <i>Section 3.4</i> (regarding UA conditions), and Sections 5.3.1, 5.3.2, and 5.3.3.</u></p>
B.2.	<p><u>D. / E. The Proposed Action Violates the Unilateral Agreement:</u></p> <p><u>The Paradise Cove property is subject to that certain Unilateral Agreement (Ordinance No. 89-27), dated February 13, 1989, recorded in the Land Court of the State of Hawaii as Document No. 1613497 (“Unilateral Agreement”), which provides that Section 1: “Declarant will limit the type of commercial activity on the Property to restaurants and retail activity associated with a Hawaiian Theme Park and a commercial lū’au operation.”</u></p> <p><u>Section 3 of the Unilateral Agreement provides in pertinent part “Declarant will develop the Property consistent with adopted urban design provisions and considerations for Ko Olina (West Beach)”.</u></p>	<ul style="list-style-type: none"> • <u>Kendall Kim , KOD</u> • <u>Ken Williams, KOCA & KORA</u> 	<p><u>The Unilateral Agreement and Declaration for Conditional Zoning, dated February 13, 1989, and Ordinance No. 89-27 (the UA), which rezoned the Cove Property, contains the language recited in this comment. Regarding the conditions under the UA more generally, <i>Section 1.2</i> of the EIS acknowledges the UA conditions and Ordinance No. 89-27. An expanded discussion has been added to <i>Section 1.7</i> of the Final EIS.</u></p> <p><u>In its comment letter on the Draft EIS dated July 22, 2024, DPP also noted that, “The Project complies with UA conditions to limit commercial activity to restaurants and retail activity associated with a Hawaiian Theme Park and a commercial Lū’au operation; limit lot coverage to 30 percent; maintain a 40-foot shoreline setback area free from structures; and connect to the Ko ‘Olina public sewer system.”</u></p> <p><u>A discussion of the Project’s consistency with adopted urban design provisions has been added as <i>Section 5.3.3</i> of the EIS.</u></p>
B.3.	<p><u>D. / E. The Proposed Action Violates the Unilateral Agreement:</u></p> <p><u>With respect to the retail and restaurant operations, there appears to be no connection between the proposed restaurant and retail activities and the commercial lū’au. The EIS claims that one of the objectives of the Proposed Action is to “activate” the Project during hours in which the commercial lū’au is not in operation. Thus, the restaurant and retail is not planned to be operated in connection with the lū’au, but rather as independent operations leased to third parties, which is clearly not the intent of the restrictions contained in the Unilateral Agreement.</u></p>	<ul style="list-style-type: none"> • <u>Kendall Kim , KOD</u> • <u>Ken Williams, KOCA & KORA</u> 	<p><u>In its comment letter on the Draft EIS dated July 22, 2024, DPP has confirmed that the planned Cove Redevelopment Project is consistent with Condition No. 1 of the UA , which provides that the “Declarant will limit the type of commercial activity on the Property to restaurants and retail activity associated with a Hawaiian Theme Park and a commercial lū’au operation.”</u></p> <p><u>The comment raises questions about the degree of entity “connection” between certain uses planned for the Project. The UA does not require a “connection” between operators. The UA calls for certain uses to be “associated with” a Hawaiian Theme Park. As with the current operation, the theme of the proposed Project will be on creating an authentic Hawaiian experience , as described in <i>Section 3.3.1</i> of the EIS, as follows:</u></p> <p><u>The intent of the Project is to update the commercial lū’au show and create an authentic Hawaiian outdoor recreation facility and community gathering place for kama’āina (Hawai’i residents) and visitors that honors and reflects history, culture, and connection to place. Revitalization of the Cove Property will provide ancillary uses comprised of a dynamic mix of retail, entertainment, and dining experiences within an immersive coastal setting that authentically honors the property’s Hawaiian legacy in a contemporary form. The Cove is envisioned to serve as a major recreational resource, visual amenity, and economic generator for the community.</u></p> <p><u>The Hawaiian theme will be incorporated in various ways throughout the Project, including through location, legacy and history of the Cove Property, architecture, site design and landscaping, and the opening of the Property to kama’āina and visitors alike. Moreover, as stated in <i>Section 2.2</i> of the EIS, “The commercial lū’au will continue to be the focal point of the Cove Property.” Within this revitalized Hawaiian-themed property, visitors will have the opportunity to enjoy shows, shopping, dining, attractions, and cultural activities. However, unlike the current conditions, where access to the Cove Property is limited to those who purchase tickets to the one nightly</u></p>

Table 7.3: Draft EIS Summary of Comments and Responses

No.	Comments	Commenter	Responses
			<p><u>lū'au show offered, access to The Cove will be available to all who wish to experience this authentic Hawaiian community gathering place without being required to purchase a ticket to the lū'au show.</u></p> <p><u>The UA calls for certain uses to be associated with a Hawaiian Theme Park. The Project proposes various interrelated uses and is therefore consistent with UA Condition No. 1 in that regard.</u></p>
B.4.	<p><u>D. / E. The Proposed Action Violates the Unilateral Agreement:</u></p> <p><u>The EIS makes some vague statements with respect to having the retail operations be run by local owners which "may" sell locally made goods, but as stated, the retail operations could just as easily be chain stores selling goods made elsewhere.</u></p>	<ul style="list-style-type: none"> • <u>Kendall Kim , KOD</u> • <u>Ken Williams, KOCA & KORA</u> 	<p><u>This comment is acknowledged. However, in the context of UA Condition No. 1, it is unclear why the comment assumes that non-local products offered for sale at the Project or shops that are not fully owned or controlled by Hawai'i entities would be problematic with respect to the UA conditions. UA Condition No. 1 does not mandate that all goods sold at or businesses operating within the Project must be exclusively local. The Condition focuses on maintaining the Hawaiian theme and supporting related uses.</u></p> <p><u>At this stage in the planning process, it is premature to identify particular retailers or specific goods that may be part of the retail environment at the Cove Project. However, Section 3.3.5 of the EIS describes the retail "Village Walk" component of the Project as follows:</u></p> <p><u>this area may feature curated small scale shops (Building 2, Figure 3.9), a market (Building 3, Figure 3.10), and show-related retail (Building 4, Figure 3.3) showcasing a selection of goods, including those made in Hawai'i, fostering an authentic connection between people and place and supporting the local economy. Selected retailers may focus on quality local or seasonal goods. The Village Walk will provide lū'au attendees an attractive and dynamic space to relax and shop before or after the shows. Retail options will attract guests and families in the 'Ewa region looking for a distinctive shopping experience in a tranquil and authentic setting.</u></p>
B.5.	<p><u>D. / E. The Proposed Action Violates the Unilateral Agreement:</u></p> <p><u>The Proposed Action also includes activities not permitted under the UA, including "nightly entertainment", which is undefined and could include entertainment not associated with the commercial lū'au, and "corporate retreats", which are clearly unrelated to the commercial lū'au.</u></p>	<ul style="list-style-type: none"> • <u>Kendall Kim , KOD</u> • <u>Ken Williams, KOCA & KORA</u> 	<p><u>Similar to the current operation, the proposed Project focuses on providing an authentic Hawaiian experience. This concept is clearly woven into the program and objectives of the planned Project. As such, it is not clear from the comment why "nightly entertainment" is a concern, as commercial lū'au shows have been taking place at the Cove Property nightly for decades.</u></p> <p><u>The subject property is proposed to be revitalized as The Cove project. The Hawaiian theme will be incorporated in various ways throughout the site, including through its location, legacy and history of the Cove Property, architecture, site design and landscaping, and the opening of the Property to kama'āina and visitors alike, and the commercial lū'au will continue to be the focal point of the Property.</u></p> <p><u>The EIS is clear that the current nighttime lū'au show will be renewed and that the Property will continue to host such nightly entertainment. For example, Section 3.3.3 of the EIS which now provides:</u></p> <p><u>The current nightly commercial lū'au show will be renewed to perpetuate and honor the Hawaiian culture and history of place through the traditions of hula and mele. In addition to nightly entertainment, potential programming at the performing arts venue may include wedding and other event receptions [and gatherings], corporate retreats, Hawaiian cultural arts and educational programs and demonstrations, community events, and holiday shows.</u></p> <p><u>Similar language is found throughout the EIS. As previously noted, nightly entertainment of this nature has been taking place on the Property since the late 1970s.</u></p> <p><u>Regarding "corporate retreats," the intent of that descriptor was to describe one of variety of events that could take place within this Hawaiian-themed project. However, in light of the comment expressing concerns about corporate retreats, the language within the LUO was revisited. The technical (and nonintuitive) definition of "corporate retreat" under the LUO is not part of the Project programming. Therefore, as shown in the block quote above, we have revised language in the Final EIS to eliminate reference to "corporate retreats."</u></p>
B.6.	<p><u>D. / E. The Proposed Action Violates the Unilateral Agreement:</u></p> <p><u>The EIS goes on to state that "activation of the Cove Property with a variety of programs and events will create a new community-oriented recreation experience". The restrictions in the UA do not permit the creation of a "new community-oriented recreation experience", but rather expressly limit the permitted uses to those associated with the commercial lū'au.</u></p>	<ul style="list-style-type: none"> • <u>Kendall Kim , KOD</u> • <u>Ken Williams, KOCA & KORA</u> 	<p><u>This comment is acknowledged. Please see responses to B.2 and B.3 addressing the proposed uses in the context of UA Condition No. 1.</u></p>
B.7.	<p><u>D. / E. The Proposed Action Violates the Unilateral Agreement:</u></p> <p><u>As drafted, the Proposed Use creates an open-ended opportunity for the Applicant to undertake any type of event at any time during the day or night, regardless of whether such use is consistent with the UA and without reference to Ko Olina Resort and surrounding residential communities.</u></p>	<ul style="list-style-type: none"> • <u>Kendall Kim , KOD</u> • <u>Ken Williams, KOCA & KORA</u> 	<p><u>Contrary to the suggestion made in the comment, the Applicant does not intend to pursue uses and activities that are inconsistent with the UA. The EIS expressly acknowledges the UA conditions and Ordinance No. 89-27. And, in its comment letter on the Draft EIS dated July 22, 2024, DPP has confirmed that the activities and uses planned for the Project are consistent with the UA conditions.</u></p> <p><u>The expressed concern about a lack of "reference to Ko Olina Resort" is unclear, particularly in light of other comments in this letter asserting the Applicant "improperly conflates the Property with Ko Olina Resort." See e.g. Comments B.16. and B.17.</u></p>

Table 7.3: Draft EIS Summary of Comments and Responses

No.	Comments	Commenter	Responses
			<p>The EIS repeatedly identifies that the Project is adjacent to Ko Olina Resort. Because this concern is raised in the context of day and night activities, the Applicant assumes the concern is related to potential noise impacts. <i>Section 4.9</i> of the EIS addresses noise impacts from the proposed Project (both during construction and Project operation) and takes into account the potential for impacts to the residential areas of Kai Lani at Ko Olina and The Coconut Plantation – Ko Olina. The Acoustic Study (<i>Appendix H</i>) has been updated to assess the potential impacts of the relocated amphitheater on the nearest residential developments of Kai Lani at Ko Olina and The Coconut Plantation – Ko Olina. As summarized in <i>Section 4.9</i>, the new amphitheater’s sound amplification system is being designed to achieve the three to four dBA reduction while maintaining current maximum program sound levels within the audience seating area. This mitigation measure will ensure that the new amphitheater will maintain the existing sound levels of the current lū’au show. The final design of the sound system will be determined as the Project progresses.</p> <p>For context, the same types of uses planned for the proposed Project are and/or have been in operation at the Cove Property for well over 40 years. The commercial activities at the Property long predate the existence of Ko Olina Resort and its surrounding residential communities (e.g., The Coconut Plantation, Kai Lani at Ko Olina, Ko Olina Fairways, Ko Olina Hillside Villas, Ko Olina Kai Golf Estates, and Beach Villas at Ko Olina). Therefore, the proposed use of the Cove Property is generally consistent with existing conditions within the surrounding community.</p>
B.8.	<p><u>D. / E. The Proposed Action Violates the Unilateral Agreement:</u> The EIS should be corrected to accurately state the Proposed Action will only undertake those activities specifically permitted by the UA.</p>	<ul style="list-style-type: none"> • <u>Kendall Kim , KOD</u> • <u>Ken Williams, KOCA & KORA</u> 	<p>The Project will be developed consistent with the UA and the LUO. DPP has confirmed that the proposed Project is consistent with the UA conditions. An analysis of the Project’s consistency with the UA is provided in <i>Section 3.4</i> of the Final EIS. At present, Applicant does not intend to seek a change in the B-1, Neighborhood Business District zoning designation of the Property.</p>
B.9.	<p><u>D. / E. The Proposed Action Violates the Unilateral Agreement:</u> With respect to the requirement that the development be consistent with the urban design provisions and considerations for Ko Olina, the Applicant has made no effort to analyze whether its proposed development is consistent with the Ko Olina Urban Design Plan² (“UDP”), or the adopted Ko Olina Resort Design Guidelines (“Design Guidelines”).</p> <p>[Footnote 2: See Revised Ordinances of Honolulu, Ordinance 86-61.]</p>	<ul style="list-style-type: none"> • <u>Kendall Kim , KOD</u> • <u>Ken Williams, KOCA & KORA</u> 	<p>Ordinance No. 86-61 is not applicable to the Property. Ordinance No. 86-61 appears to be an amendment to the development plan land use map for Ko’olauloa. The Property is not within the Ko’olauloa area or subject to that development plan.</p> <p>The Cove Property was rezoned under Ord. 89-27. Condition No. 3 of the UA provides that the “Declarant will develop the Property consistent with adopted urban design provisions and considerations for Ko Olina (West Beach) to include a 40 foot wide strip along the seaward property boundary which shall be open and free of structures and improvements.”</p> <p>Regarding an analysis of the Cove’s consistency with urban design provisions, <i>Section 5.3.3</i> of the EIS now provides an analysis of the Project’s consistency with various urban design provisions. Namely, (i) urban design principles and controls for ‘Ewa; West Beach special area under the Ewa Development Plan in effect at the time of the enactment of Ord. 89-27; (ii) the urban design provisions for West Beach dated May 1986; and (iii) the guidelines applicable to the Ko Olina area found in the ‘Ewa Development Plan, Ordinance 20-46, effective December 9, 2020, which “incorporates key elements for Ko Olina from the former Development Plan and the [West Beach/Ko Olina] Unilateral Agreement.”</p> <p>With respect to item (ii), the current ‘Ewa Development Plan expressly incorporates key elements from those design provisions. The comment seeking an analysis of the “Ko Olina Resort Design Guidelines” appears to be misplaced. As noted in Comment E from the KOD letter and F from the KOCA & KORA letter (Comments B.16. and B. 17. in this <i>Table 7.3</i>), Campbell Estate, the prior owner of the land upon which Ko Olina Resort is constructed, “made the deliberate decision not to include Lanikūhonua and the Paradise Cove lū’au site within Ko Olina Resort. Ko Olina Resort is subject to a separate Unilateral Agreement, SMA Permit and Shoreline Setback Variance, each which contains requirements different from those affecting the Paradise Cove lū’au property[.]” There are no “adopted Ko Olina Resort Design Guidelines” that are applicable to the Cove Property.</p>
B.10.	<p><u>D. / E. The Proposed Action Violates the Unilateral Agreement:</u> The Applicant has not consulted with either the New Construction Committee or Modification Construction Committee for Ko Olina Resort, which administer the Design Guidelines.</p>	<ul style="list-style-type: none"> • <u>Kendall Kim , KOD</u> • <u>Ken Williams, KOCA & KORA</u> 	<p>Neither the “New Construction Committee” nor the “Modification Construction Committee for Ko Olina Resort” is recognized within the language in Condition No. 3 of the UA. Further, neither of these committees submitted comments during the public comment period for the EISPN or the Draft EIS. The reference to “the Design Guidelines” is also unclear. Condition No. 3 of the UA refers to consistency with “adopted urban design provisions and considerations for Ko Olina (West Beach).” It does not refer to any “Design Guidelines” and there are no “Design Guidelines” applicable to the Cove Property.</p> <p>The Applicant interprets these terms to refer to committees described under the Declaration of Covenants for Ko Olina Community Association, dated December 1, 1986, which includes design guidelines that are relevant only to land that is subject to that Declaration of Covenants. The Cove Property has never been subject to that Declaration of Covenants. Similarly, the Amended and Restated Declaration of Covenants for Ko Olina Community Association (which we assume is the declaration mentioned in Comment B.11. below), recorded May 10, 2006, was never recorded against the Cove Property. Therefore, any committees established under either of these declarations are irrelevant for the purposes of analyzing Project consistency pursuant to Condition No. 3 of the UA (Ordinance No. 89-27).</p>

Table 7.3: Draft EIS Summary of Comments and Responses

No.	Comments	Commenter	Responses
B.11.	<p><u>D. / E. The Proposed Action Violates the Unilateral Agreement:</u> Given the preliminary plans that have been submitted as part of the EIS, the Proposed Action is <u>not consistent with the UDP.</u> For example, the UDP provides at Section I.A.3: <u>Building Orientation. Generally, on those land parcels within the major axis perpendicular to the shoreline, the long dimensions of buildings should be perpendicular to the shoreline to afford view corridors to the ocean. The narrower dimensions of buildings should face the shoreline and setbacks should be varied to avoid a wall effect along the shoreline.</u> (Emphasis Added).</p>	<ul style="list-style-type: none"> • <u>Kendall Kim , KOD</u> • <u>Ken Williams, KOCA & KORA</u> 	<p>The comment letter did not include a copy of the referenced “Ko Olina Urban Design Plan” cited. Additionally, as noted in a prior response, Ordinance 86-61, which is cited in the comment letter, appears to be an amendment to the development plan land use map for Ko’olauloa. The Property is not within the Ko’olauloa area or subject to that development plan, therefore the comment is not applicable.</p> <p>However, Ordinance No. 86-09 (effective March 11, 1986) and its Unilateral Agreement and Declaration for Conditional Zoning, which is the ordinance that enacted an approximately 642-acre rezoning of the Ko Olina Resort land (then known as West Beach), imposed a condition upon the Resort that “An urban design plan for West Beach shall be submitted to the Department of Land Utilization for approval.” From our research, we identified that certain document entitled “Urban Design Provisions for West Beach” dated May 1986 and approved by the Department of Land Utilization in August 1986, has language such as what is quoted in the comment. To clarify, Ordinance No. 86-09 did not rezone the Cove Property nor has that Unilateral Agreement been an encumbrance on the Cove Property. However, the language quoted in the comment letter closely tracks Section III.A.1.c. of those urban design provisions. In response to the comment, <i>Section 5.3.3</i> of the EIS now provides an analysis of the Project’s consistency with various urban design provisions.</p> <p>Further research identified certain urban design provisions that were incorporated into the SMA Resolution No. 86-61, with amendments by the Honolulu City Council, which authorized development within the SMA of the Ko Olina Resort. It is unclear whether or how those provisions are relevant to Ko Olina Resort in light of the Department of Land Utilization’s subsequent (August 1986) acceptance of the “Urban Design Provisions for West Beach” noted above. As such, an analysis of those provisions is not applicable, particularly as SMA Resolution No. 86-61 clearly does not encumber the Cove Property, nor did it authorize development within the Cove Property. However, from the Applicant’s cursory review, it is acknowledged that the language cited in the comment is also found within that Ko Olina Resort SMA Resolution, with some modifications.</p> <p>As to the specific language cited in the comment, it is noted that the provision is drafted as a recommendation rather than a mandatory requirement (the provision is framed as “Generally”). Furthermore, its applicability is directed to “land parcels with the major axis perpendicular to the shoreline[.]” The Cove Property is approximately 1,164 feet by 655 feet at its furthest reaches, and its major axis (approximately 979 feet) is roughly parallel to the shoreline and is not perpendicular to the shoreline. As such, even if these private urban design provisions were applicable to the Cove Property, the specific provision cited in the comment would not be applicable due to the configuration of the Cove parcel.</p>
B.12.	<p><u>D. / E. The Proposed Action Violates the Unilateral Agreement:</u> In reviewing the plans for the buildings contained in the EIS, the Applicant proposes to violate this provision by having many of the buildings (e.g., Buildings 1, 2, 3, 5, 6, 8) be parallel to the shoreline, creating the wall effect blocking views that is prohibited.</p>	<ul style="list-style-type: none"> • <u>Kendall Kim , KOD</u> • <u>Ken Williams, KOCA & KORA</u> 	<p>Please see the response to D./E., Comment 10 immediately above addressing the inapplicability of the provision cited in the comment letter.</p> <p>The assertion that the Project will create a “wall effect” appears to be inconsistent with the relevant facts presented in the EIS. The Property encompasses approximately 10.85 acres (472,757 sf). As a B-1, Neighborhood Business District-zoned property, a lot coverage of approximately 470,448 sf. However, pursuant to the UA (Ordinance 89-27), the lot coverage of the Cove Property is limited to no more than 30 percent, i.e., lot coverage is limited to approximately 141,827 sf. Even with this significant limitation on development, the Cove Redevelopment Project proposes a lot coverage of approximately 13.84 percent (65,413 sf), well under the 30 percent limitation. The preliminary design for the Project as described in the EIS contemplates a project that is under 20 percent lot coverage. Moreover, within this modest footprint, the new structures at The Cove will be compatible with the site’s coastal setting. As discussed, and shown throughout <i>Section 3.0</i>, the overall Project design will predominately consist of open structures and the inclusion of outdoor terrace seating (covered and uncovered), and open areas will be incorporated throughout to preserve views and create a relaxed setting.</p>
B.13.	<p><u>D. / E. The Proposed Action Violates the Unilateral Agreement:</u> <u>Section I.B of the UDP provides that for buildings within the SMA:</u> <u>2. Structures shall generally be setback a distance of 300 feet from the existing, certified shoreline . . . Subject to the policies set forth herein below. Structures related to recreation uses may be excepted from this requirement upon approval of the Department of Land Utilization, provided that such structures shall not exceed 25 feet in height.</u> Applicant states that certain of the buildings will be raised between 8-19 feet. If the buildings are raised 8-19 feet above sea level, the buildings would exceed 25 feet in height from the original surface of the land and would therefore be in violation of this restriction.</p>	<ul style="list-style-type: none"> • <u>Kendall Kim , KOD</u> • <u>Ken Williams, KOCA & KORA</u> 	<p>The Cove Property will be redeveloped consistent with its zoning. With regards to the comment’s reference to certain “urban design provisions” please see our response to D./E., Comment 10.</p> <p>The Cove Property is zoned in the B-1 Neighborhood Business District, with a permitted building height of up to 40 feet. <i>Section 3.3.1</i> of the Draft EIS, clearly states that, “structures will adhere to the 40-foot height limit of the B-1, Neighborhood Business District[.]” The 40-foot height limit is the same height standard that was applied to the Cove Property when West Beach Estates sought (with the permission of the Estate of James Campbell as landowner) and obtained SMA and CUP approval from the City Council and the Department of Land Utilization in 1993. We also note that the ‘Ewa Development Plan, Ordinance 20-46, effective December 9, 2020, which “incorporates key elements for Ko Olina from the former Development Plan and the [West Beach/Ko Olina] Unilateral Agreement” specifically provides that building heights at Paradise Cove are to be no more than 40-feet in height.</p>
B.14.	<p><u>D. / E. The Proposed Action Violates the Unilateral Agreement:</u> Additionally, many, if not all, of the buildings would be in violation of the 300-foot setback.</p>	<ul style="list-style-type: none"> • <u>Kendall Kim , KOD</u> • <u>Ken Williams, KOCA & KORA</u> 	<p>The Cove Property is not subject to a 300-foot setback.</p>

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			<p>The original 'Ewa Development Plan special provisions for the West Beach special area explicitly contemplate that the Planning Department has the authority to authorize lesser or greater setbacks during design review. This flexibility has been maintained through to the current 'Ewa Development Plan, which anticipates greater or lesser setbacks to be approved by DPP during design review.</p> <p>The design review setback analysis for the Cove Property occurred over 30 years ago, when the Property was rezoned. Under Condition No. 3 of the UA (Ordinance No. 89-27), the Cove Property is subject to a 40-foot setback. The 40-foot wide strip that runs along the seaward property boundary must be kept open and free of structures and improvements. DPP has confirmed that the proposed Project is consistent with this requirement.</p> <p>In addition, unrelated to the UA, because the proposed Project is a redevelopment of the Property, pursuant to Ordinance No. 23-03, the Property will be subject to an increased shoreline setback of 60 feet. As described in <i>Section 1.11.2</i> of the EIS, "In alignment with ROH, Chapter 26, planned structures will be set back at least 60 feet from the certified shoreline. The 60-foot setback area will be maintained as open space, preserving the natural shoreline environment and lateral public pedestrian access to the beach."</p>
<p>B.15.</p>	<p>D. / E. The Proposed Action Violates the Unilateral Agreement: <u>While the Amended and Restated Declaration of Covenants of Ko Olina Community Association is not recorded against the Property, to the extent that compliance with the adopted Design Guidelines is required by the UA, the Proposed Action violates numerous provisions, including the provisions with respect to view corridors, setbacks, building massing, and building heights.</u></p>	<ul style="list-style-type: none"> • <u>Kendall Kim, KOD</u> • <u>Ken Williams, KOCA & KORA</u> 	<p>The Applicant agrees that the Cove Property is not subject to any KOCA declarations of covenants. Moreover, as noted in the response B.14. above, there are no "Design Guidelines" applicable to the Cove Property. By the plain language in the Cove rezoning UA (Ordinance No. 89-27), Condition No. 3, no Ko Olina "Design Guidelines" were imposed upon the Property. Please refer to the responses with respect to views, setbacks, building orientations, and heights (responses B.11 through B.14). A further analysis of the Project's consistency with various urban design provisions, including building massing, has been added to <i>Section 5.3.3</i> of the EIS.</p>
<p>B.16.</p>	<p>E. The EIS improperly conflates the Property with Ko Olina Resort: <u>The EIS continuously refers to the Proposed Action as either taking part within Ko Olina Resort, or as part of the "wider" Ko Olina Resort area. JCC is the successor to Campbell Estate, which was the prior owner of the land upon which Ko Olina Resort is constructed. Campbell Estate made the deliberate decision not to include Lanikūhonua and the Paradise Cove lū'au site within Ko Olina Resort. Ko Olina Resort is subject to a separate Unilateral Agreement, SMA Permit and Shoreline Setback Variance, each which contains requirements different from those affecting the Paradise Cove lū'au property, and it is the Resort, not the Paradise Cove lū'au site, that is intended to be part of the second city which provides relief from congestion in Waikiki. While the Paradise Cove lū'au property has the right to use the entry roadway, JCC does not contribute towards maintenance of the road or other Ko Olina Resort infrastructure. The constant references to the Proposed Action taking place within Ko Olina Resort gives the improper appearance that KOD, KOCA, KORA, and/or the constituent residential communities within Ko Olina Resort, have approved of or are affiliated with the Proposed Action. In fact, the opposite true. KOCA and KORA object to the Proposed Action as an ill-advised throwback to the overly intensive type of use which has led to over tourism of Hawai'i's precious natural resources and asserts that the Proposed Action should be rethought in its entirety. As such, the EIS should not analyze the benefits and liabilities of the Proposed Action as if it were included within Ko Olina Resort.</u></p>	<p><u>Kendall Kim, KOD</u></p>	<p>According to Ordinance No. 20-46 (the 'Ewa DP), the Cove Property is physically considered to be within the Ko Olina Resort. The 'Ewa DP includes the Cove Property on the Ko Olina Land Use Map, a copy of which has been added to the EIS as <i>Figure 1.6</i>. In this regard, the City's 2020 'Ewa DP is consistent with the language and land use map used in prior iterations of the 'Ewa DP.</p> <p>With respect to the "Ko Olina Resort" area, the 'Ewa DP's general policies include a directive to "Develop Ko Olina Resort as an integral part of the Secondary Urban Center." The 'Ewa DP Land Use Map designates the Cove Property as "Resort" and the DP text clearly identifies that the Cove Property "should be used for resort commercial purposes."</p> <p>Notwithstanding this land use designation, the EIS does inform the public that that the Cove is not within the Ko Olina Resort Master Plan. See e.g., footnote 1 in <i>Section 2.1</i>:</p> <p><u>"The Cove Property is located adjacent to the Ko Olina Resort area. The Ko Olina Resort Master Plan does not encompass the Cove Property or the neighboring LCI property, as they are not subject to the original Ko Olina Declaration of Conditions, Covenants and Restrictions recorded by Campbell Estate in 1986. For planning purposes, the City and County of Honolulu 'Ewa DP (amended 2020), which establishes the long-range vision for the region, identifies the Cove Property within the physical extents of the resort land use area (<i>Figure 1.6</i>)."</u></p> <p>The Applicant agrees that "Ko Olina Resort is subject to a separate Unilateral Agreement, SMA Permit and Shoreline Setback Variance, each which contains requirements different from those affecting the Paradise Cove lū'au property," as none of the terms or conditions of those entitlements are applicable to the Cove Property. The EIS does not convey the "appearance" that Project concept or design is approved by the entities noted in the comment. None of those entities are listed as Project development partners and the EIS is clear that the Project is not part of the Ko Olina Resort master plan area. See, e.g., <i>Section 1.8</i>, footnote 3.</p> <p>Regarding the Cove Property's contribution to road maintenance and Resort infrastructure, the comment letter correctly notes that the Cove Property "is not subject to the payment obligations in the underlying declarations that govern the Resort" (see Comments Y.1. and Y.2.).</p> <p>The comment that KOCA and KORA object to the proposed Project is acknowledged. However, the comment letter is from KOD and not from KOCA or KORA. It is not clear from the comment letter whether KOD has been given the authority to make representations on behalf of KORA or KOCA.</p> <p>In response to the comment regarding "over tourism of Hawaii's precious natural resources," the Project has been carefully designed to minimize environmental impacts while enhancing the community's access to cultural and outdoor recreational activities. <i>Section 4.0</i> of the EIS includes a thorough assessment of potential impacts on natural resources, including traffic, infrastructure, and coastal ecosystems, and proposes mitigation measures where appropriate. The Cove intends to balance tourism with its long-term commitment to sharing authentic Hawaiian culture through entertainment, educational activities, and local engagement that will strengthen this region's role as the Secondary Urban Center.</p> <p>In response to the comment that the Project should be "rethought in its entirety" , it is unclear which aspects of the Project KOD believes should be reconsidered. The Applicant continues to meet with various stakeholders, has disclosed environmental</p>

Table 7.3: Draft EIS Summary of Comments and Responses

No.	Comments	Commenter	Responses
			<p>considerations in this EIS, and will continue to comply with the conditions of the UA (Ordinance No. 89-27) and applicable regulations. Community outreach and program refinement will continue as the Project progresses.</p> <p>The environmental analysis provided in the EIS is consistent with the requirements under HRS, Chapter 343 and its implementing regulations (HAR, Title 11, Chapter 200.1). It is unclear how the requested analysis, which seemingly disregards the physical location of the Cove Property, would be consistent with the good faith disclosure of relevant information appropriate in an EIS. The EIS was developed based on a comprehensive understanding of the physical, environmental, and cultural context of the Cove Property and its surrounding area. Any analysis (i.e., the comment that the Project should <i>not</i> be analyzed “as if it were included within Ko Olina Resort”), that omits the Project’s specific location or context would not provide an accurate or meaningful evaluation of its potential impacts. Therefore, the Applicant believes the current analysis meets the requirements of HRS, Chapter 343.</p>
<p>B.17.</p>	<p>F. The EIS improperly conflates the Property with Ko Olina Resort: <u>The EIS continuously refers to the Proposed Action as either taking part within Ko Olina Resort, or as part of the “wider” Ko Olina Resort area. JCC is the successor to Campbell Estate, which was the prior owner of the land upon which Ko Olina Resort is constructed. Campbell Estate made the deliberate decision not to include Lanikūhonua and the Paradise Cove lū’au site within Ko Olina Resort. Ko Olina Resort is subject to a separate Unilateral Agreement, SMA Permit and Shoreline Setback Variance, each which contains requirements different from those affecting the Paradise Cove lū’au property, and it is the Resort, not the Paradise Cove lū’au site, that is intended to be part of the second city which provides relief from congestion in Waikiki. While the Paradise Cove lū’au property has the right to use the entry roadway, JCC does not contribute towards maintenance of the road or other Ko Olina Resort infrastructure. The constant references to the Proposed Action taking place within Ko Olina Resort gives the improper appearance that KOCA, KORA, and/or the constituent residential communities within Ko Olina Resort, have approved of or are affiliated with the Proposed Action. In fact, the opposite is true. KOCA and KORA object to the Proposed Action as an ill-advised throwback to the overly intensive type of use which has led to over tourism of Hawai’i’s precious natural resources and asserts that the Proposed Action should be rethought in its entirety. As such, the EIS should not analyze the benefits and liabilities of the Proposed Action as if it were included within Ko Olina Resort.</u></p>	<p>Ken Williams, KOCA & KORA</p>	<p>According to Ordinance No. 20-46 (the ‘Ewa DP), the Cove Property is physically considered to be within the Ko Olina Resort. The ‘Ewa DP includes the Cove Property on the Ko Olina Land Use Map, a copy of which has been added to the EIS as <i>Figure 1.6</i>. In this regard, the City’s 2020 ‘Ewa DP is consistent with the language and land use map used in prior iterations of the ‘Ewa DP.</p> <p>With respect to the “Ko Olina Resort” area, the ‘Ewa DP’s general policies include a directive to “Develop Ko Olina Resort as an integral part of the Secondary Urban Center.” The ‘Ewa DP Land Use Map designates the Cove Property as “Resort” and the plan text clearly identifies that the Cove Property “should be used for resort commercial purposes.”</p> <p>Notwithstanding this land use designation, the EIS does inform the public that the Cove is not within the Ko Olina Resort Master Plan See e.g., <i>Section 2.1</i>, footnote 1:</p> <p>“The Cove Property is located adjacent to the Ko Olina Resort area. The Ko Olina Resort Master Plan does not encompass the Cove Property or the neighboring LCI property, as they are not subject to the original Ko Olina Declaration of Conditions, Covenants and Restrictions recorded by Campbell Estate in 1986. For planning purposes, the City and County of Honolulu ‘Ewa DP (amended 2020), which establishes the long-range vision for the region, identifies the Cove Property within the physical extents of the resort land use area.”</p> <p>The Applicant agrees that “Ko Olina Resort is subject to a separate Unilateral Agreement, SMA Permit and Shoreline Setback Variance, each which contains requirements different from those affecting the Paradise Cove lū’au property,” as none of the terms or conditions of those entitlements are applicable to the Cove Property.</p> <p>Regarding the Cove Property’s contribution to road maintenance and Resort infrastructure, the statement made in the comment letter correctly notes that the Cove Property “is not subject to the payment obligations in the underlying declarations that govern the Resort” (see Comments Y.1. and Y.2.).</p> <p>The EIS does not convey the “appearance” that Project concept or design is approved by the entities noted in the comment. None of those entities are listed as Project development partners and the EIS is clear that the Project is not part of the Ko Olina Resort master plan area. See, e.g., <i>Section 1.8</i>, footnote 3. However, it is acknowledged that the comment that KOCA and KORA object to the proposed Project.</p> <p>In response to the comment regarding “over tourism of Hawai’i’s precious natural resources,” the Project has been carefully designed to minimize environmental impacts while enhancing the community’s access to cultural and outdoor recreational activities. <i>Section 4.0</i> of the EIS includes a thorough assessment of potential impacts on natural resources, including traffic, infrastructure, and coastal ecosystems, and proposes mitigation measures where appropriate. The Cove intends to balance tourism with its long-term commitment to sharing authentic Hawaiian culture through entertainment, educational activities, and local engagement that will strengthen this region’s role as the Secondary Urban Center.</p> <p>In response to the comment that the Project should be “rethought in its entirety”, it is unclear which aspects of the Project KOCA/KORA believe should be reconsidered. The Applicant continues to meet with various stakeholders, has disclosed environmental considerations in this EIS, and will continue to adhere to comply with applicable regulations. Community outreach and program refinement will continue as the Project progresses.</p> <p>The environmental analysis provided in the EIS is consistent with the requirements under HRS, Chapter 343 and its implementing regulations (HAR, Title 11, Chapter 200.1). It is unclear how the requested analysis (i.e., the comment that the Project should <i>not</i> be analyzed “as if it were included within Ko Olina Resort”), which seemingly disregards the physical location of the Cove Property, would be consistent with the good faith disclosure of relevant information appropriate in an EIS. The EIS was developed based on a comprehensive understanding of the physical, environmental, and cultural context of the Cove Property and its surrounding area. Any analysis that omits the Project’s specific location or context would not provide an accurate or meaningful evaluation of its potential impacts. Therefore, the Applicant believes the current analysis meets the requirements of HRS, Chapter 343.</p>

Table 7.3: Draft EIS Summary of Comments and Responses

No.	Comments	Commenter	Responses
C.	Redevelopment Program/Uses and Design		EIS Section 3.0
C.1.	<p>2. The Final EIS should revise the following Figures:</p> <p>a. <u>Figure 3.2 Existing Conditions – Demolition Plan, legend, plan and text are not legible.</u> <u>Figure 3.3 Preliminary Site Plan, legend text is not legible.</u></p>	DPP	<u>Figures 3.2 and 3.3 have been updated accordingly.</u>
C.2.	<p><u>A. The Focal Point, Scale and Scope of the Proposed Action is Inappropriate.</u> <u>The focal point of the property is and always has been intended to be a commercial lū'au to perpetuate Hawaiian cultural practices by keeping longstanding Hawaiian arts alive. Furthermore, the scale and scope of the Proposed Action is completely inappropriate for a location adjacent to a pristine public beach. The Applicant proposes to deemphasize the commercial lū'au footprint to approximately only one acre, increase building density by more than 300%, with nearly all of the increase going to the installation of a strip mall of retail shops and restaurants that do not appear to have the required connection to the commercial lū'au, increase wastewater discharge by over 300% and increase storm water sheet flow discharge into the ocean by 100%. All the increase in construction will be taking place on the property that has enormous cultural importance with a known native Hawaiian burial complex, with a high likelihood of disturbing additional iwi kūpuna.</u> <u>The massive increase in building coverage is not permitted by the Unilateral Agreement (defined below) and irrevocably commits such Property to a shopping center rather than the lū'au it is supposed to be.</u></p>	Kendall Kim, KOD	<p><u>The proposed uses and the planned scale and scope of the Project are consistent with the O'ahu General Plan, the 'Ewa DP, the property's B-1, Neighborhood Business District zoning, and the property's governing UA (Ordinance No. 89-27).</u></p> <ul style="list-style-type: none"> <u>O'ahu General Plan (Section 5.3.1): The Project supports the 'Ewa region as a Secondary Urban Center.</u> <u>'Ewa DP (Section 5.3.2): This plan supports the inclusion of resort-retail uses, which the Project respects by integrating retail and restaurant establishments that complement the primary lū'au and Hawaiian cultural theme.</u> <u>'Ewa DP Ko Olina Resort guidelines which identifies the Property for resort commercial purposes. See e.g. Table 5.9 that has been added to the EIS.</u> <u>Zoning (Section 5.3.4): The property is zoned B-1, Neighborhood Business District, which allows retail and dining and a commercial lū'au (considered an "Amusement Facility" or "Recreation, General Outdoor") with the approval of a CUP, Major pursuant to ROH, Chapter 21. As with the last major redevelopment of the Property in the 1990s, the Applicant will seek a CUP Major for the Project. Regarding building scale.</u> <u>UA (Ordinance No. 89-27): The UA permits up to 30 percent lot coverage (approximately 141,827 sf of the 472,757-sf lot. The proposed development remains well under this maximum limit at 13.84 percent (65,413 sf). See Figure 3.18. Importantly, the UA allows for commercial activities such as retail, and restaurants associated with a Hawaiian Theme Park and a commercial lū'au operation, consistent with the scope of the Project. As such, the Project's proposed building coverage is consistent with the applicable UA. Further, as to building scale, the Project will adhere to the 40 foot height limit of the B-1, Neighborhood Business zoning district.</u>
C.3.	<p><u>A. The Scale and Scope of the Proposed Action is Inappropriate.</u> <u>The scale and scope of the Proposed Action is completely inappropriate for a location adjacent to a pristine public beach. The Applicant proposes to deemphasize the commercial lū'au (which is the actual permitted use pursuant to the underlying entitlements), increase building density by more than 300%, with nearly all of the increase going to the installation of a strip mall of retail shops and restaurants that do not appear to have the required connection to the commercial lū'au, increase wastewater discharge by over 300%, and increase storm water sheet flow discharge into the ocean by 100%. All of the increase in construction will be taking place on a property that has enormous cultural importance with a known native Hawaiian burial complex, with a high likelihood of disturbing additional iwi kūpuna.</u> <u>The massive increase in building coverage is not permitted by the Unilateral Agreement (defined below) and is completely out of step with the current approach adopted by Ko Olina Resort and other leaders in Hawai'i, which is to move to a "less is more" approach that preserves and protects Hawai'i's precious resources, rather than irrevocably committing such resources to retail and restaurants that no one needs or wants.</u></p>	Ken Williams, KOCA & KORA	<p><u>With the planned redevelopment, the focal point of the Cove Property will continue to be the commercial lū'au, which will be renewed and relocated at a new amphitheater. The lū'au is central to perpetuating Hawaiian arts and culture, ensuring that longstanding practices remain accessible to both residents and visitors. The new amphitheater and other areas on the site, such as the cultural pavilion and open air activity lawns, will serve as multifunctional spaces for programming, community gathering, or relaxing. Potential programming may include pre- and post-show educational and cultural workshops and/or activities that highlight the sense of place and fit appropriately within the coastal setting or coordinated events and programs with the neighboring Lanikūhonua Cultural Institute. Contrary to the comment, the planned retail and dining establishments are designed to complement this cultural offering, not create a shopping center, and the uses will adhere to the Hawaiian theme, further enhancing the cultural experience. At this stage in the planning process, it is premature to identify particular retailers or specific goods that may be part of the retail environment at the Cove Project. However, Section 3.3.5 of the EIS describes the retail "Village Walk" component of the Project.</u> <u>The EIS provides a detailed assessment of wastewater discharge and stormwater runoff (Section 4.8). The Project design and implementation aim to support redevelopment while minimizing potential impacts to the surrounding resort and the adjacent beach/natural cove, as discussed throughout the EIS.</u></p>
C.4.	<p><u>Kai Lani Resident Concerns:</u> <u>18. Scale of all building structures</u> <u>20. A clear understanding of exact land use</u></p>	Elizabeth and Richard Rubinstein	<p><u>A Sewer Connection Application for the Project was approved on November 14, 2024 (File No. 2024/SCA-1132), confirming that the existing wastewater infrastructure is sufficient to serve the Project (Section 4.8.3). To further mitigate the estimated wastewater generation, the Applicant is studying the use of a blackwater system for The Cove intended to recycle water from all onsite plumbing fixtures to R1 level per the requirements of HDOH. The R1 water would be reused on site to flush toilets, urinals and irrigation per 2021 United Plumbing Code, Chapter 16. A proposed blackwater system for The Cove would collect wastewater from toilets, sinks, urinals, and kitchen waste (post-grease interceptor) and process it through a multi-step treatment system. The treated R1 water would be reused through a distinct piping system. The system would be designed to process and recycle an estimated 60,000 gallons of blackwater daily. The determination of use and final design of a blackwater system will be determined as the Project progresses.</u> <u>To clarify, the Project is anticipated to decrease the quantity of stormwater generated on site from 33.43 cfs to 26.26 cfs, a decrease of approximately 21 percent and an improvement from existing conditions (Tables 4.6 and 4.7). Stormwater management will comply with the City's Rules Relating to Water Quality to protect the quality of the adjacent ocean. During construction, BMPs will be incorporated where practical and may include, but not be limited to, phasing of construction activities, temporary silt fencing and screens, replacing ground cover of the disturbed area, providing adequate water sources at the site, stabilized construction</u></p>

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No.	Comments	Commenter	Responses
			<p><u>ingress/egress, inlet protection, and temporary filter sock perimeter controls. An NPDES general permit authorizing discharges of stormwater associated with construction activities will be obtained from the HDOH CWB. In the long term, redevelopment of the Cove Property will require site improvements to existing drainage conditions representing an improvement from existing conditions. To improve runoff quality and minimize impacts, the Project will integrate LID measures such as bioswales, rain gardens, and permeable pavement (Section 4.8.1). Based on preliminary design, the existing parking lots will be reconfigured and an area of asphalt pavement will be replaced by landscape planters. Stormwater runoff will be directed to landscape planters throughout the site, which promotes percolation into the ground and filters out contaminants prior to the runoff entering the existing underground drainage systems. Additionally, stormwater quality treatment will be provided by an underground infiltration system and an above-ground retention basin. Final treatment controls will be evaluated as the design progresses.</u></p> <p><u>In addition to measures to ensure the protection of water quality at the adjacent beach, the existing access will be maintained. Similar to current practice, regular responsible maintenance of the Project site and the public beach access easement will be conducted daily to avoid potential solid waste spillover onto the beach.</u></p> <p><u>Regarding iwi kūpuna, the Applicant is actively conducting consultation with SHPD and cultural and lineal descendants regarding the mitigation commitment to avoid impacts to SIHP No. -04968 and establish the burial preserve area (CSH 2) in perpetuity (Section 4.1). During construction, archaeological monitoring will be conducted to identify and document any additional exposures of SIHP No. -03362 and SIHP No. -04968 and any newly identified historic properties that may be identified during construction. An AMP will be submitted meeting the requirements of HAR, §13-279-4 to the SHPD for review and acceptance.</u></p> <p><u>Regarding the comment that the Project is "out of step" with the Resort's approach, as described above, the Project is consistent with the O'ahu General Plan, the 'Ewa DP, the property's B-1, Neighborhood Business District zoning, and the property's governing UA (Ordinance No. 89-27). Since the late 1970s, the Cove Property has been used for commercial lū'au, entertainment, and wedding operations. The Cove Redevelopment proposes to maintain these uses, while updating and revitalizing the programming. The Project's planned building coverage of approximately 13.84 percent is well below the 30 percent limitation set forth in the UA (Ordinance No. 89-27) and complies with all applicable zoning and development regulations, reflecting a deliberate effort to balance redevelopment with what is appropriate for the character of the surrounding area and for the cultural legacy of this property. The Project embraces a "less is more" approach by preserving the majority of the site as open space.</u></p> <p><u>Moreover, the Project has been designed to honor and protect Hawai'i's resources, consistent with the State and City policies discussed throughout Section 5.0 of the EIS. The Project is consistent with broader sustainable development goals in Hawai'i, integrating of stormwater management systems and sustainable practices (Section 4.12) designed to minimize environmental impacts. The Project will incorporate programming and design elements that reflect the site's Hawaiian legacy while ensuring compatibility with the surrounding resort uses. Access to the adjacent beach and natural cove will be maintained, ensuring the community continues to benefit from this resource.</u></p> <p><u>Regarding the comment regarding the irrevocable commitment of resources, redevelopment of the Cove Property involves an irrevocable commitment of land, as new structures will be added to the site. However, as mentioned above, the privately-owned property has been in commercial use since the late 1970's. The planned structures are designed to have minimal environmental impact and will be flexible in use. The majority of the Project site will remain as open space, offering opportunities for programming, gathering, or relaxing. The planned redevelopment will open the Cove Property to both locals and visitors, unlike the current program, which restricts access to ticket holders only.</u></p> <p><u>The Project will not result in the irrevocable commitment of natural, cultural, or historic resources. Beach access and parking will be maintained during construction and long-term operation, and site redevelopment will improve stormwater management and reduce runoff from existing conditions. BMPs will be implemented to prevent sedimentation and pollution, as discussed above and in detail in Section 4.8.1. As discussed above, historic resources on the property, including two identified historic properties (SIHP Nos. -03362 and -04968), will be protected through archaeological monitoring and avoidance measures as described in Section 4.1. The burial preserve area for SIHP No. -04968, CSH 2, will remain in perpetuity, ensuring the preservation of iwi kūpuna. Additionally, the Project will incorporate educational programming to honor the site's legacy and support traditional cultural practices like gathering of limu, fish, and salt.</u></p>
C.5.	<p><u>H.G. Cumulative Impacts</u> <u>Based on the foregoing, the cumulative negative impacts of the Project outweigh the purported benefits. KOCA and KORA believe that the Project should be revised to maintain the lū'au in its current figuration and renovate the space. The current operator can remain in place, keeping the 250+ families employed, as we understand that it is JCC that has terminated the lease and is</u></p>	Kendall Kim, KOD	<p><u>As discussed in Section 4.13.1, the cumulative impacts of The Cove Redevelopment project, in combination with other regional developments, are not expected to be adverse. On the contrary, the Project's benefits extend beyond commercial expansion. The redevelopment includes cultural programming, recreational opportunities, and access improvements that serve both locals and visitors. The commercial lū'au will be updated and will continue to be the focal point of the Cove Property. The planned programming to support a Hawaiian Theme Park and ancillary dining and retail spaces are in accordance with Ordinance No. 89-27. These proposed</u></p>

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	<p><u>requiring the lessee to demolish all structures. The revised plan should limit the uses for the Property to that of a lū'au venue and a Hawaiian cultural resource. The current design for 50,000 ft.² of restaurant and retail space should be removed.</u></p>		<p><u>uses diversify the region's economy, enhance visitor and resident experiences, and provide a modern interpretation of Hawaiian culture that serves the community's evolving needs. In contrast, limiting the property as recommended in the comment would restrict its potential to support the 'Ewa region as envisioned in the 'Ewa DP, and would not align with the goal and objectives of the Project, which were established with input by legacy families (Section 2.0).</u></p>
<p>C.6.</p>	<p>Q. Cumulative Impacts <u>Based on the foregoing, the cumulative negative impacts of the Project outweigh the purported benefits. KOCA and KORA believe that the Project should be revised to maintain the lū'au in its current figuration and renovate the space. The current operator can remain in place, keeping the 250+ families employed, as we understand that it is JCC that has terminated the lease and is requiring the lessee to demolish all structures. The revised plan should limit the uses for the Property to that of a lū'au venue and a Hawaiian cultural resource. The current design for 50,000 ft.² of restaurant and retail space should be removed.</u></p>	<p><u>Ken Williams, KOCA & KORA</u></p>	<p><u>The Project incorporates several features that are reasonably viewed as providing cumulative beneficial impacts to the physical environment. The Project's integration of LID measures will enhance stormwater management by reducing runoff volumes and improving water quality. Over time, these measures contribute to broader regional efforts to reduce strain on stormwater systems, mitigate flooding risks, and enhance groundwater recharge in West O'ahu. These impacts, when combined with other developments that are required to adopt similar strategies, represent a significant cumulative benefit to local hydrology and ecosystem health.</u></p> <p><u>The Applicant is studying the use of a blackwater system for The Cove intended to recycle water from all onsite plumbing fixtures to R1 level per the requirements of HDOH. This would reduce the Project's reliance on municipal wastewater treatment facilities and potable water supplies. When adopted widely, such systems encourage more sustainable water use practices across communities, contributing cumulatively to resource conservation. By incorporating such measures, the Project aligns with wider regional efforts to balance development with the protection of natural resources as stated in the 'Ewa DP's "Vision for 'Ewa's Future." Over time, the integration of green infrastructure and sustainable water management create cumulative benefits that align with long-term environmental priorities.</u></p> <p><u>The Project will also remove structures in the shoreline setback area. These measures align with broader State and City policies and strategies (e.g., the Hawai'i 2050 Sustainability Plan, Coastal Zone Management Program (HRS, Chapter 205A), and the 'Ewa DP) to adapt to and mitigate the effects of climate change.</u></p> <p><u>With regards to employment, during Project operations, it is estimated that the Project will generate 817 jobs (678 FTE) comprised of 583 direct jobs (484 FTE), 121 indirect jobs (100 FTE), and 113 induced jobs (94 FTE), resulting in labor income valued at close to \$35.5 million each year. Annual revenue to the State of Hawai'i is projected at \$4,591,378 per year and estimated to be \$2,062,228 per year to the City and County of Honolulu. All figures are in 2024 dollars. This commitment to development of the Cove Property represents a significant private investment that will generate economic benefits for the people who will be working at the Project and significant fiscal benefits for the State and the City and County of Honolulu.</u></p> <p><u>The Project's anticipated benefits, including the creation of an enhanced cultural and recreational amenity, economic growth, and the preservation of public access to recreational resources, demonstrate that the Project is not simply a commercial expansion, but a balanced strategy in alignment with the 'Ewa region's current needs and future vision. Therefore, potential negative cumulative impacts do not outweigh the Project's anticipated benefits.</u></p>
<p>C.7.</p>	<p><u>KOCA and KORA object to the Project due to the numerous primary, secondary and cumulative negative impacts on Ko Olina Resort and the surrounding community which are not adequately mitigated by the procedures set forth in the EIS.</u></p>	<ul style="list-style-type: none"> • <u>Kendall Kim , KOD</u> • <u>Ken Williams, KOCA & KORA</u> 	<p><u>This comment, which asserts that the Cove Redevelopment project will generate numerous primary, secondary and cumulative negative impacts on Ko Olina and to surrounding communities, is acknowledged. The Applicant further acknowledges the comment asserted that the proposed mitigation measures presented in the EIS will not adequately address those impacts. However, the comment lacks specific details regarding the nature of these impacts or particular mitigation measures that are deemed insufficient. Without this specificity, it is not feasible to provide a targeted response beyond this general acknowledgement.</u></p> <p><u>The proposed Project involves the revitalization of the Cove Property, including a new performing arts venue, restaurants, retail, and programming that creates an authentic Hawaiian community gathering place that honors and reflects the history, culture, and connection to place. As explained in the EIS, this property has primarily been used for similar uses (commercial lū'aus, weddings, and entertainment) since the late 1970's. The uses at the Cove Property long predate the existence of the Resort.</u></p> <p><u>The EIS, particularly Section 4.13, includes information and analysis of anticipated direct, secondary, and cumulative effects of the proposed Project.</u></p>
<p>C.8.</p>	<p><u>Overall, these impacts far outweigh the purported benefits, most of which will go to the Campbell beneficiaries, and will not be reinvested in the community.</u></p>	<ul style="list-style-type: none"> • <u>Kendall Kim , KOD</u> • <u>Ken Williams, KOCA & KORA</u> 	<p><u>With respect to impacts, as noted in the response C.7. above, specific impacts which are being referred to are not clearly identified. Similarly, it is not clear what specific benefits are alleged to be primarily accruing to Campbell beneficiaries , nor does the comment identify what information from the Draft EIS was relied upon to formulate the comment.</u></p> <p><u>Section 4.10 of the EIS and the EIR (Appendix A) provide comprehensive information about the anticipated economic and fiscal benefits that the Project will generate for local workers and to the City and the State.</u></p> <p><u>The Project is anticipated to bring significant economic and fiscal benefits (direct and indirect) during both the construction and operational stages. During the estimated two-year construction period, the Project is projected to support over 1,400 jobs (900 direct jobs (873 FTE), 152 indirect jobs (148 FTE), and 377 induced jobs (366 FTE)), generating approximately \$114.4 million in labor</u></p>

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No.	Comments	Commenter	Responses
			<p>income. During that same period, the Project is projected to generate approximately \$10,170,535 in revenue to the State of Hawai'i and \$4,309,537 in revenue to the City and County of Honolulu.</p> <p>During Project operations, it is estimated that the Project will generate 817 jobs (678 FTE) comprised of 583 direct jobs (484 FTE), 121 indirect jobs (100 FTE), and 113 induced jobs (94 FTE), resulting in labor income valued at close to \$35.5 million each year. Annual revenue to the State of Hawai'i is projected at \$4,591,378 per year and estimated to be \$2,062,228 per year to the City and County of Honolulu. All figures are in 2024 dollars. This commitment to development of the Cove Property represents a significant private investment that will generate significant economic benefits for the people who will be working at the Project and significant fiscal benefits for the State and the City and County of Honolulu.</p>
C.9.	<p><u>Land use:</u> Need proof! Between parking lots and proposed buildings, the entire lot is developed. Green space is minimal. I suggest the developer submit the total use by percent of land covered by developed space. Currently only structures are identified. There are varying amounts of the structures depending on which map you look at. The maps included in the study vary regarding design and structures. See figure V1. (refer to the letter included in Appendix X).</p>	Karen Messick	<p>Preliminary design of The Cove is planned to encompass a total building area of approximately 65,413 sf, which will cover approximately 13.84 percent of the 10.85-acre (472,757-sf) lot. This is well under the 30 percent lot coverage limit under the property's rezoning (Ordinance No. 89-27). Typically in the B-1, Neighborhood Business zoning district, maximum building area is not regulated in the LUO and the maximum density is limited to a Floor Area Ratio of 1.0 (ROH, Chapter 21-3.120-2). However, when the Cove property was rezoned, the density of improvements was limited to only 30 percent of the lot.</p> <p>Figure 3.18 illustrates the percentage of building area (13.84 percent), open space (65.0 percent), and parking/loading/back of house areas (21.16 percent).</p>
C.10.	<p><u>Special Use Restricted to 30% of lot and 60-foot set back from ocean.</u> Clearly on the proposed map(s) the lot is completely developed. It indicates removing two large green areas which exist today and covering what is now the open spaces in Paradise Cove with walking paths, tiki bars, restaurants, and retail. Who in their infinite wisdom would put an entertainment center of 650 seats next to a Wedding Chapel, removing the grassy open space adjacent to the chapel which is now used by wedding patrons for receptions. What is the actual square footage of ALL improvements including those buildings that will remain and all surface covered parking and walkway lots? Request an analysis by green space, developed building space, paved walk spaces, and parking lot space.</p>	Karen Messick	<p>For the purposes of complying with the property zoning Ordinance and the Honolulu Land Use Ordinance (ROH, Chapter 21), certain types of improvements are, by law, not counted as building area. The definition of "Building Area" is defined under the LUO as follows:</p> <p><u>"The total area of a zoning lot covered by structures and covered open areas. The following are not considered building area:</u></p> <ol style="list-style-type: none"> (1) Open areas covered by eaves and normal overhang of roofs; (2) Uncovered entrance platforms, uncovered terraces, and uncovered steps when these features do not themselves constitute enclosures for building areas below them, and do not exceed 30 inches in height; and (3) All-weather surfaces. <p>Understanding the above definition, approximately 65.0 percent of the Cove Property will be enhanced by pockets of open space with lush landscaping, shading, and natural pathways to create an inviting experience that highlights the beauty of the surrounding coastal area.</p> <p>Similar to current practice, commercial weddings will occur at different times than the nightly lū'au show. Wedding patrons would continue to be able to utilize open spaces across the Cove Property for receptions, as needed.</p> <p>As such, the planned Project provides ample open space in accordance with the LUO and ensures a balanced design that accommodates all programmed activities on the site.</p>
C.11.	<p><u>Kai Lani Resident Concerns:</u> <u>9. Hawaiian cultural authenticity versus commercialization</u></p>	Elizabeth and Richard Rubinstein	<p>The Applicant acknowledges the concern. As discussed in Section 2, the purpose of the Project is to honor and reflect the rich cultural heritage of the Cove Property. The site has been used as a Hawaiian Theme Park and commercial lū'au since 1979 and was last redeveloped in the early 1990s. Access and commercial activity since that time have been limited to only ticketed and reserved events. For the first time, the property will be accessible to the public, including local residents. Project represents a generational opportunity to create a new Leeward O'ahu gathering place, open for the public to enjoy.</p> <p>Since 2017, the Applicant has engaged with legacy families and cultural experts throughout the planning and development phases to ensure that the project honors the history and cultural significance of the area. Their input has been instrumental in shaping the redevelopment plans and ensuring the Project authentically reflects the Cove Property's legacy rather than commercializes it. The redevelopment will feature elements that authentically reflect Hawaiian culture and traditions including the incorporation of traditional architectural styles, and cultural programming.</p> <p>The commercial lū'au will continue to be the focal point of the Cove Property, honoring the long-established use of the site while providing an enhanced experience for visitors. The ancillary uses, including retail and dining, are designed to complement the experience of the property as a Hawaiian Theme Park. Potential programming will promote Hawaiian cultural practices and ensuring that the site remains a place of learning and connection to the culture.</p>

Table 7.3: Draft EIS Summary of Comments and Responses

No.	Comments	Commenter	Responses
D.	Archaeological, Historic, and Cultural Resources		EIS Section 4.1
D.1.	<p><u>SHPD’s comments focus on Table 1.1: Summary of Impacts and Mitigation Measures. With respect to Archaeological, Cultural, and Historic Resources, Table 1.1 indicates the following:</u></p> <p><u>The Project may potentially affect two historic properties within the Project area: State Inventory of Historic Places (SIHP) Site 50-80-12-3362 (wetland and cultural layer) and SIHP Site 50-80-12-4968 (Burials 1 through 5).</u></p> <p><u>Consultation is reported to have occurred with SHPD and cultural descendant Ms. Nettie Fernandez Tiffany.</u></p> <p><u>The burial preserve area (SIHP Site 50-80-12-4968) “shall remain in perpetuity to preserve the iwi kūpuna (Native Hawaiian skeletal remains).”</u></p> <p><u>The AIS is reported is currently being reviewed by SHPD.</u></p> <p><u>Future ground disturbing work will be subject to archaeological monitoring to be preceded by the submittal of an archaeological monitoring plan (AMP) meeting the requirements of HAR §13-279-4 and its acceptance by SHPD.</u></p> <p><u>Comment 1:</u></p> <p><u>SHPD agrees that the Project has potential to affect the two historic properties documented in previous studies as being present within the proposed redevelopment property. SIHP Site 50-80-12-3362 has integrity of location and materials, is significant under HAR §13-284-6 Criterion d for its potential to yield information about the former wetland environ and its use by native Hawaiians. Mitigation through archaeological monitoring (a form of data recovery) including some controlled sampling is appropriate. SIHP Site 50-80-12-4968 consists of five inadvertent burial finds in an unofficial preserve, i.e., with no established preserve boundary or preservation plan. As the spatial extent of SIHP Site 50-80-12-4968 is not known, potential exists for the Project to impact yet unidentified burials and archaeological data. To avoid such impacts, SHPD recommends (1) consultation (see Comment 2) regarding several approaches: (a) additional testing in the vicinity to establish the spatial limits of the site or (b) establish a large buffer around the known burials; SHPD’s AIS review recommended 10 meters (Email, November 27, 2022; Susan A. Lebo (SHPD) to David Shideler and Brittany Enanoria (Cultural Surveys Hawai’i, Inc); SHPD review comments have been uploaded to the Documents section of HICRIS Project No. 2020PR32795.</u></p> <p><u>HRS 6E consultation regarding SIHP Site 50-80-12-4968 (burial preserve) and the mitigation measures for both sites must be incorporated into the revised AIS report prepared for the Project.</u></p>	DLNR State Historic Preservation Division (SHPD)	<p><u>The Applicant acknowledges the comment.</u></p> <p><u>The Applicant is currently conducting consultation with SHPD and known cultural and lineal descendants to the area regarding the recommended approach to avoid impacts to SIHP No. -04968. The results of this consultation process will be incorporated into an updated Draft AIS and a BSCPP. As requested by SHPD, a larger buffer zone than the existing buffer zone is being considered (Option B) and presented to recognized lineal and cultural descendants of the area. The BSCPP meeting the requirements of HAR Section 13-300-34 will be completed for SIHP No. -04968 and submitted to SHPD via the HICRIS online system for review and acceptance.</u></p>
D.2.	<p><u>Comment 2:</u></p> <p><u>Consultation with SHPD and Ms. Tiffany, representing Lanikūhonua, is inadequate. Please ensure consultation is conducted and provide a summary of the consultation results with the Office of Hawaiian Affairs (OHA), the geographic area representative on the O’ahu Island Burial Council (OIBC), or with any of the Native Hawaiian Organizations (NHOs) and recognized descendants that consulted regarding the inadvertent burial finds comprising SIHP Site 50-80-12-4968 or regarding other cultural and historic properties within the Project area or vicinity.</u></p> <p><u>SHPD requests that to the extent feasible, all parties involved in the 1995 consultation regarding the burials be consulted in the development of the Burial Site Component of a Preservation Plan (BSCPP). Preparation of the BSCPP should follow the process detailed in HAR §13-300-40(i)(1-2). The parties identified in SHPD’s letter dated January 18, 1995 (Log No. 13707, Doc. No. 9501KM05) included representatives of the Estate of James Campbell, Paradise Cove Lū’au, Lanikūhonua, Cultural Surveys Hawai’i, Inc., Koa Mana, Na Keiki Ka Mo’I Canoe Club, Nordic Construction Co., and SHPD. The Office of Hawaiian Affairs should also be consulted along with any Native Hawaiian Organizations or descendants who have requested consultation regarding</u></p>	SHPD	<p><u>Consultation with the signatories of the 1995 Burial Agreement and known cultural and lineal descendants of the area has been initiated and is ongoing (<i>Section 4.1</i>). This consultation is regarding the specifics for the interim and long-term protection measures for SIHP No. -04968. The BSCPP will be prepared pursuant to in HAR §13-300-40(i)(1-2) and consultation with the Office of Hawaiian Affairs will also be undertaken in the preparation of the BSCPP. A letter to OHA was sent on June 19, 2024 In compliance with HAR Section 13-284-6(c). Kamakana Ferreira responded via email with comments, and was subsequently informed of SHPD’s guidance regarding a BSCPP for SIHP No. -04968 instead of a preservation plan that was originally stated in previous correspondence to OHA. OHA will have the opportunity to review and provide comments to the BSCPP.</u></p>

Table 7.3: Draft EIS Summary of Comments and Responses

No.	Comments	Commenter	Responses
	<p>burials in the area in the intervening years. SHPD's letter has been uploaded to the Documents section of HICRIS Project No. 2020PR32795.</p>		
<p>D.3.</p>	<p>Comment 3: To date, no preserve boundaries have been agreed on, no burial treatment plan in the form of a BSCPP has been prepared, reviewed, and filed with the Bureau of Conveyances. Pursuant to HAR §13-300-40(h), within 90 days following a determination to preserve in place or relocate, the department shall approve the burial site component of either a preservation plan [BSCPP] or an archaeological data recovery plan [BSCDRP].” In a consultation meeting held on July 5, 2024 among SHPD (Susan A. Lebo and Samantha Hemenway), Cove Campbell Kobayashi LLC (Matthew Pennaz), James Campbell Co., LLC (Matthew Caires), and Cultural Surveys Hawai'i, Inc (archaeological consultants; Scott Belluomini and Brittany Enanoria), SHPD indicated that submittal of a BSCPP for SIHP Site 50-80-12-4968 (Burials 1 through 5) remains an outstanding mitigation commitment for the inadvertent burial discoveries documented during excavation for gas lines in 1995 (Jourdane 1995, Hammatt 1995) within the southwestern portion of the current proposed redevelopment project area. A decision to preserve the five burials comprising SIHP Site 50-80-12-4968 was reached on January 18, 1995, as detailed in SHPD's letter (Log No. 13707, Doc. No. 9501KM05). A copy of the letter was emailed to the consultation participants following the meeting and was also uploaded to HICRIS Project No. 2020PR32795, along with a copy of Jourdane (1995). Further, to ensure preservation “in perpetuity,” SHPD requests the landowner implement HAR §13-300-40(i)(3) which states that “In order to provide perpetual protection for human skeletal remains inadvertently discovered, departmental determinations to preserve in place shall be recorded with the bureau of conveyances. In addition, any affected landowner may enter into an in situ burial agreement with the State.” Details regarding the five burial finds and the preservation measures implemented thus far are provided in SHPD's letter dated January 18, 1995 (Log No. 13707, Doc. No. 9501KM05). Further, implementation of the BSCPP shall be the responsibility of the landowner, permittee, or developer, in discoveries related to development where land alteration project activities exist (HAR §13-300-40(i)(1)).</p>	<p>SHPD</p>	<p>The Applicant appreciates the guidance provided by SHPD in July 2024. As discussed in <i>Section 4.1</i>, consultation with the signatories of the 1995 Burial Agreement, as well as known cultural and lineal descendants of the area and OHA has been initiated and is ongoing, as discussed in Response D.2. above and in <i>Section 4.1.1</i>. The Applicant acknowledges that the implementation of the BSCPP will be the responsibility of the landowner, permittee, or developer, in discoveries related to development where land alteration project activities exist (HAR Section 13-300-40(i)(1)). It is currently unclear if SIHP No. -04968 was recorded with the Bureau of Conveyances; however, the landowner will verify. If it was not recorded, the landowner will record the burial preserve area (CSH 2) for SIHP No. -04968 with the Bureau of Conveyances.</p>
<p>D.4.</p>	<p>Comment 4: SHPD reviewed the draft archaeological inventory survey (AIS) report (Enanoria et al. 2020) and requested revisions via email on November 27, 2022 (see Comment 1), including, but not limited to, concerns regarding SIHP Site 50-80-12-4968 (Burials 1 through 5). SHPD has not yet received a revised draft AIS for review and acceptance. Please highlight the revisions in the text and submit the revised AIS report along with a cover letter that specifies the changes made to the document with their page numbers. Please submit the cover letter, the highlighted revised AIS report, and any additional project related documents to SHPD via HICRIS Project No. 2020PR32795 using the Project Supplement option. SHPD requests that when the AIS is accepted, that the Final AIS replace the draft AIS (Enanoria et al. 2020) provided in the draft EIS (Volume II, Appendix B).</p>	<p>SHPD</p>	<p>The Applicant is in receipt of SHPD's written comments. A revised draft AIS incorporating SHPD's recommended changes noted in highlighting and a cover letter that specifies the changes made to the document will be submitted to SHPD via HICRIS Project No. 2020PR32795. An updated draft AIS documenting the most current status of consultation (September 2024) has been attached to this Final AIS (Appendix B). However, after acceptance of the Final EIS, the current updated draft AIS will be updated once again to reflect the results of consultation on the 1995 Burial Agreement, which is currently ongoing, and submitted to SHPD for review and acceptance in connection with the forthcoming SMA Use Permit (Major) application, which is the Applicant's first application for a permit authorizing ground disturbance on the Property. As requested by SHPD, a larger buffer zone than the existing buffer zone is being considered and is presented to recognized lineal and cultural descendants of the area. The BSCPP meeting the requirements of HAR Section 13-300-34 will be completed for SIHP # -04968 and submitted to SHPD via the HICRIS online system for review and acceptance. Given the need to update the draft AIS following ongoing consultation and SHPD's acceptance of the BSCPP, the AIS is noted as an unresolved issue in <i>Sections 1.9 and 4.14</i>.</p>
<p>D.5.</p>	<p>Comment 5: SHPD requests an archaeological monitoring plan (AMP) meeting the requirements of HAR 13-279-4 be prepared and submitted for review and acceptance prior to initiation of any project-related ground disturbing activities. Further, SHPD requests the AMP include provisions to ensure minimize the potential for project excavations to impact human burials such as the implementation of shallow lifts (max. 10 centimeters in thickness) and short draws (max. 1 meter in length) within 10 feet of the preserve boundary. Additionally, SHPD requests the AMP include a</p>	<p>SHPD</p>	<p>As noted in the draft AIS (Appendix B), archaeological monitoring of all ground-disturbing activities is agreed upon for the entire Project area. On-site archaeological monitoring will be conducted to identify and appropriately document any additional exposures of SIHP # -03362 and any newly identified historic properties that may be encountered during construction. An AMP meeting the requirements of HAR Section 13-279-4 will be submitted for SHPD review and acceptance prior to initiation of any project-related ground disturbing activities.</p>

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	<p>sampling strategy to obtain controlled stratigraphic data associated with SIHP Site 50-80-12-3362 (wetland deposits).</p>		
<p><u>D.6.</u></p>	<p>SHPD's additional comments include the following related to Section 4.1 Archaeological, Cultural and Historic Resources:</p> <p><u>Comment 1:</u> Revise the text and tables describing SIHP 50-80-12-4968 (Burials 1 through 5) to correlate with the information provided in Jourdane (1995) and SHPD's letter dated January 18, 1995. If additional information is available from notes recorded by Hal Hammatt in 1995, upload this information to HICRIS Project No. 2020PR32795 and ensure it is included in the revised AIS report to be submitted to SHPD for review and acceptance and included in EIS Volume II, Appendix B.</p>	<p>SHPD</p>	<p>Discussion of the 1995 Burial Agreement is incorporated into the EIS and the draft AIS (<i>Appendix B</i>). If additional information is present Dr. Hammatt's notes will be reviewed and uploaded to HICRIS with the revised draft AIS and BSCPP.</p>
<p><u>D.7.</u></p>	<p><u>Comment 2:</u> Note, page 4-1, the AIS has been reviewed. SHPD is awaiting submission of a revised AIS. SHPD does not provide concurrences with AIS reports. SHPD's responsibility is to review and accept an AIS report for the project, make a HRS §6E-42 project effect determination, agree with appropriate mitigation commitments, and to request and review agreed upon mitigation plans for implementation.</p>	<p>SHPD</p>	<p>Page 4-1 of the EIS has been corrected to note that the AIS will be submitted for review and acceptance by SHPD.</p>
<p><u>D.8.</u></p>	<p><u>Comment 3:</u> Note, the section titled Previous Archaeological Studies, page 4-2 through page 4-4, does not include the current AIS. This is acceptable as it summarizes work completed prior to the current AIS (presented in EIS Volume II, Appendix B). However, the section titled Archaeological Testing, page 4-4 through 4-5 needs to be relabeled as Current AIS. Archaeological testing does not appropriately describe the study in accordance with HAR §13-276 and the requirements of Archaeological Inventory Surveys.</p> <p>Within these two sections, please address the following:</p> <ol style="list-style-type: none"> The number of inadvertent burial finds is five, not six. Jourdane (1995) indicated the inadvertent find reported on January 10, 1995, represented a "minimum of one individual ... although it is possible that more than [one] set of remains may be represented." The burial was in Jaucas sand, and no burial pit was identified. SHPD's letter dated January 18, 1995 (Log No. 13707, Doc. No. 9501KM05) indicates a total of five burials, while the draft EIS, page 4-2 describes SIHP Site 50-80-12-04968 as consisting "of approximately six sets of human skeletal remains." Please address. Table 4.1. Please correct Hammatt to Hammatt; both Jourdane and Hammatt are Burial Documentation of Inadvertent Burial Finds; correct # of burials documented. The Archaeological Testing section needs to be revised to reflect it concerns the current AIS; needs to include the additional consultation requested pursuant to HAR 13-284-6 and HAR 13-276 regarding SIHP Site 50-80-12-4968 and inclusion of the consultation methods and results in the revised AIS. Additionally, this section needs a map similar to Figure 4.1 but updated to include the additional locations of SIHP Site 50-80-12-3362 identified during the current AIS. Lastly, Table 4.2 needs to be revised to indicate SIHP Site 50-80-12-4968 consists of five human burials, was exposed in a gas line trench excavation, is significant under Criteria d and e, not d and c, and mitigation is preservation in perpetuity via BSCPP filed with the DLNR Bureau of Conveyances. Additionally, remove mention of "eligibility" as these sites were assessed for integrity and significance per HAR 13-284-6, not for eligibility for inclusion in the Hawaii Register of Historic Places. Lastly, archaeological monitoring is recommended for all Project-related ground disturbing activities, not just for impacts to SIHP Site 50-80-12-3362. 	<p>SHPD</p>	<p>Page 4-4 of the Final EIS and revised draft AIS have been revised to note that "Current EIS. Within this section, the following requested edits have been made:</p> <ol style="list-style-type: none"> Section 4.4.1 has been corrected to note five inadvertent burial finds. Table 4.1 has been revised accordingly. The AIS (Appendix B) and Section 4.1.1 have been updated with a discussion on the ongoing consultation conducted as of publication of this Final EIS. As requested, the Final EIS also includes a new figure (Figure 4.2) showing the additional locations of SIHP No. -03362. Information regarding SIHP No. -04968 has been updated within Table 4.2 and the Final EIS text according to the comments. Note that page 4-8 acknowledges that archaeological monitoring is recommended mitigation for all Project-related ground disturbing activities. The heading for "Potential Impacts and Mitigations Measures" on page 4-14 has been revised. As part of the CIA, an effort was made to contact and consult with approximately 80 NHOs, agencies, and community members, including descendants of the area. Access to the shoreline, including for the purposes of traditional cultural practices, will continue to be protected and maintained with the redevelopment of the Cove Property. The mitigation measure to be implemented in the event that iwi kūpuna and/or cultural finds are encountered during construction has been revised accordingly (Section 4.1.1).

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	<p><u>On page 4-5, Change (HAR, Section 13-284-7) to HAR §13-284-7. Same comment, page 4-6, HAR, Section 13-279-4. On page 4-6, revise discussion of burial preserve to reflect SHPD's comments. Remove SHPD's concurrence and change Log No. 2020.00688 to HICRIS Project No. 2020PR32795.</u></p> <p><u>4. The <i>Potential Impacts and Mitigation Measure</i> section needs to be ... Measures. Additionally, (1) revise to expand consultation to other Native Hawaiian Organizations and recognized descendants, (2) codify in an agreement document that access to the shoreline for maintenance of ongoing traditional cultural practices will be protected and maintained, and (3) revise to indicate "in the event that potential iwi kūpuna are identified..." the following will occur (1) an osteologist will determine if the find is human and, if so determined, then ... comply with HAR §13-300-40 and HRS §6E-43, including completion of a BSCPP or BSCDRP (as appropriate, depending on decision to preserve in to preserve in place or relocate) and filing of the BSCPP or BSCDRP with the DLNR Bureau of Conveyances. The discussion of a reinterment plan and cultural preservation plan should be removed as the consultation, short-term and long-term treatment, maintenance, etc. shall be included in the BSCPP or BSCDRP, which every is appropriate.</u></p>		
<p><u>D.9.</u></p>	<p><u>A draft archaeological inventory survey (AIS) was prepared by Cultural Surveys Hawaii (CSH) in consultation with the State Historic Preservation Division (SHPD) and cultural descendant, Nettie Fernandez. The report noted that previously 5 sets of human remains were found (SIHP #4968) in the project area. The burial was in fact re-identified during the recent fieldwork and was assessed to be significant under Criterion D and E. Continued preservation is proposed for the burial, as well as archaeological monitoring.</u></p> <p><u>OHA notes that pursuant to Hawaii Administrative Rules (HAR) 12-284-6(c), consultation with OHA is required for Criterion E sites. As of the writing of this email, OHA does not have any records of being consulted. We encourage the applicant to consult with OHA as required by the rules.</u></p> <p><u>While preservation is proposed, it's unclear if a burial treatment plan (BTP) will be prepared or if one was already in place when the burials were found in 1995. Could you please clarify if there is a BTP in place or if one will be developed? If one is already in place, OHA would further like to request assurances that protections measures have been carried out. If a BTP is being developed, OHA again calls for consultation as part of the drafting of the BTP. Further, we recommend consulting with the Oahu Island Burial Council (OIBC) and any recognized descendants as part of the drafting process.</u></p>	<p><u>Office of Hawaiian Affairs (OHA)</u></p>	<p><u>Following the publication of the Second Draft EIS, consultation with OHA was initiated pursuant to HAR Section 13-284-6(c). On July 15, 2024, OHA was informed of SHPD's guidance regarding a BSCPP for SIHP No. -04968 instead of a preservation plan that was originally stated in May 2024 letter to OHA.</u></p> <p><u>Consultation with the signatories of the 1995 Burial Agreement, as well as known cultural and lineal descendants of the area has been initiated and is ongoing as of publication of this Final EIS. OHA will have the opportunity to review and provide comments to the BSCPP.</u></p>
<p><u>D.10.</u></p>	<p><u>3. The Sierra Club is committed to actively promoting and advocating for the rights of Indigenous peoples, supporting their efforts for Free Prior Informed Consent (FPIC), honoring Treaty rights regarding land and water, increasing access on federal lands for cultural practices and gathering, protecting of sacred sites on federal lands, and building power for Tribal partners at the grassroots and all levels of government. The exploitation of lands goes hand in hand with the exploitation of people.</u></p> <p><u>Lanikūhonua and Paradise Cove have always been regarded as the most spiritual and sacred historical lands in this area. They are the undisturbed grounds once home to Chief Kākuhihewa, the 15th ruling chief of ancient O'ahu and was also a place of rest and rejuvenation for Hawaiian monarchs in the past. The property holds great cultural significance to the Native Hawaiian people. The site was used by Native Hawaiians for gathering of resources, including salt and limu, and has been used as a place to celebrate the art of hula. There is a known burial complex on the property, and at least six iwi kūpuna have been previously disturbed. In addition, the Banyan tree known as "Auntie's tree" holds special cultural significance, and native Hawaiian leaders have stated that the property is associated with native Hawaiian mo'olelo. There are also two fishponds in the area as well an altar that likely served as a fishing shrine where offerings were previously made. Given the important cultural significance of the property, additional consultation from influential native Hawaiian advisors from the Leeward Coast should be sought. The AIS</u></p>	<p><u>Sierra Club</u></p>	<p><u>Given its long-standing connection to and history with this place, the Applicant understands the cultural and archaeological value and legacy of the Cove Property and recognizes the cultural importance of Lanikūhonua and Paradise Cove as areas historically used for gathering resources and cultural practices, as well as the presence of burial sites. To clarify, the majority of the Cove Property is not "undisturbed grounds" but appears to be moderately disturbed from multiple phases of land altering activities including the plantation, ranching, and the development of the existing lū'au area.</u></p> <p><u>Cultural and archeological resources have been studied and the results are documented in the EIS. SHPD reviewed and provided detail comments on the first draft of the AIS (February 2020) that was included as <i>Appendix B</i> to the Draft EIS. That draft AIS has been revised pursuant to SHPD's comments, and that updated document is provided in <i>Appendix B</i>.</u></p> <p><u>The draft AIS and forthcoming BSCPP recognize these important aspects and are being refined through ongoing consultation with SHPD, signatories of the 1995 Burial Agreement, and known cultural and lineal descendants of the area. Regarding the burial complex, there are five burial (SIHP No. -04968, are within the southwestern potion of the current project area consisting of at least two post-Contact burials based on associated artifacts. This burial preserve area (approximately 752.85 sf in size) is currently covered with landscaped naupaka brush. The area seaward/makai of the burial preserve area is a maintained flat, grassy landscaped area extending that extends to the shoreline. Entrance to the burial preserve area on either side (north-south) makai of the existing lū'au stage is cordoned sanctioned off with rope and wooden poles to deter pedestrian access.</u></p> <p><u>The comments regarding the traditional and customary practices of gathering resources and celebrating hula are acknowledged.</u></p>

Table 7.3: Draft EIS Summary of Comments and Responses

No.	Comments	Commenter	Responses
	<p>(Archaeological Inventory Survey) should be revised to include how any iwi kūpuna disturbed during the redevelopment will be handled and protected, and deference on this topic should be given to the Leeward Coast Native Hawaiian leaders. The revised AIS, along with the approval from Hawai'i State Historic Preservation Division should be included in the final EIS.</p>		<p>In response to comments provided by SHPD (see D.1. through D.8.), the draft AIS has been revised (<i>Appendix B</i>) and summarized in <i>Section 4.1.1</i>. The draft AIS discloses the proposed mitigation commitments to be implemented to address potential impacts on significant historic properties. The agreed upon mitigation commitments consist of archaeological monitoring (a form of data recovery) and preservation through avoidance:</p>
<p>D.11.</p>	<p>Cultural: <u>New encroachments on the cultural and archeological resources may be likely but are not studied in the DEIS. Having increased tourist-oriented retail and restaurants competing with our existing Ko Olina stores does not appear to add value to the Ko Olina, or west side community. Additionally, this may compound the congestion, noise, and environmental impacts that are very unfavorable for the Resort. It would appear that the present Paradise Cove entertainment complex has taken much more from the community than it has returned.</u></p>	<p><u>Kai Lani at Ko Olina Association of Apartment Owners (AOAO)</u></p>	<ul style="list-style-type: none"> • <u>Archaeological monitoring (a form of archaeological data recovery) of all ground-disturbing activities for the entire Project area. On-site archaeological monitoring will be conducted to identify and document any additional exposures of SIHP No. -03362 and SIHP No. -04968 and any newly identified historic properties that may be identified during construction. An AMP will be submitted meeting the requirements of HAR, §Section 13-279-4 to the SHPD for review and acceptance.</u> • <u>SHPD's records for SIHP No. -04968 indicate that consultation with NHOs, CSH, and representatives from the James Campbell Estate was conducted and that long-term preservation was agreed upon in a meeting held on January 18, 1995. This was formalized in the 1995 Burial Agreement. SHPD has no record of a preservation plan for SIHP No. -04968. On July 5, 2024, SHPD confirmed that a BSCPP is required for SIHP No. -04968.</u>
<p>D.12.</p>	<p><u>New encroachments on cultural and archeological resources may be likely but are not studied in the EIS.</u></p>	<ul style="list-style-type: none"> • <u>William and Sara Barnes</u> • <u>Marilyn Harvey-Heinz & Don Heinz</u> 	<p><u>Consultation is ongoing regarding the specifics for interim and long-term protection measures for SIHP No. -04968 (five sets of human skeletal remains) and will be outlined in a forthcoming BSCPP document following the results of consultation.</u></p>
<p>D.13.</p>	<p>5. Cultural and Archaeological Impacts: <u>Potential encroachments on cultural and archaeological resources are not adequately studied in the EIS.</u></p>	<p><u>Eileen Meuris, Steve Meuris, and Marguerite Casillas</u></p>	<p><u>As requested by SHPD, a larger buffer zone than the existing buffer zone is being considered and will be presented to recognized lineal and cultural descendants of the area. The BSCPP meeting the requirements of HAR, §13-300-34 will be completed for SIHP No. -04968 and submitted to SHPD for their review and acceptance.</u></p>
<p>D.14.</p>	<p><u>I am the Director of the Native Hawaiian Traditional Healing Center at the Waianae Coast Comprehensive Health Center and the President of the Nānākuli Hawaiian Homestead Association. I would like to comment on the proposed plans for the Campbell property, which is currently home to Paradise Cove Lū'au.</u> <u>As a traditional Native Hawaiian healer and protector of the sites and practices of our culture, I expressed my adamant disapproval of The Cove redevelopment plans presented by James Campbell Company at the Kapolei/Honokai Hale Neighborhood Board Meeting held in May 2024. I am also submitting my disapproval and opposition to the redevelopment in conjunction with the Project's Environmental Impact Statement comment period.</u> <u>I am well acquainted with the Campbell property and its historical and cultural significance to our Native Hawaiian people. There are two sacred burial sites on the property which hold 'iwi of our kūpuna; ancestral 'aumakua, the manō, are known to enter the ocean near the banyan tree; and our ancestors share mo'olelo telling us of the path of the nightmarchers through the area.</u> <u>It is my kuleana to ensure that our sacred spaces are honored and preserved. My hope would be that the Campbell Company recognizes the sensitivity and significance of the site they're looking to build on. This community will raise their voices in further opposition if our concerns are not heard.</u> <u>Please reconsider plans for restaurants and a shopping mall and instead dedicate the space to one that honors our culture and preserves our history for future generations.</u></p>	<p><u>Kamaki A. Kanahele</u></p>	<p><u>It is currently unclear if SIHP No. -04968 was recorded with the Bureau of Conveyances; however, the landowner will verify, and, if not, will record the burial preserve area (CSH 2) for SIHP No. -04968 to ensure that it shall remain in perpetuity to preserve the iwi kūpuna (Native Hawaiian skeletal remains).</u> <u>The results of consultation will be incorporated into a revised draft within the AIS and BSCPP which will then be submitted to SHPD via the online HICRIS system. Following the requirements under HRS, Chapter 6E, SHPD does not issue approvals for AIS document in connection with EIS or other HRS, Chapter 343 reviews. SHPD acceptance of an AIS and the associated mitigation plans will however be required prior to the start of significant ground disturbance on the Property.</u> <u>The CIA (<i>Appendix C</i>) was prepared by CSH to analyze the impact of the Project on cultural practices and features associated with the Project site and the greater Honouliuli ahupua'a. The CIA includes documentation of mo'olelo associated with the Honouliuli ahupua'a. In preparing the CIA, CSH made an effort to contact and consult with 80 NHOs, agencies, and community members including descendants of the area in order to identify individuals with cultural expertise and/or knowledge of the the ahupua'a of Honouliuli. Of the 80 NHOs, agencies, and community members contacted, 13 responded. Of the 13 respondents, in-person, virtual, phone, or written consultation was conducted with the following five participants: Nettie Fernandez Tiffany (kahu (caretaker) of Lanikūhonua Cultural Institute), William Aila, Jr. (prior chair of Hawaiian Homes Commission, Director of Department of Hawaiian Homelands), Kūhiō Lewis (Chief Executive Officer for the Council for Native Hawaiian Advancement), Tracie Ka'ōnohilani Farias Lopes (Kumu Hula (hula teacher) for Ka Lā 'Ōnohi Mai O Ha'eha'e and Instructor at Hawai'i Pacific University), and R. Keawe Lopes (Kumu Hula of Ka Lā 'Ōnohi Mai O Ha'eha'e and Director of the Kawaihuelani Center for Hawaiian Language at the University of Hawai'i at Mānoa).</u> <u>Finally, to clarify, the planned redevelopment will retain existing significant trees within the Cove Property to the extent practicable (<i>Figure 3.15</i>).</u></p>
<p>D.15.</p>	<p>5. Cultural considerations. <u>Clearly, the EIS has safeguards in place for honoring and protecting land sacred to the Hawaiian people. However, at the Neighborhood Board Meeting, Mr. Kamaki A. Kanahele, Director of Native Hawaiian Traditional Healing at the Waianae Coast Community Health Center, expressed serious concerns about the protection of sacred areas within the Cove project. It is our understanding that Mr. Kanahele is a well-respected, influential member of the Waianae and Nanakuli communities; we urge you to include him in discussions of the cultural impact of the Cove project.</u></p>	<p><u>Pieter and Claire van Wingerden</u></p>	
<p>D.16.</p>	<p>L. Archaeological Impacts</p>	<p><u>Ken Williams, KOCA & KORA</u></p>	

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No.	Comments	Commenter	Responses
	<p>The Property holds great cultural significance to native Hawaiians. The site was used by native Hawaiians for the gathering of resources, including salt and marine resources, and has been used as a place to celebrate the art of hula. There is a known burial complex on the Property, and at least six iwi kūpuna have been previously disturbed. In addition, the Banyan tree known as Auntie's tree holds special cultural significance, and native Hawaiian leaders have stated that the Property is associated with native Hawaiian mo'olelo. Given the important cultural significance of the Property, additional consultation from influential native Hawaiian advisors from the Leeward Coast should be sought, especially in light of the fact that several influential native Hawaiian leaders have already stated their opposition to the Project given the negative impact of the Project on cultural resources.</p> <p>The draft Archaeological Impact Survey ("AIS") for the Property has not yet been accepted by the State Historic Preservation Division ("SHPD"), and therefore it is unknown whether the AIS will be accepted, or whether it will need to be revised and resubmitted in order to obtain approval. From our initial review of the AIS, we believe that the AIS should be revised to include additional information on how the iwi kūpuna will be handled and protected. Special attention should be paid to how any iwi kūpuna disturbed during the redevelopment will be handled, and deference on this topic should be given to the Leeward Coast native Hawaiian leaders. This is especially true as the profits from the Cove Redevelopment will go to the Campbell beneficiaries, who we understand no longer invest in Hawai'i, as opposed to being reinfused into the local community. The revised AIS, along with the approval from SHPD, should be included in the final EIS.</p>		
D.17.	<p>M. The Cultural Impact Assessment Should be Revised:</p> <p>The draft Cultural Impact Assessment ("CIA") does not include the analysis required by the Hawaii Supreme Court in its decision in <i>Ka Pa'akai O Ka'Aina v. Land Use Commission, State of Hawai'i</i>, 94 Hawai'i 31, 47, 7 P.3d 1068, 1084 (2000), as amended (Jan. 18, 2001).</p> <p>In <i>Ka Pa'akai</i>, the Hawaii Supreme Court held that "[i]n order for the rights of native Hawaiians to be meaningfully preserved and protected, they must be enforceable. In order for native Hawaiian rights to be enforceable, an appropriate analytical framework for enforcement is needed. Such an analytical framework must endeavor to accommodate the competing interests of protecting native Hawaiian culture and rights, on the one hand, and economic development and security, on the other." <i>Id.</i> at 1083.</p> <p>The Property is of great cultural significance to native Hawaiians, being associated with numerous myths and legends, containing a known burial complex, and providing access to the beach to gather marine resources. As such, it is very important that the <i>Ka Pa'akai</i> analytical framework be included so that the accepting agency has sufficient information to fully consider the environmental factors in order to be able to make a reasonable decision after balancing the risks of harm to the environment against the purported benefits to be derived. The analytical framework is required to include specific findings and conclusions as to the following matters:</p> <p>(1) the identity and scope of "valued cultural, historical, or natural resources" in the petition area, including the extent to which traditional and customary native Hawaiian rights are exercised in the petition area; (2) the extent to which those resources—including traditional and customary native Hawaiian rights—will be affected or impaired by the proposed action; and (3) the feasible action, if any, to be taken by the LUC to reasonably protect native Hawaiian rights if they are found to exist. As the current draft of the CIA does not include these findings and conclusions, it should be revised.</p>	Ken Williams, KOCA & KORA	<p>The CIA has been updated to compile the relevant information into a new section titled <i>Ka Pa'akai Analysis (Appendix C)</i>. A summary of the analysis is included in <i>Section 4.1.2</i> of the Final EIS.</p> <p>The <i>Ka Pa'akai Analysis</i> identifies significant cultural, historical, and natural resources within and surrounding the Project area, including native vegetation, marine resources, fishponds, and sites of spiritual and cultural significance. During consultation, interviewees highlighted the importance of maintaining access to the shoreline for traditional and customary practices such as gathering aquatic resources, religious ceremonies, and hula preparations. Historical resources, including burials documented within the Cove Property, were also noted, alongside comments about potential disturbances during construction. To address these issues, proposed mitigation measures include preserving existing historic properties, ensuring practitioner access to the adjacent shoreline, and implementing protocols to protect archaeological and burial sites during development.</p> <p>As detailed in the AIS (<i>Appendix B</i>), consultation is ongoing regarding the specifics for interim and long-term protection measures for SIHP No. -04968 (five sets of human skeletal remains) and will be outlined in a forthcoming BSCPP document following the results of consultation. As requested by SHPD, a larger buffer zone than the existing buffer zone is being considered and will be presented to recognized lineal and cultural descendants of the area. The BSCPP meeting the requirements of HAR, §13-300-34 will be completed for SIHP No. -04968 and submitted to SHPD for their review and acceptance.</p> <p>It is currently unclear if SIHP No. -04968 was recorded with the Bureau of Conveyances; however, the landowner will verify, and, if not, will record the burial preserve area (CSH 2) for SIHP No. -04968 to ensure that it shall remain in perpetuity to preserve the iwi kūpuna (Native Hawaiian skeletal remains).</p>
E.	Biological Resources		EIS Section 4.3
E.1.	<p>We have reviewed the Draft Environmental Impact Statement for The Cove at Ko Olina Project on O'ahu. The U.S. Fish and Wildlife Service (Service) appreciates the mitigation and best management practices included for federally listed species in Table 1.1 Summary of Impacts and Mitigation Measures.</p>	U.S. Fish and Wildlife Service	<p>The Applicant acknowledges the Cove Property's proximity to the proposed Hawaiian green sea turtle critical habitat and the potential for light disorientation (<i>Section 4.3.4</i>). The EIS includes mitigation measures to minimize the potential for light disorientation to the Hawaiian green sea turtle and Hawaiian seabirds, including the use of fully shielded lighting on buildings near the beach.</p>

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No.	Comments	Commenter	Responses
	<p>The Service would like to discuss some concerns about Figure 4.7 [now Figure 4.8] on page 4-32. In the figure, there are three buildings planned to be built directly next to a beach where there is proposed green sea turtle (<i>Chelonia mydas</i>) critical habitat. These buildings are Building 1, Building 6, and Building 7. Due to the area being known for both sea turtles and seabirds, light disorientation is a high risk in this area. In addition to all lights being "wildlife friendly" and shielded with automatic sensors, we recommend also ensuring that no lights can be seen from the beach. Lights visible from the beach could disorient sea turtles during nesting and/or hatching. Additionally, permanent exterior lighting as is mentioned on page 1-22 is a risk to seabirds year-round, but even more so during seabird fledging season.</p> <p>Please reach out to us to discuss alternative options for wildlife friendly lighting to use for this project. Please use reference code 2024-0095249-S7-001 when referring to this project.</p>		<p>Buildings 6 and 7 are elevated above the adjacent beach where the shoreline is characterized by a natural rocky shelf, which may reduce the potential impact on the beach area. The Applicant will coordinate with USFWS as needed to ensure that the lighting design aligns with wildlife protection guidelines.</p>
E.2.	<p>The State listed 'ōpe'ape'a or Hawaiian Hoary Bat (<i>Lasiurus cinereus semotus</i>) could potentially occur at or in the vicinity of the project and may roost in nearby trees. Any required site clearing should be timed to avoid disturbance to bats during their birthing and pup rearing season (June 1 through September 15). During this period woody plants greater than 15 feet (4.6 meters) tall should not be disturbed, removed, or trimmed. Barbed wire should also be avoided in any construction as bats can become ensnared and killed by such fencing material during flight.</p>	DLNR Department of Forestry and Wildlife (DOFAW)	<p>Section 4.3.4 of the EIS includes mitigation measures to minimize the potential impacts to the Hawaiian Hoary Bat, including the BMPs recommended by DOFAW, as applicable.</p>
E.3.	<p>The State endangered 'īlio holo i ka uaua or Hawaiian Monk Seal (<i>Monachus schauinslandi</i>) and threatened honu or Green Sea Turtle (<i>Chelonia mydas</i>) could potentially occur or haul out onshore within the vicinity of the proposed project site. Nesting season for honu is April through December and 'īlio holo i ka uaua can give birth to pups all year round. If either species is detected within 100 feet (30 meters) of the project area, all nearby construction operations should cease and not continue until the focal animal has departed the area on its own accord.</p> <p>State-listed waterbirds such as ae'o or Hawaiian stilt (<i>Himantopus mexicanus knudseni</i>), 'ālae ke'oke'o or Hawaiian coot (<i>Fulica alai</i>), and 'ālae 'ula or Hawaiian gallinule (<i>Gallinula chloropus sandvicensis</i>) could potentially occur at or in the vicinity of the proposed project site. It is against State law to harm or harass these species. If any of these species are present during construction, all activities within 100 feet (30 meters) should cease and the bird or birds should not be approached. Work may continue after the bird or birds leave the area of their own accord. If a nest is discovered at any point, please contact the O'ahu Branch DOFAW Office at (808) 973-9778 and establish a buffer zone around the nest.</p> <p>The State endangered pueo or Hawaiian Short-eared owl (<i>Asio flammeus sandwichensis</i>) could potentially occur in the project vicinity. Pueo are most active during dawn and dusk twilights. Remove and exclude non-native mammals such as mongoose, cats, dogs, and ungulates from the nesting area. Minimize habitat alterations and disturbance during pueo breeding season. Pueo nest on the ground and active nests have been found year-round. Before any potentially disturbing activity like clearing vegetation, especially ground-based disturbance, DOFAW recommends a qualified biologist conduct surveys during crepuscular hours and walk line transects through the area to detect any active pueo nests. If a pueo nest is discovered, notify DOFAW staff, minimize time spent at the nest, and establish a minimum buffer distance of 100 meters from the nest until chicks are capable of flight.</p> <p>DOFAW is concerned about impacts to vulnerable birds from nonnative predators such as cats, rodents, and mongooses. We recommend taking action to minimize predator presence; remove cats, place bait stations for rodents and mongoose, and provide covered trash receptacles.</p>	DLNR DOFAW	<p>Section 4.3.4 of the EIS acknowledges the potential for the Hawaiian monk seal and Hawaiian green sea turtle to nest along the beach adjacent to the Cove Property and the potential for State-listed waterbirds to occur in the Project vicinity. This section has been updated to include additional mitigation measures recommended by DOFAW, which will be implemented as applicable during construction and operation of the Project to protect these species and their habitats.</p> <p>Section 4.3.4 of the EIS has also been updated to disclose the potential for the pueo to occur in the Project vicinity, as advised by DOFAW. The EIS incorporates the recommended mitigation measures, which will be implemented during construction and operation of the Project.</p> <p>Finally, the Applicant understands the potential impacts nonnative predators pose to vulnerable birds. To minimize potential impacts to vulnerable birds from nonnative predators such as cats, rodents, and mongooses, the Applicant will incorporate actions to limit predator presence, including effective waste management to minimize attraction to trash.</p>
E.4.	<p>2. Multiple endangered species will be disturbed by this development. The endangered Hawaiian Monk Seal (<i>Neomonachus schauinslandi</i>) and threatened Green Sea Turtle (<i>Chelonia Mydas</i>) both frequently haul out on the natural beach at Paradise Cove. On occasion, multiple/several Hawaiian Monk Seals can be found at this beach. In addition to those, the DLNR has identified</p>	Sierra Club	<p>Section 4.3.4 of the EIS acknowledges the potential for the Hawaiian monk seal to haul out from and the Hawaiian green sea turtle to nest along the beach adjacent to the Cove Property. The EIS also identifies BMPs that will be implemented as applicable during Project construction and operation to mitigate potential impacts to protected species (see also Table 1.1).</p>

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	<p>the area as frequented by the Hawaiian Hoary Bat (<i>Lasiurus semotus</i>) as well as the threatened White Tern (<i>Gygis alba</i>).</p> <p>In addition, runoff and sedimentation during construction will harm delicate nearshore coral reefs just offshore of the development site, which include coral species that are endemic to Hawai'i. Both sedimentation and runoff can kill coral at all life stages. Keeping construction away from the beach and an increased setback to at least 130' would be important measures to mitigate some of these impacts.</p>		<p>Potential short-term impacts to water quality are related to construction activities, which are temporary in nature. To address potential impacts to marine life, including the Hawaiian monk seal, Hawaiian green sea turtle, and various species of coral, stormwater runoff will be minimized through compliance with HDOH and City regulations. Additionally, standard BMPs as discussed in <i>Section 4.8.1</i> will be employed to minimize impacts and will be detailed in subsequent construction plans. BMPs may include, but not be limited to, phasing of construction activities, use of temporary silt fencing and screens, the use of a stabilized construction ingress/ egress, inlet protection, and temporary filter sock perimeter controls. With the implementation of BMPs, potential short-term impacts will be mitigated.</p>
E.5.	<p>As a part of our Federal permits to conduct coral restoration in the area, we are required to consult with National Oceanographic and Atmospheric Administration (NOAA) on Essential Fish Habitat (EFH) and Endangered Species Act (ESA). KCR recommends that a consultation for ESA and EFH for the "The Cove" EIS is conducted before final approval and adoption. The EIS as it stands does not adequately address the potential impacts to all species, especially endangered species and the very fragile coral reef ecosystem that is directly offshore. The EIS should be revised to study this impact.</p>	Kuleana Coral Restoration	<p><i>Section 4.3.4</i> of the EIS includes mitigation measures to minimize potential impacts to protected avifauna, including Hawaiian seabirds. Construction will primarily occur during daylight hours to minimize impacts on wildlife. If nighttime construction is necessary during seabird fledging season (September 15 to December 15), a biological monitor may be hired, or nighttime activity will be halted. When nighttime work is required, all lighting will be shielded downward, and "wildlife-friendly" lighting will be used long-term to reduce potential interactions with nocturnally flying seabirds. In the event a seabird nest or a downed seabird is discovered, construction within a 100-foot radius of the nest will cease, and the USFWS will be contacted. Nest monitoring guidelines will be followed to minimize disruption. Additionally, staff will receive training on seabird fallout and the hazards of light pollution prior to the start of construction.</p>
E.6.	<p>The added density at PC threatens protected monk seals, sea turtles, and shorebirds, moving environmental interests in the wrong direction and potentially violating regulations. The current stewardship of the beach area is inadequate, with garbage regularly overflowing the containers and visitors disturbing sea turtles and other wildlife. Improving shore environments should be an immediate priority.</p>	Eileen Meuris, Steve Meuris, and Marguerite Casillas	<p>The Project site does not contain coastal wetlands that could provide habitat for endangered Hawaiian waterbirds. To prevent attracting these birds during construction, contractors will avoid creating puddles or standing water and will manage trash to prevent drawing birds to the area. If a waterbird or its nest is found, work will stop within a 100-foot radius, and USFWS will be notified for further guidance. Although the Project site lacks habitat for the endangered pueo, measures are in place should a nest be discovered, including notifying DOFAW and establishing a 100-meter buffer zone around the nest.</p>
E.7.	<p>Environmental: The environmental concerns are extensive. The added density of uses at "The Cove" without meaningful additional protections for marine mammals, sea turtles, and shore birds moves the environmental interests of Ko Olina in the wrong direction and may violate various regulations. Improving our shore environments is a major priority for Oahu; this is a significant aspect missing in the DEIS.</p>	Kai Lani at Ko Olina AOAQ	<p>In the long-term, the use of LID measures, such as bioswales, rain gardens, planter boxes, sand filters, or permeable pavement, may be integrated into the Project design, as feasible, and will comply with the City's Rules Relating to Water Quality. Final treatment controls and BMPs will be assessed as the design phase continues. The integration of landscaped, permeable open space is expected to reduce surface runoff, promote infiltration, manage stormwater, and improve water quality. Additionally, source control BMPs, such as covering trash areas and routing stormwater from paved areas to landscaped areas, may be included to prevent pollution of stormwater.</p>
E.8.	<p>Kai Lani Resident Concerns: 6. Environmental impact on existing sea and wildlife 7. Increase of rodent, feral cat, and non-native avian wildlife</p>	Elizabeth and Richard Rubinstein	<p>As recommended by DOFAW, the Applicant will incorporate actions to limit predator presence, including effective waste management to minimize attraction to trash. The Cove will implement recycling efforts to minimize solid waste, as discussed in <i>Section 4.8.4</i>. Educational signage and guidelines may be posted around the Cove Property to encourage thoughtful care for the site and the surrounding environment. Recycling will also be encouraged through the use of trash cans with recycling containers.</p>
E.9.	<p>Light Pollution: Artificial lighting from construction sites can disorient and confuse marine wildlife such as sea turtles, fish, crabs, and birds. The disruption of their natural rhythms can have long-lasting consequences on their survival and population dynamics. DAR recommends that construction activities occur during daylight hours to the extents possible. All outdoor lighting should be fully shielded and pointed downward. Outdoor lighting should be turned off when not necessary, and automatic sensors are recommended. Seabird fledging season occurs during Sept 15th -Dec 15th, and nighttime activity should be halted during this time. Fledglings become easily confused by artificial lighting, which can cause them to crash or land on the ground. If downed or injured fledglings are observed in the construction area, they should be reported for rescue: Hawaii Wildlife Center (808) 884-5000 9:00 am - 5:00 pm, 7 days a week Hawaii Marine Animal Response (808) 220-7802 7:00 am - 7:00 pm</p>	DLNR Department of Aquatic Resources (DAR)	<p>The Project will implement the recommended mitigation measures during construction, as noted in <i>Table 1.1</i> and <i>Section 4.3.4</i>.</p>

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	<p><u>Personnel working on-site should be informed of the hazards light pollution may pose to seabirds and other wildlife and be able to recognize native species.</u></p>		
<p><u>E.10.</u></p>	<p><u>Artificial lighting can adversely impact seabirds that may pass through the area at night by causing them to become disoriented. This disorientation can result in their collision with manmade structures or the grounding of birds. For nighttime work that might be required, DOFAW recommends that all lights used be fully shielded to minimize the attraction of seabirds. Nighttime work that requires outdoor lighting should be avoided during the seabird fledging season, from September 15 through December 15, when young seabirds make their maiden voyage to sea. If nighttime construction is required during the seabird fledging season (September 15 to December 15), we recommend that a qualified biologist be present at the project site to monitor and assess the risk of seabirds being attracted or grounded due to the lighting. If seabirds are seen circling around the area, the lights should then be turned off. If a downed seabird is detected, please follow DOFAW's recommended response protocol by visiting https://dlnr.hawaii.gov/wildlife/seabird-fallout-season/.</u></p> <p><u>Permanent lighting also poses a risk of seabird attraction, and as such should be minimized or eliminated to protect seabird flyways and preserve the night sky. For illustrations and guidance related to seabird-friendly light styles that also protect seabirds and the dark starry skies of Hawai'i please visit https://dlnr.hawaii.gov/wildlife/files/2016/03/DOC439.pdf.</u></p>	<p><u>DLNR DOFAW</u></p>	
<p><u>E.11.</u></p>	<p><u>Kai Lani Resident Concerns:</u> <u>2. Light pollution</u></p>	<p><u>Elizabeth and Richard Rubinstein</u></p>	
<p><u>E.12.</u></p>	<p><u>Due to the arid climate and risks of wildfire to listed species, we recommend coordinating with the Hawai'i Wildfire Management Organization at (808) 850-0900 or admin@hawaiiwildfire.org, on how wildfire prevention can be addressed in the project area. When engaging in activities that have a high risk of starting a wildfire (i.e., welding in grass), it is recommended that you:</u></p> <ul style="list-style-type: none"> • <u>Wet down the area before starting your task.</u> • <u>Continuously wet down the area as needed.</u> • <u>Have a fire extinguisher on hand, and</u> • <u>In the event that your vision is impaired, (i.e., welding goggles) have a spotter to watch for fire starts.</u> 	<p><u>DLNR DOFAW</u></p>	<p><u>The Project will incorporate the mitigation measures proposed by DLNR DOFAW, as noted in <i>Table 1.1</i> and <i>Section 4.4.5</i>.</u></p>
<p><u>E.13.</u></p>	<p><u>DAR recommends that the applicant take steps to plant native vegetation, that actively acts to retain surface storm-water run-off and sediment during precipitation events. Short grass will be likely ineffective at retaining surface stormwater run-off and sediment. Planting an effective vegetated buffer, down the slope of the construction site will help to capture soil and pollutants and absorb excess surface runoff from precipitation before they reach the shoreline.</u></p> <p><u>DAR recommends planting native species. The most effective native soil/sand stabilizer with water and sediment retention capabilities is Pohinahina (<i>Vitex rotundifolia</i>). Others include 'aki'aki (<i>Sporobolus virginicus</i>), Pa'u o Hi'iaka (<i>Jaquemontia sanwicense</i>), Pohuehue (<i>Ipomoea pes-capre</i>). The former species will act as a barrier much like a gravel berm, whereas the latter species are low-growing and hearty enough for walking on. They can be purchased at Hui Ku Maoli OIa nursery www.hawaiiannativeplants.com</u></p>	<p><u>DLNR DAR</u></p>	<p><u>Drainage improvements to the Cove Property are anticipated to decrease the total stormwater runoff generated on site compared to existing conditions and to properly treat potential runoff in accordance with applicable State and City rules and standards, including the City's Rules Relating to Water Quality. In order to retain surface stormwater runoff and sediment, LID measures such as bioswales, rain gardens, planter boxes, sand filters, and permeable pavement will be considered and located where appropriate to reduce direct stormwater outflow from the site and to mitigate peak flows (<i>Section 4.8.1</i>).</u></p> <p><u>New landscaping at the Cove Property will be installed as part of the Project. As described in <i>Section 3.3.9</i>, landscaping is expected to include the use of native, Polynesian-introduced, and tropical plants. The preliminary plant palette includes pohinahina and pohuehue, as recommended by the DLNR DAR (<i>Figure 3.17</i>). As a water conservation measure, plant materials were selected based on drought tolerance and ability to survive in the hot and dry coastal environment of the 'Ewa region.</u></p> <p><u>In an effort to minimize the spread of the Coconut Rhinoceros Beetle, the Project will not include the planting of new palms. An invasive species management plan involving both observation and treatment will be prepared prior to construction to mitigate the spread of the Coconut Rhinoceros beetle. The plan will identify mitigation measures to minimize the potential spread of invasive species, including requiring that equipment, materials, and personnel should be cleaned of excess soil and debris.</u></p>
<p><u>E.14.</u></p>	<p><u>DOFAW recommends using native plant species for landscaping that are appropriate for the area, i.e., plants for which climate conditions are suitable for them to thrive, plants that historically occurred there, etc. Please do not plant invasive species.</u></p> <p><u>DOFAW also recommends referring to www.plantpono.org for guidance on the selection and evaluation of landscaping plants and to determine the potential invasiveness of plants proposed for use in the project.</u></p>	<p><u>DLNR DOFAW</u></p>	

Table 7.3: Draft EIS Summary of Comments and Responses

No.	Comments	Commenter	Responses
	<p><u>DOFAW recommends minimizing the movement of plant or soil material between worksites. Soil and plant material may contain detrimental fungal pathogens (e.g., Rapid 'Ōhi'a Death), vertebrate and invertebrate pests (e.g., Little Fire Ants, Coconut Rhinoceros Beetles, etc.), or invasive plant parts (e.g., Miconia, Pampas Grass, etc.) that could harm our native species and ecosystems. We recommend consulting the O'ahu Invasive Species Committee (OISC) at (808) 266-7994 to help plan, design, and construct the project, learn of any high-risk invasive species in the area, and ways to mitigate their spread. All equipment, materials, and personnel should be cleaned of excess soil and debris to minimize the risk of spreading invasive species.</u></p>		
<p><u>E.15.</u></p>	<p><u>The invasive Coconut Rhinoceros Beetle (CRB) or <i>Oryctes rhinoceros</i> is found on the islands of O'ahu, Hawai'i Island, Maui and Kaua'i. On July 1, 2022, the Hawai'i Department of Agriculture (HDOA) approved Plant Quarantine Interim Rule 22-1. This rule restricts the movement of CRB-host material within or to and from the island of O'ahu, which is defined as the Quarantine Area. Regulated material (host material or host plants) is considered a risk for potential CRB infestation. Host material for the beetle specifically includes a) entire dead trees, b) mulch, compost, trimmings, fruit and vegetative scraps, and c) decaying stumps. CRB host plants include the live palm plants in the following genera: Washingtonia, Livistona, and Pritchardia (all commonly known as fan palms), Cocos (coconut palms), Phoenix (date palms), and Roystonea (royal palms). When such material or these specific plants are moved there is a risk of spreading CRB because they may contain CRB in any life stage. For more information regarding CRB, please visit https://dlnr.hawaii.gov/hisc/info/invasive-species-profiles/coconut-rhinoceros-beetle/.</u></p>	<p><u>DLNR DOFAW</u></p>	
<p><u>E.16.</u></p>	<p><u>N. Botanical Resources</u> <u>There is an active infestation of coconut rhinoceros beetles on coconut trees on the Paradise Cove property, with a high likelihood of spread due to the Project construction activities. The EIS should analyze what actions the current landowner is taking for remediation and treatment for the existing trees and must include an action plan (as opposed to merely stating that vague "best management practices" will be followed) to ensure that the coconut rhinoceros beetle infestation does not spread to Ko Olina Resort and neighboring communities. No construction should be permitted until the coconut rhinoceros beetle infestation has been adequately resolved.</u></p>	<p><u>Ken Williams, KOCA & KORA</u></p>	
<p><u>E.17.</u></p>	<p><u>We recommend that Best Management Practices are employed during and after construction to contain any soils and sediment with the purpose of preventing damage to near-shore waters and marine ecosystems.</u></p>	<p><u>DLNR DOFAW</u></p>	<p><u>The Applicant will implement BMPs and erosion and sediment control measures during construction to mitigate potential stormwater runoff on nearshore waters and marine life (<i>Sections 4.3.2 and 4.8.1</i>).</u></p>
<p><u>E.18.</u></p>	<p><u>5. We recommend the use of best management practices (BMP) for stormwater management to minimize the impact of the project to the existing area's hydrology while maintaining on-site infiltration and preventing polluted runoff from storm events. Stormwater management BMPs may earn credit toward LEED certification. More information on stormwater BMPs can be found at http://planning.hawaii.gov/czm/initiatives/low-impact-development/.</u></p>	<p><u>DLNR Commission on Water Resource Management (CWRM)</u></p>	<p><u>To mitigate potential stormwater runoff in the long-term, the use of LID measures, such as bioswales, rain gardens, planter boxes, sand filters, or permeable pavement, may be integrated into the Project design, as feasible, and will comply with the City's Rules Relating to Water Quality, which are in place to protect water quality. Final treatment controls and BMPs will be assessed as the design phase continues. Additionally, source control BMPs, such as covering trash areas routing stormwater from paved areas to landscaped areas, may be included to prevent pollution of stormwater.</u></p>
<p><u>E.19.</u></p>	<p><u>Sedimentation:</u> <u>Sedimentation can introduce suspended solids, nutrients, and pollutants into aquatic ecosystems, leading to turbidity, reduced light penetration, and impaired water quality. Implement erosion and sediment control measures such as silt fences, sediment traps, and erosion control blankets to minimize soil disturbance and sediment runoff during construction activities.</u></p>	<p><u>DLNR DAR</u></p>	
<p><u>E.20.</u></p>	<p><u>Vegetation buffers:</u> <u>Maintain vegetative buffers along coastal areas to stabilize soil, reduce erosion, and filter sediment-laden runoff before it reaches the ocean.</u></p>	<p><u>DLNR DAR</u></p>	
<p><u>E.21.</u></p>	<p><u>Stormwater management:</u></p>	<p><u>DLNR DAR</u></p>	

Table 7.3: Draft EIS Summary of Comments and Responses

No.	Comments	Commenter	Responses
	Implement stormwater management practices such as permeable pavement, vegetated swales, and retention ponds to reduce stormwater runoff volume and pollutant loads.		
E.22.	<p>Monitoring and compliance: Consider establishing monitoring protocols to assess sedimentation levels, water quality parameters, and compliance with regulatory requirements throughout the project lifecycle. DAR would like to request notification, photo-documentation, and GPS coordinates for any occurrence where above-average amounts of sediment or pollution have entered the water, to assess the impact, if any.</p>	DLNR DAR	
E.23.	<p>Erosion/LBSP: DAR recommends that best management practices for mitigation of erosion and LBSP be followed. The close proximity to aquatic resources should be considered during design and construction. Landscape design and leveling should be such that long-term erosion and LBSP are minimized. During construction, these measures would include any type of barrier (e.g., sediment barriers/bags, petroleum absorption, diapers, etc.) that limits the amount of sediment or LBSP (e.g., petroleum products, chemicals, debris, etc.) to the maximum extent practicable. DAR recommends that all construction materials be composed of environmentally inert materials to the extent practicable. Some work may be performed during low rain conditions, but all construction would be halted during storm conditions or when storm conditions threaten the watershed.</p>	DLNR DAR	
F.	Shoreline Survey and Setback Area		EIS Section 4.4.6
F.1.	3. Figure 1.10 Preliminary Shoreline Survey indicates there are concrete rubble masonry walls within the shoreline setback. Verify that these walls were legally built and if any work is proposed.	DPP	As noted in Section 3.3.1 and indicated in Figure 3.2, the concrete rubble masonry walls within the shoreline setback will be demolished as part of The Cove Redevelopment. As part of the shoreline certification process, coordination with DLNR on this issue is ongoing (Section 1.9 and 4.14).
F.2.	Were you aware that photographs submitted with the 2024 Shoreline Certification Application OA-2103 propose shoreline certification at the toe of two CRM walls on the west side of the beach? The DEIS neither mentions existing nor proposes new shoreline structures. In fact, the DEIS points out that the February 1989 Unilateral Agreement for Conditional Zoning promised that structures would not be constructed within 40-feet of the makai (shoreline) property boundary. Are the two shoreline CRM walls illegal?	Douglas Meller	
F.3.	1. The shoreline setback is severely insufficient and lacks meaningful climate adaptation in their planning. The Cove is proposing a mere 60' setback. Setbacks can range from 60' to 130'. Their proposal assumes a 3.2 ft sea level rise by 2100. Unfortunately, the 3.2 ft estimate for Hawai'i is from the 2013 IPCC report, and the updated sea level rise for Hawai'i in the 2022 IPCC is 3.9 ft as the mid-range scenario. A high range scenario predicts up to 8 ft of sea level rise for Hawai'i. These updated sea level rises are also indicated in the 2023 Hawai'i State SEA LEVEL RISE VULNERABILITY AND ADAPTATION REPORT published by the DLNR. If they proceed with their proposal, the base of multiple buildings will be submerged. See the dark blue dotted line indicating 3.2 ft sea level rise, figure taken from the DEIS. In light of the underestimated value used in their planning, as well as the impacts from king tides, large swells, and storm surges, the setback should be no less than 130'.	Sierra Club	Pursuant to ROH, Section 26-1.4, the shoreline setback line for the Cove Property is established at 60 feet from the certified shoreline. Under ROH, Section 26-1.4(a)(3), the shoreline setback is 60 feet on zoning lots where historical erosion data has not been collected for the Hawaii shoreline study, or its successor, where the historical erosion data show coastal accretion, or where the historical erosion data show an annual coastal erosion rate of zero. For the Cove Property, no historical erosion data has been collected (SOEST, 2021). Thus, the appropriate setback is 60 feet. Moreover, as discussed in Section 4.4.6, the Cove Property's shoreline is characterized by a natural rocky shelf with a pocket of sand providing a natural beach (Figure 3.1). Due to the presence of a natural rocky shelf, which stabilizes the shoreline and protects the adjacent beach, erosion at the Cove Property is not anticipated. Regarding SLR, the updated City and County of Honolulu "Sea Level Rise II - Guidance Document" (July 29, 2022) recommends that the City continue to utilize the 3.2-ft SLR-XA for planning purposes until updated SLR-XA map data is available. As discussed in Section 4.4.6, portions of the planned Project are within the 3.2-ft. SLR-XA. In particular, the Cove Property is vulnerable to annual high wave flooding with an expected 3.2 feet of SLR. Planned structures at The Cove will be set back at least 60 feet from the shoreline of the beach and may be elevated eight to 19.5 feet above msl to proactively consider the potential impacts of SLR. The 60-foot setback area will be maintained as open space, providing a natural buffer to mitigate potential flooding. Areas along the coastline will be vegetated, and therefore also function as a vegetated buffer. These structural design measures will be put into place precisely to prevent the loss of structures to SLR, as is suggested in Comment F.5. Redevelopment of the site for The Cove will be designed to ensure ongoing successful, safe, and sustainable operations at the site for the foreseeable future. Landscaped, permeable open space will be integrated throughout to mitigate potential flooding. The open spaces will reduce surface runoff, promote infiltration, manage stormwater, improve water quality, and enhance overall resilience to
F.4.	Given the multiple impacts to coastal marine ecosystems, KCR would request that the development adopt the maximum 130-foot setback. This would allow for increased public access and minimize negative impacts to the coral reef and seaweed ecosystems that our community depends on and that we have invested so much time and money to protect and restore.	Kuleana Coral Restoration	
F.5.	F. / G. The Shoreline Setback should be at least 130'	<ul style="list-style-type: none"> Kendall Kim, KOD 	

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	<p>The Applicant incorrectly states the required Shoreline setback for the Property. While there are certain setbacks specified in the UDP and the Design Guidelines (i.e., 300 feet) if permission is granted to vary from such setbacks, then under the new Shoreline Setback Ordinance, City and County of Honolulu Ordinance 23-3, the Shoreline Setback is determined as follows: the shoreline setback line will be established at the following distances mauka from the certified shoreline:</p> <p>(1) Sixty feet plus 70 times the annual coastal erosion rate, up to maximum setback of 130 feet, on zoning lots within all development plan and sustainable communities plan areas except the Primary Urban Center Development Plan area; provided that any property owner who believes the annual erosion rate applicable to a specific zoning lot does not accurately represent the actual erosion rate for that zoning lot may submit an application to the director requesting approval of an alternative coastal erosion rate methodology and data for the zoning lot in accordance with the procedures and informational requirements set forth in the department's rules implementing this chapter.</p> <p>(2) Sixty feet on zoning lots within the Primary Urban Center Development Plan area.</p> <p>(3) Sixty feet on zoning lots where historical data has not been collected for the Hawai'i shoreline study, or its successor, where the historical erosion data show coastal accretion, or where the historical erosion data show an annual coastal erosion rate of zero.</p> <p>Here the applicant appears to believe that the Shoreline Setback should be set forth pursuant to subsection (3). However, the Property is located within the Ewa Development Plan area, and therefore the Shoreline Setback should be established pursuant to subsection (1). Using the approach required by the Ordinance, the Shoreline Setback should be established at 60 feet + 70 times the annual coastal erosion rate. To the extent that the coastal erosion rate has not yet been established for the Property, it clearly should be, and the EIS should be revised to include this information. The Proposed Action should not be permitted to proceed until the Shoreline Setback has been accurately established.</p> <p>The Applicant proposed to establish the Shoreline setback at the minimum of 60 feet in order to permit the Applicant to make a significantly more intensive use of the property than would otherwise be permitted, and to construct numerous buildings immediately adjacent to the setback line. The EIS indicated that if this is done, even the conservative estimates for sea level rise used by the Applicant will cause several of the proposed structures to be completely inundated. See Fig 4-7. Allowing construction of structures which will certainly be lost to sea level rise is poor planning, as there will be significant primary impacts to the environment as a result, not the least the hazardous materials that will be deposited directly into delicate nearshore ecosystems when the buildings are lost to the sea. Therefore, the Shoreline Setback should be set at the maximum of 130 5.feet, not at the minimum.</p>	<ul style="list-style-type: none"> Ken Williams, KOCA & KORA 	<p>extreme weather events. LID measures may be integrated where feasible to promote infiltration of surface stormwater runoff and lengthen the time of concentration of surface and coastal water runoff. The site will be graded to allow runoff and potential coastal flooding to flow through the site.</p> <p>With the implementation of the above-mentioned mitigation measures, the 60-foot setback area is appropriate, and the Project has been designed to be prepared to withstand the potential impacts of SLR.</p>
F.6.	<p>Both DEIS Figure 1.10 and pending 2024 Shoreline Certification Application OA-2103 propose shoreline certification at the same location on the beach as the August 3, 2021, certified shoreline. The following photograph from the DAGS shoreline certification website shows that the August 3, 2021, certified shoreline was makai of both the debris line and the vegetation line for a large part of the beach.</p> <p>That is improper, but probably no one paid attention during the covid epidemic. For the pending 2024 Application OA-2103, my understanding is that DAGS Land Survey and DLNR Land Management employees will schedule a site inspection to determine the current highest wash of the waves. But the 2024 application might be rejected because §13-22-19, Hawaii Administrative Rules, prohibits shoreline certification "... where an unauthorized improvement encroaches upon state land or where an unauthorized improvement interferes with the natural shoreline processes."</p>	Douglas Meller	<p>DLNR inspected the site in August 2024, and the survey is currently under review. Further coordination is ongoing to address outstanding considerations before finalizing the certification process.</p>

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No.	Comments	Commenter	Responses
F.7.	Resolution 93-318 required that “[Applicant] Beach activities ... shall be limited to passive activities.... [Commercial] activities ... shall not unreasonably interfere with public use of the public beach or preclude the use of the public beach by the general public.” The DEIS pretended this condition regulates public recreational use of the beach. The FEIS should instead acknowledge that the DPP is authorized to impose civil fines if commercial weddings or commercial placement of rental beach chairs and umbrellas interfere with public use of the beach.	Douglas Meller	The Cove Redevelopment does not propose activities that will interfere with public use of the adjacent beach, including commercial activities, such as weddings or renting beach chairs or umbrellas. <i>Section 3.3.8</i> has been revised to make this clarification.
G.	Climate Change and Sea Level Rise Implications		EIS Section 4.4.6
G.1.	Development is not in the conservation district and EIS already addresses the SLR-XA.	DLNR Office of Conservation & Coastal Lands (OCCL)	The Applicant acknowledges the comment and the discussion on the SLR-XA provided in <i>Section 4.4.6</i> .
G.2.	Sea Rise/Flooding: Ignoring sea rise and future flooding has been identified as another problem with the plan. The DEIS states that in the next 75 years, approximately 1/3 of the existing Paradise Cove property will be subject to repeated flooding due to global warming and expected sea rise. Based on that factor alone, it is not practical, or responsible, to allow additional developments in environmentally sensitive areas.	Kai Lani at Ko Olina AOA	The Cove Redevelopment has been planned with careful consideration of the potential impacts of SLR and flooding, as discussed in <i>Section 4.4.6</i> . The updated City and County of Honolulu “Sea Level Rise II – Guidance Document” (July 29, 2022) recommends that the City continue to utilize the 3.2-ft SLR-XA for planning purposes until updated SLR-XA map data is available. As discussed in <i>Section 4.4.6</i> , portions of the planned Project are within the 3.2-ft. SLR-XA. In particular, the Cove Property is vulnerable to annual high wave flooding with an expected 3.2 feet of SLR.
G.3.	Ignoring sea rise and future flooding is yet another problem with the plan. (The EIS states that in the next 75 years, approximately 1/3 of the PC property will be subject to repeated flooding due to global warming and expected sea rise.) It doesn't appear to be practical or responsible to allow additional development in any of the environmentally sensitive areas.	<ul style="list-style-type: none"> William and Sara Barnes Marilyn Harvey-Heinz & Don Heinz 	Redevelopment of the site for The Cove will be designed to ensure ongoing successful, safe, and sustainable operations at the site for the foreseeable future. Landscaped, permeable open space will be integrated throughout to mitigate potential flooding and the urban heat island effect. The open spaces will reduce surface runoff, promote infiltration, manage stormwater, improve water quality, and enhance overall resilience to extreme weather events. LID measures may be integrated where feasible to promote infiltration of surface stormwater runoff and lengthen the time of concentration of surface and coastal water runoff. The site will be graded to allow runoff and potential coastal flooding to flow through the site.
G.4.	8. Sea Rise and Flooding: Ignoring the risks of sea rise and future flooding, as one-third of PC property is predicted to be subject to repeated flooding within 75 years due to global warming, is irresponsible and impractical for additional development in sensitive areas.	Eileen Meuris, Steve Meuris, and Marguerite Casillas	Planned structures at The Cove will be set back at least 60 feet from the shoreline of the beach and may be elevated eight to 19.5 feet above msl to proactively consider the potential impacts of SLR. The 60-foot setback area will be maintained as open space, providing a natural buffer to mitigate potential flooding. Areas along the coastline will be vegetated, and therefore also function as a vegetated buffer. With the implementation of the above-mentioned mitigation measures, the 60-foot setback area is appropriate, and the Project will be prepared to mitigate the potential impacts of SLR.
H.	Police Protection		EIS Section 4.6.1
H.1.	The Honolulu Police Department does not have any concerns at this time. If there are any questions, please call Major Gail Beckley of District 8 (Kapolei, Wai'anae at (808)723-8400.	Honolulu Police Department (HPD)	The Applicant acknowledges the comment and will keep HPD apprised of the Project progress.
H.2.	O. Public Services The Hawaii Police Department District 8 services the Ko Olina Resort area and the Paradise Cove property. District 8 is already strained due to staffing challenges, and the increase in services required by the Project will strain District 8 even further. There will also be an increase in required services from KOCA, through its Aloha Team security staff, with no commitment from JCC/CCK to pay their fair share of the increase in costs.	Ken Williams, KOCA & KORA	In its letters dated May 17, 2024, and June 18, 2024, commenting on the Draft EIS, HPD noted that they do not have concerns regarding the Project's potential impact on the department's ability to provide police protection. As noted in <i>Section 4.6.1</i> , once in operation, The Cove will consider and evaluate the need for additional private security on the property, as needed
I.	Recreational Resources and Beach Access/Protection		EIS Section 4.6.6
I.1.	K. Public beach access should be commensurate with use The Applicant seeks to privatize the benefits from the excessive exploitation of the Property and attempting to push the burdens of its operations on the public and neighboring properties. This is most clear with respect to the manner in which public beach access is handled. The Applicant routinely states that public beach access will be maintained at existing levels in order to preserve the natural cove and lagoon, attempting to characterize its actions as being protective of the	Ken Williams, KOCA & KORA	The Cove Redevelopment does not propose activities that will commercialize or interfere with public use of the adjacent beach, including commercial activities, such as weddings or renting beach chairs or umbrellas. <i>Section 3.3.8</i> has been revised to make this clarification. Contrary to the assertion that the Project solely targets tourists, The Cove is designed to serve a diverse range of users, including local residents and families. The redevelopment aims to create a vibrant gathering place that offers benefits to both visitors and locals. The Project will enhance the overall experience of the property while respecting and preserving public beach access.

Table 7.3: Draft EIS Summary of Comments and Responses

No.	Comments	Commenter	Responses
	<p>beach and nearshore ecosystems. However, the Proposed Action seeks to "activate" the Property during daytime hours, which essentially means that the Applicant wishes to dramatically increase the use of the public beach by its tourist customers during the day, at the expense of the local families who wish to utilize the beach. If an increase in the number of people using the beach will have a significant negative impact on the beach and nearshore ecosystem, which appears to be the argument Applicant is making as to why it should not be required to increase public beach access, the Proposed Action, which will unquestionably increase beach use, should not be undertaken.</p>		<p>The Project aims to provide uses on site related to a Hawaiian Theme Park and commercial lū'au, which may not result in a proportional increase in beach usage. The redevelopment includes ancillary amenities such as dining options, retail, and event spaces that cater to both tourists and local residents. These amenities are intended to attract visitors to the Cove Property itself, potentially reducing the direct pressure on the beach.</p> <p>The current public beach access along the south of the Cove Property will be maintained, and additional signage will be provided to direct visitors and ensure accessibility.</p> <p>To mitigate potential impacts on the beach and nearshore ecosystems, the Applicant will regularly maintain landscaping on the Cove Property. Educational signage and guidelines may be posted around property to encourage thoughtful care for the site and the surrounding environment. To protect water quality, site improvements will decrease the amount of runoff generated on site and anticipated stormwater runoff will be properly treated on site in accordance with applicable State and City requirements.</p>
I.2.	<p>Resolution 93-318 required that "The Applicant shall provide or cause the landowner to provide in perpetuity: ... Safe lateral access, fronting the Paradise Cove property in accordance with plans approved by the Department of Recreation." I do not [know] why, but safe lateral public access has not been provided. It may be legal but is not safe for the public to walk along the rocky coastline. Paradise Cove signs currently prohibit the public from walking on level ground mauka of the rocky coastline. Rather than defending the status quo, I request that the FEIS propose a new lateral pedestrian easement for the public to safely walk on level ground mauka of the rocky property coastline.</p>	Douglas Meller	<p>As described the <i>Atlas of Natural Hazards in the Hawaiian Coastal Zone</i> (Fletcher et. Al, 2002), the artificial coves of Ko Olina provide sandy beaches along an otherwise rocky shoreline. Characteristic of the original shoreline of the west side of O'ahu, the Cove Property's shoreline is characterized by a natural rocky shelf with a pocket of sand providing a natural beach/cove (Figure 3.4). The landowner maintains the existing 10-foot-wide public beach access easement, and safe lateral public access to the shoreline is currently provided to the adjacent beach. As such, the landowner is deemed to have met the provisions of Resolution No. 93-318. This condition will continue with redevelopment of the property.</p> <p>Currently, access to the Cove Property is only provided to those attending the lū'au show. The planned redevelopment includes expanded programming associated with the Hawaiian theme park that will allow residents and visitors to access the Cove Property. As indicated on the preliminary site plan (Figure 3.3), pathways and open spaces are provided throughout the property, including adjacent to the rocky shoreline, to accommodate safe pedestrian access.</p>
I.3.	<p>Kai Lani Resident Concerns: 13. Protection and preservation of natural beach areas on both sides of the proposed project</p>	Elizabeth and Richard Rubinstein	<p>The current level of beach access and parking will be maintained to protect the beach/natural cove adjacent to the Cove Property, which is a valued natural resource in the area. The existing public beach access along the southern end of the property will remain in place and continue to be maintained by the landowner.</p> <p>The natural beach located north of the Cove Property is owned and maintained by a different landowner and is not included in the scope of the Project.</p>
J.	Access, Traffic, and Circulation		EIS Section 4.7
J.1.	<p>DHS has reviewed the proposed the Cove at Ko Olina Redevelopment project and the map of the area. A check on DHS' internal data system and Google Maps found two (2) licensed Group Child Care Centers, and three (3) licensed Before and After School Facilities located within one (1) mile radius of the area that may be affected by the traffic during the construction phase.</p>	Department of Human Services (DHS)	<p>The Applicant acknowledges the comment. Construction BMPs as described in Sections 4.7 and 4.9 will be employed to minimize traffic and noise impacts to surrounding educational and childcare facilities.</p>
J.2.	<ol style="list-style-type: none"> 1. Fire department access roads shall be in accordance with National Fire Protection Association (NFPA) 1: 2018 Edition, Section 18.2.3 2. A fire department access road shall extend to within 50 feet (15 meters) of at least one exterior door that can be opened from the outside and that provides access to the interior of the building (NFPA 1: 2018 Edition, Section 18.2.3.2.1.) 3. Fire department access roads shall be provided such that any position of the facility or any portion of an exterior wall of the first story of the building is located not more than 150 feet (46 meters) from fire department access roads as measured by an approved route around the exterior of the building or facility. (NFPA 1: 2018 Edition, Sections 18.2.3.2.2 and 18.2.3.2.2.1, as amended.) 	Honolulu Fire Department (HFD)	<p>The Applicant acknowledges that fire access roads will be designed in accordance with NFPA standards, and final construction drawings will be submitted to HFD as part of the building permitting process.</p>
J.3.	<p>5. Comments relating to public health and safety should be addressed prior to building permit submittals:</p> <ol style="list-style-type: none"> a. An overall timeline or phasing plan should be provided for the proposed development. This overall timeline should include the anticipated dates to obtain major building permit(s) for demolition/construction work, including the projected date of occupancy, shall be 	DPP	<p>a. Redevelopment of the property is expected to commence upon receipt of necessary permits and approvals. It is anticipated that 24 months will be required for construction. Improvements are planned to start as early as 2025 and may be completed by 2027, subject to market conditions (Section 3.4). A more detailed timeline or phasing plan will be provided to DPP as design and permitting of the Project progresses. Construction activities are expected to occur in the following general phases: demolition, site preparation (clearing and grading), excavation, foundation installation, structure construction, grading.</p>

Table 7.3: Draft EIS Summary of Comments and Responses

No.	Comments	Commenter	Responses
	<p>prepared by the applicant in a format acceptable to the Department. The timeline should identify when the traffic management plan (TMP), updates and/or validation to the findings of the initial traffic impact report (TIR) and off-site roadway work will be submitted for review and approval in relation to when approvals for construction plans, building and occupancy permits will be necessary. Typically, the TMP or subsequent updates should be submitted and approved prior to the issuance of the (temporary) certificate of occupancy (CO), however in this case, a portion of the TMP should be prepared which addresses the design adequacy of the porte-cochere area depending on what parking operations measures are implemented from the parking management plan. A new TIR may be required if there is a significant change to the scope or timing of the major work items contained in the initial report.</p> <p>b. A TMP shall include traffic demand management (TDM) strategies and parking management strategies from the Parking Management Plan (PMP) to minimize the amount of vehicular trips for daily activities. TDM strategies could include carpooling and ride sharing programs, transit, bicycle and pedestrian incentives and other similar TDM measures. A pedestrian and bicycle circulation plan should also be included to provide accessibility and connectivity to and along the surrounding sidewalks and at street intersections, as it relates to complete streets initiatives. A post TMP will be required after full build-out, to validate the relative effectiveness of the various TDM and parking management strategies identified in the report.</p> <p>c. Updates to the TIR will be required approximately six months after the issuance of the CO, to validate the traffic projections, trip reduction rates, distribution and assignment contained in the initial TIR. If additional traffic mitigation measures or modifications are necessary to support related traffic impacts directly attributable to this development, the applicant will be required to implement these measures.</p> <p>d. Construction plans for all work within or affecting future public streets should be submitted for review and approval. All vehicular access points shall be constructed as standard City dropped driveways. Adequate vehicular sight distance shall be provided and maintained at all driveways for pedestrians and other vehicles.</p> <p>e. Driveway grades shall not exceed five percent for a minimum distance of 5-feet from the back of the designated pedestrian walkway.</p> <p>f. All loading and parking areas shall be designed such that vehicles enter and exit in front first.</p> <p>g. Bicycle parking or bike racks shall be provided within this project and shall be located in a safe and convenient location.</p> <p>h. Drop-off/pick-up areas should be done on-site. Access to these areas should be via standard dropped driveways and the length of this area shall be designed to accommodate the anticipated type and number of vehicles to prevent any overflow of vehicles onto the Ali'inui Drive. The design shall be wide enough to allow a moving vehicle to safely pass a stationary parked vehicle. The TMP should address minimizing the average dwell time for these users and how it will be managed.</p> <p>i. The TIR should be expanded to quantify and verify the trip generation rates discounts taken. Please quantify the reductions taken from comparisons to the compatible uses near the project site.</p> <p>j. The TIR should expand on the existing operations at the projects driveways. Do median openings adequately serve incoming and exiting traffic currently without affecting thru traffic on Ali'inui Drive? Is there currently a need for left turn lanes and acceleration lanes? Depending on the PMP strategies implemented, will there be a need for turn lanes and/or acceleration lanes?</p>		<p>installation of interior finishes and fittings, architectural coatings, and landscaping. The Applicant will prepare a TMP and an updated TIR if required by DPP. Off-site roadway work is not anticipated.</p> <p>b. The TMP will include TDM strategies and parking management strategies. These may include, but not be limited to, carpooling and ride sharing programs, transit, bicycle and pedestrian incentives and other similar measures. A determination on the proposed parking management strategies to be implemented will be made as the Project progresses (Section 4.7.3).</p> <p>c. It is acknowledged that updates to the TIR will be required after issuance of the certificate of occupancy.</p> <p>d. Though not anticipated, construction plans for work within or affecting future public streets will be submitted to the DPP for review and approval if required. The Project will utilize existing vehicular access points along Ali'inui Drive to the Cove Property, which are constructed to City standards and provide and maintain adequate vehicular sight distance for pedestrians and other vehicles.</p> <p>e., f. The Applicant acknowledges the comments regarding design of the Project driveways and loading and parking areas.</p> <p>g. Bicycle parking will be provided on site in accordance with LUO standards (see Figure 3.3 and Section 3.3.10.4).</p> <p>h. A drop-off/pick-up area has been designated on site to prevent overflow of vehicles onto the Ali'inui Drive (see Figure 3.3). The design will allow for sufficient passing to minimize potential conflicts with vehicles and will address average dwell time for these users (Section 4.7.1).</p> <p>i. The trip generation reductions used in the TIR considered several factors. These factors included the type of use, the target market, and potential attraction given the relative location of the other uses in the area. For retail uses, the reductions assumed that the majority of customers would come from within the resort area, as these establishments are expected to offer specialty products. For quality restaurants, the analysis took into account the broader appeal these venues may have outside the resort area. Accordingly, the TIR assumed that 80 percent of the trips would originate from within the resort, while 20 percent would come from external areas, acknowledging that such establishments may attract patrons from the wider community. Similar to the retail uses, the majority of trips associated with the fast-food-type restaurants were also assumed to come from areas within the adjacent resort area. These establishments are not expected to be flagship venues, and the resort's location relative to other population centers further supports this assumption. In calculating the reductions for trips assumed to come from areas within the adjacent resort, consideration was given to the limited availability of parking in the area and the multimodal options available in the vicinity (such as pedestrian pathways). Based on these factors, a portion of internal trips were assumed to be made via non-motorized modes, with 80 percent of trips made via walking and 20 percent via private vehicles. If required, the Applicant can provide additional quantifications of these reductions in an updated TIR.</p> <p>j. Field investigations were conducted to observe operations at the Project driveways, and no issues that would require additional modifications were observed. Traffic operations during events at the Cove Property will be managed in accordance with a TMP, which is being prepared for the Project. Based on the parking strategies contemplated by the PMP, turn lanes and/or acceleration lanes are not anticipated to be required at this time.</p> <p>k. In the event of inclement weather, such as rain, events, including the lū'au, are expected to be canceled in accordance with the standard procedures followed at similar venues operated by the Applicant. As such, increased vehicular use during such periods is not anticipated.</p> <p>l. On-site parking will be managed in accordance with the PMP (Section 4.7.3). A determination on the parking management strategies to be implemented will be made as the Project progresses. As the PMP notes, parking demand at the Project site will depend on the attractiveness of the establishments and visitor experiences. As such, demand may change based on a variety of factors. The benefit of applying the recommended strategies is that they provide a series of levers that can manage demand through parking charge modifications and supply management. As operation of the Project progresses, the Applicant reserves the flexibility to make adjustments to this strategy as needed. With the implementation of parking management strategies, Project parking demand is expected to be accommodated within the proposed parking supply.</p>

Table 7.3: Draft EIS Summary of Comments and Responses

No.	Comments	Commenter	Responses
	<p>k. Clarify the operations during inclement weather conditions. Will shows go on or be cancelled? Vehicular use will increase during inclement weather. The TIR should include a scenario for inclement weather whereby increased projected trips (above the 10 percent) are analyzed, and its potential impacts are known and see if any mitigative measures are needed.</p> <p>l. Adequate on-site parking should be provided. The PMP should be a working document until all parking management strategies are implemented and effectively working. The strategies chosen will affect the porte-cochere areas and driveway entry/exit points and operations. The type of design and improvements needed (ex. turn lanes, acceleration lanes, storage lengths, etc.), should accommodate the parking management strategies that are implemented.</p>		
J.4.	<p>The DEIS does not adequately comment on the potential traffic issues that “The Cove”, as proposed, will have on Ko Olina, and Kai Lani in particular. The traffic study was conducted during the weekday, on Wednesday and Thursday, which are not typically high traffic times, compared to a weekend. This assessment was carried out during the month of September, which is a month of low tourist density month in Ko Olina. It does not capture the increased number of vehicular right-hand turns entering the proposed development off Ali’i’nuui Drive at the entrance to Ko Olina, or the number of anticipated right or left hand turns exiting. There are four unregulated crossing lanes which emerge out of the proposed parking lot and development. This would represent additional traffic flow interruption into Ali’i’nuui Drive. From the very early morning hours each morning, from approximately 4:30am for food service delivery to restaurants and merchants, to closing time of restaurants and events at 11:00pm, with some employees leaving the property after closing duties. These are important statistics to project in any redevelopment project to accurately capture and reflect traffic flow, especially when the hours of operation are different, and the scope; specifically, the size and scale of the developed space, does not align with the proposal. This was not captured in the reported numbers.</p>	Kai Lani at Ko Olina AOA	<p>The Applicant acknowledges the comments regarding traffic impacts, particularly with regard to traffic congestion and traffic flow, specifically at Ko Olina Resort’s main entrance, along Ali’i’nuui Drive, and at various intersections in the vicinity of the Project site. The TIR follows standard practices established by both State and City transportation agencies for traffic impact studies. The TIR was also conducted using methodologies developed by the ITE, which are the industry standard and widely accepted for determining vehicle trip generation. The study periods analyzed in the TIR, including the weekday peak periods chosen for analysis, are consistent with State and City guidelines and industry standards, and are considered representative for comprehensively assessing typical traffic patterns in the area. It is acknowledged that traffic during weekends and peak tourist seasons may differ; however, the aim of the TIR is to assess the existing and anticipated typical or average traffic pattern.</p> <p>To support the TIR, manual turning movement counts were collected at two intersections (Ali’i’nuui Drive/Olani Street and Ali’i’nuui Drive/Kamoana Place). Additionally, screen line traffic volumes were collected along Ali’i’nuui Drive just north of the Ko Olina Resort’s main entrance. To ensure a comprehensive understanding, the TIR also considered various factors beyond weekday traffic counts, such as anticipated visitor volumes and operating hours for restaurants and events. These projections were based on established methodologies for estimating traffic generation and circulation, taking into account the scale and scope of the development.</p> <p>Key findings from the TIR and projected Year 2027 traffic conditions are summarized in Section 4.7.1 and indicate that:</p>
J.5.	Kai Lani Resident Concerns:	Elizabeth and Richard Rubinstein	<ul style="list-style-type: none"> Traffic levels at critical intersections are projected to operate at LOS B or better during both AM and PM peak hours, even with the addition of the Project’s traffic. This is similar to existing conditions (Table 4.4).
J.6.	<p>3. Traffic congestion and control</p> <p>17. Emergency access and egress in the presence of large crowds</p>		<ul style="list-style-type: none"> Traffic volume increases on Ali’i’nuui Drive north of the Project site are expected to remain minimal (1 percent increase during AM peak hours and 3 percent during PM peak hours), staying within daily traffic fluctuation ranges.
J.7.	<p>Traffic Flow and Congestion:</p> <p>The proposed all-day use of The Cove’s beach entertainment and retail areas, which currently operate primarily in the evening, will undoubtedly increase traffic congestion at the resort’s only entry point. This will create significant delays for our guests upon arrival, severely impacting their first impression and overall experience at our luxury resort. Our guests expect a seamless and pleasant arrival, not a traffic bottleneck.</p>	Peter Togawa, Beach Villas Ko Olina AOA	<ul style="list-style-type: none"> The Project will incorporate BMPs to ensure smooth traffic flow, including sufficient sight distances, on-site loading areas, and adequate turning radii for service vehicles to avoid encroaching on public roadways. These measures aim to mitigate potential disruptions and maintain the safety and efficiency of traffic movement. <p>Regarding comments about unregulated crossing lanes and potential right-hand and left-hand turns at the Project site’s entrance and exit, field investigations were conducted to observe operations at the Project driveways and no issues that would require additional modifications were observed. The TMP currently being prepared for the Project will identify strategies to minimize potential issues relating to queuing that could impact adjacent roadways. The TMP may also consider emergency access and egress to safeguard public safety.</p>
J.8.	<p>We welcome hundreds of golfers weekly, from group and FIT travelers coming from Waikiki to our on-resort visitors and kama’āina. In total, guests of our resort partners, employees, supporting small businesses, residents and beach goers, contribute to approximately 4,000-5,000 vehicles entering Ko Olina daily via our main entrance, beginning as early as sunrise.</p> <p>The expansive retail and restaurant operations proposes for The Cove will greatly impact traffic flow into the resort. I would like to see a more comprehensive plan to address this issue should the project move forward.</p>	Ko Olina Golf Club	<p>Regarding parking, a PMP for the Project was prepared to minimize the burden on existing parking infrastructure and reduce the impact on the adjacent resort. The PMP includes strategies such as valet services, charging for parking, incentivizing TNC use, promoting other modes of transportation, and beach parking management (Appendix E and Section 4.7.3). A determination on the parking management strategies to be implemented will be made as the Project progresses. As the PMP notes, parking demand at the Project site will depend on the attractiveness of the establishments and visitor experiences. As such, demand may change based on a variety of factors. The benefit of applying the recommended strategies is that they provide a series of levers that can manage demand through parking charge modifications and supply management. As operation of the Project progresses, the Applicant reserves the flexibility to make adjustments to this strategy as needed. With the implementation of parking management strategies, Project parking demand is expected to be accommodated within the proposed parking supply.</p>
J.9.	<p>The entrance to Ko Olina Marina is located on Waipahe Place adjacent to the resorts popular Ulua Lagoon (4) public parking area. We have eight ocean activity boats who host ocean tours for anywhere between 250 and 350 guests on a daily basis. In addition, we have over 300 slips where tenants moor their boats and numerous other boaters who utilize our public boat ramp to access the ocean. As with all resort partners, residents, and employees, these tenants and boaters must enter Ko Olina via the resort’s main entry.</p>	Ko Olina Marina	

Table 7.3: Draft EIS Summary of Comments and Responses

No.	Comments	Commenter	Responses
	<p>We have reviewed the proposed actions in your EIS, particularly with regards to entering and exiting the resort's entrance. What is currently proposed does not adequately address how traffic from the increased and potentially steady flow of vehicles to your shopping mall during the day will be mitigated for Ko Olina's businesses. One anticipated scenario for the Marina is our guests missing their tour departure times.</p> <p>Please revisit your traffic studies and at a minimum conduct them during peak traffic hours to account for the thousands of employees, beach goers, residents and guests trying to reach their destination daily. As currently proposed, The Cove redevelopment will surely have a negative impact on our business.</p>		<p>The TIR considered multimodal transportation, as discussed in <i>Section 4.7.2</i>. The Project will incorporate BMPs to help reduce vehicular traffic by encouraging alternative transportation modes through providing bicycle facilities on site, integrating wayfinding signs, and providing improved, ADA-compliant pedestrian connections to facilitate access between on- and off-site facilities.</p> <p>While the projected increases in vehicular traffic are expected to be minimal, the Applicant will ensure that the TMP addresses the expressed comments and implements effective measures for managing traffic flows during peak periods. These measures will help mitigate congestion and support the ongoing smooth operation of the adjacent resort.</p>
J.10.	<p>Traffic Congestion:</p> <p>The proposed development will exacerbate the traffic congestion in our area. The EIS fails to adequately address the impact of increased vehicular traffic on our private roads and the Ali'inui/Olani intersection. Adding more vehicles without proper infrastructure improvements will only worsen this situation, making it more difficult for residents to commute to work, access essential services, and go about their daily lives.</p>	Carla L. Kozak	
J.11.	<p>Traffic Congestion:</p> <p>The proposed development will worsen traffic congestion in our area. The Environmental Impact Statement does not sufficiently address the effects of increased vehicular traffic on our private roads and the Ali'inui/Olani intersection. Adding more vehicles without corresponding infrastructure upgrades will exacerbate the problem, making it harder for residents to commute, access essential services, and manage their daily activities.</p>	Dale Fishell	
J.12.	<p>Traffic Congestion:</p> <p>The planned increase in daytime use without corresponding infrastructure upgrades will severely impact traffic within the resort. The anticipated surge in vehicle numbers will exponentially increase congestion on our private roads, causing substantial delays to resident commutes.</p>	Nicolas Politsch	
J.13.	<p>Traffic and Transportation Study:</p> <p>Ko Olina has only one entrance and exit, which could complicate access and internal circulation as traffic will most likely increase. As a result, accessing the Resort could be more challenging.</p> <p>Parking is already a challenge at Ko Olina. Will there be sufficient parking to accommodate patrons and deliveries to The Cove? Based on the number of projected employees and potential visitors, it does not appear to be the case. As a result, would the proposed Parking management strategy (such as parking charge, mandatory valet, transportation network company incentives) be sufficient to remedy the potential parking issues and meet demand?</p> <p>Contrary to what is written in Table 1.1: Summary of Impacts and Mitigation Measures, I believe that traffic and parking will have a long-lasting negative impact on the Resort.</p>	Veronique Jones	
J.14.	<p>Traffic:</p> <p>The proposed development will considerably aggravate traffic congestion in the front of the resort. The EIS does not sufficiently address the impact of increased vehicular traffic on our private roads and the main intersection of Ali'inui Drive. Adding more vehicles without appropriate infrastructure improvements will worsen the situation, making it more challenging for residents to commute, access essential services, and carry out their daily activities.</p>	Warren Miles	

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J.15.	<p><u>Marriott's Ko Olina Beach Club is the most successful vacation club product in the company's portfolio, hosting owners who return to Ko Olina year after year. Once The Cove project is launched, we have serious concerns about the traffic and parking plan proposed by the project's developers. Our resort is located furthest east of Ko Olina's entrance, meaning our guests and employees will likely experience the most significant delays when arriving at the resort.</u></p> <p><u>To ensure a positive vacation experience for our guests, I urge the project's development team to revisit and thoroughly analyze the traffic data for Ali'inui Drive during peak hours. The increased number of visitors due to The Cove redevelopment will heighten traffic congestion at Ko Olina's only point of entry, potentially leading to longer delays and frustration for our guests.</u></p> <p><u>A seamless and welcoming arrival experience is crucial for maintaining guest satisfaction and encouraging repeat visits. We suggest collaborating with local traffic management experts to develop an effective traffic and parking plan that mitigates these concerns.</u></p>	Edgar Gum	
J.16.	<p><u>2. Traffic congestion.</u></p> <p><u>According to the EIS, no long-term adverse impact on traffic conditions is expected. However, the EIS did not specifically consider the impact on traffic entering and exiting the Resort at the Ko Olina gate house, which could be a potentially serious traffic problem both within and immediately beyond the resort. Also, when considering multimodal transportation (bicycle, pedestrian, rail), the Transportation Impact Report recommends a number of Best Management Practices and states that a determination on this matter will be made as the project progresses. (Appendix D) This does not give adequate assurance that any of these Best Practices would be implemented.</u></p>	Pieter and Claire van Wingerden	
J.17.	<p><u>TRAFFIC STUDY Volume II pages 363-425</u></p> <p><u>Comment Point 1: NO where did the traffic study show the increased number of vehicular right-hand turns entering the proposed development off Ali'inui Drive at the entrance to Ko Olina or the number of anticipated right or left hand turns exiting (crossing four lanes with no traffic control devices) out of the proposed parking lot and development. That number would be an indication of additional traffic flow interruption into Ali'inui Drive. From the hours of very early morning: most likely 4:30am due to food prep for restaurants and truck service deliveries for restaurants and merchants to closing time of restaurants and events at 11:00pm with employees leaving the property even later after closing duties.</u></p> <p><u>These are important statistics to project in any redevelopment project, especially one where the hours or operation will be significantly different and the size and scale of the developed space is significantly different. Nowhere were these numbers reported.</u></p> <p><u>Comment Point 2: In my opinion, the traffic study is flawed both on the observation days, Wednesday and Thursday, time of day and time of year, September, one of the lowest visitor months to the islands and resort. The study was conducted and extrapolated peak hours (6am-9am and 3pm- 6pm) and the assumptions of 80% of visitors to the additional 30,000 square feet of proposed restaurant space would be on foot. (PDF: Volume II page 359 item B. 1. A Traffic Study) Data and time of day observations is inadequate to accurately predict increased vehicle traffic into the Resort and on the resort paid for roadways.</u></p> <p><u>Comment Point 3: 782 additional trips were projected for the "peak" or "observed" hours. Table 2. Reduces that number (which is what was used to calculate (LOS) to 212. (PDF: Volume II page 376 item A. 1. Traffic Study) See charts Table 1.-Table 2 starting on Pg 377. Projected anticipated peak hour trips were calculated at 537. However, in table 2 it is adjusted down to 145. The conclusions of the study stated no significant impact.</u></p> <p><u>Comment Point 4: These observations and assumptions underestimate the use of our infrastructure to access the "proposed development." It does not account for the increase in traffic in extended business hours of vehicular traffic when retail shops are open and restaurants are open for breakfast, lunch, dinner, and deliveries are made to vendors for food, merchandise</u></p>	Karen Messick	<p><u>The Applicant acknowledges the detailed comments regarding the TIR and its assumptions.</u></p> <p><u>Comment Point 1: Ali'inui Drive is a four-lane roadway with two lanes in each direction. Although some delay to through traffic may result from vehicles turning into the Project driveways, there is an additional through lane along both directions of Ali'inui Drive that can be used to bypass turning traffic.</u></p> <p><u>To clarify, baseline traffic data used in the TIR included manual turning movement count surveys at two key intersections (Ali'inui Drive/Olani Street and Ali'inui Drive/Kamoana Place) as well as screen line traffic volumes along Ali'inui Drive just north of the resort's main entrance.</u></p> <p><u>Comment Point 2: The study time periods are based on standard practice used by both State and City transportation agencies as basis for their review of traffic impact studies. Notably, although supplemental turning movement counts were collected in November 2023, the TIR utilized traffic data collected in Year 2018, when collected traffic volumes and hotel occupancy rates for areas outside of Waikiki were both higher. Post-pandemic data indicates that current hotel occupancies continue to remain below pre-pandemic levels. As a result, the TIR presents a conservative assessment.</u></p> <p><u>Comment Point 3: As previously discussed, the study time periods are based on standard practice used by both State and City transportation agencies as basis for their review of traffic impact studies. The projected trip numbers in the traffic study follow established methodologies, adjusting for observed conditions, pedestrian access, and vehicle occupancy. The reduction in projected trips accounts for factors like the percentage of foot traffic within the adjacent resort area and the reduced vehicle dependency of visitors accessing certain uses at the Project site. Refer to the response provided to the DPP Comment i, which is identified as Comment J.3. in this Table 7.3.</u></p> <p><u>Comment Point 4: The TIR focused on peak hours when traffic volumes are expected to be the highest. During operation, the Project will coordinate with service providers to manage deliveries and other operational traffic efficiently, minimizing disruptions to Ali'inui Drive and surrounding roadways. Such strategies will be documented in the forthcoming TMP.</u></p> <p><u>Comment Point 5: Field investigations were conducted to observe operations at the Project driveways, and no issues that would require additional modifications were observed. While the Project is expected to attract a high volume of visitors, the increase in people on-site will be effectively managed through a comprehensive TMP, which is being prepared for the Project.</u></p> <p><u>Comment Point 6: For long-term traffic impacts during Project operations, the TIR utilized data from the Institute of Transportation Engineers and incorporated a multi-modal trip generation analysis, reflecting the proximity of the Project to nearby hotels and pedestrian-friendly infrastructure. As summarized in the EIS, traffic operations in 2027 with the Project are expected to remain similar</u></p>

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No.	Comments	Commenter	Responses
	<p><u>and supplies or peak visit times such as weekends. (existing use of the subject property is 5-9pm with only service vehicles in daytime.</u></p> <p><u>Comment Point 5: The type of assumptions used and observations made, incorrectly concludes that NO change is needed in any traffic control devices or roadway redesign to accommodate the increased daylong additional traffic predicted to access and utilize the proposed “project” through Ko Olina owned and maintained roadways. I believe a review of the developers marketing study would reveal the actual anticipated number of vehicular visits. I am quite sure the developer has done that analysis. I have asked for it but have not had any success. No developer would plan such a development without a proposed Return On the Investment, which would include predicted revenues based on visits and visits generated from certain geographic areas, not just within the resort.</u></p> <p><u>Comment Point 6: Financially a project such as this could not make it with only an additional 145 visits at peak (6-9 and 3-6 hours) Where is the traffic study that indicates the TOTAL PREDICTED additional Vehicular traffic through our roadways. In addition, the state in the letter asked the Developer to consider surrounding proposed or in progress development.</u></p> <p><u>Comment Point 7: The Kapolei, and Ewa region is projected to grow plus 300,000 new residential units in near future. A large percentage of future population increase.</u></p> <p><u>Nowhere in the traffic study did the developer consider the additional population in Kapolei, as requested by the state. See page 381 2. B A 1% growth rate was assumed by the traffic study.</u></p> <p><u>Comment Point 8: Farrington Highway is a parking lot daily west bound from 3-6pm and 6-9am eastbound for which the City and County transportation division have no answers to resolve.</u></p> <p><u>Additional anticipated traffic was unaccounted for in the study, traffic into this area further complicates the traffic congestion, with additional employees and service providers at ALL hours of the Day and Night both weekdays and weekends.</u></p> <p><u>Comment Point 9: The study was done on Wednesdays and Thursdays (see charts 393-399) only with no statistics observed on heavy weekend traffic into the resort from local communities utilizing the beaches in Ko Olina, or the departure arrival of visitors for holidays to the hotels and surrounding communities as most visitors who enjoy the resort for extended periods of time from off island arrive and depart on weekends.</u></p> <p><u>Comment Point 10: Further, a major portion of the traffic study was done in 2018, in September a low time for visitors as mainlanders are preparing to return to school and is now six years old and outdated. It is my request the developer provide an updated study including weekend and all-day traffic analysis and projected visitors to the “project” under consideration. I could go on about the false assumptions in this traffic study but do not hold those assumptions to the traffic study company as they were given information from the developer. It is my hope that the Office of Planning and development will do a deep dive into these studies. It would be my recommendation to reject the tenants of the existing traffic study and require the developer to include projections for use based on the proposed development.</u></p>		<p><u>to baseline conditions. Minor increases in traffic volume are within daily fluctuations, and the anticipated increase in traffic along Ali’i’nuui Drive is not expected to significantly affect roadway operations. Further, a TMP will be prepared to manage traffic during operation and will include strategies such as carpooling, ride-sharing, and transit incentives.</u></p> <p><u>Comment Point 7: Although growth is expected within the Kapolei and ‘Ewa regions in the future, there are no known developments within the immediate vicinity of the Project that are expected to be completed within the same timeframe. However, a background growth rate was conservatively assumed along Ali’i’nuui Drive to account for potential growth that may occur between baseline and With Project 2027 conditions.</u></p> <p><u>Comment Point 8: Farrington Highway is outside the immediate scope of the TIR study.</u></p> <p><u>Comment Point 9: The TIR follows standard practices established by both State and City transportation agencies for traffic impact studies. The TIR was also conducted using methodologies developed by the ITE, which are the industry standard and widely accepted for determining vehicle trip generation. The study periods analyzed in the TIR, including the weekday peak periods chosen for analysis, are consistent with State and City guidelines and industry standards, and are considered representative for comprehensively assessing typical traffic patterns in the area. It is acknowledged that traffic during weekends and peak tourist seasons may differ; however, the aim of the TIR is to assess the existing and anticipated typical or average traffic pattern.</u></p> <p><u>Comment Point 10: The 2018 counts were subsequently supplemented by manual turning movement counts collected in November 2023 to verify counts from 2018 and assess traffic volumes in the vicinity after the COVID pandemic, which resulted in decreased traffic volumes and changes to travel patterns. However, a comparison of the traffic data taken from Years 2018 and 2023 shows that traffic volumes collected in 2023 were generally less than those collected in 2018. In addition, occupancy rates for Waikiki, Other O’ahu, and Upscale hotel categories were considered. According to data from the State DBEDT, in general, occupancy rates for all the categories considered are also less in 2023 than in 2018. As such, for the purpose of the TIR, the Year 2018 traffic data was used to represent baseline Year 2023 conditions for a conservative assessment.</u></p>
K.	Parking		EIS Section 4.7.3
K.1.	<p>P. Parking and Comfort Station</p> <p><u>The current parking plan shows a total of 406 stalls: 113 valet stalls, 90 employees/patron stalls, and 203 overflow stalls on the Lanikūhonua parking lot. The redevelopment plan states that the Project will generate 817 FTE jobs. Therefore, there is clearly insufficient employee parking to meet the projected needs of the Project. This will likely cause a spillover into Ko Olina’s lagoon parking and/or the Ko Olina Station/Center parking. The parking plan exacerbates the problem by reducing the amount of bus parking, thus requiring additional personal vehicle use. While the EIS supposes that much of the use of the Property will come from Ko Olina Resort, it is unclear that this will be true given the fact that the Resort currently has two excellent lū’au operations, and significant restaurant and retail operations. Bus parking should</u></p>	Ken Williams, KOCA & KORA	<p><u>To clarify, the EIR (Appendix A) estimates that the Project may generate or sustain an estimated total of 817 jobs (678 FTE) annually, of which 583 (484 FTE) would be direct on site. Approximately 121 (100 FTE) would be indirect and 113 (94 FTE) would be induced and should not be considered as part of the parking analysis.</u></p> <p><u>Section 4.7.3 discusses potential strategies to accommodate parking demand on the site. Employee parking will be accommodated within the off-street parking entitled to the Applicant on the adjacent Lanikūhonua lot. While the operations of the valet program will be at the discretion of the valet operator, employee vehicles may be parked in spaces located furthest from the valet stand given their low turnover rate. Parking charges for employee spaces are at the discretion of the site operator but may be a reduced price given the lack of parking alternatives. A determination on final parking strategies to accommodate employees will be determined as the Project progresses.</u></p>

Table 7.3: Draft EIS Summary of Comments and Responses

No.	Comments	Commenter	Responses
	<p>not be reduced, and instead the Project should require bus transport as part of the lū'au experience.</p> <p>***</p>		<p>It is expected that the majority of employees will carpool or take public transportation to the site, as is currently the case with existing employees of Paradise Cove. The TMP being prepared for the Project will include TDM strategies, such as carpooling and multimodal transportation, to address employee parking.</p> <p>Bus parking counts conducted during the PMP survey indicate that the peak demand for buses at the existing commercial lū'au operation was between five to six buses on Fridays and Saturdays. The Project also plans to reduce the lū'au capacity from 1,2000 visitors at one time to 650. As such, it is expected that eight bus stalls will adequately serve the Project.</p> <p>The PMP recommends reducing the bus pricing to incentivize patrons to use the bus service, thereby decreasing overall parking demand and reducing personal vehicle use.</p>
K.2.	<p>Parking: This issue is unavoidable, and it is unfeasible to consider that the proposed suggestions within the DEIS will deal with it appropriately. Parking within Ko Olina has always posed challenges. The report cites that Paradise Cove presently has 354 vehicle spaces on the 10.8-acres. It states that it will be limited to 406 spaces to accommodate an increased parking demand; however, the DEIS projects that the parking demand will increase to 440 spaces or higher. Keeping in mind, "The Cove" project is approximately three times larger than the existing facilities, so the estimate may be inaccurate. This number may be significantly higher, given the fact the number of full-time employees is predicted to rise from approximately 298 to 678. This will pose a significant supply vs demand problem. With this, the DEIS acknowledges that the current plan cannot accommodate the parking demand which is likely to occur. There are no assurances that offsite parking overflow will not be sought by the developer between the grassy area East of the current Paradise Cove and West of Kai Lani. This is a major concern to owners as there isn't a clear and workable solution with acceptable contingency planning contained in the DEIS.</p>	Kai Lani at Ko Olina AOA	<p>To clarify, the EIR (<i>Appendix I</i>) estimates that the Project may generate or sustain an estimated total of 817 jobs (678 FTE) annually, of which 583 (484 FTE) would be direct on site. Approximately 121 (100 FTE) would be indirect and 113 (94 FTE) would be induced and should not be considered as part of the parking analysis.</p> <p>The Applicant acknowledges the concern about potential overflow parking affecting the adjacent resort. To clarify, the Applicant is not considering parking overflow between the grassy area east of the Project site and west of Kai Lani, nor will this be an option for consideration in the future. Fortunately, because of the lack of on-street parking and access restrictions in the adjacent area, spillover into adjacent neighborhoods is not feasible given the security of gated communities and resort properties.</p> <p>Regarding comments on the reduction of bus parking stalls, counts conducted during the PMP survey indicate that the peak demand for buses at the existing commercial lū'au operation was between five to six buses on Fridays and Saturdays. The Project also plans to reduce the lū'au capacity from 1,2000 visitors at one time to 650. As such, it is expected that eight bus stalls will adequately serve the Project.</p> <p>The PMP recommends reducing the bus pricing to incentivize patrons to use the bus service, thereby decreasing overall parking demand and reducing personal vehicle use.</p>
K.3.	<p>Kai Lani Resident Concerns: 4. Parking pressure: Both legal and illegal 5. Monitoring and control of all access points to the proposed project</p>	Elizabeth and Richard Rubinstein	<p>The PMP was updated in September 2024 to reflect the reduction in square footage (<i>Appendix E</i>). As discussed in <i>Section 4.7.3</i>, a valet operator has reviewed the site plan and determined that an additional 50 parking spaces could be added with valet operations within the driveway aisles across the entire site. The use of valet parking is considered a parking management tool to increase the overall parking supply. The addition of 50 parking spaces with valet usage would result in a total parking supply of 446 parking spaces across the site.</p>
K.4.	<p>Parking overflow problems appear unavoidable, and the EIS has no iron clad plan to assure that overage parking won't end up elsewhere at the resort, including potentially Ko Olina's beloved meadow. (The EIS reports the current PC has 354 vehicle spaces on the 10.8 acres and will have no more than 406 spaces in the future to accommodate an increased parking demand that The EIS expects to be 440 spaces or higher (for a project that is 3 times larger!). And that estimate may be wrong and could easily be higher if the EIS broadly stated mitigation ideas do not work or are never implemented. So, the EIS effectively acknowledges the current plan cannot accommodate all the parking demand likely to occur with the new plan. There are no assurances that offsite parking overflow will not be sought by the developer and its operators. This is a major concern without a clear and workable solution provided by the EIS.</p>	<ul style="list-style-type: none"> William and Sara Barnes Marilyn Harvey-Heinz & Don Heinz 	<p>For the Project to accommodate parking demand, additional parking demand reduction strategies to the proposed valet component will be needed. As described in <i>Section 4.7.3</i>, the PMP proposes several strategies include lū'au-specific parking management, incentivizing TNC use, promoting other modes of transportation, and beach parking management.</p> <p>A determination on the parking management strategies to be implemented will be made as the Project progresses. As the PMP notes, parking demand at the Project site will depend on the popularity of the establishments and visitor experiences. As such, demand could be lower or higher depending on a variety of factors. The benefit of applying the recommended strategies is that they provide a series of levers that can manage demand through parking charge modifications and supply management. Increasing hourly rates, adjusting hourly rates based on demand, and valet parking are some of the ways that strategies can be adjusted to manage demand. It is anticipated that the parking program will need to be refined after the introductory valet period and throughout the Project operations to achieve a balance between demand and visitor satisfaction. With the implementation of parking management strategies, Project parking demand is expected to be accommodated within the proposed parking supply.</p>
K.5.	<p>Parking: EIS does not sufficiently address parking concerns. The proposed plans reduce the number of parking spaces for employees and buses compared to the current setup, where Paradise Cove effectively accommodated parking for over 200 employees and supported bus transportation to reduce personal vehicle use. The new plans include a day-use activation, which will require additional parking. This shortfall will likely result in overflow parking issues within the Ko Olina Resort.</p>	Dale Fishell	
K.6.	<p>Parking: The EIS fails to adequately address parking concerns. The proposed plans reduce employee and bus parking compared to existing provisions, where Paradise Cove efficiently accommodated parking for over 200 employees and facilitated bus transportation to minimize personal vehicle</p>	Carla L. Kozak	

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	<p><u>usage. The new plans introduce a day-use activation, necessitating additional parking. This insufficiency will inevitably lead to overflow parking issues in the Ko Olina Resort.</u></p>		
K 7.	<p>3. Parking Overflow: <u>The EIS does not provide a viable plan to manage increased parking demand, with current and future parking spaces falling short of requirements. This could lead to overflow parking in areas like Ko Olina's meadow, without assurances from the developer to prevent this issue.</u></p>	<p><u>Eileen Meuris, Steve Meuris, and Marguerite Casillas</u></p>	
K.8.	<p>Parking: <u>The EIS fails to adequately address parking concerns. The current plan reduces the number of available parking stalls while simultaneously increasing the usage of the property. Presently, Paradise Cove provides sufficient parking for all its employees and includes bus parking to minimize personal vehicle use. The proposed reduction in parking facilities will not only inconvenience employees but also exacerbate congestion and parking issues within the resort.</u></p>	<p><u>Nicolas Politsch</u></p>	
K.9.	<p>Parking: <u>The EIS fails to adequately address parking concerns. The proposed plans significantly reduce employee and bus parking compared to the existing provisions, where Paradise Cove efficiently accommodated parking for over 200 employees and facilitated bus transportation to minimize personal vehicle usage. The new plans introduce a day-use activation, necessitating additional parking. This insufficiency will inevitably lead to spillover of parking issues to the Ko Olina Resort.</u></p>	<p><u>Warren Miles</u></p>	
K.10.	<p>3. Parking. <u>Again, the EIS statement on the adequacy of parking facilities raises doubt as to whether or not this will be a problem once the Cove project is complete. It is stated that parking strategies <i>may</i> be implemented and "will be finalized as the Project progresses and <i>may</i> be adjusted during operation, based on need." (Italics added.) As with noise and traffic concerns, clear commitment to mitigation is lacking.</u></p>	<p><u>Pieter and Claire van Wingerden</u></p>	
K.11.	<p>Parking Study Volume II Pg-427- 448 <u>Current attendee at Paradise Cove (assume the lower of 800 attendees) arrive 65% by private vehicle or 520 persons (assume 2 per vehicle equals 260 vehicles) (study assumes 3.2 per vehicle)</u> <u>(Assume full tour busses at 56 people per bus is equal to 224 persons or 4 large tour busses.)</u> <u>10% arrive by foot or 80 persons.</u> <u>Currently there are 15 spaces for Public Beach access.</u> <u>Parking analysis recap from the Parking Study</u> <u>Existing for Paradise Cove:</u> <u>Vehicle (66 employee spaces)</u> <u>Vehicle (10 Chapel)</u> <u>Vehicle 203 guest spaces (Figure 4 site plan controlled by Lanikūhonua under parking agreement.)</u> <u>Total 279 vehicle spaces</u> <u>Vehicle 18 Bus spaces</u> <u>Parking Existing: Proposed from Parking study.</u> <u>Lanikūhonua 203 Conditional Use permit in zone 3</u> <u>69 vehicles: Proposed 113 vehicle along Ali 'nui (current bus parking)</u> <u>6 accessible: Proposed 5 accessible.</u> <u>31 bus stalls: Proposed 90 vehicle plus 8 bus stalls.</u> <u>Golf Cart Parking: none</u></p>	<p><u>Karen Messick</u></p>	<p><u>While the PMP assumes an average occupancy of 3.2 persons per vehicle for study purposes, in actuality, vehicle occupancy may vary. For this reason, the PMP recommends flexible parking management strategies to accommodate peak demand that may be adjusted based on actual use patterns once in operation (Section 4.7.3).</u> <u>To clarify, the EIR (Appendix A) estimates that the Project may generate or sustain an estimated total of 817 jobs (678 FTE) annually, of which 583 (484 FTE) would be direct on site. Approximately 121 (100 FTE) would be indirect and 113 (94 FTE) would be induced and should not be considered as part of the parking analysis.</u> <u>Employee parking will be accommodated within the off-street parking entitled to the Applicant on the adjacent Lanikūhonua lot. While the operations of the valet program will be at the discretion of the valet operator, employee vehicles may be parked in spaces located furthest from the valet stand given their low turnover rate. Parking charges for employee spaces are at the discretion of the site operator but may be a reduced price given the lack of parking alternatives.</u> <u>It is expected that the majority of employees will carpool or take public transportation to the site, as is currently the case with existing employees of Paradise Cove. The TMP being prepared for the Project will include TDM strategies, such as carpooling and multimodal transportation, to address employee parking.</u></p>

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	<p><u>(That is how many of the proposed attendees from the surround Ko Olina communities would arrive to patronize restaurants or shops, based on the walking distance to most residential communities of over ½ mile.</u></p> <p><u>Where do employees park? What is the number of spaces needed daily for an all-day long operation of restaurants, retail etc.</u></p>		
<p><u>K.12.</u></p>	<p><u>Employment:</u></p> <p><u>Developer states:</u></p> <p><u>678 FTE annually 34. Million in labor annually equals \$653,846.00 weekly.</u></p> <p><u>If generating 653,846.00 in salaries the average weekly salary would be \$1.0 a week. 678 or 52,469.00 individual compensation weekly.</u></p> <p><u>Where do the 678 workers park?</u></p> <p><u>Compared to the 290 employees of the existing business? Double the employees required.</u></p>	<p><u>Karen Messick</u></p>	
<p><u>K.13.</u></p>	<p><u>Parking Study Volume II Pg-427- 448</u></p> <p><u>Additional use:</u></p> <p><u>30,000 sq feet of restaurant 26,000 sq feet of retail</u></p> <p><u>9,000 sq ft of lū'au support A 650-seat venue.</u></p> <p><u>What are the projected daily staff persons needed to run these businesses? What is the parking need for the additional staff?</u></p>	<p><u>Karen Messick</u></p>	
<p><u>K.14.</u></p>	<p><u>Parking Study Volume II Pg-427- 448</u></p> <p><u>The proposed parking does not sufficiently take into consideration delivery trucks with only two 12 x 35 loading spaces back-to-back, logistically difficult to access and two 8.5 x 19 parking spaces identified for trucks in the north parking lot. (the space does not allow for trucks to lower gates and thus unload onto hand trucks.)</u></p> <p><u>Currently supply deliveries occur on site before operation hours through gated lots which pose no issues.</u></p> <p><u>THEREFORE: Request the developer to plan more appropriately. (maybe observe the loading and unloading process for delivery trucks at the Marketplace in Ko Olina to understand the need and current practice for deliveries to restaurants and merchants.</u></p> <p><u>Thus, requiring loading and delivering trucks to load onto pallets and hand deliver through the proposed development to all the proposed new businesses, incurring safety hazards for pedestrians and delivery men alike, moving heavy loads of foods, beverages, and merchandise.</u></p> <p><u>Where is the space for refuse pick up?</u></p>	<p><u>Karen Messick</u></p>	<p><u>As shown in <i>Figure 3.3</i>, four loading stalls for large commercial vehicles sized 12 feet by 35 feet will be provided. Delivery management strategies, including enforcement of parking restrictions and management of loading/unloading times, use of additional attendants or security, and the development of a delivery schedule program may be employed to alleviate congestion in specific loading areas.</u></p> <p><u>Space for refuse pick-up will occur at the loading bays.</u></p>
<p><u>K.15.</u></p>	<p><u>Parking Study Volume II Pg-427- 448</u></p> <p><u>How long will the parking agreement with Lanikūhonua be honored, is it in perpetuity?</u></p> <p><u>What happens when it is no longer in effect? Then will there be inadequate parking to support the development? And the roadway will become clogged.</u></p>	<p><u>Karen Messick</u></p>	<p><u>The Project will not impact the 15 off-street parking stalls currently provided to beachgoers. The 203 off-street parking stalls provided to the Cove Property on the adjacent Lanikūhonua lot will continue to be provided.</u></p> <p><u>Beach access will continue to be provided at the southeast end of the Cove Property. To mitigate the concern of beach parking misuse, the PMP proposes several management strategies that may be implemented into Project operation (<i>Section 4.7.3</i>). Time limits could be considered for beach parking to limit the amount of time vehicles can be parked. The limiting of parking time could dissuade beach visitors from visiting the Project commercial components before or after their beach visits. In addition, the beach parking supply could be incorporated within the total parking supply of the Project and managed through a ticketing system managed by the valet program.</u></p> <p><u>A determination on the parking management strategies to be implemented will be made as the Project progresses. As the PMP notes, parking demand at the Project site will depend on the popularity of the establishments and visitor experiences. As such, demand could be lower or higher depending on a variety of factors. The benefit of applying the recommended strategies is that they provide a series of levers that can manage demand through parking charge modifications and supply management. Increasing hourly rates, adjusting hourly rates based on demand, and valet parking are some of the ways that strategies can be adjusted to manage demand.</u></p>

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No.	Comments	Commenter	Responses
			It is anticipated that the parking program will need to be refined after the introductory valet period and throughout the Project operations to achieve a balance between demand and visitor satisfaction. With the implementation of parking management strategies, Project parking demand is expected to be accommodated within the proposed parking supply.
L.	Airports		EIS Section 4.7.5
L.1.	1. HDOT's Environmental Impact Statement Preparation Notice comments related to Airports, number 1 through 4 of letter STP 8.3210, dated July 8, 2021, are still valid and applicable. Please include a copy of HDOT's comments and appropriate responses in the Final EIS.	State of Hawai'i Department of Transportation (HDOT)	Responses to HDOT's comments on the EISPN related to Airports were provided in the Draft EIS (see <i>Table 7.2</i>). HDOT's comments and the Applicant's responses are provided below. Additionally, general discussion of the potential impacts the Project may have on airports as well as proposed mitigation measures has been added to the Final EIS in <i>Section 4.7.5</i> .
L.2.	1. The proposed Project is approximately 3.42 miles from Kalaheo Airport (JRF). All projects within 5 miles from Hawaii State airports are advised to read the Technical Assistance Memorandum (TAM) for guidance with development and activities that may require further review and permits. The TAM can be viewed at this link: http://files.hawaii.gov/dbedt/op/docus/TAM-FAA-DOT-Airports_08-01-2016.pdf	HDOT	The Applicant acknowledges receipt of the memorandum. The Applicant will review the technical guidance provided as part the detailed design of the Project. The Project does not include activities that may cause a glint/glare hazard or an aerial obstruction to existing flight paths. However, the Project will include landscaping. The TAM identifies "certain landscape, trees, and ground cover" as a potential wildlife attractant. In order to reduce potential wildlife attractants on site, landscaping at the site will be regularly maintained and stormwater drainage would be designed to minimize standing water, which could attract waterfowl. The Applicant will also plan to incorporate actions to limit predator presence, including effective waste management and recycling to minimize attraction to trash. Given the Project site's distance from JRF, proposed uses, and the planned design, adverse impacts to airport operations are not anticipated and related permits are not expected to be required.
L.3.	2. The proposed Project is approximately 18,190 feet from the end of Runway 29 at JRF. Federal Aviation Administration (FAA) regulation requires the submittal of FAA Form 7460-1 Notice of Proposed Construction or alteration pursuant to the Code of Federal Regulations, Title 14, Part 77.9, if the construction or alteration is within 20,000 feet of a public use of military airport which exceeds a 100:1 surface from any point on the runway of each airport with its longest runway more than 3,200 feet. Construction equipment and staging area heights, including heights of temporary construction cranes, shall be included in the submittal. The form and criteria for submittal can be found at the following website: https://oeaaa.faa.gov/oeaaa/external/portal.jsp	HDOT	The Applicant will submit a Notice of Proposed Construction or Alteration to the FAA if required.
L.4.	3. Due to the proximity to the airport, the developer should be aware of potential noise from aircraft operations. There is also potential for fumes, smoke, vibrations, odors, etc. resulting from occasional aircraft flight operations over or near the Project location. These impacts may increase or decrease over time and depending on airport operations.	HDOT	The Applicant acknowledges the comment and potential impacts the site's proximity to the Kalaheo Airport may have on the Project.
L.5.	4. The HDOT-A requires that the proposed landscaping does not create a wildlife hazard attractant. Please review the FAA Advisory Circular (AC) 150/5200-33C Hazardous Wildlife Attractants On or Near Airports for guidance. If the project results in a wildlife attractant, these effects shall be immediately mitigated by the developer upon notification by the HDOT-A and/or FAA.	HDOT Airports	The Project site is located in the dry 'Ewa region of O'ahu. In order to reduce the risk of creating a wildlife attractant, landscaping at the site will be regularly maintained. Landscaping is expected to consist of native, Polynesian-introduced, or tropical trees, shrubs, and ground cover of varying sizes (<i>Figure 3.15</i>).
M.	Utilities (in general)		EIS Section 4.8
M.1.	Infrastructure: Additional heavy demands on Ko Olina infrastructure are proposed, including roads, sewer, water, storm drainage, and telecom without sufficient clarity as to how these capacity expansion demands will be met, who will pay for them, and how applicants' future needs may become limited as a result. For example, the DEIS estimates "The Cove" project will generate 7 times the wastewater discharge, which is an increase from 10,800 gal. per day, to 72,765 gpd; ref: pp 4-69, without stating how this will be handled and at whose expense. If infrastructure has to be utilized more heavily, there are several questions, such as how infrastructure capacities will be allocated, and how does the developer propose to protect the Ko Olina community and other west side users from having to absorb some or all of these costs. As stated above, like all Ko Olina associations, Kai Lani contributes annually to infrastructure costs. An increased demand by a third party who will not be contributing to the use of infrastructure could result in the increase	Kai Lani at Ko Olina AOA	The EIS provides a detailed assessment of wastewater discharge, water demand, and stormwater runoff (<i>Section 4.8</i>). The Project design and implementation are intended to support the redevelopment while effectively minimizing potential impacts to the surrounding resort through the implementation of mitigation measures discussed throughout the EIS. As noted in <i>Section 4.8.3</i> of the EIS, to meet the anticipated wastewater demand for the Project, the Applicant has coordinated with the City to increase the allocation of sewer capacity for the Cove Property within the master planned tributary area. In accordance with the Kapolei Interceptor Sewer Assessment Agreement, Kapolei Properties LLC, an affiliate of the James Campbell Company LLC, exercised its assignment right under the agreement to reassign 52,000 gpd of unused and unneeded sewer allocation from Kapolei Harborside (TMK (1) 9-1-014: 085) to the Cove Property. Combined with the existing allocation of 25,000 gpd, the updated sewer allocation for The Cove now totals 77,000 gpd. Subsequently, a Sewer Connection Application for the Project was submitted to the City and approved on November 14, 2024 (File No. 2024/SCA-1132).

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	<u>being bore by Kai Lani residents, many of whom are older, and are on a fixed income. The uncertainty that remains regarding the unknown increases in monthly fees will have a significant adverse impact on our residents.</u>		<u>To further mitigate the estimated wastewater generation, the Applicant is studying the use of a black water system for The Cove intended to recycle water from all onsite plumbing fixtures to R1 level per the requirements of HDOH. The R1 water would be reused on site to flush toilets, urinals and irrigation per 2021 United Plumbing Code, Chapter 16. A proposed blackwater system for The Cove would collect wastewater from toilets, sinks, urinals, and kitchen waste (post-grease interceptor) and process it through a multi-step treatment system. The treated R1 water would be reused through a distinct piping system. The system would be designed to process and recycle an estimated 60,000 gallons of black water daily. The determination of use and final design of a black water system will be determined as the Project progresses. Costs to establish and maintain the black water will be carried by the Project and not by residents of Ko Olina Resort. Additionally, it is anticipated that connection to the City sewer system will require fees.</u>
M.2.	<u>Kai Lani Resident Concerns: 14. Use of resources and infrastructure integrity to support a large scale venue</u>	<u>Elizabeth and Richard Rubinstein</u>	
M.3.	<u>Additional heavy demands on Ko Olina infrastructure are proposed including roads, sewer, water, storm drainage, and telecom without sufficient clarity as to how these capacity expansion demands will be met, who will pay for them, and how applicants' future needs may become limited as a result. For example, the EIS estimates the new PC project will generate 7 times the wastewater discharge (an increase from 10,800 gal. per day to 72,765 gpd - Pg. 4-69) without clearly stating how this will be handled and at who's expense. If infrastructure has to be utilized more heavily, how exactly will infrastructure capacities be allocated, and how does the developer propose to protect the entire Ko Olina community and other west side users from having to absorb some or all of these costs?</u>	<ul style="list-style-type: none"> • <u>William and Sara Barnes</u> • <u>Marilyn Harvey-Heinz & Don Heinz</u> 	<p><u>The increase in water demand is being coordinated with BWS, which has verified that the exiting potable system is adequate to accommodate the Project. As such, no upgrades to the City or Ko Olina system are required. The Applicant will continue to consult with BWS as the Project progresses and final approval will be confirmed during the building permit process, as is typical. Connection to the BWS water system for potable water use will require the Applicant to pay a fee to the City and County of Honolulu, in addition to monthly charges.</u></p> <p><u>Construction of The Cove will comply with the City's Rules Relating to Water Quality, which are in place to protect water quality. As discussed in Section 4.8.1, to improve stormwater runoff quality and minimize impacts to receiving waters in the long-term, the use of LID measures, such as bioswales, rain gardens, planter boxes, sand filters, or permeable pavement, will be integrated into the Project design. Final on-site treatment controls and BMPs will be paid for by the Applicant and assessed as the design phase continues.</u></p>
M.4.	<u>Infrastructure Strain: The proposal places additional demands on Ko Olina's infrastructure, including roads, sewer, garbage collection, water, storm drainage, and telecom, without clear plans on how these demands will be met or funded. The EIS estimates a significant increase in wastewater discharge without specifying handling methods or costs. There are no details on how infrastructure capacities will be allocated or protected for the community and other west side users.</u>	<u>Eileen Meuris, Steve Meuris, and Marguerite Casillas</u>	<p><u>As discussed in Section 4.7.1, the redevelopment of The Cove is not anticipated to adversely affect traffic operations in the vicinity of the Project area. Traffic operations in the vicinity of the Project area are generally expected to remain similar to baseline and Without Project conditions. As such, existing roadways serving the Project are anticipated to be adequate. Temporary traffic management measures will be implemented as required during construction to minimize disruptions. Internal circulation and parking areas within The Cove will be designed to handle anticipated vehicle and pedestrian flows efficiently.</u></p>
M.5.	<u>Certainly, everything being proposed puts serious pressure on the sensitive environment, the entire community of Ko Olina and the perfectly planned infrastructure in place throughout the property.</u>	<u>Marilyn Harvey-Heinz & Don Heinz</u>	<p><u>The Project will not have a significant impact on the City's waste stream and disposal to the H-POWER Plant. The Applicant will coordinate with waste management providers to ensure that solid waste disposal aligns with City requirements. Similar to current practice, regular responsible maintenance of the Project site and the public beach access easement will be conducted daily to avoid potential solid waste spillover onto the beach. The Cove will implement recycling efforts to minimize solid waste. Recycling will also be encouraged through the use of trash cans with recycling containers.</u></p> <p><u>It is anticipated that planned structures be equipped with telecommunication services. As design of the Project progresses, improvements to the telecommunication services at the Cove Property will be coordinated with the relevant service provider.</u></p>
M.6.	<u>Insufficient Public Facilities: The redevelopment plans do not include provisions for additional public beach parking or restroom facilities to accommodate the expected increase in visitors to The Cove's beach area. This will lead to an overflow into our privately owned lagoon parking areas and comfort stations, which are already heavily used. The added strain on these facilities will diminish the quality and convenience that our guests and owners have come to expect.</u>	<u>Peter Togawa, Beach Villas Ko Olina AOA</u>	<p><u>The 15 vehicle stalls provided on the Lanikūhonua property for public beachgoers will continue to be provided.</u></p> <p><u>The nearest Ko Olina Lagoon parking to the Cove Property is approximately 0.37 miles south at the end of Olani Street. Given this distance, overflow from the public beachgoers is not anticipated to impact the private parking areas or facilities described, as the proximity between these locations is not immediately close. To clarify, the Applicant does not control public beach use or visitation levels to the adjacent beach, which is a public resource. The Applicant is committed to maintaining public beach access at current level but cannot influence the number of beachgoers beyond the property.</u></p>
M.7.	<p><u>ENGINEERING STUDY Volume II page 449-474 Completed by G70 Purpose: Evaluate Infrastructure: Roads: Water: Sewage: Drainage</u></p> <p><u>The introduction to the analysis says the demolished building will result in replacement of SIMILAR structures. This is a falsehood. There are no independent Retail only shops or restaurants serving patrons daily. The only structures on this property are support buildings (some small tourist driven gift vendors) for the Paradise Cove Lū'au which operates for guests from the hours of 5:00pm to 9:00pm. There is NO similarity of the proposed development to the existing one. The expanded proposed hours of operation range from Breakfast hours? 6:00am to dinner hours 11:00pm? There is also no proposal for operating and the additional service vehicles needed to support these businesses.</u></p> <p><u>Note: Engineering Study includes Admission of ownership of Ali'inui Drive to be Ko Olina.</u></p>	<u>Karen Messick</u>	<p><u>To clarify, the term "similar" in the analysis highlights that the planned redevelopment will include commercial-related structures, consistent with the use of existing buildings on the Cove Property.</u></p> <p><u>The existing buildings primarily support the commercial lū'au, which will continue to be the focal point of the Project and is planned to occur during the evenings. The ancillary range of commercial activities supporting the Hawaiian Theme Park and lū'au are expected to operate at extended hours, during the daytime. The need for additional service vehicles will be considered in the forthcoming TMP.</u></p>

Table 7.3: Draft EIS Summary of Comments and Responses

No.	Comments	Commenter	Responses
	<p><u>Note: Engineering study reports: Most patrons arrive by bus or vehicle. (not walkers and in direct conflict with assumptions in the Traffic Study.) Therefore, these environmental studies invalidate each other.</u></p>		
N.	Stormwater, Drainage, and Water Quality		EIS Section 4.8.1
N.1.	<p><u>I. / G.F. The Proposed Action Overburdens Resources:</u> *** The EIS also discloses that the Proposed Action would increase the Flow Q discharges for sheet water flow into the ocean and the delicate nearshore ecosystem by 100%. See Table 4.7, showing a Q value for the ocean at 22.05cfs, versus the existing Q of 11.1cfs. The EIS claims in Table 1-1 that there will be no adverse impact to surface waters, but there appears to be no analysis of this dramatic increase other than to state that BMPs will be followed. Such a significant increase in discharge into the ocean obviously raises concerns that there will be negative impacts to the pristine waters from additional debris and trash, causing excess turbidity, or harms from fertilizers and/or pesticides used by Applicant. [Note that all other shorefront lots on Resort have been designed and built to drain toward the roadways and NOT into the ocean, unlike the Proposed Action lot.] *** <u>Taken together, the Proposed Action overburdens the limited resources that are available, and on this basis alone the Proposed Action should be rejected.</u></p>	<ul style="list-style-type: none"> • <u>Kendall Kim, KOD</u> • <u>Ken Williams, KOCA/KORA</u> 	<p><u>Construction of The Cove will comply with the City's Storm Drainage Standards (August 2017), which are in place to protect life and property during large storms. While the PER estimates an increase of runoff into the ocean from 11.1 cfs to 22.05 cfs, improvements to the site are anticipated to result in a total decrease in stormwater runoff generated on site from 33.43 cfs to 26.26 cfs. Potential impacts to water quality as a result of stormwater runoff generated on site will be mitigated through the implementation of BMPs, which are required by the City. As discussed in Section 4.8.1, to mitigate potential pollution to stormwater runoff in the long-term, the use of LID measures, such as bioswales, rain gardens, planter boxes, sand filters, or permeable pavement, may be integrated into the Project design, as feasible. Based on preliminary design, the existing parking lots will be reconfigured and an area of asphalt pavement will be replaced by landscape planters. Stormwater runoff will be directed to landscape planters throughout the site, which promotes percolation into the ground and filters out contaminants prior to the runoff entering the existing underground drainage systems. Additionally, stormwater quality treatment will be provided by an underground infiltration system and an above-ground retention basin. Final treatment controls and BMPs will be assessed as the design phase continues. Additionally, source control BMPs, such as covering trash areas and routing stormwater from paved areas to landscaped areas, may be included to prevent pollution of stormwater.</u></p> <p><u>To clarify, while other shorefront lots within the Resort have been designed to drain toward roadways, these drainage systems eventually discharge into the ocean through the existing stormwater infrastructure. The design for the Proposed Action lot has been developed with consideration of the site-specific conditions and regulatory requirements.</u></p>
N.2.	<p><u>According to the EIS, the project will increase sheet water flow into the ocean by over 100%. Such a huge increase in water flowing directly into the ocean may cause negative impacts to the clarity of the water from suspended solids, and increase the amount of pesticides, herbicides, fertilizers, and trash in the adjacent ocean environment. The EIS states that there will be "no impact" from this increased flow, but no analysis was undertaken with respect to these impacts. The EIS provides no rationale for why a 100% increase in sheet flow to the pristine near shore water should be permitted, as opposed to requiring the property to otherwise mitigate the sheet water flow and maintain it within the boundaries of the property. The EIS should be revised to study this impact.</u></p>	<p><u>Kuleana Coral Restoration</u></p>	
N.3.	<p><u>Kai Lani Resident Concerns:</u> <u>15. Runoff of polluted waters from complex parking and entertainment areas</u></p>	<p><u>Elizabeth and Richard Rubinstein</u></p>	<p><u>As illustrated in Figure 4.19, stormwater runoff from the parking lots and entertainment areas are proposed to be managed through the use of LID measures, such as bioswales, rain gardens, planter boxes, sand filters, or permeable pavement. Final treatment controls and BMPs will be assessed as the design phase continues. Construction of The Cove will comply with the City's Rules Relating to Water Quality, which are in place to protect water quality.</u></p>
O.	Water Supply		EIS Section 4.8.2
O.1.	<p><u>1. We recommend coordination with the county to incorporate this project into the county's Water Use and Development Plan. Please contact the respective Planning Department and/or Department of Water Supply for further information.</u></p>	<p><u>DLNR CWRM</u></p>	<p><u>The Applicant is coordinating with the relevant agencies regarding water use, including the DPP and BWS.</u></p>
O.2.	<p><u>4. We recommend that water efficient fixtures be installed and water efficient practices implemented throughout the development to reduce the increased demand on the area's freshwater resources. Reducing the water usage of a home or building may earn credit towards Leadership in Energy and Environmental Design (LEED) certification. More information on LEED certification is available at http://www.usgbc.org/leed. A listing of fixtures certified by the EAP as having high water efficiency can be found at http://www.epa.gov/watersense.</u></p>	<p><u>DLNR CWRM</u></p>	<p><u>Water conservation measures may be implemented in design of The Cove redevelopment and may include the use of water-efficient features such as the use of Water Sense-labeled ultra-low flow water fixtures and toilets (Section 4.8.2).</u></p>
O.3.	<p><u>6. We recommend the use of alternative water sources, wherever practicable.</u></p>	<p><u>DLNR CWRM</u></p>	<p><u>The Applicant acknowledges the comment and will investigate the use of alternative water sources as applicable.</u></p>
O.4.	<p><u>8. We recommend adopting landscape irrigation conservation best management practices endorsed by the Landscape Industry Council of Hawaii. These practices can be found online at</u></p>	<p><u>DLNR CWRM</u></p>	<p><u>The Project is expected to integrate several landscape conservation BMPs noted in the memo wherever practicable.</u></p>

Table 7.3: Draft EIS Summary of Comments and Responses

No.	Comments	Commenter	Responses
	http://www.hawaiiscape.com/wp-content/uploads/2013/04/LICH_Irrigation_Conservation_BMPs.pdf .		<p>The Project plans to integrate the use of LID measures, such as bioswales, rain gardens, planter boxes, sand filters, or permeable pavement, into the Project design, as feasible, and will comply with the City's Rules Relating to Water Quality. Final treatment controls and BMPs will be assessed as the design phase continues.</p> <p>The Applicant is also studying the use of a blackwater system for The Cove intended to recycle water from all onsite plumbing fixtures to R1 level per the requirements of HDOH. This water would be used for various approved purposes, including irrigation. Further discussion is provided in <i>Section 4.8.3</i>.</p> <p>Landscaping is expected to consist of native, Polynesian-introduced, or tropical trees, shrubs, and ground cover of varying sizes. As a water conservation measure, the preliminary plant palette includes materials selected based on drought tolerance and ability to survive in the hot and dry coastal environment of the 'Ewa region. The Applicant will ensure that landscaping is routinely maintained.</p>
0.5.	<p>9. There may be the potential for ground or surface water degradation/contamination and recommend that approvals for this project be conditioned upon a review by the State Department of Health and the developer's acceptance of any resulting requirements related to water quality.</p>	DLNR CWRM	<p>The Cove Redevelopment is not expected to significantly impact groundwater quantity or quality within, or down-gradient from the site (<i>Section 4.3.2</i>).</p> <p>As the land use entitlements review process for the Project continues, the Applicant anticipates additional review by relevant agencies, including HDOH, requirements related to water quality are expected to be determined throughout the permitting process.</p>
0.6.	<p>12. Well Construction Permit(s) is (are) are required before the commencement of any well construction work.</p>	DLNR CWRM	<p>Construction of a well is not within the scope of the Project; therefore, a Well Construction Permit will not be required.</p>
0.7.	<p>13. A Pump Installation Permit(s) is (are) required before ground water is developed as a source of supply for the project.</p>	DLNR CWRM	<p>Construction of a source of ground water is not within the scope of the Project; therefore, a Pump Installation Permit will not be required.</p>
0.8.	<p>The existing potable water system is adequate to accommodate the proposed development. However, please be advised that this information is based upon current data, and therefore, the Board of Water (BWS) reserves the right to change any position or information stated herein up until the final approval of the building permit application. The final decision on the availability of water will be confirmed when the building permit application is submitted for approval.</p>	Board of Water Supply (BWS)	<p>The Applicant acknowledges that a final decision on the availability of water will be confirmed upon submittal and approval of the building permit application. See <i>Section 4.8.2</i> for further discussion regarding water requirements for the Project.</p>
0.9.	<p>When water is made available, the applicant will be required to pay our Water System Facilities Charges for resource development, transmission, and daily storage.</p>	BWS	<p>The Applicant acknowledges that BWS Water System Facilities Charges must be paid when water is made available to the Project.</p>
0.10.	<p>Water conservation measures are required for all proposed developments. These measures include utilization of nonpotable water for irrigation, rain catchment, drought tolerant plants, xeriscape landscaping, efficient irrigation system such as drip system and moisture sensors, and the use of Water Sense labeled ultra-low flow water fixtures and toilets.</p>	BWS	<p>Water conservation measures may be implemented in design of The Cove redevelopment and may include, but not be limited to, the following: efficient irrigation systems such a drip system and moisture sensors, utilization of nonpotable water for irrigation, drought tolerant plants, and the use of Water Sense-labeled ultra-low flow water fixtures and toilets (<i>Section 4.8.2</i>).</p>
0.11.	<p>BWS understands that the proposed development will not require additional nonpotable water from the BWS Barbers Point nonpotable water system. However, water conservation measures are still required for nonpotable irrigation systems. The proposed project is subject to BWS Cross-Connection Control and Backflow Prevention requirements prior to the issuance of the Building Permit Applications.</p>	BWS	<p>In its comments on the EISPN, BWS initially understood that non-potable water would need to be coordinated with KOCA. However, further coordination with BWS following the EISPN publication clarified that the Project may seek review and approval directly from the agency. Since the projected non-potable water demand for the Project is expected to remain consistent with that of the existing development, the need for an additional non-potable water resource is not anticipated at this time. This understanding is reflected in BWS' most recent comments on the Draft EIS (<i>Appendix A-2</i>). The Applicant is also studying the use of a blackwater system for The Cove intended to recycle water from all onsite plumbing fixtures to R1 level per the requirements of HDOH. This water would be used for various approved purposes, including irrigation. Further discussion is provided in <i>Section 4.8.3</i>.</p>
0.12.	<p>11. The Hawaii Water Plan is directed toward the achievement of the utilization of reclaimed water for uses other than drinking and for potable water needs in one hundred per cent of State and County facilities by December 31, 2045 (§174C-31(g)(6), Hawaii Revised Statutes). We strongly recommend that this project consider using reclaimed water for its non-potable water needs, such as irrigation. Reclaimed water may include, but is not limited to, recycled wastewater, gray water, and captured rainwater/stormwater. Please contact the Hawai'i Department of Health, Wastewater Branch, for more information on their reuse guidelines and the availability of reclaimed water in the project area.</p>	DLNR CWRM	<p>Additionally, in its comments on the Draft EIS, BWS stated that the existing potable water system is adequate to accommodate the domestic demands of the Project.</p>
0.13.	<p>I. / G.F. The Proposed Action Overburdens Resources: The Applicant contemplates that the Proposed Action will require a 300% increase in non-potable water use, while at the same time acknowledging there is currently an insufficient non-potable water allocation for the Property to meet this demand. The Applicant attempts to circumvent this by relying on Ko Olina Resort to develop an additional non-potable water</p>	<ul style="list-style-type: none"> • Kendall Kim, KOD • Ken Williams, KOCA/KORA 	

Table 7.3: Draft EIS Summary of Comments and Responses

No.	Comments	Commenter	Responses
	<p>resource. As the Board of Water Supply (“BWS”) has disclosed to the Applicant, the non-potable resources for the area are already overburdened, and the Resort is currently working with BWS and its Resort partners to reduce, not increase, non-potable water resource use. While additional non-potable water resources are anticipated to be developed, it is not known when all of the approvals required will be obtained, or the timeline for completion of construction of such resources. The EIS is defective in this regard, as it analyzes the Proposed Action as if non-potable water is available. The EIS should also include an analysis of the Proposed Action using the actual situation with respect to non-potable water so that all stakeholders have the opportunity to review this information. If the conclusion is that the Proposed Action cannot move forward because of the strain it will place on non-potable water resources, the EIS should so state.</p> <p>***</p> <p>Similarly, the Proposed Action also requires a 1000% increase in potable water demand, going from 13,500 GPD to 119,350 GPD. There is no analysis of the potential harmful effects of such a drastic increase, or the strain on resources that will result from this huge increase.</p> <p>***</p> <p>Taken together, the Proposed Action overburdens the limited resources that are available, and on this basis alone the Proposed Action should be rejected.</p>		
0.14.	<p>Non-Potable Water: The Board of Water Supply has requested G70 to coordinate with the Ko Olina Community Association on developing a non-potable well. The well will be developed “by others”. “Others” should be identified. While I am sure I am simplifying the issue, I believe that Ko Olina Community Association should not bear the burden to complete the construction of the non-potable well due to the addition of The Cove.</p>	Veronique Jones	
0.15.	<p>4. An approved water supply capable of supplying the required fire flow for fire protection shall be provided to all premises upon which facilities, buildings, or portions of buildings are hereafter constructed or moved into the jurisdiction. The approved water supply shall be in accordance with NFPA 1; 2018 Edition, Sections 18.3 and 18.4.</p>	HFD	<p>BWS has confirmed that the existing water system is currently adequate to accommodate the Project. The Applicant acknowledges that coordination with BWS and HFD will be conducted during the building permitting process to ensure that the water supply provided on-site is adequate to meet required flow levels for fire protection needs.</p>
0.16.	<p>The construction drawings should be submitted for our approval, and the construction schedule should be coordinated to minimize impact to the water system. The on-site fire protection requirements should be coordinated with the Fire Prevention Bureau of the Honolulu Fire Department.</p>	BWS	<p>The Applicant acknowledges that final construction drawings will be submitted to BWS, HFD, and DPP as part of the building permitting process.</p>
0.17.	<p>5. Submit civil drawings to the City and County of Honolulu’s Department of Planning and Permitting and route them to the HFD for review and approval.</p>	HFD	
0.18.	<p>Water: The engineering report indicate a sixfold use in potable water. How can that be with no impact to traffic? BWS requires based on non-potable water use a new well. Who is supplying that and how will it be tied into the project? Will it require disruption of the existing Ko Olina owned roadway?</p>	Karen Messick	<p>Recent consultation with BWS acknowledges that The Cove Redevelopment will not require additional non-potable water use compared to the existing development’s current usage. Since the projected non-potable water demand for the Project is expected to remain consistent with that of the existing development, the need for a new, additional non-potable water resource is not required. To clarify, the increase in potable water use does not inherently result in proportional traffic increases. The TIR (<i>Section 4.7.1</i>) is based on factors such as visitor and employee volume, operational hours, and site access, which are evaluated separately from water demand. Furthermore, BWS verified water availability in a letter dated July 3, 2024 commenting on the Draft EIS, confirming their system could accommodate the Project’s anticipated water needs (<i>Appendix A-2</i>). No impacts to Ali’i Drive due to water are anticipated.</p>

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P.	Wastewater Treatment and Disposal		EIS Section 4.8.3
P.1.	<p><u>I. / G.F. The Proposed Action Overburdens Resources:</u> With respect to wastewater, the EIS projects an increase in wastewater discharges from 10,800 GPD to 72,765 GPD, a 700% increase. This estimates for wastewater discharge appears to be too conservative, as elsewhere the Applicant states that wastewater discharges can be estimated at 80% of water consumption, which, if correct, suggests that the correct figure is closer to 95,480 GPD, a 900% increase over the current use. The EIS also acknowledges that the Applicant does not have sufficient wastewater sewer capacity for the wastewater discharge that the Proposed Action will generate. We understand that West Beach Pump Station #1 is currently at capacity and cannot accept additional sewer flows. *** Taken together, the Proposed Action overburdens the limited resources that are available, and on this basis alone the Proposed Action should be rejected.</p>	<ul style="list-style-type: none"> • <u>Kendall Kim, KOD</u> • <u>Ken Williams, KOCA/KORA</u> 	<p>As noted in <i>Section 4.8.3</i> of the EIS, The Applicant has coordinated with the City to increase the allocation of sewer capacity for The Cove Property within the master planned tributary area. In accordance with the Kapolei Interceptor Sewer Assessment Agreement, Kapolei Properties LLC, an affiliate of the James Campbell Company LLC, exercised its assignment right under the agreement to reassign 52,000 gpd of unused and unneeded sewer allocation from Kapolei Harborside (TMK (1) 9-1-014: 085) to the Cove Property. Combined with the existing allocation of 25,000 gpd, the updated sewer allocation for The Cove now totals 77,000 gpd. Subsequently, a Sewer Connection Application for the Project was submitted to the City and approved on November 14, 2024 (File No. 2024/SCA-1132).</p> <p>To further mitigate the estimated wastewater generation, the Applicant is studying the use of a blackwater system for The Cove intended to recycle water from all onsite plumbing fixtures to R1 level per the requirements of HDOH. The R1 water would be reused on site to flush toilets, urinals and irrigation per 2021 United Plumbing Code, Chapter 16. A proposed blackwater system for The Cove would collect wastewater from toilets, sinks, urinals, and kitchen waste (post-grease interceptor) and process it through a multi-step treatment system. The treated R1 water would be reused through a distinct piping system. The system would be designed to process and recycle an estimated 60,000 gallons of blackwater daily. The determination of use and final design of a blackwater system will be determined as the Project progresses.</p>
Q.	Solid Waste Management		EIS Section 4.8.4
Q.1.	<p><u>Refuse/Trash:</u> Trash management is already a concern, and it may become an even bigger problem on lands in or around PC. There are times when scattered trash on area grounds coming from PC patrons is not picked up. Several residents, when out swimming near the current Paradise Cove operations, have seen plastic cups, bags, etc. on the environmentally-sensitive ocean reefs. Increased activities will worsen refuse and trash management issues. Increased traffic to these areas will increase the amount of trash, and requirements for additional trash collection, which will contribute to traffic congestion and noise. It is believed the DEIS does not provide ample discussion or contingency management plans for this.</p>	<p><u>Kai Lani at Ko Olina AOA</u></p>	<p>As noted in <i>Section 4.8.4</i>, similar to current practice, regular responsible maintenance of the Project site and the public beach access easement will be conducted daily to avoid potential solid waste spillover onto the beach. The Cove will implement recycling efforts to minimize solid waste. Measures include, but may not be limited to, the recycling of glass, plastic bottles, cardboard, aluminum, and paper; the use of compostable or alternative disposable cutlery, like cups and silverware made from cornstarch or bamboo; and recycling of food waste. Educational signage and guidelines may be posted around the Cove Property to encourage thoughtful care for the site and the surrounding environment. Recycling will also be encouraged through the use of trash cans with recycling containers.</p>
Q.2.	<p><u>Kai Lani Resident Concerns:</u> 8. Garbage storage and collection</p>	<p><u>Elizabeth and Richard Rubinstein</u></p>	
Q.3.	<p><u>Trash management may become a bigger problem than it already is on lands in or around PC. Currently there are times when scattered trash on area grounds coming from PC patrons is not picked up. Several residents, when out swimming near the current Paradise Cove operations, have seen plastic cups, bags, etc. on the environmentally sensitive ocean reefs.</u></p>	<ul style="list-style-type: none"> • <u>William and Sara Barnes</u> • <u>Marilyn Harvey-Heinz & Don Heinz</u> 	
Q.4.	<p><u>4. Trash Management: Increased activities may worsen trash management issues, with reports of excess garbage and feral cats already affecting the environmentally sensitive ocean reefs near PC.</u></p>	<p><u>Eileen Meuris, Steve Meuris, and Marguerite Casillas</u></p>	
R.	Noise Impacts		EIS Section 4.9
R.1.	<p><u>Sound/Noise Pollution:</u> As per the DEIS, the plan proposes increasing the size of the entertainment and retail activities at Paradise Cove by approximately 3 times its' current size. Further, it proposes increasing the hours of operation by 10 hours per day, from 7am to 10pm. It proposes to relocate the lū'au amphitheater to the North side of the property, near the wedding chapel, and much closer to the open space meadow and Kai Lani. This will place the source of amplified sound within an estimated 300+ yards of the closest residents at Kai Lani and make the existing amplified sound encroachment problem much worse. The DEIS acknowledges the "spill over" of amplified sound during entertainment events, which may "potentially impact noise sensitive receptors". The DEIS goes on to suggest that amplified noise levels will not be any different than existing conditions, ignoring the critical fact that the relocated amphitheater will now be much closer to numerous</p>	<p><u>Kai Lani at Ko Olina AOA</u></p>	<p>The Applicant acknowledges the surrounding community's concern with regards to noise related to the lū'au show and the relocation of the associated amphitheater. The Acoustic Study (<i>Appendix H</i>) was updated in September 2024 to reflect the new amphitheater at its proposed relocation. Note that the Acoustic Study is based on traffic projections from the TIR and measurements taken at eight points in 2021 and 2022.</p> <p>The Applicant understands that amplified sound related to the show may spill over to the adjacent neighborhoods at times. However, as found in sound measurements taken for the Acoustic Study during the period from late afternoon until about 8:30 to 9:00 PM, the existing sound levels associated with live commercial entertainment events do not exceed the Honolulu Liquor Commission's 60 dBA limit at the closest residences to the Cove Property, including The Coconut Plantation – Ko Olina and Kai Lani at Ko Olina where existing sound levels range from 48 dBA to 52 dBA. This is attributed to the design of the existing sound system, which provides sound shielding effects, and the distance of the current show from these residences acting as a natural buffer. Throughout the Cove Property</p>

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	<p>residences, and the longer hours and increased number of visitors will collectively increase noise pollution. The DEIS assertion does not acknowledge that current noise levels from Paradise Cove entertainment often exceed the noise control statutes of the city and disturbs residences after 9 o'clock pm many nights. Choosing to relocate the amphitheater to this location does not take into consideration the noise considerations for Kai Lani, which is unacceptable, given the proximity and impacts of this level of noise. Kai Lani was not consulted during this process, which would have been appropriate considering the significant impacts to its' residents. There are many existing strategies that could help reduce, or mitigate to some extent, such sound encroachment; however, the DEIS does not provide options, which is unacceptable for Kai Lani.</p>		<p>and immediately beyond its boundaries, primarily to the south and east, exceedances of the Honolulu Liquor Commission's 60 dBA limit may occur.</p> <p>Measures to minimize noise impacts include limiting sound spillover to 60 DNL or less and restricting such occurrences to the hours between 7:00 AM to 10:00 PM. The amount of sound spillover will depend on the design of the new sound system of the planned amphitheater and the noise-shielding effects of intervening building structures within the Cove Property. It is anticipated that amplified sound from entertainment shows at the new amphitheater/performing arts venue will remain comparable to existing conditions.</p> <p>Amplified sound from the planned lū'au show at the new amphitheater/ performing arts venue may continue to spill over to adjacent areas, potentially impacting noise sensitive receptors (i.e., residential areas) in the surrounding neighborhood. Preservation-zoned land to the north and east of the Cove Property will continue to mitigate the potential increase in noise levels by acting as a buffer between the site and the residential areas of Kai Lani at Ko Olina and The Coconut Plantation - Ko Olina.</p> <p>Given the reduced buffer distances between the planned amphitheater and Kai Lani at Ko Olina, a three to four dBA reduction in spillover sound levels will be required to mitigate potential noise impacts. The amphitheater's sound amplification system is being designed to achieve this reduction while maintaining current sound levels within the audience seating area. This mitigation measure will ensure that sound levels remain consistent with those of the existing lū'au show. The final design of the sound system will be determined as the Project progresses.</p> <p>Additional measures to minimize noise impacts include limiting sound spillover to 60 DNL or less and restricting such occurrences to the hours between 7:00 AM to 10:00 PM. Intervening building structures within the Cove Property may also serve to minimize sound levels.</p>
R.2.	<p><u>Kai Lani Resident Concerns:</u> <u>1. Noise and monitoring of decibel levels from lū'au/entertainment activities.</u> <u>16. Air and noise pollution from various activities</u></p>	Elizabeth and Richard Rubinstein	
R.3.	<p><u>The proposed plan envisions increasing the size of the entertainment and retail activities at PC by approximately 3 times the current size, while also increasing the hours of operation by 10 hours per day (from 7 am to 10pm according to the EIS). Further, it envisions relocating the lū'au amphitheater to the north side of the property, near the wedding chapel and much closer to the open space meadow and Kai Lani residential community of 116 homes. This will place the source of amplified sound coming from PC within an estimated 300+yards of the closest residents at Kai Lani and make the existing amplified sound encroachment problem much, much worse. The EIS acknowledges that there will be "spill over" amplified sound during entertainment events and this will "potentially impact noise sensitive receptors". The EIS goes on to contend that amplified noise levels will be no different than existing conditions, ignoring the critical fact that the relocated amphitheater will now be much, much closer to numerous residences. The EIS assertion also ignores the fact that existing noise levels from PC entertainment often exceeds the noise control statutes of the city, and currently disturbs residences well after 9PM many nights. This is truly unacceptable and there are certainly other locations at the resort and on Oahu where a relocated lū'au facility could be more comfortably located. So the proposal calls for more amplified noise impacts, 3 times longer operating hours, and three times more buildings and impervious surface coverage. This is not sustainable.</u></p>	<ul style="list-style-type: none"> • <u>William and Sara Barnes</u> • <u>Marilyn Harvey-Heinz & Don Heinz</u> 	
R.4.	<p><u>I hope this message finds you well. I am writing with a deep sense of urgency and concern regarding the proposed amphitheater project slated to be constructed a mere 300 yards from my home. As a dedicated resident of this community, I feel compelled to voice the significant and dire impact this proposal would have on our lives.</u></p> <p><u>The proximity of the planned amphitheater to our home means that the amplified sound during events will inevitably permeate our living space, creating an environment that is intolerable and unlivable. The constant barrage of noise will shatter the peace and tranquility that every homeowner values and expects, making daily life an unbearable ordeal. The stress and disruption caused by such intrusive noise levels cannot be overstated; it will affect our ability to work, rest, and even communicate within our own home.</u></p> <p><u>Furthermore, the emotional and psychological strain of living in such conditions must not be underestimated. Our home, which should be a sanctuary and a place of respite, will instead become a source of continuous distress and discomfort. The implications for our health and well-being are profoundly troubling.</u></p> <p><u>I urgently request that you reconsider the location of the proposed amphitheater or implement substantial measures to mitigate the noise pollution it will generate. This may include soundproofing measures, strategic planning of event times to minimize disruption, or even relocating the amphitheater to a more suitable area far removed from residential zones.</u></p>	Cornel Catuna	

Table 7.3: Draft EIS Summary of Comments and Responses

No.	Comments	Commenter	Responses
	<p>The decisions made now will have lasting ramifications on the lives of many residents. I trust that you will take into serious account the voices of those who will be most affected and take immediate action to prevent the deterioration of our living conditions.</p>		
R.5.	<p>1. Expansion and Noise Pollution: The proposed plan increases the size of entertainment and retail activities at PC by approximately three times and extends operating hours from 7 AM to 10 PM. The relocation of the lū'au amphitheater closer to the Kai Lani residential community will exacerbate existing noise issues. The EIS admits that amplified sound will impact nearby residents but fails to acknowledge that relocating the amphitheater will worsen the problem. Current noise levels already violate city statutes and disturb residents, which is unacceptable. Alternative locations should be considered to minimize these impacts.</p>	Eileen Meuris, Steve Meuris, and Marguerite Casillas	
R.6.	<p>1. Noise abatement: Currently, the noise from the Lū'au performance at Paradise Cove is heard with regularity by residents on the west and south sides of the Kai Lani community and is deemed a nuisance by these residents. Although limits on these noise levels for current lū'au performances have been established, these limits have not been enforced. Furthermore, the Cove Development plan brings the arena for performances, including the lū'au, closer to Kai Lani than is currently the case and is expected to hold performances during the day and the evening. The EIS states, "Amplified sound from the amphitheater/performing arts venue may well spill over to adjacent areas. However, amplified sound is anticipated to remain comparable to existing conditions." (EIS, p. 4-73) This, in itself, is alarming, since current levels of noise from the lū'au are <i>not</i> acceptable. The EIS further states that sound abatement may be integrated into the new amphitheater/performing arts venue to mitigate potential noise impacts on the surrounding area." (EIS, p.4-73) Stating that sound abatement "may be integrated" is no guarantee that mitigation would actually happen.</p>	Pieter and Claire van Wingerden	
R.7.	<p>J. The Acoustic Study is Not Representative The Acoustic Study was conducted in two parts, once in 2021 and once in 2022. Data from these periods is not representative of actual conditions, as traffic flows were significantly reduced during the pandemic. The Acoustic Study appears to indicate that relocating and reorienting the amphitheater could cause noise that is in exceedance of the permissible levels for the communities that are nearest to the Property. Residents within Ko Olina already routinely suffer from noise exceedances from the amplified sound system, and moving the sound system even closer will only exacerbate this problem. Given that the Proposed Action as currently drafted would permit use of the Property from early morning until late at night, a revised Acoustic Study using current data from normal conditions (and not the status during the pandemic) is needed, along with more rigorous mitigation measures to ensure that the property is in conformance with the noise regulations.</p>	Ken Williams, KOCA & KORA	
R.8.	<p>Noise Pollution: The anticipated noise levels from the project is another major concern. The new location of the amphitheater, construction activities and the increased volume of traffic will contribute to higher noise levels, disrupting the peace and the tranquility that our community values. The EIS does not provide sufficient mitigation measures to address this issue. Continuous exposure to elevated noise levels can have adverse effects on residents' health, including increased stress, sleep disturbances, and reduced overall well-being.</p>	Carla L. Kozak	<p>The Applicant acknowledges the surrounding community's concern with regards to noise related to the construction period, which are expected to be unavoidable but temporary. However, according to measurements conducted as part of the Acoustic Study, anticipated construction noise levels are not extreme and are similar to existing background noise levels measured along Ali'inui Drive (refer to Sites 7 and 8 of Figure III-3 of Appendix H). Adverse impacts from construction noise are not expected to be in the "public health and welfare" category due to the temporary nature of the work, and the regulation of construction noise by the HDOH. Because of the relatively high noise levels associated with construction activities (75 to 85+ dBA at 100-foot distance) and due to the exterior nature of the work, mitigation measures to reduce construction noise to inaudible levels will not be practical in all cases, but the use of quiet equipment is recommended.</p>
R.9.	<p>Increased Noise: The expected noise levels from the project are also a significant concern. The new amphitheater location, construction activities, and increased traffic will raise noise levels, disturbing the peace</p>	Dale Fishell	<p>Permissible noise levels during construction are regulated by the HDOH in accordance with permit requirements under HAR, Title 11, Chapter 46. The use of drilling and cast-in-place piles for foundation may also minimize risks of potential noise and vibration impacts</p>

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No.	Comments	Commenter	Responses
R.10.	<p><u>and tranquility our community cherishes. The EIS lacks adequate mitigation measures for this issue.</u></p> <p>Noise: <u>The anticipated noise levels from the project are another major concern. The construction activities, and increased traffic volume will lead to higher noise levels, disrupting the peace and tranquility of our community values. The EIS does not provide sufficient mitigation measures to address this issue. Continuous exposure to elevated noise levels can have adverse effects on residents' health, including increased stress, sleep disturbances, and reduced overall well-being. While any future construction will also create noise levels, it's imperative that noise levels be minimized to ensure a healthy community environment.</u></p>	<p><u>Warren Miles</u></p>	<p><u>on the surrounding area during the construction phase. Prior to the start of construction, a noise permit will be obtained from HDOH. Contractors will comply with HDOH construction noise limits and curfew times in accordance with HAR, Title 11, Chapter 46. Under current permit procedures, noisy construction activities are restricted to hours between 7:00 AM and 6:00 PM, from Monday through Friday, and exclude certain holidays. Construction activities are typically restricted to the hours of 9:00 AM to 6:00 PM on Saturdays, with construction not permitted on Sundays. The use of heavy equipment would be scheduled as much as possible during daylight hours to avoid disturbing area residents during the evening.</u></p>
S.11.	<p>Noise: <u>Construction noise levels will undoubtedly be high. What measures does Group 70 plan to implement to minimize construction noise? After construction is complete, how will noise be managed for nearby residents and communities? For instance, would The Cove and its restaurants/venues close not later than 9PM to ensure no noise disturbances will occur after 10:00PM(with employees, restaurants personnel leaving the premises)? Will there be strict guidelines to ensure compliance with all state noise ordinances?</u> <u>Finally, according to the Draft Environmental Statement, "the Project may result in a minor increase in noise along Ali'inui Drive"; For the reasons stated above (higher volume of traffic, sounds emanating from different venues and activities, etc.) the increase in noise could actually be very significant and have a long-term negative impact on the resident's well-being.</u></p>	<p><u>Veronique Jones</u></p>	
R.12.	<p><u>The additional infrastructure required, volume of traffic, additional parking and the fact that the noise level from the expansion of the hours for PC is unacceptable. We are directly in the sight lines and noise footprint of this development</u></p>	<p><u>Marilyn Harvey-Heinz & Don Heinz</u></p>	
R.13.	<p><u>Kai Lani Resident Concerns:</u> <u>18. Landscaping screening to protect Kai Lani residential view and noise barrier (see photos included in Appendix A-2)</u> <u>The following pictures feature the original Monkey Pod Tree stand that had shielded our community from viewing the service area, garbage activities, parking lot lighting, and provided a sound buffer. The Monkey Pod Tree stand was removed in its entirety by the Campbell company to expose our community to full view of the service area, employee parking lot, garbage facilities, bright parking lot lights directly shining into our complex, plus eliminating the sound buffer of the lū'au and chapel musical and DJ entertainment activities. There was no offer of replanting a public landscape barrier to shield the exposed activities that impacted the quality of life within the directly facing Kai Lanai apartments. It is of note that the plans presented by the EIS proposal feature the non-existent Monkey Pod Trees lining the property edge as an existing landscape.</u></p>	<p><u>Elizabeth and Richard Rubinstein</u></p>	<p><u>The Preliminary Landscaping Plan (Figure 3.15) has been revised to incorporate additional trees and shrubs along the northern property boundary to provide additional screening of The Cove.</u></p>
S.	<p>Operations and Local Economy</p>		<p>EIS Section 4.10</p>
S.1.	<p><u>An increase in tourist-oriented retail and restaurants will compete with existing businesses in Ko Olina, adding congestion, noise, and environmental impacts without benefiting the community. The plan does not align with the Ko Olina master plan, and will oversaturate Ko Olina with unnecessary retail and food service businesses. The plan changes the fundamental nature of the property use from a native Hawaiian cultural area to ordinary retail and food service; an affront and insult to the Hawaiian culture.</u></p>	<p><u>Kai Lani at Ko Olina AOA0</u></p>	<p><u>The Cove Property will be redeveloped consistent with its longtime use as a commercial lū'au and Hawaiian Theme Park and outdoor recreation facility as described throughout Section 3.0. As discussed in Section 2.0, the Cove Property reflects the rich legacy of Alice Kamokilaikawai Campbell. In fact, commercial use of the Cove Property pre-dates the establishment of Ko Olina Resort. As such, the planned improvements have been refined over several years with input by legacy families and ongoing input by Native Hawaiian leaders in the region.</u></p>
S.2.	<p>Cultural: <u>New encroachments on the cultural and archeological resources may be likely but are not studied in the DEIS. Having increased tourist-oriented retail and restaurants competing with our existing</u></p>		<p><u>Contrary to its current condition, where primarily tourist visitors have access to the site during lū'au shows, the redevelopment is envisioned as a gathering place for both residents and visitors. Contrary to the claim that the Project is "an affront of Hawaiian culture," the Project will retain its cultural focus, integrating the commercial lū'au show, while updating the property with new dining, retail, and entertainment options that complement the Hawaiian theme. Planned improvements are designed to enhance the site's</u></p>

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No.	Comments	Commenter	Responses
	<p><u>Ko Olina stores does not appear to add value to the Ko Olina, or west side community. Additionally, this may compound the congestion, noise, and environmental impacts that are very unfavorable for the Resort. It would appear that the present Paradise Cove entertainment complex has taken much more from the community than it has returned.</u></p>		<p><u>cultural and community value, honoring Hawaiian traditions while providing a dynamic experience that reflects both history and modernity. To avoid any confusion, please note that the Lanikūhonua Cultural Institute, which is on the property immediately adjacent to the Cove Property, will remain as-is. However, potential programming at the Cove includes educational and cultural workshops and coordinated cultural events and programs with the neighboring Lanikūhonua Cultural Institute.</u></p>
<p>S.3.</p>	<p><u>Community benefit appears to be negative. Having increased tourist-oriented retail and restaurants, competing with our existing Ko Olina stores does not seem to be a useful addition for the community or the west side community. Meanwhile, added congestion, noise and environmental impacts seem to be a big negative for the Resort. Indeed, the present Paradise Cove entertainment complex has taken much more from the community than it has returned.</u></p>	<ul style="list-style-type: none"> • <u>William and Sara Barnes</u> • <u>Marilyn Harvey-Heinz & Don Heinz</u> 	<p><u>Moreover, the proposed Project has been assessed for its impacts to valued cultural, historical, and natural resources and the extent to which the Project may affect traditional and customary native Hawaiian rights. See the CIA prepared for the Project (Appendix C). As part of the CIA, CSH made an effort to contact and consult with 80 NHOs, agencies, and community members including descendants of the area in order to identify individuals with cultural expertise and/or knowledge of the ahupua'a of Honouliuli. Of the 80 NHOs, agencies, and community members contacted, 13 responded. Of the 13 respondents, in-person, virtual, phone, or written consultation was conducted with the following five participants: Nettie Fernandez Tiffany (kahu (caretaker) of Lanikūhonua Cultural Institute), William Aila, Jr. (prior chair of Hawaiian Homes Commission, Director of Department of Hawaiian Homelands), Kūhiō Lewis (Chief Executive Officer for the Council for Native Hawaiian Advancement), Tracie Ka'ōnohiloni Farias Lopes (Kumu Hula (hula teacher) for Ka Lā 'Ōnohi Mai O Ha'eha'e and Instructor at Hawai'i Pacific University), and R. Keawe Lopes (Kumu Hula of Ka Lā 'Ōnohi Mai O Ha'eha'e and Director of the Kawaihuelani Center for Hawaiian Language at the University of Hawai'i at Mānoa). The Applicant will continue to consult with cultural descendants, NHOs, and other community groups to ensure that the Project honors the intention to create an authentic gathering place.</u></p>
<p>S.4.</p>	<p><u>6. Negative Community Impact: Increased tourist-oriented retail and restaurants will compete with existing businesses in Ko Olina, adding congestion, noise, and environmental impacts without benefiting the community. The plan does not align with Ko Olina's master plan and will oversaturate Ko Olina with unneeded retail and food service businesses. The plan changes the fundamental nature of the property use from a native Hawaiian cultural area to primarily ordinary retail and food service, an affront and insult to the Hawaiian culture.</u></p>	<p><u>Eileen Meuris, Steve Meuris, and Marguerite Casillas</u></p>	<p><u>As discussed in Section 4.10, the Project is expected to provide substantial economic and employment benefits, both in the short and long-terms. Construction is expected to generate around 1,429 jobs (1,386 FTE), of which 900 (873 FTE) would be direct, 152 (148 FTE) indirect, and 377 (366 FTE) induced. Upon operation, the Project is expected to sustain approximately 817 (678 FTE) jobs annually, of which 583 (484 FTE) would be direct, 121 (100 FTE) indirect, and 113 (94 FTE) induced. This will contribute to the economic diversity in the West O'ahu region, helping regional employees by reducing commute times. Furthermore, the Project is expected to generate approximately \$4.6 million in State government revenue and \$2.1 million in City revenue each year.</u></p> <p><u>While comments about oversaturation of restaurants and retail spaces are noted, The Cove is designed to complement, not compete with, existing Ko Olina businesses by offering unique, immersive cultural experiences focused on Hawaiian heritage. The marketplace and retail spaces will feature locally made goods, agricultural products, and other offerings that differentiate from typical retail outlets. Additionally, the amphitheater, cultural pavilion, and planned workshops emphasize the Project's commitment to education and cultural authenticity, providing activities that support both tourism and local engagement.</u></p>
<p>S.5.</p>	<p><u>Kai Lani Resident Concerns: 23. Business plan to support viability of project. What type of client/customer/employee volume would have to be solicited to profitably support the project? Important since it determines community impact long term.</u></p>	<p><u>Elizabeth and Richard Rubinstein</u></p>	<p><u>Regarding the Project's business plan, The Cove aims to attract both local residents and visitors seeking an authentic cultural experience. The redevelopment of the property and updated programming is expected to sustain a balanced volume of customers and employees. This multifaceted approach is essential for long-term viability and community benefit, providing both economic value and a recreational resource oriented towards Native Hawaiian culture to the local community.</u></p>
<p>S.6.</p>	<p><u>C. Restaurant/Retail Oversaturation</u></p> <p><u>The EIS claims that the economic benefits outweigh the contemplated impact. However, the EIS does not adequately study the fact that West O'ahu, and Kapolei specifically, is currently undergoing difficult economic conditions due to the oversaturation of the market. There are currently many lū'au options in the area, including two compelling lū'au operations within Ko Olina Resort, Fia Fia, at Marriott's Ko Olina Beach Club, and Ka Wa'a at Aulani, A Disney Resort & Spa. In addition, several other lū'au are operating close by, including Germaine's Lū'au in Kapolei, Chief's Lū'au at Wet & Wild in Kapolei, Mele Lū'au at Coral Crater, and Mauka Warriors Lū'au at the Hawaii Country Club in Kunia.</u></p> <p><u>The Project wishes to operate 41+ thousand square feet of new restaurants, with no acknowledgment that additional restaurant space is needed. Ko Olina Resort contains numerous restaurants, including Eggs N' Things, Farm to Barn, 808 Craft House, Monkeypod Kitchen, Mekiko Cantina, Black Sheep Creamery, Tropic Poke, Starbucks and ABC's Island Country Market. Ko Olina Golf Club also hosts Roy's Restaurant from Chef Roy Yamaguchi and a snack shop. Each of the resorts currently operating within Ko Olina offer a variety of dining and lounge options including Manalo Lounge, Mina's Fish House, La Hiki, Dr. Mai Tai's, Hōkūle'a, Waterman Bar and Noe at the Four Seasons Resort O'ahu at Ko Olina; 'Ama'Ama, Makahiki, Ulu Café, Off the Hook, The 'Ōlelo Room, Wailana Pool Bar, Mama's Snack Shop, Pāpālua Shave Ice, and Little 'Ōpihi's at Aulani, A Disney Resort & Spa; Longboard's Bar & Grill, Longhi's Restaurant, Nai'a</u></p>	<p><u>Ken Williams, KOCA & KORA</u></p>	<p><u>The Cove Redevelopment will create new job opportunities in the 'Ewa region, benefiting local residents and aligning with the broader vision of establishing West O'ahu as the island's "Secondary Urban Center." The Project aims to enhance the quality of life in the region by offering a unique gathering place that honors the history and culture of the region. By offering a performing arts venue, restaurants, retail spaces, and cultural programming at one location, the Project offers a different kind of experience compared to existing offerings in the surrounding areas, thereby catering to both local residents and tourists seeking a diverse cultural and entertainment experience.</u></p> <p><u>During Project operations, the EIR (Appendix I) estimates that the Project will generate 817 jobs (678 FTE) comprised of 583 direct jobs (484 FTE), 121 indirect jobs (100 FTE), and 113 induced jobs (94 FTE), resulting in labor income valued at close to \$35.5 million each year. Annual revenue to the State of Hawai'i is projected at \$4,591,378 per year and estimated to be \$2,062,228 per year to the City and County of Honolulu (in 2024 dollars). These estimated impacts demonstrate the Project's potential to stimulate local economic growth in the West O'ahu region.</u></p> <p><u>To clarify, the Project propose approximately 27,496 sf of new restaurants, contrary to the claims made in the comment (Table 3.1). Regarding oversaturation concern, it is important to note that the long-standing Hawaiian Theme Park and commercial lū'au and the planned ancillary retail and dining spaces at The Cove are designed to complement existing establishments by offering unique and culturally focused experiences. The Project aims to integrate these offerings within a Hawaiian cultural context that attracts a diverse range of visitors. Furthermore, the new retail and dining offerings are not intended to compete directly with the existing venues but instead provide additional experiences that support the area's broader growth as a recreational and cultural destination.</u></p> <p><u>The Applicant recognizes the importance of carefully balancing potential benefits and challenges and acknowledges retail closures in the region, which are influenced by various factors outside of the scope of the Project, including shifts in consumer behavior and</u></p>

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	<p><u>Pool Bar, and The Marketplace at Marriott's Ko Olina Beach Club; and Makai Hale Beach Bar at the Beach Villas at Ko Olina. In fact, there are currently 140 restaurants in the greater Kapolei area, raising the issue that additional restaurant spaces are not currently needed, and adding such a significant amount of restaurant space may lead to oversaturation. Indeed, there have been many notable restaurant closures, including Outback Steakhouse, Ruby Tuesdays, Plantation Tavern and Ho Ho Chinese Restaurant.</u></p> <p><u>With respect to retail operations, Ko Olina Station and Ko Olina Center already contain numerous retail stores, and each of the resort properties also contain several retail shops. Adding an additional 20,000 square feet of retail will cause additional oversaturation. While the EIS attempts to characterize the retail operations as small vendors, it should be noted that the amount of retail square footage to be added is significantly more than the total amount of retail square footage at Ko Olina Station and Ko Olina Center.</u></p> <p><u>The socioeconomic analysis contained in the EIS does not sufficiently analyze the impact of such a large amount of retail and restaurant space, and the potential for this increase to be the harmful, rather than helpful, to the West O'ahu community. There have been many retail closures in Kapolei in the last few years, and thus the potential negative impacts of the Project should be considered along with the supposed benefits.</u></p>		<p><u>broader economic conditions. As previously noted, The Cove is intended to revitalize the site, which has long been in commercial use. The Project is envisioned to complement existing establishments by offering unique and culturally-focused experiences. This differentiation is expected to attract a mix of local residents and visitors, creating economic synergies with other businesses in the region rather than displacing them.</u></p>
I.	Visual Impacts		EIS Section 4.11
<u>T.1.</u>	<p><u>There were no buildings or other structures when my wife and I were married on the beach in July 1977. The DEIS proposes a 50-yard-long Restaurant Building No. 1 which will trash the mauka view from the beach. Please, please relocate this building mauka of the rocky shoreline or substantially reduce its frontage mauka of the beach.</u></p>	<p><u>Douglas Meller</u></p>	<p><u>As with all proposed structures on The Cove property, Building No. 1 will not exceed a height of 40 feet and will be set back at least 60 feet from the shoreline.</u></p> <p><u>Views of the Cove Property from the adjacent beach will be renewed with the development of a more contemporary and authentic Hawaiian gathering place. The Project will demolish existing outdated structures on the Cove Property and will include open-air structures and pavilions consisting of clean, natural, and textured materials that complement the surrounding environment. These elements are intended to blend with the landscape and enhance, rather than obstruct, the views from the beach to the mountains. The proposed structures are thoughtfully positioned to minimize visual impacts on the beach experience.</u></p>
U.	Sustainability Features		EIS Section 4.12
<u>U.1.</u>	<p><u>7. We recommend participating in the Hawaii Green Business Program, that assists and recognizes businesses that strive to operate in an environmentally and socially responsible manner. The program description can be found online at http://energy.hawaii.gov/green-business-program.</u></p>	<p><u>DLNR CWRM</u></p>	<p><u>The Applicant acknowledges the resources and will review the program for applicability to the Project as design and programming progress.</u></p>
<u>U.2.</u>	<p><u>2. Describe strategies to reduce carbon emissions from the project, if any.</u></p>	<p><u>HDOT</u></p>	<p><u>As described in Section 4.12, The Cove is being proactively planned and designed to incorporate various strategies to enhance sustainability in alignment with City and State goals. Covered open-air structures will reduce reliance on air conditioning, lowering energy consumption. The use of bioswales, rain gardens, permeable pavements, and other LID measures will help reduce the carbon footprint associated with stormwater management while mitigating heat island effects. To promote carbon-neutral modes of transportation, the Project will provide bicycle storage and encourage walking through enhanced site connectivity and landscaping. This reduces dependence on motor vehicles, further cutting down emissions. Off-street parking stalls will comply with the City's EV charging standards, supporting the shift toward low-emission vehicles. The use of compostable materials, like bamboo or cornstarch-based disposable cutlery, will also minimize carbon emissions compared to traditional plastics. The incorporation of low-flow plumbing fixtures and the potential use of blackwater will reduce the energy required for water heating and treatment, indirectly lowering carbon emissions. Whenever feasible, construction materials and products may be sourced locally, reducing emissions associated with transportation.</u></p>

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V.	Consistency with Ko Olina Resort and Master Plan		EIS Section 5.0
V.1.	1. The Final EIS should reference the West Beach Urban Design Plan and how the Project conforms with the Urban Design Plan.	DPP	<p>Consistent with the Cove rezoning Ordinance 89-27, condition 3, a discussion of the Project's consistency with adopted urban design provisions has been added as <i>Section 5.3.3</i> of the EIS (<i>Table 5.9</i>).</p> <p>The consistency analysis considers (i) the urban design principles and controls for the West Beach special area provided under the Ewa DP that was in effect at the time the Cove Property was rezoned under Ordinance No. 89-27; (ii) the urban design provisions for West Beach dated May 1986 that were required under the West Beach/Ko Olina rezoning/UA (Ordinance No. 86-09) and subsequently approved by the DLU, and (iii) the Ko Olina-specific objectives, policies, and guidelines under the current Ewa DP, which incorporates key elements for Ko Olina from the former DP and the West Beach/Ko Olina Resort rezoning UA.</p> <p>To clarify, the Cove Property is not subject to the Ko Olina rezoning Ordinance (Ordinance No. 86-09). That rezoning did not change the zoning of the Property or authorize any development at the Cove Property, nor was it recorded against the Cove Property. This additional analysis is being provided in response to public comments on the Draft EIS.</p>
V.2.	<p>C. / D. Impact on Master Plan:</p> <p>The stated benefits of the Project do not outweigh the negative impact the Project will have on Ko Olina Resort. It is the Resort, not the Paradise Cove property, that is intended to relieve the tourist impact on Waikiki. The Resort Master Plan has been established to allow the Resort to absorb the residents and guests in a planned manner, and it has the necessary infrastructure, including water, non-potable water, wastewater, as well as over 200 public parking spaces. The Paradise Cove Property was always intended to be a limited use for the commercial lū'au, acting as a place where visitors and guests could celebrate the native Hawaiian art of hula. The Project seeks to subvert the original intent of the Master Plan by deemphasizing the lū'au and turning the Property into a strip mall and restaurant operation completely out of character with the overall look and feel of the Resort.</p> <p>The Master Plan accounts for all resort, commercial and residential uses and has been sequenced to maximize success based on economics and need, while assembling a mix of uses and products that are complementary, not redundant, and synergistically compatible. This approach provides for the greatest chance of success for all stakeholders. The Project will provide minimal to no benefit to the Master Plan for the Resort. The Cove Redevelopment offerings are NOT distinct from Ko Olina's current offerings, and the redundant uses have the potential to negatively impact Ko Olina Resort's ability to fulfill its role as one of Honolulu's Secondary Urban Centers.</p>	<ul style="list-style-type: none"> • <u>Kendall Kim, KOD</u> • <u>Ken Williams, KOCA & KORA</u> 	<p>The Cove Property is designated as a "Resort/Recreation Area" in the 'Ewa DP. Restaurant and retail uses are already present within the Ko Olina Resort on various properties. While The Cove will include these uses, The Cove is designed to complement, and not compete with, existing Ko Olina businesses by offering unique, immersive experiences focused on Hawaiian culture.</p> <p>The Ko Olina Resort Master Plan has its roots in the declaration prepared and recorded by the Trustees Under the Will and of the Estate of James Campbell, Deceased (Campbell Estate) in 1986, against the land that would later become the Ko Olina Resort. Campbell Estate's vision was for the resort to become a first-class destination resort/residential community. Master planning was part of that vision. However, to clarify, the Ko Olina Resort Master Plan is a private, i.e. non-governmental, plan for the development of the Ko Olina Resort. This Master Plan does not govern the Cove Property or the neighboring Lanikūhonua property, as they are not subject to the original Ko Olina Declaration of Conditions, Covenants and Restrictions recorded by Campbell Estate in 1986.</p> <p>The Cove Property has been used for commercial lū'au and other commercial uses since the late 1970s. As such, these activities and uses at the Cove Property pre-date the establishment of the Ko Olina Resort and its associated Master Plan and were existing background conditions prior to and during the development of the resort.</p> <p>Several years after the start of commercial operations at the Cove Property in the late 1970s (but prior to the opening of the 'Ihiani at the Ko Olina Resort), the property was rezoned to the B-1, Neighborhood Business District, allowing a range of commercial activities, such as restaurants, retail, associated with a Hawaiian Theme Park and a commercial lū'au operation. Currently, operations at the Cove Property take place seven days a week. The commercial lū'au dinner and show operate every evening and other commercial uses, such as commercial weddings, are held beforehand. As such, a similar pattern of day and evening commercial uses at the Cove Property has been ongoing. As described in the EIS, the Project will include a new performing arts venue, restaurants, retail, and programming to create an authentic Hawaiian community gathering place that honors and reflects the history, culture, and connection to place. The intent is to renew the nightly commercial lū'au show to perpetuate and honor the Hawaiian culture and history of place through the traditions of hula and mele. In addition to nightly entertainment, potential programming at the new performing arts venue may include wedding and other event receptions, graduations, Hawaiian cultural arts and educational programs and demonstrations, community events, and holiday shows.</p> <p>Regarding the stated concern about the benefits that the Cove Redevelopment Project can provide to the Ko Olina Resort, and the concern that the Project could potentially negatively impact the Resort's ability to fulfill its role as a Secondary Urban Center, we note that the Cove Redevelopment is consistent with the O'ahu General Plan's and the 'Ewa DP's vision for the Secondary Urban Center (see detailed discussion in <i>Sections 5.3.1 and 5.3.2</i> and response C.2. regarding consistency with O'ahu General Plan and 'Ewa DP).</p>
W.	Financial Contribution to Ko Olina Resort		EIS Section 7.0
W.1.	<p>Additional Strain on Resources:</p> <p>The 10.8-acre property is officially an outparcel within the Ko Olina Resort, yet derives almost all of its benefits from the infrastructure and amenities provided by the resort, as well as the City and County. Additionally, Ko Olina provides substantial patron support with customers who come from nearby Ko Olina hotels. The parcel and its owners reportedly do not pay to Ko Olina any funds to help defray the costs they impose on the resort and the disturbances they cause, yet draws heavily on local customer support. This appears to be a proposition serving the interests of</p>	Kai Lani at Ko Olina AOAQ	<p>As described in response V.1 and V.2., the Cove Property is not subject to the Ko Olina Master Plan or the associated conditions, covenants, and restrictions recorded by Campbell Estate in 1986. The Applicant understands that there are concerns about potential impacts on the broader infrastructure and services provided by the Ko Olina Resort, including security and maintenance. The Project has been designed to minimize its impact on existing services. The Cove's operational plans include provisions for independent on-site security, waste management, and maintenance services to ensure that it remains largely self-sufficient.</p> <p>As noted in <i>Section 4.8.3</i> of the EIS, the Applicant has coordinated with the City to increase the allocation of sewer capacity for The Cove Property within the master planned tributary area. In accordance with the Kapolei Interceptor Sewer Assessment Agreement,</p>

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No.	Comments	Commenter	Responses
	<p><u>the Paradise Cove proponents, who now propose to greatly enlarge the facilities at the community's expense.</u></p>		<p><u>Kapolei Properties LLC, an affiliate of the James Campbell Company LLC, exercised its assignment right under the agreement to reassign 52,000 gpd of unused and unneeded sewer allocation from Kapolei Harborside (TMK (1) 9-1-014: 085) to the Cove Property. Combined with the existing allocation of 25,000 gpd, the updated sewer allocation for The Cove now totals 77,000 gpd. Subsequently, a Sewer Connection Application for the Project was submitted to the City and approved on November 14, 2024 (File No. 2024/SCA-1132). To further mitigate the estimated wastewater generation, the Applicant is also studying the use of a blackwater system for The Cove intended to recycle water from all onsite plumbing fixtures to R1 level per the requirements of HDOH. The R1 water would be reused on site to flush toilets, urinals and irrigation per 2021 United Plumbing Code, Chapter 16. A proposed blackwater system for The Cove would collect wastewater from toilets, sinks, urinals, and kitchen waste (post-grease interceptor) and process it through a multi-step treatment system. The treated R1 water would be reused through a distinct piping system. The system would be designed to process and recycle an estimated 60,000 gallons of blackwater daily. The determination of use and final design of a blackwater system will be determined as the Project progresses.</u></p> <p><u>The increase in water demand is being coordinated with BWS, which has verified the Project's water needs. As such, no upgrades to the City or Ko Olina system are required. The Applicant will continue to consult with BWS as the Project progresses and final approval will be confirmed during the building permit process, as is typical.</u></p>
<p><u>W.2.</u></p>	<p><u>Kai Lani Resident Concerns: 22. Financial responsibility for community services provided by KOCA proportional to AOA residential dues.</u></p>	<p><u>Elizabeth and Richard Rubinstein</u></p>	
<p><u>W.3.</u></p>	<p><u>The 10.8 acre PC property is officially an outparcel within the Ko Olina Resort, yet derives almost all of its benefits from the infrastructure and amenities provided by the resort as well as the City and County. Additionally, Ko Olina provides substantial patron support with customers who come from nearby Ko Olina hotels. The parcel and its owners reportedly do not pay to Ko Olina any funds to help defray the costs they impose on the resort and the disturbances they cause, and yet draw heavily on local customer support. This is a self-serving proposition that the PC proponents now propose to greatly enlarge - at the community's expense.</u></p>	<ul style="list-style-type: none"> • <u>William and Sara Barnes</u> • <u>Marilyn Harvey-Heinz & Don Heinz</u> 	
<p><u>W.4.</u></p>	<p><u>Lack of Financial Contribution: Cove Campbell Kobayashi LLC has shown an unwillingness to acknowledge the increased burden on our existing facilities or to contribute financially to their maintenance. This places an unfair responsibility on our resort to manage the additional wear and tear, potentially compromising the pristine condition of our amenities.</u></p>	<p><u>Peter Togawa, Beach Villas Ko Olina AOA</u></p>	<p><u>Improvements to the Project site are anticipated to decrease the total generation of stormwater runoff on the Cove Property, representing an improvement from existing conditions. Construction of The Cove will comply with the City's Rules Relating to Water Quality, which are in place to protect water quality. As discussed in Section 4.8.1, to improve stormwater runoff quality and minimize impacts to receiving waters in the long-term, the use of LID measures, such as bioswales, rain gardens, planter boxes, sand filters, or permeable pavement, will be integrated into the Project design, as feasible. Final on-site treatment controls and BMPs will be paid for by the Applicant and assessed as the design phase continues.</u></p>
<p><u>W.5.</u></p>	<p><u>Ko Olina is a great place to live, work, and play. Currently, all major resort stakeholders share and take pride in maintaining the resort's private roads, walking-paths, beaches, landscaping, gates, security etc. for the benefit of everyone who comes to enjoy our beaches and amenities. I encourage project developers to reach out to Ko Olina's long-term stakeholders to ensure the best interest of all of resort partners continue to be met.</u></p>	<p><u>Ko Olina Golf Club</u></p>	<p><u>Connection to the BWS water system for potable water use will require the Applicant to pay a fee to the City and County of Honolulu, in addition to monthly charges. Additionally, it is anticipated that connection to the City sewer system will require fees.</u></p> <p><u>As discussed in Section 4.7.1, the Project will implement a TMP to efficiently manage traffic flow on site to minimize potential impacts to Ali'inui Road.</u></p>
<p><u>W.6.</u></p>	<p><u>Non-contribution to the Ko Olina Community Association: It is also concerning that the proposed project does not include provisions for contributing to the Ko Olina Community Association. Our community relies on contributions from all developments to maintain and improve shared amenities and infrastructure. The lack of contribution from this project sets a concerning precedent and undermines the cooperative spirit that has allowed our community to thrive. It is essential that all developments, including this one, contribute their fair share to ensure the continued upkeep and enhancement of our community facilities.</u></p>	<p><u>Carla L. Kozak</u></p>	<p><u>While The Cove is not part of the Ko Olina Resort, redevelopment of the Property is intended to benefit the broader 'Ewa community. The Project will create authentic Hawaiian gathering place for cultural performances, educational programs, and events that both residents and visitors can enjoy. This approach aligns with the goals of the 'Ewa DP and O'ahu General Plan, which envision the region as a thriving Secondary Urban Center.</u></p>
<p><u>W.7.</u></p>	<p><u>Ko Olina Community Association Membership: The proposed project does not include provisions for contributing to the Ko Olina Community Association. Our community depends on contributions from all members to maintain and enhance shared amenities and infrastructure. It is crucial that all developments, including this one, contribute their fair share to ensure the ongoing maintenance and improvements of our community facilities.</u></p>	<p><u>Dale Fishell</u></p>	
<p><u>W.8.</u></p>	<p><u>10. Financial Contributions and Benefits: The PC property, although benefiting from Ko Olina's infrastructure and amenities, reportedly does not contribute to the costs that it imposes on the property. This imbalance is unfair, and the proposed expansion would greatly exacerbate the issue. In particular, there is no recognition of the impact to liability that this proposed development brings to the property.</u></p>	<p><u>Eileen Meuris, Steve Meuris, and Marguerite Casillas</u></p>	
<p><u>W.9.</u></p>	<p><u>My community, The Coconut Plantation at Ko Olina, is comprised of 270 residents who contribute \$86,000.00 annually to the Ko Olina Community Association for the privilege of living in the Resort. The money collected supports the resorts upkeep for roadway maintenance, pedestrian walkways, streetlights, entry staff greeters, security staff, landscape of common grassy areas, maintenance of public beaches, restroom facilities, care for the many large Monkeypods trees</u></p>	<p><u>Karen Messick</u></p>	

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	<p><u>that line the streets and so much more without taxing the resources of the County or City of Honolulu to maintain the beaches or infrastructure.</u></p> <p><u>To think that “The Cove” developer would even consider it fair or right that they dramatically increase the utilization of and profit from the use of our owner paid for infrastructure, literally on the backs of our homeowners is unconscionable. Especially since research indicates the amount of additional traffic and patronage utilizing our infrastructure would increase six-fold. (see the engineering report Vol II 449- 474.) Regardless of the original easement agreement, this project changes the nature of the site substantially and will increase visits to the site sixfold as well as create roadway congestion and parking problems.</u></p>		
W.10.	<p><u>Monetary Contribution to the Ko Olina Community Association:</u></p> <p><u>Another significant concern is the proposed project's lack of provisions for contributing to the Ko Olina Community Association. Our community depends on contributions from all resort developments to maintain and enhance SHARED amenities and infrastructure. The absence of a contribution from this project sets a troubling precedent and undermines the cooperative spirit that has allowed our community to thrive. It is crucial that all developments, including this one, CONTRIBUTE THEIR FAIR SHARE to ensure the continued upkeep and improvement of our community facilities.</u></p>	Warren Miles	
W.11.	<p><u>Kai Lani Resident Concerns:</u></p> <p><u>Financial responsibility for community services provided by KOCA proportional to AOA0 residential dues.</u></p>	Elizabeth and Richard Rubinstein	
W.12.	<p><u>Ko Olina Community Association Membership:</u></p> <p><u>The proposed project does not seem to include any plans to contribute to the Ko Olina Community Association despite intending to benefit from our infrastructure. Each community and resort property pays an assessment to the association, which is essential for maintaining and improving the beauty and functionality of our resort. These contributions support the ongoing upkeep and enhancements that benefit all residents and visitors. It is only fair that your project, which will utilize our infrastructure and amenities, also contributes its fair share to ensure the continued quality and appeal of our resort.</u></p>	Nicolas Politsch	
W.13.	<p><u>4. Responsibility for impact on infrastructure and common areas of Ko Olina Resort.</u></p> <p><u>Ko Olina infrastructure is privately owned and communities within the Resort contribute to the maintenance of this infrastructure. According to Ken Williams in the May 22 meeting, no financial support has been extended by the owners of the Cove Development for any increased impact on the infrastructure incurred by the Cove Project. This places an inequitable burden on Ko Olina communities and individual owners</u></p>	Pieter and Claire van Wingerden	
W.14.	<p><u>“Maintenance Fees”</u></p> <p><u>The construction will span several years, during which private roads (recently repaved) will be heavily used by contractors and builders. The increased traffic and additional personnel working at The Cove will also impact the PRIVATE infrastructure & utilities of the Resort as well as the environment post-completion. Will there be a monetary contribution from The Cove to help maintain Ko Olina?</u></p>	Veronique Jones	
X.	Alternatives Analysis		EIS Section 6.0
X.1.	<p><u>H. The Draft EIS Fails to Rigorously Analyze Alternatives:</u></p> <p><u>Pursuant to HAR 200.1-1(c): Exemption notices, EAs, and EISs are meaningless without the conscientious application of the environmental review process as a whole and shall not be merely a self-serving recitation of benefits and a rationalization of the proposed action. (Emphasis added).</u></p>	Ken Williams, KOCA & KORA	<p><u>In response to the comments raised regarding the rigor of the alternatives analysis, a high level environmental review has been included in <i>Table 6.3</i>. This updated analysis further evaluates the environmental impacts of the Proposed Action and the alternatives. The alternatives analysis considers viable options, as required by the EIS process, and reflects an understanding of the long-term consequences of various scenarios.</u></p>

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	<p><u>Unfortunately, the EIS at issue does not rigorously analyze the alternatives to the Proposed Action and serves mainly to rationalize the purported benefits. Rather than providing the accepting agency with realistic alternatives, the Applicant merely repeats the same phrase, again and again, that it will be an "authentic Hawaiian meeting place". It is unclear how the 50,000 square-foot retail/restaurant mall complex that Applicant intends to install is authentically Hawaiian, or how it will serve the local community as a meeting place given that there will be no increase in the free parking stalls available to local families.</u></p> <p>1. The No Action Alternative is merely a straw man:</p> <p><u>The No Action alternative presents a fake doomsday scenario, claiming that if no action is taken, the Property will fall into disrepair and become an eyesore. This is clearly a straw man argument. The EIS does not analyze the simple solution that the lease for the existing tenant can be extended, with any needed updates to the existing structures, obviating the need for the Proposed Action.</u></p> <p><u>The EIS should be revised to include the impacts of the Cove Redevelopment on the 250+ families currently associated with the Paradise Cove lū'au given that the EIS states that the current operator will be terminated at the expiration of the existing lease, and the anticipated time for construction of the new improvements is at a minimum two years.</u></p> <p><u>Furthermore, since JCC is the landlord, it is under no obligation to require the existing tenant to remove the existing improvements. The Paradise Cove lū'au site is part of the larger Lanikūhonua site, and JCC can easily maintain the Property in the same fashion to ensure that there is no degradation of the Property. Given the proposed irrevocable commitment of resources for this site, and the fact that the Applicant's own modeling shows that sea level rise is likely to inundate several of the proposed buildings, the no action alternative may in fact be the most prudent course of action, and more rigorous analysis of this alternative using the actual facts of the situation is required.</u></p> <p>2. The Alternative Design Assumptions are flawed:</p> <p><u>The Alternative Design set forth in the EIS states that the design would be characterized by increased density and buildings of up to 40 feet in height, with lot coverage to reach the maximum of 30%. The Applicant fails to state any basis for why the Alternative Design would necessarily include these features. The Alternative Design could just as easily feature a less intensive use, with a lower lot coverage ratio, buildings not higher than the 25-foot maximum, following the setbacks required by the UA and using the appropriate perpendicular building orientation. The Alternative Design proffered in the EIS is again used as a scare tactic to try and convince the public that if the Proposed Action is not permitted, a much worse alternative would be implemented. The EIS should be corrected to include alternative designs that are in keeping with the underlying requirements, not simply reciting, and then dismissing, the worst-case alternative.</u></p> <p>3. The Alternative Use Hotel is not a Realistic Alternative:</p> <p><u>The Alternative Use analyzed under this alternative is a resort hotel constructed on the Property, which the EIS acknowledges is not permitted to use under the Unilateral Agreement. Again, this alternative appears to have been selected as a way of frightening the community into thinking that if the Proposed Action is not approved, a resort hotel would be constructed. There appears to be zero chance that a resort hotel could actually be constructed on the Property given the fact that the Applicant's own data shows that there is a high likelihood that large portions of the Property will be subject to inundation through sea level rise. Additionally, the same issues would apply with respect to the lack of non-potable water allocations, and the wastewater increases associated with such a use. A hotel would also not be permitted under the UDP, as it would negatively impact the view corridors that have been established and would not comply with the setbacks applicable to shoreline parcels.</u></p>		<p><u>The No-Action Alternative is not intended to present a "straw man" scenario, and the inclusion of the alternative of "no action" is consistent with the EIS rules (HAR § 11-200.1-24). It provides a realistic depiction of the potential impacts of failing to redevelop the property after the expiration of the current operation's lease. While extending the current lease may appear to be a straightforward solution, it would not align with the Project objectives of creating an authentic community gathering place or optimizing the potential of the property.</u></p> <p><u>Additionally, the assumption that the Cove Property would fall into disrepair under a No-Action scenario considers the practical realities of aging infrastructure, the lack of investment without a new lease or redevelopment, and the absence of a long-term strategy to maintain the area. Although no immediate harm would occur, the site would gradually face challenges that could impact its overall condition, aesthetic appeal, and community value.</u></p> <p><u>Additionally, Section 4.4.6 acknowledges that portions of the planned Project are within the 3.2-ft. SLR-XA. With no further development or construction, the property's current vulnerabilities and risks associated with SLR and flooding remain unchanged. Coastal erosion, flooding from heavy rains, and storm surges will continue to affect the area at the same levels, as no measures are taken to either mitigate or worsen these risks. With no new development or improvements, there would be no efforts to enhance the property's resilience, such as improving drainage or designing flood-resistant structures.</u></p> <p><u>Regarding the comment alleging that the Project involves an "irrevocable commitment of resources", redevelopment of the Cove Property involves an irrevocable commitment of land, as new structures will be added to the site. However, as mentioned above, the privately-owned property has been in commercial use since the late 1970's. The planned structures are designed to have minimal environmental impact and will be flexible in use and the majority of the Project site will be retained as open space.</u></p> <p><u>The Project will not result in the irrevocable commitment of natural, cultural, or historic resources. Beach access and parking will be maintained during construction and long-term operation, and site redevelopment will improve stormwater management and reduce runoff from existing conditions. BMPs will be implemented to prevent sedimentation and pollution, as discussed above and in detail in Section 4.8.1. Historic resources on the property, including two identified historic properties (SIHP Nos. -03362 and -04968), will be protected through archaeological monitoring and avoidance measures as described in Section 4.1. The burial preserve area for SIHP No. -04968, CSH 2, will remain in perpetuity, ensuring the preservation of iwi kūpuna. Additionally, the Project will incorporate educational programming to honor the site's legacy and support traditional cultural practices like gathering of limu, fish, and salt.</u></p> <p><u>Regarding the short-term employment related impacts as a result of the Proposed Action, discussions with the current lessee have been conducted. The Applicant recognizes the importance of the current operations and will consider solutions that will minimize disruption during redevelopment.</u></p> <p><u>Alternative Design: The proposed Alternative Design reflects zoning allowances and development possibilities that are permissible within the Cove Property's B-1, Neighborhood Business District zoning designation and the UA for the property (Ordinance No. 89-27).</u></p> <p><u>The Alternative Design scenario explored in the Draft EIS is not a "worst-case alternative." It evaluates an increased-density scenario that is still consistent with the underlying zoning. The comment suggesting an analysis of a less intensive redevelopment of the Cove Property is acknowledged. However, that very concept is woven throughout the proposed Project, which is far less dense than what is authorized under the applicable UA. The Alternative Design proposal is a reasonable alternative that could attain certain of the stated objectives. The analysis determined that the Alternative Design scenario would be more likely than the proposed Project to generate certain negative environmental impacts, although many of those could be mitigated by standard Best Management Practices. Redeveloping the Cove Property to maximum allowable density would likely generate significantly more jobs in the short term (construction) and long-term, and more revenue to the State and City (Table 6.3).</u></p> <p><u>Alternative Use - Hotel: The inclusion of a hotel alternative in the Draft EIS was not presented to frighten the community. It is an option that, while inconsistent with current zoning, is consistent with the property's designation under the 'Ewa DP as the parcel is designated for Resort/Recreation uses. Rezoning the property to the Resort District would also be in keeping with the expanse of Resort District-zoned land within the SMA of Ko Olina Resort</u></p> <p><u>The alternatives presented in Section 6.0 were compiled in good faith, taking into account the range of reasonable alternative proposals that could be pursued on the Cove Property. The analysis was prepared to enable decision-makers to make a reasoned decision on the relative environmental risks and benefits of the proposed Project. It is recognized that you would prefer the Applicant to prepare new analyses that look at other development scenarios. However, HRS, Chapter 343 does not require that an EIS exhaust all possible alternatives to a "Proposed Action" or engage in endless rounds of analysis for each possible development iteration. The alternatives analysis was prepared consistent with HAR, § 11-200.1-24. Moreover, in accordance with HAR, § 11-200.1-27, the analysis in Section 6.0 has been expanded in response to comments (Table 6.3).</u></p>

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	<p><u>While the Unilateral Agreement only permits a commercial lū'au with limited accessory retail and restaurants, even if a zoning change was sought, there are a myriad of less intensive uses that could be proposed and analyzed under this alternative. Actual analysis of realistic alternative uses should have been included in the EIS.</u></p>		
Y.	Community Outreach Process		EIS Section 7.0
Y.1.	<p><u>B. Failure to coordinate.</u> <u>As an initial matter, we note that the EIS makes frequent mention of how the Project will provide benefit to a Ko Olina Resort and its residents and guests. Unfortunately, JCC and its development partner CCK have made no effort to coordinate any of the planning for the Projects with KOD. The Project will have a significant impact on Ko Olina Resort, including increases in traffic, use of Resort Infrastructure, and an increase in the number of visitors traveling in between the two properties, which will place a strain on Ko Olina Resorts infrastructure, security team, and maintenance crews. JCC appears to believe that it can simply push these costs off on the Resort without any contribution given the fact that the Property is not subject to the payment obligations in the underlying declarations that govern the Resort. The Ko Olina Resort Master Plan never contemplated a 50,000 square-foot strip mall at the entrance of the Resort, and none of the Resort facilities were designed to handle facilities of the size at that location. The Master Plan for the Property contemplated a limited use: a commercial lū'au, which could have accessory retail and restaurants directly related to the lū'au, which could have accessory retail and restaurants directly related to the lū'au, not the gargantuan retail/restaurant complex that is currently contemplated.</u> <u>Given this massive change in use, coordination between JCC/CCK is needed in order to manage the proposed operations. Furthermore, given the significant change in use from what is contemplated under the Master Plan, JCC/CCK should pay a fair share contribution of the increased costs for infrastructure and security services.</u> <u>The EIS takes the opposite approach, claiming that the Project is not part of the Resort "brand" and therefore collaboration with Ko Olina Resort Association ("KORA") is inappropriate. However, the Project clearly wishes to ride along the Resorts coattails for free, repeatedly stating that the Project is part of the "wider Ko Olina Resort" and claiming that the Project will enhance the overall Resort experience. To the extent that the Project wishes to change its fundamental use and be part of the wider Ko Olina Resort, it should accept the obligations that come with the 30 years of branding of the Resort, and the significant annual marketing spend. KOCA and KORA do engage in ongoing community outreach with a wide variety of partners and have an established stakeholder network. The position advocated by JCC/CCK gives no assurance that there will be brand consistency, notwithstanding the fact that the Project is being positioned as complementary to the Resort and utilizes Resort guests and residents in computing their baseline traffic analysis.</u></p>	Kendall Kim, KOD	<p><u>The Applicant acknowledges the comments expressed by the Ko Olina Resort community regarding the proposed development of The Cove. The Applicant is committed to ensuring that the Project not only complements the surrounding area but also respects the existing infrastructure, environment, and community values.</u> <u>The Applicant understands that there are concerns about potential impacts on the broader infrastructure and services provided by the Ko Olina Resort, including security and maintenance. The Project has been designed to minimize its impact on existing services. The Cove's operational plans include provisions for independent security, waste management, and maintenance services to ensure that it remains largely self-sufficient. The Applicant will continue discussions with Ko Olina Resort to coordinate, where appropriate.</u> <u>The Cove is designed to honor the Hawaiian legacy of this property, its historic use, and its designation in the 'Ewa DP for Resort/Recreation Area uses. The proposed lū'au show, cultural workshops, and Hawaiian outdoor recreational activities planned for The Cove will enhance, and not compete with, the offerings of Ko Olina by providing a unique cultural experience that celebrates the area's history and traditions. This will create an enriching environment for both kama'āina and visitors, aligning with the shared vision for this area as a world-class resort destination that honors its cultural heritage.</u> <u>Finally, the Applicant acknowledges the comments regarding transparency and communication throughout the planning process. Since publication of the Draft EIS, the Applicant has undertaken substantial outreach with leaders in the Native Hawaiian community. Additionally, the Applicant has met with various stakeholders within the Ko Olina Resort community, including the residential associations. As the Project progresses, the Applicant will continue to keep the community apprised of the Project.</u></p>
Y.2.	<p><u>B. Failure to coordinate:</u> <u>As an initial matter, we note that the EIS makes frequent mention of how the Project will provide a benefit to Ko Olina Resort and its residents and guests. We are disappointed that JCC and its development partner CCK have made no effort to coordinate any of the planning for the Project with either of KOCA or KORA. The Project will have a significant impact on Ko Olina Resort, including increases in traffic, use of Resort infrastructure, and an increase in the amount of visitors traveling in between the two properties. The new uses will significantly increase daytime traffic, which is not accounted for in the traffic study, which will place a strain on Ko Olina Resort's infrastructure, security team, and maintenance crews. The traffic impact is one of the most significant issues for residents and guests within Ko Olina Resort, and particular attention should be paid to the impacts that the Proposed Action will have on traffic.</u></p>	Ken Williams, KOCA & KORA	

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	<p><u>JCC appears to believe that it can simply push these costs off on the Resort without any contribution given the fact that the Property is not subject to the payment obligations in the underlying declarations that govern the Resort. The Ko Olina Resort Master Plan never contemplated a 50,000 square-foot strip mall at the entrance to the Resort, and none of the Resort facilities were designed to handle facilities of this size at that location. The Master Plan for the Property contemplated a limited use; a commercial lū'au, which could have accessory retail and restaurants directly related to the lū'au, not the gargantuan retail/restaurant complex that is currently contemplated.</u></p> <p><u>Given this massive change in use, coordination between JCC/CCK is needed in order to manage the proposed operations. Furthermore, given the significant change in use from what is contemplated under the Master Plan, JCC/CCK should pay a fair share contribution of the increased costs for infrastructure and security services. To the extent that JCC/CCK wish to promote themselves as being part of the Ko Olina Resort they should also participate in the marketing programs operated by KORA and pay their fair share.</u></p> <p><u>The EIS takes the opposite approach, claiming that the Project is not part of the Resort "brand" and therefore collaboration with KORA is inappropriate. However, the Project clearly wishes to ride along the Resort's coattails for free, repeatedly stating that the Project is part of the "wider Ko Olina Resort" and claiming that the Project will enhance the overall Resort experience. To the extent that the Project wishes to change its fundamental use and be part of the wider Ko Olina Resort, it should accept the obligations that come with the benefits the Resort brings. KORA's marketing efforts add significant value, given the 30+ years of branding of the Resort, and the significant annual marketing spend. KOCA and KORA do engage in ongoing community outreach with a wide variety of partners and have an established stakeholder network. The position advocated by JCC/CCK gives no assurance that there will be brand consistency, notwithstanding the fact that the Project is being positioned as complementary to the Resort and utilizes Resort guests and residents in computing their baseline traffic analysis.</u></p> <p><u>KOCA raised the coordination issues in its comments to the EISPN and requested that the EIS address these issues. Unfortunately, the EIS merely shrugs off these issues, and fails to adequately address this topic.</u></p>		
<p><u>Y.3.</u></p>	<p><u>Need for Stakeholder Collaboration:</u></p> <p><u>This redevelopment project must involve all major resort partners, residential communities, and businesses from the outset. Collaboration is essential to maintaining the unique appeal and high standards of Ko Olina Resort. Without it, the redevelopment could undermine the community's shared vision and negatively affect our guests' and owners' experiences.</u></p> <p><u>I urge Cove Campbell Kobayashi LLC to reconsider its plans and consider our community's significant concerns. Mitigative actions must be incorporated to address these issues and ensure a positive outcome for all stakeholders.</u></p>	<p><u>Peter Togawa, Beach Villas at Ko Olina AOAQ</u></p>	
<p><u>Y.4.</u></p>	<p><u>The community of Kai Lani, part of the greater Ko Olina Community Association (KOCA), is a beautiful 11-acre property that sits East of Paradise Cove. Built in 2004, it consists of 116 apartments spread across 30 buildings. Kai Lani is also the closest neighbor to the existing Paradise Cove with buildings approximately 300 feet away from the current fence line. Like other Ko Olina communities, Kai Lani contributes financially on an annual basis towards infrastructure such as road and pedestrian walkways maintenance, streetlights, staff and security, landscape of common elements, maintenance of public beaches, and restroom facilities. Our owners have voiced serious concerns over the DEIS both verbally, to myself and others, and in writing to you during this community consultation process. These are not trivial concerns; their basis revolves around various areas within the DEIS that lack detail to allow owners to understand the development of the project and its direct, and lasting, impact on Kai Lani. The areas of specific concern involve not just Kai Lani, but the serious impact it may have on other residential communities within Ko Olina as a whole. Riddled with broadly stated mitigations, in our opinion,</u></p>	<p><u>Kai Lani at Ko Olina AOAQ</u></p>	

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No.	Comments	Commenter	Responses
	<p><u>the DEIS does not contain appropriate, or sufficient information, to support their effectiveness or feasibility, thus putting our community uneasy of what the future may look like with the development of “The Cove”.</u></p> <p><u>Although underway since 2021, there has been little to no communication until May 2024. When the initial DEIS was discovered, there was a profound impact voiced by residents, to the size and scope of the new facilities. During a public presentation of the plan to attendees at the Makakilo/Kapolei/Honokai Hale Neighborhood Board meeting on May 22, nine people spoke eloquently and passionately in strong opposition to the project as described in the DEIS. The General Manager of the Ko Olina Resort, Mr. Ken Williams, detailed how the plan as proposed would adversely affect the whole of Ko Olina. Mr. Williams concerns and warnings were loudly heard by those from Kai Lani attending the meeting, especially when Kai Lani residents learned that the James Campbell Company would not be paying for the existing or future infrastructure; this caused great concern. Each speaker at the meeting voiced their concern that the planning process had not been transparent, and raised many concerns for which the DEIS did not provide answers.</u></p> <p><u>Of note, since that public meeting, members of the James Campbell Company have made efforts reach out to Kai Lani. They have addressed owners at a Kai Lani Board meeting on July 8 2024, and provided an opportunity to do a “walk-through” of the project on July 22, 2024. These actions were seen as a positive step towards community consultation by owners; however, it did not answer many questions, or address valid concerns. For some, it raised further concerns for which there were no answers.</u></p>		
Y.5.	<p><u>Kai Lani Resident Concerns:</u></p> <p><u>21. Open communication to include the input of all Ko ‘Olina AOA’s</u></p>	<p><u>Elizabeth and Richard Rubinstein</u></p>	
Y.6.	<p><u>We now know that although the study for an updated plan has been underway since 2021, (according to a city official), there has been almost no generally announced communication with the community until May of this year. The EIS effort finally surfaced on May 8th, announcing a new project that will be astonishingly 3 times larger than the present facilities. More recently, a public presentation of the plan was made by development representatives on May 22nd to attendees at Makakilo/Kapolei/Honokai Hale Neighborhood Board. Nine people spoke at the meeting, at length, in strong opposition to the plan. One of the most prepared speakers was the General manager of Ko Olina, who explained how the proposal would adversely affect the whole resort. No one spoke in favor of the proposed plan. All voiced concern that the planning process had not been transparent and raised many concerns for which the EIS did not provide answers. Meanwhile, the project proponents have not made provision for offering opportunities for interested parties at Ko Olina (of which there are many) to meet with the proponents of the project to ask questions and express concerns. Indeed, even the KOCA office had been excluded as of the May 22nd meeting, not-withstanding the major interests that it represents.</u></p>	<ul style="list-style-type: none"> • <u>William and Sara Barnes</u> • <u>Marilyn Harvey-Heinz & Don Heinz</u> 	
Y.7.	<p><u>It has come to our attention that although an updated plan has been under study since 2021, there was almost no community communication until May of this year. The EIS was only released on May 8th, announcing a new project that will be three times larger than the current facilities. A public presentation of the plan was made on May 22nd to attendees at the Makakilo/Kapolei/Honokai Hale Neighborhood Board meeting. Nine people, including Ken Williams, the General Manager of Ko Olina, and Kamaki Kanahele, the Director of the Native Hawaiian Traditional Health Center at Waianae and President of the Nanakuli Homestead Community Association, who called the plan “culturally destructive,” spoke strongly about the lack of community involvement with the design and raised numerous fundamental concerns about the plan. No one spoke in favor, and many raised concerns about the lack of transparency in the planning process and the numerous unanswered questions in the EIS. Despite the significant interest from the Ko Olina community, the project proponents have not provided</u></p>	<p><u>Eileen Meuris, Steve Meuris, and Marguerite Casillas</u></p>	

Table 7.3: Draft EIS Summary of Comments and Responses

No.	Comments	Commenter	Responses
	<u>opportunities for dialogue or addressed concerns from interested parties, including the KOCA office, as of the May 22nd meeting.</u>		
Y.8.	<u>9. Campbell LLC's Reputation:</u> <u>The expanded uses and congestion at PC threaten Campbell LLC's reputation and the community's well-being. Access to Lanikūhonua and the adjacent public beach may be compromised, degrading the visitor experience due to increased commercial activity.</u>	<u>Eileen Meuris, Steve Meuris, and Marguerite Casillas</u>	
Y.9.	<u>Campbell LLC is endangering its reputation, given its important role in Kapolei and Oahu and the historical family ownership of the adjacent Lanikūhonua property. And it is endangering the community of which it is a part. With expanded uses and congestion at PC, many questions arise as to how convenient access will be protected for Lanikūhonua and the adjacent public beach (home to endangered turtles and monk seals). The heightened commercial uses at PC appear to be completely incompatible with adjacent uses. It appears that future visits to Lanikūhonua will be degraded by this major expansion of commercial uses.</u>	<ul style="list-style-type: none"> • <u>William and Sara Barnes</u> • <u>Marilyn Harvey-Heinz & Don Heinz</u> 	
Y.10.	<u>This project has not been transparent from the beginning and has side stepped the homeowners & partners of this community. KOCA was not directly invited from the onset in the overall vision to ensure the community was not negatively impacted.</u>	<u>Marilyn Harvey-Heinz & Don Heinz</u>	
Z.	<u>Neighboring Communities</u>		<u>EIS Section 7.0</u>
Z.1.	<u>Our review indicates that the proposed project should have no adverse impacts on any Department of Community Services activities or projects in the surrounding neighborhood. Nevertheless, we ask that the applicant take into consideration the health, safety, accessibility, and long-term wellbeing of area residents and others living nearby and or involved with activities in the project vicinity.</u>	<u>Department of Community Services (DCS)</u>	<p><u>The Applicant acknowledges the comment. As discussed throughout the EIS, the Project will consider the health, safety, accessibility, and long-term wellbeing of residents in the surrounding area.</u></p> <p><u>The Project team has integrated several measures to address these comments. For health and safety, all relevant building and safety codes will be met, including fire, emergency access, and security protocols. The design of the project will incorporate safe pedestrian walkways and designated bike lanes to enhance accessibility and ensure the area is easy to navigate for residents and visitors alike.</u></p> <p><u>Additionally, ensuring long-term community well-being is a priority for the Project. The landscape and open space plans have been developed to promote community interaction and provide green, serene spaces for relaxation, recreation, and cultural activities.</u></p>
Z.2.	<p><u>Kai Lani Resident Concerns:</u></p> <p><u>10. Security in general to include 24-hour security protocols to address open access from Kai Lani Complex. Front entrance of Kai Lani is gated but the ocean side of the complex has open access that is adjacent to the proposed project complex situated along Lot 7, Federal rail access, and Lot 8.</u></p> <p><u>11. Project hours of operation and impact on Kai Lani community</u></p> <p><u>12. Construction duration and disruption for Kai Lani residents</u></p>	<u>Elizabeth and Richard Rubinstein</u>	<p><u>The Project will coordinate between existing security and HPD on an ongoing basis to ensure adequate police coverage is provided during construction activities that require police-assisted traffic guidance.</u></p> <p><u>The Project will include ancillary retail, restaurant, and gathering opportunities for residents and visitors to the Cove Property and may therefore increase the de facto on-site population during operating hours. However, increased demand for police services in the area is not anticipated. During operation of The Cove, additional private security on the property will be evaluated and considered, as needed.</u></p> <p><u>The anticipated construction duration is outlined in the EIS is approximately 24 months. The Project will implement BMPs to mitigate noise, dust, and traffic impacts during construction (see <i>Sections 4.9, 4.2.2, and 4.7.1</i>, respectively). Specific measures include limiting construction activities to normal working hours, utilizing noise-reducing equipment, and installing barriers to minimize noise pollution in sensitive areas, such as Kai Lani.</u></p> <p><u>Additionally, the Applicant will coordinate with local stakeholders to provide advance notice of construction activities and any temporary changes in traffic patterns or accessibility. During construction, the contractor will work with residents in the resort, including Kai Lani at Ko Olina, to address specific comments that may arise during construction and to ensure the safety and well-being of nearby residents.</u></p>
AA.	<u>Project Support</u>		<u>EIS Section 7.0</u>
AA.1.	<p><u>I am writing to express my support for The Cove Redevelopment, a significant project for the 'Ewa region. This endeavor, the first major upgrade in over 25 years, is crucial for creating a modern, authentic Native Hawaiian gathering place for both locals and visitors.</u></p> <p><u>The Cove Redevelopment will transform the area into a vibrant hub by modernizing facilities and expanding dining, retail, and entertainment options. Key features include welcoming food and beverage establishments, family-friendly entertainment, and preserved open spaces, making it a central attraction for the community.</u></p>	<u>Kūhiō Lewis, Council for Native Hawaiian Advancement</u>	<p><u>The Applicant acknowledges the support for The Cove Redevelopment project and appreciates the recognition of the cultural, economic, and community benefits that this Project is anticipated to bring to the 'Ewa region.</u></p> <p><u>As noted, this redevelopment marks the first major upgrade to the Cove Property in over 25 years, and the Applicant is committed to creating a space that honors both the rich history of 'Ewa and the evolving needs of the community. The inclusion of cultural elements such as the upgraded amphitheater, cultural pavilion, and outdoor lawns will offer unique opportunities for cultural education and preservation, which are central to the purpose of the Project. By showcasing "Made in Hawai'i" products and promoting local artisans, we aim to foster economic growth that benefits the entire region.</u></p>

Table 7.3: Draft EIS Summary of Comments and Responses

No.	Comments	Commenter	Responses
	<p><u>Cultural education and preservation are at the heart of this project. Plans include a cultural pavilion, a "village walk," a canoe/beach hālau, and a hula lawn. Traditional hale built by master hale builder Kaina Makua will provide educational opportunities, honoring the history and traditions of 'Ewa and Honouliuli.</u></p> <p><u>Economically, the project will double current employment, creating approximately 480 full-time jobs and supporting local businesses and "Made in Hawai'i" products. This development will significantly boost the local economy, providing new opportunities for growth and prosperity.</u></p> <p><u>The performing arts venue will present an authentic Native Hawaiian show, enhancing the visitor experience and offering a deeper understanding of Hawaiian culture. Pedestrian pathways and cultural pavilions will improve site connectivity and offer rich cultural interactions for all visitors.</u></p> <p><u>The Cove Redevelopment is committed to maintaining open spaces and preserving ocean views. Structures will be set back from the shoreline, ensuring resilience and respect for the natural environment.</u></p> <p><u>This development will bring substantial benefits to the 'Ewa region by respecting cultural heritage, supporting local businesses, and fostering economic growth. I fully support The Cove Redevelopment and its positive impact on our community.</u></p>		<p><u>It is the Applicant's vision that The Cove provide a vibrant gathering place where both locals and visitors can come together to celebrate Hawaiian culture, enjoy this special place, and contribute to the ongoing prosperity of the 'Ewa region.</u></p>
AA.2.	<p><u>The Cove Redevelopment is sorely needed on our side of O'ahu and I was privileged to have been included in its planning from its onset many years ago. I am a native Hawaiian who is a native speaker of Hawaiian and have been teaching Hawaiian language, lore, history, and culture in collegiate and school systems here in Hawai'i. I currently reside in Nānākuli Hawaiian Homestead and am currently in my 53rd year as a <i>kumu hula</i>.</u></p> <p><u>I believe it was in 2017 when I came onboard with this project when I was asked for my opinion. At that time, I thought that the architectural concepts were insulting and so was the overall feel for the development. I freely gave my opinions in advocating for a sense of place that would benefit and be meaningful to the kama'āina. I left that initial meeting not expecting anything of what I had expressed to be taken seriously. I was mistaken.</u></p> <p><u>Upon reviewing the latest development plans about 2 months ago, I was pleasantly surprised that my opinion mattered. The kinds of businesses and venues reflected what will be a place where the kama'āina will feel that they have a place there. I am sure that the malihini will find that being there will also add to their experience of being in a Hawai'i that they came to see.</u></p> <p><u>The low-rise density, ocean views and open spaces are being thoughtfully preserved. These inclusions will naturally allow for cultural activities to come to life. The shoreline and other preserved open spaces are not only beautiful but also reflects the care that the Campbell Company has for legacy lands.</u></p> <p><u>I have been working with Tihati Productions in producing a venue that reassures that visitors will be treated to a carefully thought through, place-based experience. It will go beyond mere entertainment to be "edutainment".</u></p> <p><u>The Cove Redevelopment will be good for 'Ewa and Wai'anae Coast in that the responsible economic growth will foster local businesses, entrepreneurs, and cultural heritage avenues. Currently, many of these endeavors are possible largely in Honolulu. Without any reservation, I wholeheartedly support The Cove Redevelopment.</u></p>	J. Kimo Alama Keaulana	<p><u>The Applicant appreciates the detailed comments and your ongoing contributions to The Cove Redevelopment. The extensive knowledge and experience brought forth, particularly as a kumu hula and educator of Hawaiian language, culture, and history, have been instrumental throughout the planning process.</u></p> <p><u>Comments raised early in the process were noted and the current design reflects authentic cultural values and a deep sense of place. Feedback provided during the initial stages was essential in reshaping the development to honor the heritage of the 'Ewa region, ensuring that the space will resonate with kama'āina while being welcoming to malihini.</u></p> <p><u>The Applicant acknowledges and thanks the commenter for the recognition that the Project will incorporate authentic Hawaiian programming and foster responsible economic growth in the 'Ewa and Wai'anae Coast.</u></p>
BB.	No Comment		EIS Section 7.0
BB.1.	We have no comments to offer at this time as the proposed project does not impact any of the Department of Accounting and General Services' projects or existing facilities.	Department of Accounting and General Services (DAGS)	The Applicant acknowledges the agencies and utility that do not have additional comments on the Project at this time. Relevant agencies and utilities will continue to be apprised of the Project as it progresses.
BB.2.	We have no additional comments.	DLNR Engineering Division	
BB.3.	The Hawaii State Department of Education previously provided comments and has no additional comments on this project.	State Department of Education (DOE)	

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No.	Comments	Commenter	Responses
BB.4.	<u>Thank you for the opportunity to comment on the above project. The State of Hawai'i Department of Defense has no comments to offer relative to the project currently.</u>	<u>State Department of Defense (DOD)</u>	
BB.5.	<u>We have no comments at this time, as we do not have any facilities or easements on the subject property.</u>	<u>Department of Facility and Maintenance (DFM)</u>	
BB.6.	<u>Thank you for the opportunity to review and comment. The Department of Design and Construction has no comments to offer at this time.</u>	<u>Department of Design and Construction (DDC)</u>	
BB.7.	<u>Thank you for the opportunity to comment on the subject project. Hawaiian Electric Company has no objection to the project. Should Hawaiian Electric have existing easements and facilities on the subject property, we will need continued access for maintenance of our facilities. We appreciate your efforts to keep us apprised of the subject project in the planning process. As the proposed Cove at Ko Olina Redevelopment project comes to fruition, please continue to keep us informed.</u>	<u>Hawaiian Electric Company (HECO)</u>	

Section 8

References

Section 8

References

Documents

- City and County of Honolulu, Board of Water Supply. 2017. *‘Ewa Watershed Management Plan*.
- City and County of Honolulu, City Council. 1993. Resolution No. 93-318 Granting a Special Management Area Use Permit for Redevelopment of Paradise Cove.
- City and County of Honolulu, Climate Change Commission. July 2022. *Sea Level Rise II – Guidance Document*. Adopted June 5, 2018, updated July 29, 2022.
- City and County of Honolulu, Department of Planning & Permitting. 1992. *General Plan*.
- City and County of Honolulu, Department of Planning & Permitting. 2020. *‘Ewa Development Plan*. Prepared by DPP.
- City and County of Honolulu, Department of Planning & Permitting. Administrative Rules, Title 20, Chapter 3, *Rules Relating to Water Quality*.
- City and County of Honolulu, Department of Planning & Permitting. 1999. *Land Use Ordinance*.
- City and County of Honolulu, Office of Climate Change, Sustainability and Resiliency. 2021. *Multi-Hazard Pre-Disaster Mitigation Plan 2020*.
- City and County of Honolulu Police Department. 2022. *Honolulu Police Department Annual Report 2021*.
- City and County of Honolulu. Ordinance No. 86-09. Unilateral Agreement and Declaration for Conditional Zoning. *Re-zoning of West Beach Estates, now known as Ko Olina Resort*.
- City and County of Honolulu. Ordinance No. 89-27. Unilateral Agreement and Declaration for Conditional Zoning. *Re-zoning of the Cove Property*.
- Community Planning, Inc. 2003. *Engineering Report for the Kapolei Interceptor Sewer, Ewa, Oahu, Hawaii*. Prepared for The Estate of James Campbell, Housing and Community Development Corporation of Hawaii, Ko Olina Intangibles, LLC, and Finance Realty. September 2003.
- Cultural Surveys Hawai‘i, Inc. 2020. *Draft Archaeological Inventory Survey Report for The Cove Redevelopment Project, Honouliuli Ahupua‘a, ‘Ewa District, O‘ahu*. Prepared for the James Campbell Company, LLC. ~~February 2020~~ November 2024.

- Cultural Surveys Hawai'i, Inc. 2022. ~~Draft~~ *Cultural Impact Assessment for The Cove Redevelopment Project, Honouliuli Ahupua'a, 'Ewa District, O'ahu*. Prepared for the James Campbell Company, LLC. November ~~2022~~2024.
- Environmental Economics, LLC. 2024. *Final Economic Impact Report for the Cove Redevelopment*. ~~May-August~~ 2024.
- Estate of James Campbell, The. 1989. Unilateral Agreement and Declaration for Conditional Zoning. February 13, 1989.
- Federal Aviation Administration. 2016. Technical Assistance Memorandum (TAM) for Federal Aviation Administration Order 5190.6B. Issued August 1, 2016.
- Fehr & Peers. 2024. *Parking Management Plan for The Cove Redevelopment Project*. Prepared for James Campbell Company. ~~May 28, 2024~~ November 18, 2024.
- Fletcher III, Charles H., Eric E. Grossman, Bruce M. Richmond, and Ann E. Gibbs. 2002. Atlas of Natural Hazards in the Hawaiian Coastal Zone. Geologic Investigations Series I-2761. U.S. Department of Interior and U.S. Geological Survey. 2002.
- G70. 2024. *The Cove Redevelopment Preliminary Engineering Report*. Prepared for Campbell Hawai'i Investor, LLC. ~~March~~ November 2024.
- Giambelluca, T.W., Q. Chen, A.G. Frazier, J.P. Price, Y.-L. Chen, P.-S. Chu, J.K. Eischeid, and D.M. Delporte. 2013. *Online Rainfall Atlas of Hawai'i*. Bulletin of the American Meteorological Society, Volume 94, pp. 313-316, doi: 10.1175/BAMS-D-11-00228.1.
- Giambelluca, T.W., X. Shuai, M.L. Barnes, R.J. Alliss, R.J. Longman, T. Miura, Q. Chen, A.G. Frazier, R.G. Mudd, L. Cuo, and A.D. Businger. 2014. *Evapotranspiration of Hawai'i*. Final report submitted to the U.S. Army Corps of Engineers – Honolulu District, and the Commission on Water Resource Management, State of Hawai'i. University of Hawai'i at Mānoa, Honolulu.
- Hawai'i Climate Change Mitigation and Adaptation Commission. 2017. *Hawai'i Sea Level Rise Vulnerability and Adaptation Report*. Prepared by Tetra Tech, Inc. and the State of Hawai'i Department of Land and Natural Resources, Office of Conservation and Coastal Lands, under the State of Hawai'i Department of Land and Natural Resources Contract No: 64064.
- Hawai'i Tourism Authority. 2020. *Hawai'i Tourism Authority Strategic Plan 2020-2025*.
- Hawai'i Wildfire Management Organization. 2016. *Community Wildfire Protection Plan for Western O'ahu*.
- Landscape Industry Council of Hawai'i. 2012. Landscape Irrigation Conservation Best Management Practices.
- Intergovernmental Panel on Climate Change. 2014. *Climate Change 2014: Synthesis Report. Contribution of Working Groups I, II and III to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change* [Core Writing Team, R.K. Pachauri and L.A. Meyer (eds.)]. IPCC, Geneva, Switzerland, 151 pp.

PBR Hawai'i and Associates. 2024. *Conceptual Landscape Plan and Plant Palette for The Cove*. Prepared for the James Campbell Company, LLC.

Phillips Brandt Reddick and Associates, Inc. 1986. *Urban Design Provisions for West Beach, Prepared for West Beach Estates (May 1986)*.

State of Hawai'i. *Hawai'i Revised Statutes, Chapter 205, Land Use Commission*.

State of Hawai'i. *Hawai'i Revised Statutes, Chapter 205-A, Coastal Zone Management Act*.

State of Hawai'i. *Hawai'i Revised Statutes, Chapter 226, Hawai'i State Plan*.

State of Hawai'i. *Hawai'i Revised Statutes, Chapter 343, Environmental Impact Statements*.

State of Hawai'i Department of Health, Clean Water Branch. 2022. *2022 State of Hawai'i Water Quality Monitoring and Assessment Report (Public Comment Update)*. Integrated Report to the U.S. Environmental Protection Agency and the U.S. Congress Pursuant to §303(d) and §305(b), Clean Water Act (P.L. 97-117).

State of Hawai'i Office of Planning and Sustainability. 2021, June. *Hawai'i 2050 Sustainability Plan: Charting a Course for the Decade of Action (2020-2030)*.

U.S. Fish and Wildlife Service, 2023. *Information for Planning and Consultation: Species Resource List*.

U.S. Geological Survey. 1997. *Summary of the O'ahu, Hawai'i Regional Aquifer – System Analysis*. U.S. Geological Survey Professional Paper 1412-A.

William E. Wanket, Inc. 1993. *Paradise Cove: Final Environmental Assessment for Special Management Area Use Permit (SMP) and Conditional Use Permit (CUP), Type 2*. August 1993.

Wilson Okamoto Corporation. 2024. *Traffic Impact Report for The Cove Redevelopment*. Prepared for James Campbell Company LLC. ~~March~~ November 2024.

Y. Ebisu & Associates. 2024. *Acoustic Study for The Cove Redevelopment, O'ahu, Hawai'i*. ~~May~~ September 2024.

Websites

City and County of Honolulu, Department of Emergency Services. EMS Unit Locations. Retrieved from <https://emergencyservices.honolulu.gov/emergency-medical-services/ems-unit-locations/>. Accessed January 2024.

City and County of Honolulu, Department of Parks and Recreation. Park Locations and Facilities. Retrieved from <https://www.honolulu.gov/parks/default/park-locations.html>. Accessed January 2024.

City and County of Honolulu, Department of Planning and Permitting. Urban Design Plans. Retrieved from <https://www.honolulu.gov/dpp/planning/planning-documents/urban-design-plans.html>. Accessed October 2024.

City and County of Honolulu, Honolulu Fire Department. *Fire Operations*. Retrieved from: <https://fire.honolulu.gov/about-hfd/fire-operations>. Accessed January 2024.

Coastal Geology Group in the School of Ocean and Earth Science and Technology (SOEST) at the University of Hawai'i. 2021. Hawai'i Shoreline Study. Retrieved from <https://www.soest.hawaii.edu/crc/index.php/hawaii-shoreline-study-web-map>.

Commission on Water Resource Management, State of Hawai'i. 2018. Hydrologic Units Maps: Island of O'ahu. Retrieved from: https://files.hawaii.gov/dlnr/cwrp/maps/gwhu_oahu.pdf. Accessed October 2024.

Hawai'i State Public Library System. All 51 Branches. Retrieved from: <https://www.librarieshawaii.org/visit/branches/all-branches/>. Accessed January 2024.

State of Hawai'i, Department of Education. *School Finder*. Retrieved from: <https://www.hawaiipublicschools.org/ParentsAndStudents/EnrollingInSchool/SchoolFinder/Pages/home.aspx?fr2=Campbell-Kapolei&fx=true#k=%20%20owstaxIdComplexArea%3ACampbell-Kapolei>. Accessed January 2024.

State of Hawai'i Department of Health, Clean Air Branch. Hawaii Ambient Air Quality Data. Retrieved from: <https://air.doh.hawaii.gov/home/map>. Accessed January 2024.

State of Hawai'i, Department of Health. Hazard Evaluation and Emergency Response System. Retrieved from: <https://eha-cloud.doh.hawaii.gov/iHEER/#!/viewer>. Accessed January 2024.

United States Census Bureau, American Fact Finder. 'Ewa Census County Division Census Data. Retrieved from: <https://data.census.gov/table?q=Ewa%20CCD,%20Honolulu%20County,%20Hawaii>. Accessed March 2024.

United States Environmental Protection Agency. Reduced Urban Heat Island Effect. Retrieved from: <https://www.epa.gov/green-infrastructure/reduce-urban-heat-island-effect>. Accessed March 2024.

Preparers of the EIS

Section 9

Preparers of the EIS

Below is a list of individuals that contributed to the preparation and completion of this EIS. The list includes the name of the individual and their role, or the name of the company and the subfield of professional expertise utilized to conduct and complete the EIS.

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Matt Caires

Title

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Manager, Development

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Title

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Senior Project Planner

Principal Engineer

Project Engineer

Project Planner

GIS Specialist

Graphics

Administrative Support

Technical Consultants

Bench Dog Architects

Cultural Surveys Hawai'i

Environmental and Economics LLC

Fehr & Peers

PBR Hawai'i and Associates

Wilson Okamoto Corporation

Y. Ebisu & Associates

Area of Specialty

Architectural Design

Archaeological Inventory Survey,
Cultural Impact Assessment

Economic Impact Report

Parking Management Plan

Landscape Architecture

Traffic Impact Report

Acoustic Assessment