

# **EAST HONOLULU SUSTAINABLE COMMUNITIES PLAN TECHNICAL REPORT**



**1999 TO 2020**

**Volume 1 of 2**

**DEPARTMENT OF PLANNING AND PERMITTING  
CITY AND COUNTY OF HONOLULU  
SEPTEMBER 2020**

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- Appendix A.** Draft Adopting Ordinance for the Final Proposed Revised East Honolulu Sustainable Communities Plan
- Appendix B.** Summary of Comments on the 2019 Public Review Draft with DPP Responses

## Volume 2 of 2

- Appendix C.** Vision Scorecard
- Appendix D.** Scenic View Inventory 2016
- Appendix E.** January 2005 Orientation Workshop Documentation
- Appendix F.** September 2012 Community Outreach Workshop Documentation
- Appendix G.** Climate Change Workgroup Documentation
- Appendix H.** 2019 Community Workshops on the Public Review Draft Documentation
- Appendix I.** Statement of Conformance with the General Plan

All **East Honolulu Sustainable Communities Plan** review products, including this **Technical Report**, and the proposed revised **East Honolulu Sustainable Communities Plan**, in both the "clean" version proposed to be adopted by reference and in the modified Ramseyer version showing how the proposed revised **Plan** differs from the adopted 1999 **Plan**, are available on the Department of Planning and Permitting website: <http://www.honoluludpp.org>

# EXECUTIVE SUMMARY

This **Technical Report** documents the process of reviewing, revising, and preparing recommendations to the **East Honolulu Sustainable Communities Plan** ("**Plan**"), an update to the adopt 1999 **Plan**. The review covered major issues identified during the various processes of public input, written comments and suggestions received since 1999, issue analysis, and an evaluation of the implementation of the 1999 **Plan**.

The Report is organized into the following Chapters and Appendices:

## Volume 1

- Section 1 describes the overall planning process and community participation program that was followed, with a discussion of the various project phases.
- Section 2 describes and analyzes the major issues and concerns facing the community and how the vision and policies have been implemented during the review process.
- Section 3 summarizes the major revisions proposed in the **Revised Plan**, with a brief explanation of the rationale for the revision.
- Section 4 offers consideration when conducting future **Plan** reviews.
- **Appendix A** includes the Proposed Draft Ordinance
- **Appendix B** contains a summary of comments and DPP responses on the 2019 **Public Review Draft**

## Volume 2

- Other background information, including workshop documentation, can be found in the **Appendices C** through **I**
- The appendices will be available online at <http://www.honoluluodpp.org/Planning/DevelopmentSustainableCommunitiesPlans/EastHonoluluPlan.aspx> or on CD upon request.

## **Purpose of the Review**

Background. In 1992 the City Charter was amended to change the definition of Development Plans from "relatively detailed" plans to "conceptual schemes" for implementing General Plan development objectives and policies.

The amendments also established that the purpose of the Development Plans is to provide:

- "priorities . . . [for the] coordination of major development activities", and
- sufficient description of the "desired urban character and the significant natural, scenic and cultural resources" to guide zoning and "public and private sector investment decisions."

Revision Program. In response to the City Charter amendments, the City began comprehensive revisions of the eight Development Plans. The second plan to be revised is the East Honolulu Sustainable Communities Plan, which was adopted as Ordinance 99-19 in 1999.

Review Requirement. As adopted in 1999, the Plan called for a review every five years. The results of the five-year review and any recommended revisions to the Plan are then sent to the Planning Commission for further review and recommendation, and then to the City Council for review and passage as an Ordinance. Opportunities for public hearings and input are provided through presentations to the community, at Neighborhood Board Meetings, at public workshops, and during the periods of Planning Commission and City Council review. The proposed draft ordinance recommends shifting review of the Plan to every ten years from adoption.

Findings. As specified in the adopting ordinance and in the Plan, three basic questions are to be addressed in the review. The three questions are as follows:

1. Are the Plan's vision, policies, principles, guidelines, and implementation methods still appropriate?
2. Is the purpose of the Plan's guidelines being achieved?
3. Should the priorities in the Plan be revised?

Each of these issues was analyzed to determine if the **Plan** needed to be revised to better address the issue and if better implementation of the **Plan** vision and policies were needed. Detailed discussion and analysis of the issues can be found in **Section 2** of this **Technical Report**. A summary of proposed **Plan** changes and implementation recommendations based on the major issues can be found in **Section 3** of this **Review Report** with a summary shown below in the **Table ES-1**.

**TABLE ES-1: SUMMARY OF RECOMMENDATIONS**

CGB	<ul style="list-style-type: none"> <li>○ Identify that the change in terminology in the <b>Plan</b> is to be consistent with other DPs and SCPs. The change may eliminate the term “agricultural boundary” but it will keep agricultural areas outside the CGB to protect and retain the existing agricultural areas.</li> <li>○ Remove references to a preservation boundary. Land is either inside or outside of the CGB. There is no proposed change to the interpretation from the UCB to the CGB. The purpose of both tools is to direct development away from one region and into another.</li> <li>○ Adjust maps by moving the existing 17 acre Leolani development in Kamilo Nui Valley into residential from agriculture and shifting the CGB accordingly based on 2000 construction.</li> <li>○ Look into designating lands vulnerable to slides into Preservation and outside of the Community Growth Boundary.</li> <li>○ Consider placing outside the CGB undeveloped lands of Kamehame Ridge, Kalama Valley, and Wai’alae Nui.</li> <li>○ Encourage the amending of the State Land Use District to be consistent with zoning and the <b>Plan</b>.</li> </ul>
Trail Access	<ul style="list-style-type: none"> <li>○ Include a table with the status of all known surveyed trails and their availability to accompany or replace <b>Figure 3-1</b>.</li> <li>○ Site “the absence of public access to Hawai‘i’s shorelines and inland recreational areas constitutes an infringement upon the fundamental right of free movement in public space and access to and use of coastal and inland recreational areas,” HRS 115-1, and site HRS 171 (“All county public highways and trails once established shall continue until vacated, closed, abandoned, or discontinued by a resolution of the legislative body of the county wherein the county highway or trail lies. All state trails once established shall continue until lawfully disposed of pursuant to the requirements of chapter 171”).</li> <li>○ Include language recommended by the HTMC recognizing the need for a City Resource Management Program. Also recognize the demand for outdoor recreational activities in unmaintained and undeveloped areas</li> </ul>

	<p>will increase regardless of whether there a Resource Management Program in place.</p> <ul style="list-style-type: none"> <li>○ Include language supportive of keeping open East Honolulu trails, particularly Mariners Ridge, Niu Valley, and Kamilo Nui Valley.</li> <li>○ Encourage greater facilitation between land owners, users of inland recreation areas, and DLNR regarding the opening or closing of private access trails.</li> </ul>
<p>Beach Access</p>	<ul style="list-style-type: none"> <li>○ Keep language recommending the acquiring of three public access points along Portlock Road unless the community can come to some consensus over other mechanisms ensuring that it is not a unilateral decision that is blocking public access.</li> <li>○ Add language to the <b>Plan</b> that residents shall notify the City, the DLNR, and community association (if applicable) if an existing public ROW becomes blocked.</li> <li>○ Reference HRS which recognizes shoreline access in <b>Section 3.1.2</b> and/or <b>3.1.3.6</b>.</li> <li>○ Identify the impacts that SLR and beach erosion will have on diminishing lateral shoreline access. Recognize the impacts that armoring or hardening the shoreline have to adjacent beaches as well as to lateral access.</li> <li>○ Acknowledge landowners of oceanfront properties are responsible for maintenance of the vegetation so as to not encroach into the public ROW.</li> </ul>
<p>Parks</p>	<ul style="list-style-type: none"> <li>○ <b>Table 3-1 Types of DPR Island-Based Parks:</b> <ul style="list-style-type: none"> <li>● Botanical Gardens “<del>Areas developed for the recreational and educational appreciation of specific types of plants and plant communities. Areas to plan, develop, curate, maintain and study documented dryland plants for the purposes of conservation, botany, horticulture, education and passive recreation.</del>”</li> </ul> </li> <li>○ <b>3.2.4.1 Passive or Nature Parks:</b> <ul style="list-style-type: none"> <li>● Preserve and enhance Koko Head Regional Park’s coastal-oriented recreational and educational resources by implementing when funding is available, the following: <ul style="list-style-type: none"> <li>- <del>Develop new trails in and around Koko Crater</del> <u>Develop new walking/hiking trails within Koko Crater Botanical Garden for better viewing of plant collections.</u></li> <li>- <u>Prohibit access to any trails or paths from outside of Koko Crater Botanical Garden to the garden.</u></li> </ul> </li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>- <u>Protect the fragile topography by restricting recreational uses such as horseback riding to areas apart from the conservation plant collections.</u></li> <li>- <u>Continue to develop Koko Crater Botanical Garden as a conservation site of global importance for rare and endangered species from Hawai'i and other tropical dryland areas.</u></li> </ul>
Kaiwi	<ul style="list-style-type: none"> <li>o Revise <b>Section 3.2.1.2</b>, Kaiwi Scenic Shoreline to reflect the DLNR's scaled back vision for a more natural and undeveloped recreational area. Any recreational developments should be consistent with the vision for the area: to preserve as an undeveloped, rugged coastline.</li> <li>o Ensure consistency in maps. All views identified in the viewshed map should also be identified in the <b>Open Space Map</b>.</li> </ul>
Hanauma Bay	<ul style="list-style-type: none"> <li>o Revise <b>Section 3.1.2.5</b> to say that Hanauma Bay is closed once a week (remove Wednesday).</li> <li>o Smoking is banned at all beach parks, so the <b>Plan</b> can also omit smoking language in Hanauma Bay.</li> </ul>
Water Quality	<ul style="list-style-type: none"> <li>o Identify in the <b>Plan</b> some of the assets and users of Maunalua Bay: character and aesthetics, recreation, fishing, commerce, culture, habitat, etc.</li> <li>o Recognize the boundary limit of the <b>Plan</b> and City jurisdiction is at the certified shoreline but also that land use decisions have downstream impacts extending into marine environments.</li> <li>o Encourage stewardship of natural resources including Maunalua Bay. Identify recent conservation victories as a result of public fundraising and political pressure to instill the community with confidence of what is achievable with organization.</li> <li>o Encourage agricultural BMPs to mitigate stormwater runoff from agricultural lands and stockpiling.</li> <li>o Add an explanation of what a LID is and that it is required when redeveloping properties over an acre.</li> <li>o Promote stormwater retention and State water quality standards when redeveloping lands.</li> <li>o Promote permeable surfaces as a goal of redevelopment to reduce stormwater runoff to the bay and partially restore its ecological function.</li> <li>o Encourage landscaping on roadways to serve a greater ecological function like intercepting runoff and filtering oils and sediment from the roadways.</li> <li>o Encourage Best Marina Practices.</li> </ul>

	<ul style="list-style-type: none"> <li>○ Reaffirm that the great lawn, though within the CGB, is still in preservation. Identify potential, natural improvements to improve ecological function while retaining open, undeveloped character.</li> <li>○ Clean up contaminated areas that pose hazards to soil and water quality.</li> <li>○ Maintaining inadequate infrastructure does not improve downstream impacts. Incorporate mitigative measures or installation of permanent BMPs when repairing or resurfacing roadways similar to what should be considered as part of Complete Streets evaluation process.</li> <li>○ Insert language that projects shall comply with the Clean Water Act.</li> </ul>
Natural Resources	<ul style="list-style-type: none"> <li>○ Discourage further alteration of the coastline. Recognize the adverse impacts armoring has on adjacent areas as a disruptor to natural processes.</li> <li>○ Map wetlands, riparian zones, fishponds, and springs.</li> <li>○ Encourage water conservation measures and repairs to the distribution system.</li> <li>○ Work with the O’ahu Invasive Species Council (OISC) to combat the spread of invasive species in upland areas through public education.</li> <li>○ Encourage hiking organizations and their members to identify invasive species. Encourage the OISC to teach hiking organizations how to report or remove invasive species along trails</li> </ul>
Cultural and Historic Resources	<ul style="list-style-type: none"> <li>○ Remove sections detailing where some of the known artifacts or burials are for sensitivity and protection.</li> <li>○ Include a description of the Hāwea Heiau and Pāhu’a Heiau complexes in <b>Section 3.4.1</b> and include on a map and table.</li> <li>○ Ensure correct Hawaiian spelling of place names in the document and on maps. Potentially provide Hawaiian place names in an index.</li> </ul>
Complete Streets	<ul style="list-style-type: none"> <li>○ The <b><u>Plan</u></b> should include policy recommendations from the <b><u>Honolulu Complete Streets Design Manual</u></b> and the <b><u>Statewide Pedestrian Master Plan</u></b>. <ul style="list-style-type: none"> <li>● Encourage greater pedestrian connections to commercial centers, parks, beaches, and schools.</li> <li>● Discourage gated communities. Encourage existing gated communities to improve adjacent streetscape and to disguise the public-private boundary.</li> <li>● The <b><u>O’ahu Pedestrian Plan</u></b> will likely be released within the next year.</li> </ul> </li> <li>○ Any redevelopment along the marina waterfront should maximize views of the marina and construct connected pedestrian walkways along the</li> </ul>

	<p>waterfront. Encourage greater connections of existing walkways and sidewalks and consider pedestrian elements in any marina hardening.</p> <ul style="list-style-type: none"> <li>○ Pocket parks and small neighborhood parklets should be encouraged in residential areas with a high proportion of senior residents.</li> <li>○ Consider including a dedicated section of the <b>Plan</b> to Pedestrian Comfort and Safety with special attention paid to transit stop locations; include a map of the improved pedestrian access in Hawai'i Kai Marina called for in the <b>Plan</b>, including a bridge to the Koko Marina Shopping Center.</li> <li>○ Emphasize importance of age-friendly design for any new parks and improvements such as the expansion of Koko Head Park and the proposed Kaiwi Scenic Shoreline.</li> <li>○ Target areas for pedestrian improvements that have “high pedestrian potential,” particularly around schools and elderly homes.</li> <li>○ Encourage sidewalk improvements along Kalaniana'ole Highway consistent with the <b>Statewide Pedestrian Master Plan</b>.</li> <li>○ Pedestrian improvements enable those of all ages and abilities to walk and bike to nearby destinations in their community.</li> <li>○ Encourage better integration between mass transit and bicycle facilities.</li> <li>○ Seek multi-use path opportunities.</li> <li>○ Street design should encourage appropriate speeds (traffic calming). Residential streets should be designed for neighborhood speeds.</li> <li>○ Include bikeway connections on maps to areas outside of East Honolulu.</li> <li>○ Revise <b>Figure 4-1</b> to include the proposed bikeway facilities identified in the 1999 <b>Plan</b>, <b>O'ahu Bike Plan</b>, and <b>Bike Plan Hawai'i</b>.</li> <li>○ Add language to the <b>Plan</b> that lighting should be shielded downward, especially in public viewing areas including stationary point lookouts and along significant view planes.</li> <li>○ Add language that consideration for additional lighting or changes to existing lighting should seek to maintain or improve night sky visibility.</li> </ul>
<p>Housing Character</p>	<ul style="list-style-type: none"> <li>○ Emphasize that anticipated growth on O'ahu is directed toward the Primary Urban Center, Central O'ahu, and the 'Ewa Plain with little to no growth projected for East Honolulu.</li> <li>○ With the anticipated aging population in East Honolulu, incorporate senior needs to housing needs.</li> </ul>
<p>Commercial and Mixed</p>	<ul style="list-style-type: none"> <li>○ Create mixed-use hubs and increase rental housing stock by allowing residential uses above commercial in B-1 and B-2 zoned areas, with a priority given to Kalama Village Shopping Center and Koko Marina</li> </ul>

<p>Use Centers</p>	<p>Shopping Center. Kalama Village has already been called out in the <b>Plan</b> as an under-utilized commercial development that should be re-designated for residential. Consideration should be given on how to keep such units affordable.</p> <ul style="list-style-type: none"> <li>○ Change language to encourage community basic needs and services in the Koko Marina Shopping Center based on neighborhood demographics.</li> <li>○ Encourage the co-location of housing and community basic needs and services in the Kalama Village Shopping Center.</li> </ul>
<p>Climate Change / Sea Level Rise</p>	<ul style="list-style-type: none"> <li>○ Add a policy requiring analysis of the possible impact of sea level rise for new public and private projects in shoreline areas and low-lying areas and incorporation of mitigations where appropriate and feasible.</li> <li>○ Explain that while the causes of sea level rise are global, the impacts are local.</li> <li>○ Recognition of the Precautionary Principle in changes in land uses, particularly to areas that are projected to be impacted by Sea Level Rise.</li> <li>○ Add language clarifying that the policy calling for expansion of shoreline setbacks should be based on the current projections of shoreline erosion rates.</li> <li>○ Identify the threats of coastal erosion and sea level rise as two distinct natural processes that will both increase the long-term exposure of an area to marine hazards which are combined, with other factors, to form the SLR-XA layer.</li> <li>○ Recognize that the impacts of climate change will lead to greater uncertainty in projections, recognizing that the projections generally do not decrease, that may deviate from historical records and understanding of natural processes.</li> </ul>
<p>Disasters and Hazards</p>	<ul style="list-style-type: none"> <li>○ Redevelopment along drainage canals should incorporate landscaping to intercept runoff prior to entering into drainage canal.</li> <li>○ Add new policies to address the shortfall in shelter capacity and hurricane readiness.</li> <li>○ Keep or strengthen language that the DOE should coordinate with the HI-EMA and DEM agencies regarding the design of school facilities to be used as public hurricane shelters.</li> <li>○ Identify in the <b>Plan</b> areas most prone to coastal flooding.</li> <li>○ Adopt a “build back better” resiliency strategy that, in the event of a disaster, vulnerable areas along the shoreline or adjacent to streams that suffered significant damages would not be allowed to be redeveloped. Restore the ecological function of the lands that have</li> </ul>

	<p>been retreated from to serve as a buffer zone to protect inland areas from further damages.</p> <ul style="list-style-type: none"><li>○ Express desire to map Repetitive Loss areas and to determine how areas are built back in the event of a disaster.</li><li>○ Incorporate all-hazard assessments in land development application process.</li><li>○ Remove <b>Figure 2-2</b> Suspect Areas for Land Movement without more updated information than from a 1995 general soil study.</li><li>○ Identify stockpiling issues and the potential impacts that runoff has on downstream water quality.</li></ul>
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# 1. THE REVIEW PROCESS

The **East Honolulu Sustainable Communities Plan** (“**Plan**”) was adopted by Ordinance 99-19 in May of 1999. A comprehensive review of the **Plan** is required to begin five years after the adoption of the ordinance. The Department of Planning and Permitting (DPP) had three major goals for the review:

1. Evaluate the **Plan** and recommend appropriate revisions and implementing actions;
2. Involve and encourage public participation with the community in the review; and,
3. Submit a **Technical Report** and **Proposed Revised Plan** to the City Council as soon as possible, given limitations on staffing and funding.

## 1.1 Process and Milestone Events

Below are highlights of starting and re-starting of the public review process for the **Plan**. Public input and review is not limited to these milestones. Internal research has been conducted throughout these periods as well as hosting interviews and talk stories with various community leaders, organizations, and government agencies.

### 1999-2005

The review of 1999 **Plan** began in 2004, with research on land use, socio-economic trends, development proposals, and issues and concerns in the region since the **Plan**'s adoption. On January 15, 2005 a community workshop on the **Plan** was held at the 'Āina Haina Library.

During the latter half of 2005, a briefing package and overview presentation were prepared, and interviews begun with community leaders, land owners, developers, community groups, concerned residents and others with interests in East Honolulu.

Review found that policies from the **Plan** were still relevant and that further resources would not need to be expended on revisions to the **Plan**. The Department continued to solicit comments and performed outreach through individual interviews with residents, stakeholders, and policy makers. Documentation of the January 15, 2005 workshop is included in **Appendix E**.

## **2006-2012**

Due to limited resources, the **Plan** did not undergo a comprehensive review again until 2011. Between 2006 and 2012, the DPP staff continued to meet on an ad hoc basis with community stakeholders and maintained a presence at the Neighborhood boards to remain informed of issues within the community. On September 19, 2012 a workshop was at Niu Valley Middle School to reintroduce the community to the review process. The workshop was attended by 47 participants. Comments and responses from the 2012 Community Outreach Restart workshop are included in **Appendix F**. Input on the **Plan** was collected at the workshop. Some of the main points from the workshop are summarized as follows:

- Better protection of wildlife and habitat
- Reducing light pollution
- Protecting Kamilo Nui Valley agricultural lots
- Better protection of beach and mountain access
- Complete streets and age-friendly communities
- Capacity and efficiency of Kalaniana'ole Highway

Participants at the 2012 workshop were also encouraged to remain in contact with the Department where they could continue to raise concerns over the **Plan** or discuss issues within the community. An internal draft **Plan** was initiated during this time but did not advance due to limited resources.

## **2012-2016**

Since the **Plan** was last adopted, Development Plans (DPs) and Sustainable Communities Plans (SCPs) have begun to incorporate into their long-range vision and policies projections and responses to the potential threats posed by climate change and sea level rise. To gauge community thoughts on appropriate policies, a series of workshops was held with community leaders and stakeholders on January 28, March

31, and May 12 of 2016. Notes from the workgroup meetings are included in **Appendix G**. Points on which many participants agreed included:

- Better management of stormwater (capture)
- Need greater mitigative tools for upland erosion
- Exact impacts and projections of climate change and sea level rise can change. What are low-regret or no-regret steps to improve resiliency?
- Coastal setbacks and preparing our infrastructure
- Protecting and restoring cultural resources
- Establishing a timeframe and prioritizing values
- Watershed planning needed
- Green infrastructure needed for East Honolulu's high impervious surface ratio
- Opportunities implemented during redevelopment
- Potential for design competition

After the 2016 workshops, a draft of the **Plan** was produced and circulated internally to the Department. Due to limited resources, the **Plan** was not finalized and published until 2019.

## 1.2 Public Review Draft

On January 30, 2019 the **Plan** was first published on the Department's website as the **Public Review Draft** (the **Plan** was re-published on February 13, 2019 after making some minor grammatical corrections). Public notices were mailed out on February 26, 2019 informing past participants and community organizations that the **Public Review Draft** was available for review and comment. Copies were distributed to the Neighborhood Boards, Satellite City Halls, regional libraries, and Federal, State, and City Agencies. Copies were also made available online and at the Department.

Presentations on the changes proposed in the Public Review Draft were made to the three Neighborhood Boards in East Honolulu on February 26, March 21, and April 4, 2019. A workshop with jointly-held with the Board of Water Supply (BWS) at Koko Head Elementary School Cafeteria on March 4, 2019 to present the significant proposed changes to the **Plan** as well as the BWS **East Honolulu Watershed Management Plan**. Due to the partnership between agencies, the workshop was very

well attended. The workshop was also broadcasted available on ‘Ōlelo. Workshop materials on the **Plan** can be found in **Appendix I**.

An additional public workshop was held on May 18, 2019 at the ‘Āina Haina Elementary School Cafeteria per the request of community members. As there were less than 20 participants, the workshop agenda was modified and, following the formal presentation, two representatives from the Department held an extended discussion and Q&A with the participants.

The deadline for public comments on the **Public Review Draft** ended on June 28, 2019, however, all comments received until July 31, 2019 are included in **Appendix B**. In July and August 2019, the Department reviewed all comments on the Public Review Draft. Responses to these comments can also be found in **Appendix B**. Comments received after the publication of the **Technical Report** will be copied and forwarded to the Planning Commission and City Council.

### **1.3 Proposed Revised Plan**

After the public review was completed, the recommendations from agencies and the community were incorporated into the document, in what is referred to as the **Proposed Revised Plan**.

The **Proposed Revised Plan**, in modified Ramseyer format, shows where changes have been made to the vision, policies and implementing actions, and have been submitted to the Planning Commission and City Council along with a “clean” copy of the **Plan** and this **Technical Report**.

Copies of the **Proposed Revised Plan**, and the **Technical Report** are available on the Department’s website at:

<http://www.honoluluodpp.org/Planning/DevelopmentSustainableCommunitiesPlans/EastHonoluluPlan.aspx>

While the Planning Commission is reviewing the **Proposed Revised Plan**, the Department will make presentations and distribute copies of the **Plan** to the three East

Honolulu Neighborhood Boards. The neighborhood boards will have an opportunity for discussion of the **Plan** and provide their comments to the Planning Commission.

After the Planning Commission holds their public hearing on the **Proposed Revised Plan**, the Planning Commission will agree on what recommendations they want to make on the **Plan**, and then send the **Proposed Revised Plan** along with their recommendations to the City Council.

The City Council will take up a new bill to adopt a **Proposed Revised Plan** upon receipt of the Planning Commission recommendations. For the **Plan** to be adopted, it must pass three votes of the full Council called the first, second, and third readings. Between the full Council votes, the bill will be discussed at meetings of two Council Committees. There are opportunities to provide public testimony at all of the Council and Committee meetings.

While the **Plan** is at the Planning Commission and/or City Council, members of the public are encouraged to take advantage of the opportunity to continue to provide written and/or oral testimony as both the Planning Commission and the City Council review the **Proposed Revised Plan**. For those intending to submit testimony to the Planning Commission and/or City Council asking for changes to the **Plan**, they are requested to forward copies of those comments to the Department of Planning and Permitting with attention to Thomas Blair at 768-8030 or [Thomas.Blair@honolulu.gov](mailto:Thomas.Blair@honolulu.gov).

Contact the Planning Commission at 768-8007 for information regarding the public hearing. The Commission requests that an original and fifteen (15) copies of written testimony be filed at least forty-eight (48) hours before the public hearing. Persons can sign up at the public hearing to provide oral testimony. See the public notice for more information regarding participation, particularly relating to the current procedures impacted by COVID-19.

Contact the City Clerk at 768-3822 or visit the City Council website at <http://www.honolulu.gov/council.html> for the status of bills and the Council and committee meetings agenda. Members of the public can also contact the Council members directly to express their views on the **Plan** and can provide written and/or oral testimony to the full Council or to the Council Committee whenever the bill is on the

agenda. Written testimony may be submitted by e-mail or faxed. Persons wanting to provide oral testimony are asked to sign up after the agenda is posted, and can do so online, by fax, or prior to the meeting.

## 2. ISSUES IDENTIFICATION AND ANALYSIS

### 2.1 Findings on the Required Scope of Review

This chapter provides findings on the items that are required by law to be covered in the review of the Plan, on the success in implementing the Plan vision and policies, and on how well the Plan and its implementation addresses critical issues.

1. Are the Plan's regional vision, policies, design principles and guidelines, and implementation actions still appropriate? And is the Plan still consistent with the General Plan?

The Plan vision and policies enjoy wide and strong support from the community and stakeholders. Implementation methods need to be improved regarding protection of recreational access to mountain trails and beaches, and to update the terminology of the Plan to be consistent with other Development Plans (DPs), Sustainable Communities Plans (SCPs), and the General Plan. It is prudent to establish new visions and policies for the threats posed by climate change and sea level rise and the rapidly aging community. The Plan revision proposes additional measures to meet these new challenges.

The community and stakeholders are mixed in their assessment of the implementation. A demographic shift to an aging community has not necessarily resulted in more age-friendly infrastructure with the exception of the development of two elderly housing projects. Housing has remained contained to within the growth boundary experiencing some infill development. More work is needed to enhance pedestrian, bicycle, and transit modes of travel. Stormwater runoff resulting in downstream water quality issues in Maunalua Bay remains a concern. The threats posed by climate change and sea level rise pose unique challenges and opportunities that need to be addressed in the Plan.

The General Plan is undergoing a concurrent update independent of the Plan review process. The Plan remains consistent with the General Plan population distribution which allots East Honolulu approximately five percent of O'ahu's

population. Population projections for 2035 and 2040 show the percentage of O‘ahu’s population in East Honolulu slowing and then decreasing to fewer than five percent, remaining stable around the existing 50,000 while the rest of the island population grows. This stabilization of population in East Honolulu is due to a combination of trends, including: demographic shifts, an aging population, shrinking family sizes, a lack of developable land, restrictions on lands with the potential to be redeveloped, and growth being directed toward ‘Ewa, Central O‘ahu, and the Primary Urban Center. A discussion of conformance with the **General Plan** objectives and policies is included in **Appendix I**.

2. Is the purpose of the **Plan**'s guidelines being achieved?

The purpose of the **Plan**'s guidelines is to protect the natural, environmental, scenic, historical, and cultural components of the East Honolulu region, while accommodating and adapting to the minimal population growth and demographic changes that are anticipated. The 1999 **Plan** could be improved upon with increased focus on implementation and the addition of a few policies regarding climate change and sea level rise, complete streets and age-friendly communities, and the potential redevelopment of the neighborhood commercial centers. The **Plan** has been effectively used to deter development outside of the Community Growth Boundary and direct growth to infill development. The Community Growth Boundary, previously Urban Community Boundary, remains an effective tool in protecting and preserving open space and agricultural uses in East Honolulu.

3. Should the **Plan**'s priorities be revised?

With the region being largely built out, the **Plan** has not established specific development priorities. Instead, the **Plan** has identified the various means by which it is to be implemented and the priority criteria against which development proposals will be considered.

Revisions to the **Plan** are necessary to address developing issues and implementation including the needs of an aging population, choices of living

environments with nearby destinations, and, especially, to protect against the potential threats from climate change, sea level rise, and other disasters.

## 2.2 Findings on Vision Implementation

The 1999 **Plan** vision has eight major elements. The Department's assessment of the success in implementing each of these vision elements is described in **Table 2-1 Vision and Implementation**, below. The eight vision elements found in the 1999 **Plan** were slightly altered by combining “Hawai’i Kai Town Center” with “Neighborhood-oriented services. Two new vision elements are proposed in the **Public Review Draft** as “Adoption of the Concept of Ahupua’a” and “Climate Change Adaptation.” These last two vision elements are not included in the table below as they need to be adopted before being implemented.

Overall findings from community outreach indicate the **Plan** was successfully implemented by directing various development projects away from natural areas designated to protect viewsheds, coastlines, and cultural and historic resources. Further findings indicate that better implementation is needed to ensure the community is “age-friendly” and that mauka-makai recreational access is protected and restored.

**Table 2-1 Vision Implementation**

	Evaluation of Implementation
<p><b>Protect and Preserve Agricultural Uses, Natural Areas, and Cultural and Historical Resources</b></p>	<ul style="list-style-type: none"> <li>• An Urban Community Boundary (UCB) was adopted as part of the <b>Plan</b> in 1999. Leolani, a project located outside of the proposed UCB, was submitted before adoption of the <b>Plan</b> and approved after the <b>Plan</b> was adopted. Since then no land outside the UCB has been approved for urban use. The UCB has been replaced by the term Community Growth Boundary (CGB) for consistency with other DPs and SCPs.</li> <li>• The City has adopted Ordinances to reduce exposure to hazardous areas, partially as a result of boulder falls in Hawai’i Kai.</li> <li>• Proposals to develop Kamilo Nui Valley farm lots, which are outside the UCB, did not move forward, and leases for the farms have been renegotiated.</li> </ul>

	<ul style="list-style-type: none"> <li>• A cemetery approved for the area mauka of the Kamilo Nui Valley farm lots, after initial stockpiling and grading of soils, has been delayed in development.</li> <li>• Capacity was provided inside the CGB for residential in-fill development. Between July 1999 and June 2015, around 1,950 residential units were built in East Honolulu.</li> </ul>
<p><b>Preserve the Scenic Value of the Koko Head-Makapu'u Viewshed</b></p>	<ul style="list-style-type: none"> <li>• The State acquired the land for the Kaiwi State Scenic Shoreline Park in 2001, and the City acquired lands behind Sandy Beach in 2002.</li> <li>• A 2006 application to build vacation cabins above the Hawai'i Kai Golf Course on 182 acres outside the UCB was not accepted for processing by the DPP.</li> <li>• An application to build vacation cabins above the Hawai'i Kai Golf Course on two parcels outside the CGB was not accepted for processing by the DPP. In 2015, a community land trust acquired the lands in order to preserve them as open space.</li> </ul>
<p><b>Maintain the Urban Form of the Ridge-and-Valley Neighborhoods</b></p>	<ul style="list-style-type: none"> <li>• No additional ridge developments have been approved since 1999.</li> <li>• Ocean view lots for large homes on Paikō Ridge were advertised nationally, but no application for the needed Land Use District Boundary Amendment or <b>Plan</b> Amendment has been submitted.</li> <li>• A proposal for 19 single-family dwellings in Kuli'ou'ou Valley applied for a cluster permit in 2016 but was rejected by the DPP.</li> </ul>
<p><b>Expand Mauka-Makai Recreational Access</b></p>	<ul style="list-style-type: none"> <li>• There have been problems for hikers seeking access to trailheads within gated communities.</li> <li>• There have been conflicts regarding beach access in the Paikō Lagoon and Portlock areas. A City condemnation process has begun for the Portlock access lane.</li> <li>• A public-private partnership reopened the Hanapēpē Loop access.</li> <li>• The State has increased parking for hikers visiting the Kaiwi State Scenic Shoreline Park.</li> <li>• There are conflicts with parking and congestion in neighborhoods with maintained trails potentially due to nearby trail closures like Mariners Ridge</li> </ul>
<p><b>Protect and Preserve Natural</b></p>	<ul style="list-style-type: none"> <li>• A public-private partnership has cleared over 28 acres of Maunalua Bay of invasive algae, and established rain</li> </ul>

<p><b>Areas and Cultural and Historic Resources</b></p>	<p>gardens, catchment systems, and siltation basins to reduce pollutant and sediment runoff.</p> <ul style="list-style-type: none"> <li>• Protections for key natural areas have either been maintained or expanded since 1999.</li> <li>• A community land trust successfully acquired and created a 5 acre wetland, bird habitat, and cultural park area near the Hawai'i Kai Post Office.</li> <li>• Kānewai Spring and Fishpond were successfully acquired and are being restored.</li> </ul>
<p><b>Housing Stability</b></p>	<ul style="list-style-type: none"> <li>• A portion of the new housing built in Hawai'i Kai and Wai'ālae Iki since 1999 is for senior citizens.</li> <li>• A major Hawai'i Kai apartment project with 215 market-rate units and 53 affordable rental units was completed in 2016.</li> <li>• The City adopted an Accessory Dwelling Unit Ordinance which allows adding small residential units of 400 to 800 square feet on existing developed residential lots, providing housing options for seniors, students, and young families.</li> <li>• The City has revised the affordable housing rules for proposed new projects.</li> </ul>
<p><b>Focus Commercial Centers on Serving the Region's Neighborhoods</b></p>	<ul style="list-style-type: none"> <li>• Commercial center redevelopment in Hawai'i Kai has added floor space and is attracting customers from areas outside Hawai'i Kai, including Waimānalo and Kāhala.</li> <li>• The 'Āina Haina Shopping Center has been redeveloped under new ownership.</li> <li>• Non-construction jobs in East Honolulu have not increased significantly since 1999, and are not expected to show any significant growth through 2040.</li> </ul>

**2.3 Evaluation of Major Issues**

This section identifies various issues that have been mentioned by community leaders, residents, stakeholders, and policy experts as well as issues identified in research. Some of the issues are already included in the **Plan** but have evolved such that either the **Plan** or its implementation needs to be revised. Other issues have arisen since the 1999 **Plan** was published that the community wishes to be addressed.

This section follows the same general order as the **Plan** text but is meant to separate out the particular issues that have involved complex changes or discussion over time from those other issues that have changed less since the **Plan** was developed.

## **2.3.1 Protection of Open Space and Agricultural Lands**

### **2.3.1.1 Agricultural Lands Protection**

#### **Issue Analysis**

- There are approximately 88 acres in Kamilo Nui Valley and 31 acres above Kaiser High School that are in agricultural production.
- There have been indications over the years that Bishop Estates wants to develop the land or that the land is not feasible for farming. The Livable Hawai'i Kai Hui has worked with the Kamilo Nui farmers to secure short-term leases to the land and has worked on restoring previously delinquent lots.
- Plans for the development of homes in Leolani on 17 acres in Kamilo Nui Valley were proposed prior to the completion of the **Plan** with the zone change application filed in 1997 although it was not approved until July 27, 2000, after the publication of the 1999 **Plan**.
- The City is reviewing its ability to incentivize agricultural protection including designation of Important Agricultural Lands (IAL). There are no IAL designated lands in East Honolulu, existing or proposed.
- Existing agricultural lands in East Honolulu have been designated as Prime Lands or Other Lands under ALISH by the DOA. Other neighborhoods developed on lands designated as Prime Lands and Other Lands including the top of Wiliwilinui, Hawai'i Loa, the back of Kūpaua Valley, Kamehame Ridge, and Kalama Valley.
- No land in current agricultural production in East Honolulu was rated by the Land Survey Bureau's 1972 survey.
  - 20.4 acres in the back of Hahaione Valley are rated D, are not in agricultural production, and are outside of the Community Growth Boundary (CGB).
  - Lands rated E are undeveloped lands in preservation outside of the CGB.
- Upland erosion, landslides, and annual flooding have either damaged farms or limited access to farm lots in Kamilo Nui Valley.

- Some farmers have accepted loads of post construction road debris. Complaints of commercial truck traffic through residential neighborhoods leading to the farm plots.

### **Recommendations for Revision of the Plan**

- Identify that the change in terminology in the **Plan** is to be consistent with other DPs and SCPs. The change may eliminate the term “agricultural boundary” but it will keep agricultural areas outside the CGB to protect and retain the existing agricultural areas.
- Strengthen language regarding water quality impacts of urbanization of agricultural lands negatively impacts downstream sources. Encourage agricultural BMPs to mitigate stormwater runoff from agricultural lands and stockpiling.
- Adjust maps by moving the existing 17 acre Leolani development in Kamilo Nui Valley into residential from agriculture and shifting the CGB accordingly based on 2000 construction.

### **Recommendations for Improvement of Implementation**

- IAL incentives to designate agricultural land are currently under review. There needs to be better incentives to protect agricultural lands from urbanization.
- Short-term vs. long-term leases have been an issue for East Honolulu farmers and require ongoing discussions.
- Adjust SLUDs from urban to agriculture for the Kamilo Nui Valley and above Kaiser High School.
- Further discussion with the community to connection Hawai'i Kai Drive loop through Kamilo Nui Valley to serve as a secondary access point.

#### **2.3.1.2 Open Space Protection**

##### **Issue Analysis**

- The two key measures protecting open space are the CGB and State Land Use boundary laws. The former appears to be effective. The latter laws limit the City and County’s ability to regulate building activities on farm lands, and appear to abet violations of building and land use codes (Revised Ordinances of Honolulu [ROH] Chapters 16, 17, 19, 21) by making enforcement difficult.

- 70.3 percent, or 10,566 acres out of 15,022 acres, in East Honolulu are zoned for preservation. Most of these areas are in the upland forest area. Only 9,308 acres zoned preservation are within the State Conservation District; 1,259 acres zoned for preservation are in the State Urban District.

### **Recommendations for Revision of the Plan**

- Remove references to a preservation boundary. Land is either inside or outside the CGB. There is no proposed change to the interpretation from the UCB to the CGB. The purpose of both tools is to direct development away from one region and into another. The revision is to make the **Plan** consistent with other DPs and SCPs.
- Change the CGB to place outside the Boundary the wetlands near the O'ahu Club along Hawai'i Kai Drive.
- Ensure consistency in maps. All views identified in the viewshed map (previously **Figure 2-4**) should also be identified in the **Open Space Map**. Potentially include new views including: Wiliwilinui Ridge Trail, Kuli'ou'ou Ridge Summit, Koko Head Trail, Koko Kai Beach Park, and Makapu'u Point Trail.

### **Recommendations for Improvement of Implementation**

- Seek to designate 774 acres of lands within the State Urban District into Conservation. Seek to streamline and amend the State Law Use Commission Law so as to preserve regions the community wishes to protect and provide a transparent, community-driven process for any proposed redesignation.
- Work with the USFWS to map the Keawāwa Wetlands which should be relocated to outside of the Community Growth Boundary.

## **2.3.2 Preservation of Recreational Access**

### **2.3.2.1 Mountain Trail Access**

#### **Issue Analysis**

- Mountain trail access issues in East Honolulu are twofold:
  - Access to State maintained or other publically accessible trails; and
  - Access to trails on public and private lands that are either unmaintained or that traverse private lands.

- The 1999 **Plan** indicated that seventeen major trails have been inventoried by the State Department of Land and Natural Resources (DLNR) including trails that are maintained and unmaintained, the trail difficulty, and other restrictions including crossing private lands.

### Publically Accessible Trails

- Four out of O'ahu's 43 State maintained trails are located in East Honolulu. The four trails that contribute to the DLNR's Na Ala Hele System include: Wiliwilinui Ridge (3 miles), Hawai'iloa Ridge (3.5 miles), Kuli'ou'ou Valley (1.5 miles), and Kuli'ou'ou Ridge (2.5 miles).
  - The trailheads for Hawai'i Loa Ridge and Wiliwilinui Ridge trails are both located within gated communities.
  - Public parking is provided at both trailheads within the gated communities on a first-come-first-serve basis; Hawai'i Loa Ridge offers 10 paved spots, Wiliwilinui Ridge offers 14 paved and unpaved parking spots. Street parking is not permitted within either gated community.
  - Once the public parking lots are full, prospective hikers must either begin the day from a different public parking area and walk up the street to the trailhead (1.7 miles for Hawai'i Loa and over 1,000 feet elevation change, or 1 mile for Wiliwilinui Ridge) or return at a another time.
  - According to a survey performed by Hawai'i Loa Management over the month of October 2015, approximately 249 cars were admitted, 44 cars denied entry, and 10 parties opted to walk from Kawaiku'i Beach Park<sup>1</sup>.
  - The Sierra Club sued Hawai'i Loa Ridge that showing a driver's license should not be a requirement for entry but lost.
- The DLNR State Parks is responsible for the maintenance of the Makapu'u Point Lighthouse Trail (1.2 miles) and the Kaiwi Shoreline Trail (1.4 miles).
- There is no clear responsibility for the operation of Koko Crater Stairs (0.8 miles).
  - The stairs are located within the City's Koko Head Regional Park.
  - DLNR considers the Koko Crater Railway Line as an unmaintained trail.

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<sup>1</sup> Survey taken by Hawaii Loa Ridge in October 2015. P:\PolicyDocuments\DPSCP\East Honolulu\FIVE YEAR REVIEW\REVIEW REPORT\Issues\Access

- Erosion from the number of daily hikers and lack of maintenance is heavily affecting the stairs.
- A local group, the Kokonut Koalition, has raised money for maintenance of the trail and advocates for greater public support and maintenance of the trail.
- The City DPR operates and maintains approximately 2 miles of walking trails through the Koko Crater Botanical Garden.

#### Unmaintained Trails or Trails that Traverse Private Lands

- Trail closures in East Honolulu and around O‘ahu are a result of a variety of concerns including the following complaints: public safety, liability concerns, trash and cleanliness, vandalism, noise, parking, street congestion, and overcrowding.
  - Note: Regarding liability, HRS §520, 1998 is referred to as the Hawai‘i Recreational Use Statute. It protects landowners who provide, or are required to provide, public access from liability regarding members of the public exercising such public access.
- One of the most popular trails in East Honolulu, Mariners Ridge, was closed in 2013 through the construction of a gate at the trailhead at the request of neighborhood residents. The trail is on land owned by the B.P. Bishop Trust Estate (Kamehameha Schools).
- Some private land owners recognize the public benefit of trails while retaining ownership of the land either through granting easements or not enforcing trespassing. See **Table 2-2** for trail conditions and restrictions.<sup>2</sup>
- Providing more parking at trails may bring too many hikers to a trail and overwhelm the neighborhood.
- There is no long-term guarantee that a private access trail will remain open to the public as trail closures become increasingly common in other regions of O‘ahu.
- Knowledge of private access trails is widely available online through blogs and social media. Signage at trailheads is a method to ensure knowledge of dangers of the trail is seen by all hikers.

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<sup>2</sup> Kyle Parsons, Acting Trails & Access Specialist, DLNR, DOFAW

**Table 2-2 Trail Access and Ownership** (Table 3-1 simplified in the **Plan**)

#	Trail Name	Miles	Condition / Status / Restrictions <sup>2</sup>	Land Owner or Maintenance	Links
1	Wai'ālae Nui Ridge / Kalani Iki Ridge	3.0	Private access	Bishop, City BWS	2, 20
2	Wiliwilinui Ridge	3.0	Na Ala Hele, open, maintained, gated, private easement	Bishop, City BWS, State DLNR	20
3	Wailupe Gulch	1.5	Private access	Private, City, State DLNR	
4 <sup>1</sup>	Kuluī Ridge	2.3	Private access, unmaintained	City BWS	5, 20
5	Hawai'i Loa Ridge	3.5	Open, maintained, gated, parking	State DLNR, Hawai'i Loa Ridge	20
6 <sup>1</sup>	Pia Valley / Niu Valley	1.0	Private access	Land trust	7
7	Niu Ridge / Kūlepiamoā Ridge	3.0	Open, easement negotiation	Private, Land trust	8, 20
8	Kūpaua Valley	2.0	Private access	Private	
9	Kuli'ou'ou Ridge - Diamond Head (Paikō Ridge)	3.0	Private access	Private	10
10	Kuli'ou'ou Center Ridge	4.0	Private access	Paikō Trust Est.	20
11	Kuli'ou'ou Valley	1.5	Na Ala Hele, open, maintained	State DLNR	12
12	Kuli'ou'ou Ridge – Koko Head	3.0	Na Ala Hele, open, maintained	State DLNR	11, 20
13	Ka'alākei Ridge	2.0	Private access	Private, Bishop	14, 20
14	Mauna'ō'ahi Ridge	3.0	Private access	Private	13, 15
15	Hahaione Valley	2.0	Private access	Bishop Est.	13, 14, 20
16	Mariners Ridge / Kaluanui Ridge	1.5	Private access, gated, signed	Bishop Est.	20
17	Kamilo Nui Valley	2.0	Private access	Private, Bishop Est.	20
18 <sup>1</sup>	Kamilo Iki Ridge / Pāhu'a / Makahū'ena	1.8	Private access, signed	State, OHA	20
19 <sup>1</sup>	Kamehame Ridge	1.2	Private access, guard, paved	Bishop Est.	20
20	Ko'olau Summit and Spine Makapu'u – Pu'u Konahuanui	16	Private access, dangerous	State, DLNR, Bishop	
21	Tom-Tom Waimanalo	1.0	Private access, start difficult	Private, Bishop, State DLNR	20
22	Makapu'u Lighthouse Lookout	1.2	Open, maintained	State, Parks	23
23	Kaiwi Shoreline Trail	1.4	Open, maintained	State, Parks	22
24	Koko Crater Botanical Garden	2.2	Open, maintained, gated	City DPR	
25	Koko Crater Railway Line	1.0	Open, unmaintained	City DPR	26
26	Koko Crater Blowhole	1.5	Open, maintained	City DPR	23
27	Lāna'i Lookout to Bamboo Ridge and Hanauma Bay	1.5	Private Access	City DPR, State	26
28 <sup>2</sup>	Koko Head / Hanauma Bay	4.0	Restricted	City DPR, State	

<sup>1</sup>Not in the DLNR trail inventory.

<sup>2</sup>Maintained/ unmaintained refers to City's and State's role in clearing trails and managing trail erosion. Many trails designated as unmaintained may be cleared by outdoors groups including the Hawai'i Trail and Mountain Club or the Sierra Club.

- Some social media sites use “no trespassing” signs as waypoints in describing how to access the trail. DLNR is aware of these issues.
- Neither the City, the State, nor Bishop Estate has developed an effective social media campaign to combat the countless images from being circulated which often do not discuss dangers and trespassing.
- Environmental groups are often granted legal access to trails located on private lands for supervised hikes.
  - The Sierra Club led an outing on October 4, 2015 of Mariners Ridge. The group was capped at 30 hikers. Capping the number of hikers demonstrates a pent up demand from wanting to access the trail.
  - Some access rights were accompanied by social media policies which, when violated, terminated the access contract.
  - No trail groups currently lead hikes on Mariners Ridge.
- Interviews with environmental groups yielded differing views of public access to private trails:
  - Public access should be restored via lifting of legal and physical barriers.
  - Allow controlled access through organized outings.
  - It is premature to talk of reopening certain trails.
- Protection of access is easier the earlier it comes into the discussion with land owners and developers.
  - Some access agreements were made prior to development and have since been forgotten by the owners or are not enforced.
  - Some access rights are not explicit in the development agreements but have recognized access for long periods of time.
  - Getting language put into the **Plan** recognizing access rights is helpful and proactive in preserving trail access.
  - Legal challenges to landowners are often the last resort for environmental groups to preserve access and are not the most effective. Legal arguments for access rights could be strengthened with **Plan** recognition.
  - In developed neighborhoods, it is difficult to add deed restrictions if they are absent.

- The Department of Hawaiian Homelands paid \$48,000 to remove the landmark “Dead Man’s Catwalk” at the top of Kamehame Ridge to discourage people from trespassing across State and Bishop Estate owned lands.<sup>3</sup>
- There have been supervised hikes held on the recently purchased Kaiwi Mauka lands.

### **Recommendations for Revision of the Plan**

- Revise **Map A-1 Open Space** to reflect what mountain trails are open and either remove or note which trails are not available to the public currently depicted in **Exhibit 3-1**.
  - DLNR recommends potentially removing **Exhibit 3-1** since trails (Niu Valley or Mariners Ridge) could be added or not. Also publishing the map may bring awareness to trails not previously known even though existing map is already public. The DLNR is slightly hesitant about publishing status table but preferred the table instead of a map.
  - Status table is a means of conveying information to the public about which trails are acceptable to hike on and which have restrictions.
- Include a table with the status of all known surveyed trails and their availability to accompany or replace **Exhibit 3-1**.
- Strengthen language in the **Plan** recognizing “the absence of public access to Hawai‘i’s shorelines and inland recreational areas constitutes an infringement upon the fundamental right of free movement in public space and access to and use of coastal and inland recreational areas”.<sup>4</sup>
- Include language: “All county public highways and trails once established shall continue until vacated, closed, abandoned, or discontinued by a resolution of the legislative body of the county wherein the county highway or trail lies. All state trails once established shall continue until lawfully disposed of pursuant to the requirements of chapter 171.”<sup>5</sup>
- Potentially include language recommended by the HTMC recognizing the need for a City Resource Management Program. Also recognize the demand for

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<sup>3</sup> <http://www.hawaiinewsnow.com/story/31362278/state-removes-dead-mans-catwalk-in-east-oahu>

<sup>4</sup> HRS 115-1

<sup>5</sup> HRS 264-1

outdoor recreational activities in unmaintained and undeveloped areas will increase regardless of whether there a Resource Management Program in place.

- Include language supportive of keeping open East Honolulu trails, particularly Mariners Ridge, Niu Valley, and Kamilo Nui Valley.
- Encourage greater facilitation between land owners, users of inland recreation areas, and DLNR regarding the opening or closing of private access trails.

### **Recommendations for Improvement of Implementation**

- The 1999 **Plan** identified parking in neighborhoods containing trailheads as an area to be improved so that street parking does not become too congested.
  - Opening more trails will relieve pressure from other congested areas.
  - Coordinate with DLNR over community outreach efforts to address concerns in congested neighborhood areas.
- Work with the State DLNR to provide better signage at all known trailheads alerting prospective hikers of the potential dangers including trespassing.
- Where appropriate, coordinate with the State DLNR and landowner to purchase land or easement for a public right-of-way pursuant to HRS 115.
  - Continue to follow up with DLNR on the status of Niu Valley being incorporated into the Na Ala Hele program.
- Support DLNR Na Ala Hele or third party organizations in acquiring right-of-way easements to keep open trails that traverse private lands.

### **2.3.2.2 Shoreline Access**

#### **Issue Analysis**

- Shoreline access issues in East Honolulu are twofold:
  - Mauka-makai access to the shoreline from public right-of-way perpendicular to the shoreline; and
  - Lateral access to and along the shoreline from one beach to the next.

## Mauka-Makai Shoreline Access

- East Honolulu contains 13 miles of shoreline that is characterized into two distinct regions: the developed region between Wai‘alae to Koko Head, and the undeveloped Kaiwi region spanning from Koko Head to Makapu‘u.
  - Development makai of Kalaniana‘ole Highway has resulted in reduced visibility of beaches and fewer beach access points.
- There has been little to no new development along the shoreline over the past 15 years other than a few infill homes.
- The City standard for public access to the shoreline is one-quarter mile intervals and is comprised of either beach parks, pedestrian easements, or private driveways where the owners allow pedestrians access.<sup>6</sup>
  - There are three stretches in East Honolulu that do not meet this standard due to development: Wai‘alae Country Club to Kai Nani, Wailupe to ‘Āina Haina, and Niu Peninsula. See **Figure 2-1**.
- The absence of public access to Hawai‘i’s shorelines and inland recreational areas constitutes an infringement upon the fundamental right of free movement in public space and access to and use of coastal and inland recreational areas.<sup>7</sup>
- The various counties shall purchase land for public rights-of-way to the shorelines, the sea, and inland recreational areas, and for public transit corridors where topography is such that safe transit does not exist.<sup>8</sup>
- Along Portlock Road there are 19 driveways each with beach access shared among the four adjacent homes occurring approximately every 200 feet.
  - One Portlock Road home owner attempted to limit beach access through the blocking a shared, private driveway. The home owner did so against the wishes of the other owners of the driveway. The City, with the cooperation of the Portlock Road Association, had the unpermitted gate removed. There have been moves to condemn “Lane N.”
  - Portlock residents believe they can more effectively monitor and maintain the driveways than the City.

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<sup>6</sup> ROH §22-6.4

<sup>7</sup> HRS 115-1

<sup>8</sup> HRS 115-2



- There is a parcel running between the homes and the shoreline known as the Portlock Beach Reserve that is owned by Kamehameha Schools. This is lateral access way is commonly used by fishermen.
- The City has received complaints that the following beach uses have been observed in Portlock that may not directly inhibit public access, but can limit the public use of the shoreline or adversely impact nearby residents:
  - Camping
  - Making fires
  - Leaving trash
  - Weddings
  - Paid surf lessons
  - Homeless
  - Drugs
  - Being loud
- A homeowner at the end of Paikō Drive installed “official-looking” signs at the edge of his property suggesting the Paikō Lagoon Wildlife Sanctuary and park was trespassing. The resident moved boulders from the beach to block the road. DLNR investigated the incident. The owner has been fined numerous times since 2003 for actions relating to construction, improper use of state lands and restricting access. The home was up for sale in 2016.

#### Lateral Shoreline Access

- Vegetation, particularly naupaka and beach heliotrope, planted adjacent to beachfront homes can encroach upon the beach ROW limiting access.
- Landowners are responsible for the trimming of vegetation to ensure that there is not encroachment into the beach which is a public ROW.
  - The DLNR’s OCCL enforces encroachment violations by sending letters and performing checks but is staff limited.
  - OCCL successfully implemented a mass mail-out and enforcement monitoring program in the fall of 2015.
- Continuous development within the SMA has contributed to beach erosion. Armoring and hardening of the coastline has also contributed to erosion of adjacent areas in addition to creating man-made distinctions between different areas of the beach. These actions have combined to reduce lateral access.
- The impacts of SLR combined with beach erosion will further reduce lateral shoreline access, particularly in the areas around Wailupe Peninsula, the end of Paikō Peninsula and Portlock east of the marina outlet.

### **Recommendations for Revision of the Plan**

- Keep language recommending the acquiring of three public access points along Portlock Road (previously **Section 2.2.4** and **3.1.3.6**) unless the community can come to some consensus over other mechanisms ensuring that it is not a unilateral decision that is blocking public access.
- Add language to the **Plan** that residents shall notify the City, the DLNR, and community association (if applicable) if an existing public ROW becomes blocked.
- Reference HRS which recognizes shoreline access in **Section 3.1.2 / 3.1.3.6**.<sup>9</sup>
- Identify the impacts that SLR and beach erosion will have on diminishing lateral shoreline access. Recognize the impacts that armoring or hardening the shoreline have to adjacent beaches as well as to lateral access.
- Acknowledge landowners of oceanfront properties are responsible for maintenance of the vegetation so as to not encroach into the public ROW.

### **Recommendation for Improvement of Implementation**

- Recognizing the roles residents have in identifying and managing beach access points could lead to better management than City ownership of access.
- Work with DLNR once the investigation of Paikō Drive is complete to identify lessons learned to ensure access in other areas remains open.
- Work with DLNR OCCL and homeowners to ensure vegetation is properly maintained to ensure access remains open. Perhaps encourage a 311 reporting app similar to the City's or forward 311 complaints onto OCCL.
- Codify beach right-of-way access into ROH.

### **2.3.2.3 Koko Crater and Koko Stables**

#### **Issue Analysis**

- In 1958 Koko Crater was set aside for the development of a 60 acre botanical garden. Two years after in 1960, adjacent to the entrance of Koko Crater Botanical Garden, the Koko Crater Stables was established to promote and preserve the ranching and paniolo culture.

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<sup>9</sup> Lateral Access HRS 115

- Horseback riding was previously allowed in the Koko Crater Botanical Garden until 2008. In recent contract updates, the stipulation that no riding would be permitted in the garden was added.
- The City awarded Horse Haven, a prior tenant, a five year concession to the stables in April 2019 but was contested by a competitor who bid more to rent the facilities but was disqualified.
- There is community concern that the current tenant uses it as a facility for elite riders and is unavailable to beginners or casual riders.
- A prior tenant had issues with the City rule that a caretaker is not allowed to live on the grounds, a rule still in force but one not followed by Horse Haven.
- The Department of Parks and Recreation (DPR) noted the restrictions of horseback riding in the garden were the result of complaints received and concerns over the following:
  - Public safety – Trails not wide enough to permit safe passage for both riders and walkers.
  - Cleanliness – Neither riders nor the stable operator were attending to horse waste on the trail.
  - Plants – Horses have trampled and damaged some of the threatened, protected, or endangered plants.
  - Aesthetics – Having to trim trees higher to permit safe passage of horseback riders would detrimentally impact the experience for walkers, which has a higher standard as a botanical garden than recreational parks.
  - Permitting – Unsure if allowing a commercial tour operation within the park was allowed.
- Some community leaders want trail riding restored to the gardens and believe the above listed reasons are largely unfounded.
- A general survey was conducted as part of the **Statewide Comprehensive Outdoor Recreation Plan (SCORP)** with the following findings<sup>10</sup>:
  - Issue #1: Quality and Condition of Facilities. SCORP public survey respondents and provider respondents both identify, “Operating and

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<sup>10</sup> **Hawai'i Statewide Comprehensive Outdoor Recreation Plan** 2015 Update. DLNR.

maintaining existing infrastructure and facilities” as the number one priority for investment in outdoor recreation.

- **Issue #3: User Conflicts:**
  - 2% of respondents report that user conflicts have caused them to quit participating in their chosen activity.
  - 13% respond that user conflicts significantly limit or affects their ability to participate in their chosen activity.
  - 29% responded that user conflicts sometimes limits or affects their ability to participate in their chosen activity.
- Based on the findings from the SCORP, allowing horse riding in the Botanical Garden could lead to a decrease of 2-44% in regular visitors.
- There are safety and liability concerns from DPR regarding people hiking from inside the garden to and along the crater rim to the summit. The south slope trail was previously considered part of the Botanical Garden and is on the DLNR trail inventory<sup>11</sup>.

### **Recommendations for Revision of the Plan**

- Add policy that recreation facilities should be available to users of all skill levels.
- DPR recommends that the revised **Plan** include the following revisions<sup>12</sup>:
  - **Table 3-1 Types of DPR Island-Based Parks:**
    - Botanical Gardens “Areas developed for the recreational and educational appreciation of specific types of plants and plant communities. Areas to plan, develop, curate, maintain and study documented dryland plants for the purposes of conservation, botany, horticulture, education and passive recreation.”<sup>13</sup>
  - **Section 3.2.4.1 Passive or Nature Parks:**
  - Preserve and enhance Koko Head Regional Park’s coastal-oriented recreational and educational resources by implementing when funding is available, the following:

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<sup>11</sup> **Koko Head District Park Master Plan**, Group 70, Inc. DDC, Dec 2001.

<sup>12</sup> Jeanne Ishikawa, DPR. Monday, April 06, 2015.

<sup>13</sup> HBG Collections Policy, 1998

- Develop new trails in and around Koko Crater Develop new walking/hiking trails within Koko Crater Botanical Garden for better viewing of plant collections.
- Prohibit access to any trails or paths from outside of Koko Crater Botanical Garden to the garden.
- Protect the fragile topography by restricting recreational uses such as horseback riding to areas apart from the conservation plant collections.<sup>14</sup>
- Continue to develop Koko Crater Botanical Garden as a conservation site of global importance for rare and endangered species from Hawai'i and other tropical dryland areas.

### **Recommendations for Improvement of Implementation**

- Encourage greater discussion between DPR and the public prior to making decisions on what uses will be permitted within a park.
- Request that DPR more closely document damages to plant collections and trails and their causes to mitigate public concerns and doubts.
- If horse riding is ever allowed in the Botanical Garden:
  - Stable operator contributes to additional maintenance required to ensure proper quality and condition of facilities is desirable to non-riders.
  - Perform visitor count and survey to determine consistency with SCORP.

### **2.3.2.4 Kaiwi Coastline**

#### **Issue Analysis**

- The Kaiwi Coast is comprised of lands mauka and makai of Kalaniana'ole Highway containing dramatic rock and cliff faces, desert plants, sandy beaches, coves, blowholes, lookouts, and improved and unimproved trails.
- Kalaniana'ole Highway Drive between Kuapā Pond Lookout and Makapu'u was recognized as a Hawai'i Scenic Byway by the Hawai'i Department of Transportation in 2013.

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<sup>14</sup> **A Long-Range Plan for the Living Collections of the HBG** by G. Staples, V.H. Heywood and D.C. Michener, September 1990

- There are conflicting names for the region: Kaiwi or Kaiwi. Community organizations and previously the State referred to the region using two words. Some Hawaiian groups and recently the DLNR refer to the region as one word.
- Hawai'i Kai Neighborhood Board No. 1 supports the designation of the **Maunaloa-Makapu'u Scenic Byway Corridor Management Plan**, acknowledges the work done by the committee, and urges the public to comment on the plan: <http://www.kaiwicoast.org/maunaloa-Makapu'u-scenic-byway.htm>.

### Makai Lands

- Lateral shoreline access is protected by State statute, HRS 115.
- Outdoors groups have commented that they have been ticketed along historic trails on lands makai of the highway that run parallel to the shoreline.
- In early 2019 a number of no parking signs were briefly erected then removed beyond Sandy Beach.
- The DLNR State Parks, responsible for development of recreational facilities as approved in the 1996 FEIS, has downsized its plans and at this time is not seeking to construct a visitor center or comfort station between the Old Wāwāmalu Bridge and the golf course entrance<sup>15</sup>.
  - Some parking was constructed at the Makapu'u Trailhead. The lower parking area was not connected with the upper area.
  - DLNR completed renovations of the lighthouse trail in 2016 including: new pavement, trail widening, seating areas, viewfinders, interpretive signage, and new lookout.
- A weekend visitor count to Makapu'u in 2015 shows that the number of visitors to the lookout and trail has doubled since 2009 from 400 to 982 on Saturday and 749 on Sunday. This exceeds the capacity of the parking lots and has resulted in people parking along the mauka shoulder of Kalaniana'ole Highway.
- In 2010 the State Land Use Commission reclassified makai lands within the Kaiwi State Scenic Shoreline from urban to conservation.

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<sup>15</sup> [http://oegc.doh.hawaii.gov/Shared%20Documents/EA\\_and\\_EIS\\_Online\\_Library/Oahu/1990s/1996-04-OA-FEIS-KA-IWI-STATE-PARK.pdf](http://oegc.doh.hawaii.gov/Shared%20Documents/EA_and_EIS_Online_Library/Oahu/1990s/1996-04-OA-FEIS-KA-IWI-STATE-PARK.pdf)

## Mauka Lands

- Two tracts of lands mauka Kalaniana'ole Highway known as Mau'uwai and Queen's Rise were purchased by the City and a community organization for preservation from development.
- Mauka lands are zoned P-2 and outside the Community Growth Boundary but are within the State Urban Land Use District.

## **Recommendations for Revision of the Plan**

- Revise **Section 3.2.1.2**, Kaiwi Scenic Shoreline to reflect the DLNR's scaled back vision for a more natural and undeveloped recreational area. Any recreational developments should be consistent with the vision for the area: to preserve as an undeveloped, rugged coastline.
- Recognize the rights of lateral shoreline access as codified in HRS 115.
- Identify shoreline trail access issues previously discussed in **Section 2.3.2.1**.
- Ensure consistency in maps. All views identified in the viewshed map (previously **Figure 2-4**) should also be identified in the **Open Space Map**.

## **Recommendations for Improvement of Implementation**

- Coordinate with the State DLNR, Kaiwi Coast Coalition, and Livable Hawai'i Kai Hui into how best to preserve and utilize mauka lands.
- Seek to reclassify Kaiwi mauka lands that are located within the State Urban District to State Conservation District to ensure consistency with zoning, community intent, and the Community Growth Boundary.
- Review and revise signage at lookouts along Kalaniana'ole Highway to remove superfluous signage while adding signs reflecting the potential dangers. Remove "No Trespassing" signs as appropriate.

### **2.3.2.5 Hanauma Bay**

#### **Issue Analysis**

- Although Hanauma Bay is run by the City DPR, it also is located in the State Conservation District with oversight from State DLNR. Enforcement is performed by DPR.

- Hanauma Bay Education Center opened in 2002 and shows a video to all visitors. Now fewer than two percent of visitors stand on the reef.
- The **Plan** already has statements about protecting natural areas from “overuse and misuse of resources”
- A **Hanauma Bay – General Plan** (1990)<sup>16</sup>, **Hanauma Bay Nature Preserve Final Revised EA** (1996)<sup>17</sup>, and FEIS **Improvements to Hanauma Bay Nature Preserve: Koko Head Regional Park and Nature Preserve** (1999)<sup>18</sup>, a 2007 audit<sup>19</sup>, and the **Hanauma Bay Nature Preserve Master Plan Update** (Draft 2014) have all been published on the bay.
- The following impacts have been noted:

#### Biological

- Degradation of bay was a contributing factor from the number of park visitors from a University of Hawai‘i study in 1989-90.
- A 2000 study determined the number of beachgoers and snorkelers had little detrimental effect on marine life.
- The exceptions to detrimental effects are fish feeding (now banned), shower runoff, and not using the restroom prior to swimming.

#### Social

- 35 percent of visitors still complain of crowds, or of being turned away because the parking lot is full, or of waiting for more than an hour-and-a-half to get in during peak season (Crowding vs. not enough resources)<sup>20</sup>.
- There have been complaints that tour companies are circumventing rules to bus visitors to the site.
- There are complaints that tourists outnumber residents. 13% of bay users are residents.

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<sup>16</sup> Hawaii Department of Parks and Recreation. 1990. **Hanauma Bay General Plan**. Management Plan for the Hanauma Bay Beach Park.

<sup>17</sup> [http://oegc.doh.hawaii.gov/Shared%20Documents/EA\\_and\\_EIS\\_Online\\_Library/Oahu/1990s/1996-12-08-OA-FEA-HANAUMA-BAY-NATURAL-PRESERVE.pdf](http://oegc.doh.hawaii.gov/Shared%20Documents/EA_and_EIS_Online_Library/Oahu/1990s/1996-12-08-OA-FEA-HANAUMA-BAY-NATURAL-PRESERVE.pdf)

<sup>18</sup> [http://oegc.doh.hawaii.gov/Shared%20Documents/EA\\_and\\_EIS\\_Online\\_Library/Oahu/1990s/1999-08-OA-FEIS-HANAUMA-BAY-NATURE-PRESERVE.pdf](http://oegc.doh.hawaii.gov/Shared%20Documents/EA_and_EIS_Online_Library/Oahu/1990s/1999-08-OA-FEIS-HANAUMA-BAY-NATURE-PRESERVE.pdf)

<sup>19</sup> [https://www.honolulu.gov/rep/site/oca/oca\\_docs/hanauma\\_bay\\_nature\\_preserve\\_final\\_report.pdf](https://www.honolulu.gov/rep/site/oca/oca_docs/hanauma_bay_nature_preserve_final_report.pdf)

<sup>20</sup> [https://www.fresnostate.edu/chhs/recreation/documents/hb\\_seagrant\\_final.pdf](https://www.fresnostate.edu/chhs/recreation/documents/hb_seagrant_final.pdf)

- There are approximately 3,000 visitors per day to the bay (over 1 million annually), down from as many as 10,000 people per day (3 million) in the 1980's.
- The northern portion of bay is experiencing beach accretion at a rate of approximately half a foot a year.<sup>21</sup>

### **Recommendations for Revision of the Plan**

- Revise **Section 3.1.3.7** to say that Hanauma Bay is closed once a week (remove Wednesday). There is already language in ROH, Section 10-1.3. As smoking is banned at all beach parks, can also omit smoking language from the **Plan**<sup>22</sup>.
- Numerous points in the **Plan** discuss limiting visitors to protect fragile marine resources and wildlife at the bay. If a biological study shows the number of visitors does not have a detrimental effect on wildlife, there is a need to change justification for visitor limits to social capacity.
- Ensure consistency of the **Plan** with the draft **Hanauma Bay Nature Preserve Master Plan Update**.

### **Recommendations for Improvement of Implementation**

- ROH permits only 2,000 visitors on the beach *at a time* per 1990, 1998 study. May need to amend Section 10-1.3 to reflect current 2005 study.
- Coordinate with UH Sea Grant, Friends of Hanauma Bay, DPR and DDC on implementation of the Master Plan update.

## **2.3.3 Natural Resources Protection**

### **2.3.3.1 Coastal Water Quality**

#### **Issue Analysis**

- The **Plan** is a land-based plan whose vision and implementation will impact downstream water quality including coastal waters.
- Coastal water quality is a result of a combination of land use decisions and environmental factors.

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<sup>21</sup> <http://www.soest.hawaii.edu/coasts/erosion/oahu/index.php>

<sup>22</sup> ROH Sec. 41-21.3

- Nutrients from land sources travelling downstream affect the water quality of the bay. Excess nutrients promote the growth of algae that compete for space on the benthic reef surfaces and affect the ability of coral to establish and grow.
- Wetlands provide natural buffer zones against coastal hazards as well as ecological and habitat functions.
- Land-based decisions include hardening of streams, paving over wetlands, loss of ecological function, and replacement of permeable land with impermeable surfaces. Channelized streambeds for floodwater control exacerbate water quality problems and contribute to stream and estuarine habitat loss.
- Approx. 60 out of 360 in City BMP database (17%) are considered Low-Impact Development (LID). Non-LID BMPs don't address all 303(d) pollutants. LIDs typically have lower costs.
- The Polluted Runoff Control Program (PRCP), also known as the Section 319 Program, is administered by DOH and provides funding to reduce nonpoint source pollution in priority watersheds. None of East Honolulu's watersheds are listed as a priority.
- 5 out of East Honolulu's 9 watersheds runoff goes into Maunalua Bay (Wai'alaie Nui, Wailupe, Niu, Kuli'ou'ou, and Portlock). Two watersheds, Kamilo Nui and Kamilo Iki, both runoff into the marina which eventually discharges into the bay. Development within the other two watersheds, Hanauma Bay and Koko Crater has been limited to Kalama Valley, Kamehame Ridge, and areas adjacent to the golf course.
- A Maunalua Water Quality Hui was created from the Livable Hawai'i Kai Hui with participants from environmental groups and East Honolulu stakeholders.
  - There is concern that the marina causes degradation of water quality to the Bay.
- Act 125 requires all cesspools to be upgraded, converted to a septic system, or connected to a sewer system by Jan. 1, 2050.
- There are 205 active cesspools are located in the Hawaii Kai area, 96 in Kuliouou, and 220 in the Wai'alaie and Kahala.

### **Recommendations for Revision of the Plan**

- Identify in the **Plan** some of the assets and users of Maunalua Bay: character and aesthetics, recreation, fishing, commerce, culture, habitat, etc.

- Add an explanation of what a LID is and that it is required when redeveloping properties over an acre. Promote stormwater retention and State water quality standards when redeveloping lands.
- Recognize that it may be difficult to restore lost wetlands, however, with the proper application of BMPs it is possible to partially restore ecological function to the region without takings. Promote permeable surfaces as a goal of redevelopment to reduce stormwater runoff to the bay.
- Adopt a build-back-better resiliency strategy that, in the event of a disaster, vulnerable areas along the shoreline or adjacent to streams that suffered significant damages would not be allowed to be redeveloped. Restore the ecological function of the lands that have been retreated from to serve as a buffer zone to protect inland areas from further damages.
- Encourage Best Marina Practices.
- Reaffirm that the great lawn, though within the Community Growth Boundary, is still in preservation. Recognize ecological function of the lawn. Identify potential, natural improvements to improve ecological function while retaining open, undeveloped character.
- Encourage the state to perform more water quality testing at sources that empty into Maunalua Bay, specifically the Marina, Paikō Lagoon, and Wailupe Stream.

### **Recommendations for Improvement of Implementation**

- Coordinate with the varying agencies according to their role and responsibilities as identified in the **Hawai'i Water Plan**.
  - DLNR is the lead agency for reducing upland soil erosion;
  - DOH for reducing pollutant loads from residential and commercial uses in priority watersheds;
  - OP for restoring/protecting wetlands, streams, and estuaries;
  - Counties for reducing the number of IWS and illegal stormwater discharges;
  - DLNR for expanding marine protected area management and conservation;
  - DLNR for developing community-based frameworks for mitigating conflicts and community-based natural resource restoration; and,

- OP in monitoring ORMP implementation.
- Revise permitting requirements within SMA or shoreline areas and certain flood zones that property repetitively and significantly damaged by natural disasters shall not be allowed to rebuild in the same location. Define significant damages.

### 2.3.3.2 Endangered Species Habitat

#### Issue Analysis

- National Oceanic and Atmospheric Administration (NOAA) initiated a process to reclassify and broaden the Hawaiian Islands Humpback Whale National Marine Sanctuary into a habitat- and ecosystem-based approach.
  - Published in March 2015, the proposed name of the sanctuary would be the **Hawaiian Islands National Marine Sanctuary - Nā Kai 'Ewalu**.
  - Due to community resistance the expansion plans were withdrawn in January, 2016.
- The critical habitat for the endangered Hawaiian Monk Seal has expanded in East Honolulu and includes terrestrial lands spanning from Hanauma Bay to Ka'ili'ili Bay. The terrestrial habitat for the Monk Seal extends 5 meters inland from the shoreline and includes all submerged lands 10 meters from the seafloor up to a depth of 200 meters.
- In addition to the three Wildlife Preserves identified in the 1999 **Plan** (Paikō Lagoon Wildlife Sanctuary, Ihi'ihilauākea Preserve, and Hanauma Bay Marine Life Conservation District), the community has asked that a number of other wildlife, archaeological, and historic preserves being included in the **Plan** including the following:
  - Nono'ula Crater (adjacent to Ihi'ihilauākea Preserve)
    - The preserves include mixed hermland and shrubland, the moisture regime, and subcanopy and understory native plant species<sup>23</sup>.
  - Keawāwa marsh and wetlands that serve as a bird habitat for the critically endangered Hawaiian moorhen adjacent to the O'ahu Club.
  - The Hāwea Heiau complex adjacent to Keawāwa Wetlands.

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<sup>23</sup> U.S. Fish and Wildlife Service, Department of the Interior. Federal Register, Vol. 76, No. 148. August 2, 2011. Page 46443.

- The two wetlands and ponds located within the greater Kuapā Pond.
- The southern slope of Koko Crater above Hālonā Cove.
- Kealakīpapa Valley located between Koko Crater and Pu‘uokīpahulu makai of Kalaniana‘ole Highway.
- The upper ranges of the Ko‘olau mountains from Kuli‘ou‘ou to the **Plan** boundary (Kuli‘ou‘ou and Honolulu Watershed Forest Reserves).
- Kānewai Spring adjacent to Paikō Lagoon.

### **Recommendations for Revision of the Plan**

- Revise the **Open Space map** to include the above-mentioned locations or create new map to avoid saturating one map with too much information.
- Ensure correct Hawaiian spelling of place names in the document and on maps.

### **Recommendations for Improvement of Implementation**

- Encourage the US Fish and Wildlife Service (USFWS) to amend their wetland maps to identify historic and existing wetlands of Keawāwa and the areas adjacent to the O‘ahu Club.

### **2.3.3.3 Native Hawaiian Cultural and Archaeological Sites**

#### **Issue Analysis**

- The region of Maunaloa featured one of the largest fishponds in Hawai‘i, Kuapā Pond, prior to the dredging and development of the marina and adjacent tract homes.
- Wailupe Peninsula was formed with the filling in and development of Wailupe Fishpond. Niu Peninsula was formed with the filling in of wetlands.
- Portions of the Hāwea Heiau was preserved from proposed development as part of a buyout by the Livable Hawai‘i Kai Hui. Adjacent portions of the marsh are still vulnerable to development although the landowner has informally expressed to a community group that the land will not be developed in the next few years.

## Recommendations for Revision of the Plan

- Move **Table 3-5: Significant Cultural and Historic Sites in East Honolulu**, to this **Technical Report** and update accordingly.

**Table 2-3 Significant Cultural and Historic Sites** (*Previously Table 3-5*)

Feature	Reference
Makapu'u Point Lighthouse	National Register of Historic Places #77000447
Kealakipapa Valley Road	McAllister Site 3; SHPD 3
Kaloko Dwelling Site	SHPD 3997
Ka'ili'ili Midden Site	SHPD 3970
Koko Head Petroglyphs	McAllister Site 44; SHPD 1128
Makapu'u Head Cave	SHPD 3989
Makani'olu Shelter (Kuli'ou'ou)	Hawai'i Register of Historic Places #80-15-02
Burial Caves (Niu)	McAllister Site 53
5329 Kalaniana'ole Hwy/ Carl and Florence (Gurrey) Bayer Residence	Hawai'i Register of Historic Places #80-14-9804
Koko Head Petroglyphs	SHPD 1128
Kaho'ohaihai C-Shapes	SHPD 00004
Kaho'ohaihai House Site	SHPD 00005
Nāpaia House Site	SHPD 00007
Nāpaia Walled Structure	SHPD 00008
Ka'ili'ili Site	SHPD 00009, 10, 11, 12, 13
Wāwāmalu Beach Site	SHPD 14, 16, 17, 18, 19, 20, 22, 23, 24
Sandy Beach Ko'a	SHPD 00025
Kealahou Enclosure	SHPD 00026
Wāwāmalu Ranch Enclosures	SHPD 00027
Queens Gate Mounds & Walls	SHPD 00028
Kalama Valley Site	SHPD 00029, 30, 31, 32, 33, 34, 35
Koko Head House Site	SHPD 00036
Pāhu'a Heiau	SHPD 00039
Hāwea Heiau	SHPD 00042
Keahupua-o Maunalua Fishpond	SHPD 00049
House Platform	SHPD 01137
Kaluanui Site	SHPD 2900, 2901, 2903, 2904, 2905, 2906
Hana'uma Shelter	SHPD 04002

Source: McAllister, J. Gilbert, Archaeology of O'ahu (1933); Sterling E.P. and C.C. Summers, Sites of O'ahu (1978); and Kipuka Database, OHA. Last accessed October 21, 2016.

- Remove map locations of identified historic cultural and archaeological sites for protection and sensitivity concerns.
- Include a description of the Hāwea Heiau and Pāhu‘a Heiau complexes in **Section 3.4.1** and include on a map and table.
- Ensure correct Hawaiian spelling of place names in the document and on maps. Potentially provide Hawaiian place names in an index.
- Identify on a map the different types of Conservation zones managed by DLNR, particularly the Resource Subzone of the Honolulu Watershed Forest Reserve stretching from Kuli‘ou‘ou to the western **Plan** boundary.

### **Recommendations for Improvement of Implementation**

- Continue to encourage SHPD to convert historical site maps to GIS and make data available to the public.

#### **2.3.3.4 Light Pollution**

##### **Issue Analysis**

- A discussion on outdoor lighting was included in the 1999 **Plan** around nature parks and recreation areas and to avoid or shield lighting in residential districts.
- The **Koolau Loa SCP** includes the following language:
  - Minimize the adverse effects of artificial lighting on wildlife and human health by balancing the need of outdoor lighting for night utility, security, and desire for reasonable architectural expression with the need to conserve energy and protect the natural environment.
  - Adopt outdoor night lighting standards that encourage efforts to minimize glare and stray light, and reinforce the differences between urban and rural communities.
- The City retrofitted some of the 51,700 standard high-pressure sodium streetlights in use on O‘ahu with light-emitting diode (“LED”) with energy savings estimated at 50%.
  - Community and environmental groups requested that the lights should have control panels that would allow for dimming lights as well as for LEDs with a lower color temperature.
  - UH argued that the proposed lights produce excessive levels of blue light.

- The Hawai'i Kai Neighborhood Board sent the mayor a letter stating its unanimous support for warmer, 3,000K streetlights in May 2015.
  - Council passed Resolution 15-215 requesting the administration to report the findings and status of the RFP.
  - The Mayor withdrew the RFP for the 4,000K LED lights on 11/3/15 and will revise based on the above mentioned conditions.
- There is a Statewide "zero emissions clean economy target"/carbon "neutrality" requirement by 2045 (HRS § 225P-5) Act 15, SLH 2018.
    - Part of this goal will be achieved by reducing electric energy consumption statewide by 4,300 gigawatt-hours by 2030<sup>24</sup>.
  - The **Honolulu Complete Streets Design Manual** states the following:
    - Pedestrian scale lighting along sidewalks provides greater security, especially for people walking alone at night.
    - Lighting should be present at all marked crossing locations.
    - Crosswalk lighting should provide color contrast from standard roadway lighting.
    - Street lighting and traffic signals should share poles wherever possible. When retrofitting existing streets or creating new streets, pursue opportunities to combine these poles.
    - Street design and new development should consider the overall pattern of plantings, lighting, and furnishings when placing new utilities in the street.
    - Historically significant street light poles and fixtures should be maintained and upgraded where appropriate.
    - Pedestrian lighting should be coordinated with building and property owners to provide lighting attached to buildings for sidewalks, alleys, pedestrian paths, and stairways where separate lighting poles are not feasible or appropriate.
    - As appropriate, dark sky-compliant lighting should be selected to minimize light pollution cast into the sky while maximizing light cast onto the ground.

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<sup>24</sup> DBEDT and Hawai'i State Energy Office. **Transforming Power in Paradise: The Hawai'i Clean Energy Initiative**. February 2017. Accessed on April 6, 2018 at [www.hawaiicleanenergyinitiative.org](http://www.hawaiicleanenergyinitiative.org)

- Retrofits of existing street lights and new installations should provide lighting on pedestrian paths. Pedestrian lighting should be added to existing street light poles where feasible.

### **Recommendations for Revision of the Plan**

- Add language to the **Plan** that lighting should be shielded downward, especially in public viewing areas including stationary point lookouts and along significant view planes.
- Add language that consideration for additional lighting or changes to existing lighting should seek to maintain or improve night sky visibility.
- Reference the recommendations of the Honolulu Complete Streets Design Manual to encourage greater pedestrian activity.

### **Recommendations for Improvement of Implementation**

- Consideration of revisions to Sec. 21-4.100 of the LUO to include preservation to areas that require shielding from adjacent outdoor lighting fixtures.
- Revise the LUO to establish lighting standards that minimize light pollution while balancing the needs for safety, security, and architectural expression.

### **2.3.3.5 Land – Marine Planning and Regulation Coordination**

#### **Issue Analysis**

- The **Plan** is a land-based plan whose vision and implementation will impact coastal water quality. The State is the authority that directly oversees submerged lands with County authority extending mauka from the shoreline.
- The **Hawai'i Coastal and Estuarine Land Conservation Plan** recognizes that while counties have land use plans, it is the state's role and responsibility to support and protect coastal and estuarine resources.
- The federal government provides matching funds to purchase, for protection, coastal and estuarine resources and lands through NOAA's Coastal and Estuarine Land Conservation Program (CELCP) and is administered by the Hawai'i Coastal Zone Management (CZM) Program within the State Office of Planning.

- NOAA provides funds to public and private agencies for Coastal and Marine Habitat Restoration and Coastal Ecosystem Resiliency so long as the proposals are not only addressing only water quality improvement measures.
- The primary tool that County Agencies have to manage coastal lands is the SMA boundary and permitting process.
  - All state and county agencies shall enforce the CZM objectives and policies<sup>25</sup>.
  - Approximately 14 percent land in East Honolulu is located within the SMA, or 2,076 acres out of 15,046 acres.
  - Most lands makai of Kalanianaʻole Highway are within the SMA with the exception of lots along Portlock and most of Wailupe Peninsula.
  - County agencies may amend the SMA boundary subject to OP's review and determination.
- The Hawai'i Ocean Resource Management Plan (ORMP) sets forth the following perspectives and priorities through a place-based approach:
  - Connecting Land and Sea: Careful and appropriate use of the land is required to maintain the diverse array of ecological, social, cultural, and economic benefits we derive from the sea.
  - Preserving our Ocean Heritage: A vibrant and healthy ocean environment is the foundation for the quality of life valued in Hawai'i and the well-being of its people, now and for generations to come.
  - Promoting Collaboration and Stewardship: Working together and sharing knowledge, experience, and resources will improve and sustain our efforts to care for the land and the sea.
  - Various federal, state, and county agencies coordinated and contributed to the development of the ORMP, which helped to identify commonalities in vision and perspective between the following agencies:
 

<ul style="list-style-type: none"> <li>• State OP</li> <li>• DBEDT</li> <li>• DOH</li> </ul>	<ul style="list-style-type: none"> <li>• Kauai Planning Dept.</li> <li>• Maui Planning Dept.</li> <li>• Hawai'i Planning Dept.</li> </ul>
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<sup>25</sup> HRS 205A-2

- DOT
  - UH Sea Grant
  - UH SOEST
  - Dept. of Agriculture
  - State Civil Defense
  - DLNR
  - OHA
  - Honolulu BWS
  - Marine and Coastal Zone Advocacy Council
  - NOAA
  - USACE
  - US Navy
  - US Coast Guard
  - US EPA
  - Honolulu DPP
- There are two Marine Managed areas in East Honolulu: Paikō Lagoon Wildlife Sanctuary and Hanauma Bay Marine Life Conservation District. Both areas are no take zones.
- Malama Maunalua has a demonstration project with Sea Grant and Malama Maunalua which created a **Watershed Handbook for the Residents of Maunalua** to illustrate how low impact development (LID) and community tools can to reduce nonpoint source pollution. The project was funded by NOAA, OP’s Coastal Nonpoint Pollution Control Program, and UH Sea Grant.<sup>26</sup>

### **Recommendations for Revision of the Plan**

- Recognize the boundary limit of the **Plan** and City jurisdiction is at the certified shoreline but also that land use decisions have downstream impacts extending into marine environments.
- Insert a map of wetlands, riparian zones, fishponds, and springs into the **Plan**.
- Encourage stewardship of natural resources including Maunalua Bay. Identify recent conservation victories as a result of public fundraising and political pressure to instill the community with confidence of what is achievable with organization.
- Discourage further alteration of the coastline. Recognize the adverse impacts armoring has on adjacent areas as a disruptor to natural processes.

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<sup>26</sup> E Malama I Na ‘Aina Kumu Wai O Maunalua, Sea Grant

## **Recommendations for Improvement of Implementation**

- Amend the SMA to include all of Waiupe Peninsula to Kalaniana'ole Highway.
- Coordinate with the varying agencies according to their role and responsibilities as identified within the ORMP.
- As SLR and coastal erosion will continue to shift the shoreline inland, establish the means with which the SMA can expand inland at regular intervals.
- Seek grants from NOAA to address sediment reduction to streams and nearshore waters<sup>27</sup>.

### **2.3.3.6 Water Quality and Conservation**

#### **Issue Analysis**

- Water quality is a result of how rain is captured by the land or collects and drains to the ocean.
- Land use decisions have greatly increased the amount of impervious surfaces resulting in more runoff and less rainwater contained on-site. East Honolulu has one of the highest percentages of impervious to permeable surfaces on O'ahu (50-90 percent of urban areas) due to high lot coverage ratios and the age of the sub-urban community<sup>28</sup>.
- Almost all stream segments in East Honolulu have been hardened from flood control projects. Hardened streams do not allow waters enough time to settle and deposit suspended sediments in upland environments. Downstream sedimentation deposits nutrients from upstream which leads increased algae growth in marine and estuarine environments.
- "Flooding problems" are human-created issues stemming from, among other things:
  - Clearing of upland areas where water recharge would have otherwise occurred.

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<sup>27</sup> (Community-based Restoration Program: Coastal and Marine Habitat Restoration Grants and Coastal Ecosystem Resiliency Grants)

<sup>28</sup> Wanger, Jolie R. E Malama I Na Aina Kumu Wai O Maunaloa: A Watershed Handbook for the Residents of Maunaloa. UH Sea Grant. 2008.

- Transformation of native Hawaiian forests, which have demonstrated higher capability to absorb and discharge over a greater period of time, water from severe precipitation events, to alien-dominated vegetation.
  - Development which allowed buildings to be built in natural or man-created areas of flooding.
  - Lack of enforceable requirements for water pervious surfaces where feasible and practical.
  - High levels of allowed impervious surfaces without requirements for precipitation catchment and delayed discharge (e.g., rainwater cisterns).
  - City clearance actions in Wailupe stream has been observed to leave cut vegetation lying in the stream.
  - Flooding in Haha'ione Valley in 1989 that did so much damage was not just, or even primarily, due to falling rocks.
  - Repeated flooding of lower 'Āina Haina has been due to vegetation catching on the center bridge support at Kalaniana'ole Highway.
- In 2000, East Honolulu consumed 10 MGD importing 0.7 MGD from Ko'olau Poko and 9 MGD from the Primary Urban Center<sup>29</sup>. There is the potential for BWS to open additional exploratory wells as the watershed is below the sustainable yield but as there is no anticipated population growth, the existing supply is adequate. BWS is not anticipated to publish the **East Honolulu Watershed Management Plan** until late 2019 or 2020.
    - Percolation will only prevent runoff and will not contribute to recharging the aquifer as the watersheds in East Honolulu are fairly shallow.
  - The State of Hawai'i Commission on Water Resource Management published the **Water Resource Protection Plan 2019 Update** that recalculates the Sustainable Yield.
    - The Wai'alae-West Aquifer had a sustainable yield of 4 million gallons per day (mgd) in 2008 but was reduced to 2.5 mgd in 2019 (Table **F-10**). **Table H-6** shows the permitted allocation of Wai'alae-West is 2.797 mgd, or 0.297 mgd that are unallocated. Existing water use is 1.75 mgd.

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<sup>29</sup> <http://www.boardofwatersupply.com/cssweb/display.cfm?sid=1406>

- There was no change in the calculated sustainable yield of the Wai‘alae-East Aquifer from 1999, holding at 2 mgd (Table **F-10**). **Table H-6** shows the permitted allocation of Wai‘alae-East is 0.79 mgd. Existing water use is 0.16 mgd.
- There is a requirement for one-hundred percent reclaimed water use in State and County facilities by 2045 with exception. (HRS § 174C-31, g (6)) Act 170, SLH 2016.
- The U.S. Army Corps of Engineers (USACE) is working with the DDC on flood control projects for Wailupe Stream (stalled) and Kuli‘ou‘ou Stream. Federal guidance for large projects is for flood control to yield a favorable benefit-cost-ratio. Water quality improvements can be included but must not off-set the financial benefits ratio.
- City is in the process of installing pressure-sensitive gates on storm drains.
- CIP and DFM guided by the **Plan** so any guidance the **Plan** contains is very beneficial to improving water quality.

### **Recommendations for Revision of the Plan**

- Encourage clean up contaminated areas that pose hazards to soil and water quality.
- Encourage the use of permeable surfaces when an area is redeveloped and promote stormwater retention on-site.
- Encourage landscaping on roadways to serve a greater ecological function like intercepting runoff and filtering oils and sediment from the roadways.
- Encourage more efficient use of water supplies through conservation measures and distribution system leak repair.
- Preservation of existing conservation and agricultural uses.
- Maintaining inadequate infrastructure does not improve downstream impacts. Incorporate mitigative measures or installation of permanent BMPs when repairing or resurfacing roadways similar to what should be considered as part of Complete Streets.
- Insert language that projects shall comply with the Clean Water Act.
- Although it is not feasible to restore wetlands, it is still possible to restore ecological functions to surrounding areas through BMPs and LIDs.

## **Recommendations for Improvement of Implementation**

- Look into the creation of a Watershed Restoration Action Strategy (WRAS) or watershed advisory groups.
- Better enforcement of stockpiling and disposal of excess materials.
- Regularly attend state-wide or national meetings on climate change and sea level rise to remain up-to-date on projections and strategies.
- Educate residents, particularly those living adjacent to stream channels, on the opportunities and responsibilities of proper stream channel maintenance.

### **2.3.4 Adapting to Changing Conditions**

#### **2.3.4.1 Affordable Housing**

##### **Issue Analysis**

- Housing affordability has been a concern for East Honolulu and O‘ahu prompting many studies to suggest that Honolulu housing stock has not kept pace with population growth. The large shortage of housing impacts housing prices.
- There is no anticipated growth occurring in East Honolulu with population growth shifting to the Ewa Plains and around TOD.
- Though there are no plans to expand rail to East Honolulu, and a route being financially unfeasible, East Honolulu community leaders have been adamant that rail shall not be expanded to East Honolulu.
  - A Rapid Transit Corridor (Symbol 016) is on the PIM along Kalaniana‘ole Highway but is not limited to rail.
- The construction of Accessory Dwelling Units (ADUs) has been signed into law to allow homeowners to construct secondary units on their properties, where appropriate, in the hopes of providing much needed supply for rental housing.
  - The potential build-out for East Honolulu is very low due do already high lot coverage.
  - There are already deed restrictions in many of the homes in Hawai‘i Kai that would prevent the construction of ADUs.
  - There is potential for some lots in Portlock, Kuli‘ou‘ou, Niu Valley, and ‘Āina Haina to construct ADUs if they are not bound by deed restrictions.

- East Honolulu, like other regions of O‘ahu, is witnessing a rapidly aging population referred to as the “Silver Tsunami.”
  - The benefits of ADUs for seniors will be discussed in **Section 2.3.4.3 – Age Friendly Community**. There are economic benefits to seniors the longer they are able to remain in their own home.
- The limited housing that will be constructed in East Honolulu over the next 20 years will be from infill development.
- The Hale Ka Lae (7000 Hawai‘i Kai Drive) is a multi-family apartment complex being developed on the corner of Keahole Street and Hawai‘i Kai Drive that provided 54 affordable units and 215 market rate rental units when it opened in 2016.
- There is a city-wide push to allow for the construction of residential uses above the first floor of land zoned B-1 and B-2. This would affect the following areas:
  - Koko Marina Shopping Center;
  - Hawai‘i Kai Shopping Center;
  - Hawai‘i Kai Towne Center;
  - Hahaione Valley (JAIMS College has no dormitories);
  - Kalama Village Shopping Center;
  - Niu Valley Shopping Center; and,
  - ‘Āina Haina Shopping Center.
- The **‘Ewa DP** says “Permit multi-family residential use above the first floor and include it wherever possible in commercial centers” rather than identify B-1 and B-2.
- There are community concerns that short-term vacation rentals are driving up the cost of housing. Transient Vacation Units (TVUs) are prohibited (with the exception of areas zoned for resort) but continue to proliferate due to various online businesses allowing owners or tenants to list properties online and which the City has been unsuccessful in prosecuting. Enforcement is mostly on a complaint basis.
- A survey of websites taken on October 23, 2015 revealed that the following units were being advertised in East Honolulu outside of resort areas:
  - 36 Units are listed on AirBnB with an average stay of over \$100/night.

- 113 Units on vrbo.com with an average stay of over \$500/night.
- 11 Units on vacationhomerentals.com (trip advisor) with an average stay of over \$1400/night.
- Short-term rental enforcement began August 2019 but is not likely to have any impact on East Honolulu home prices.
- An attempt to include a business hotel in Hawai'i Kai was rejected by the community for the 1999 **Plan**. Kahala Resort remains the only legal short-term vacation rental area in East Honolulu.

### **Recommendations for Revision of the Plan**

- Strengthen language that recognizes East Honolulu as comprised of quiet bedroom communities.
- Emphasize that anticipated growth on O'ahu is directed toward the 'Ewa Plain with little to no growth projected for East Honolulu.
- Identify how prevalent TVUs in East Honolulu are and identify that technology facilitates their rentals.

### **Recommendations for Improvement of Implementation**

- Work with the State Legislature and City Council to grant counties greater authority with which to prosecute short-term vacation rentals; or
- Revise the existing county ban on short-term vacation rentals granting greater authority to permit new TVUs.

#### **2.3.4.2 Complete Streets**

##### **Issue Analysis**

- Act 54 was signed into law in 2009 requiring each county to establish a complete streets policy<sup>30</sup>.

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<sup>30</sup> ROH Chapter 14, Article 33

## Pedestrian Connectivity

- In 2013 the Hawai'i Department of Transportation, Highways Division published the **Statewide Pedestrian Master Plan**<sup>31</sup>. Some of the recommendations of the plan are as follows:
  - Sidewalks on both sides of Kalaniana'ole Highway to Hawai'i Kai Drive (with a few exceptions west of Wailupe).
  - Sidewalks on one side of Kalaniana'ole Highway between Wailupe and Wai'alaie and from Hawai'i Kai Drive to Waimanalo.
  - Identifying populations considered to have "high pedestrian potential" including low-income households, the elderly, and youths 17 years of age or younger.
- In 2016 DTS, DPP, DFM, and DDC jointly published the **Honolulu Complete Streets Design Manual**<sup>32</sup>.
- Act 317 was signed into law on July 10, 2012 creating county-level Safe Routes to School (SRTS) programs and established a state SRTS program special fund. The program is funded by traffic violations that occur in school zones.
  - SRTS held informational workshops in East Honolulu in the fall of 2014 to raise awareness for pedestrian safety and solicit applications for federal projects which include infrastructure and non-infrastructure projects.
- Fewer than 10 percent of Hawai'i's 220,000 children walk or bike to school, down from the national average of over 50 percent in 1969<sup>33</sup>.
- There have been calls for greater connections for pedestrians, cyclists, and motorists to different neighborhoods and shopping centers. One specific community recommendation is to open the loop between Hawai'i Kai Drive to Kamilo Street by removing the gates near Kamilo Nui Valley.
  - Exploring avenues for farmers to sell their products more directly to the community from a stand in Kamilo Nui Valley could improve the viability of the farms and raise community awareness of the agricultural lands although some farmers do not want increased exposure.

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<sup>31</sup> <http://hidot.hawaii.gov/highways/files/2013/07/Pedest-Plan-PedMP.pdf>

<sup>32</sup> [http://www4.honolulu.gov/docushare/dsweb/Get/Document-187742/160908%20Honolulu%20Complete%20Streets%20Design%20Manual\\_Final.pdf](http://www4.honolulu.gov/docushare/dsweb/Get/Document-187742/160908%20Honolulu%20Complete%20Streets%20Design%20Manual_Final.pdf)

<sup>33</sup> US DOT, 2009. <http://hidot.hawaii.gov/highways/srts/>

- The Federal Highway Administration (FHWA) publishes policies and guidelines for pedestrian and bicycle infrastructure including the following points:
  - “Bicyclists and pedestrians shall be given due consideration in the comprehensive transportation plans developed by each metropolitan planning organization and State...”<sup>34</sup>
  - Restriping roads, either as a standalone project or after a resurfacing or reconstruction project, to create striped bike lanes is cost effective.
  - Environment - environmental measures promote the creation and maintenance of a transportation system that minimizes and/or mitigates impacts to the natural environment. Air quality impacts are the most common type of environmental measure, but others evaluate impervious surface and stormwater and noise pollution.
  - Health - public health impacts of transportation decisions typically include changes to levels of physical activity, safety, and air quality. Increases in walking and bicycling are correlated with higher levels of public health.
  - Livability - quality of life impacts of transportation systems are evaluated by many local jurisdictions. Livability measures directly acknowledge the trade-offs between the demands of auto travelers passing through an area and those living adjacent to transportation infrastructure. Measures that reflect public opinion are also included within this category.
- The **O’ahu Regional Transportation Plan** (ORTP) 2040 was approved by the OMPO Policy Board on April 13, 2016 to guide the development of transportation infrastructure and policies.<sup>35</sup>
  - ORTP recommends “improving the full range of transportation options available to island residents—automobile, truck, bus, rail, bicycle, and pedestrian.”
  - No projects identified in the ORTP are specific to East Honolulu.
  - “ORTP 2040 also recognizes the impact of the transportation/land use cycle shown in Figure 1-1, a cycle that has been repeated many times on O’ahu and throughout the U.S.” (Figure 1-1 in the ORTP is **Figure 2-2**, below).

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<sup>34</sup> 23 U.S.C. 217(g)(1)

<sup>35</sup> <http://www.oahumpo.org/wp-content/uploads/2013/01/ORTP-2040-APPROVED-160502.pdf>

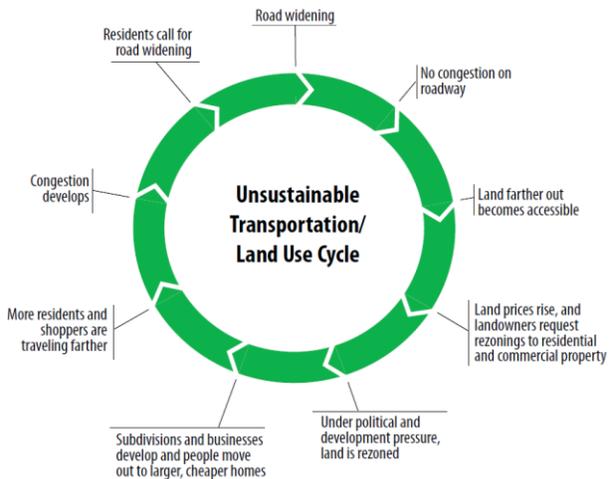


Figure 2-2 Transportation/Land Use Cycle<sup>36</sup>



Figure 2-3 Existing and Proposed Bikeways<sup>37</sup>

### Bikeways

- The 2012 **O’ahu Bike Plan** proposes an increase from 132 miles of bikeway facilities to 691 miles over a thirty-year period<sup>38</sup>. There are approximately 9.7 miles of existing bikeway facilities in East Honolulu with approximately 16.3 miles proposed collectively by the **O’ahu Bike Plan** and **Bike Plan Hawai’i**.
- The HODT published the **Bike Plan Hawai’i** in 2003. Both plans prioritize proposed bicycle projects based on need and funding.
- Most priority 1 (5-years or less) and priority 2 projects (5-10 years) have not made progress since being proposed in 2003.

### Public Transit

- Residents reported to the removal of a few bus stops, decreasing accessibility.

## **Recommendations for Revision of the Plan**

### Pedestrian Connectivity

- The **Plan** should include policy recommendations from the **Honolulu Complete Streets Design Manual** and the **Statewide Pedestrian Master Plan**.

<sup>36</sup> **Oahu Regional Transportation Plan** 2040. Oahu Metropolitan Planning Organization (PRD). 2/26/16. [http://www.oahumpo.org/wp-content/uploads/2016/02/OahuMPO\\_ORTP2040\\_PUBLICDRAFT160226.pdf](http://www.oahumpo.org/wp-content/uploads/2016/02/OahuMPO_ORTP2040_PUBLICDRAFT160226.pdf)

<sup>37</sup> **Bike Plan Hawai’i**. State Dept. of Transportation. 2013. <http://hidot.hawaii.gov/highways/bike-plan-hawaii-master-plan/>

<sup>38</sup> <http://www4.honolulu.gov/docushare/dsweb/Get/Document-179947/Oahu%20Bike%20Plan-August%202012.pdf>

- Encourage greater pedestrian connections to commercial centers, parks, beaches, and schools.
- Discourage gated communities. Encourage existing gated communities to improve adjacent streetscape and to disguise the public-private boundary.
- Any redevelopment along the marina waterfront should maximize views of the marina and construct connected pedestrian walkways along the waterfront. Encourage greater connections of existing walkways and sidewalks.
- Target areas for pedestrian improvements that have “high pedestrian potential,” particularly around schools and elderly homes.
- Encourage sidewalk improvements along Kalaniana‘ole Highway consistent with the **Statewide Pedestrian Master Plan**.
- Recognize the benefit that pedestrian improvements enable those of all ages and abilities to walk and bike to nearby destinations in their community.

#### Bikeways

- Encourage better integration between mass transit and bicycle facilities.
- Seek multi-use path opportunities.
- Street design should encourage appropriate speeds (traffic calming). Residential streets should be designed for neighborhood speeds.
- Include bikeway connections on maps to areas outside of East Honolulu.
- Move and **Table 4-2** from the **Plan** to this **Technical Report** and revise to include the proposed bikeway facilities identified in the 1999 **Plan**, **O‘ahu Bike Plan**, and **Bike Plan Hawai‘i**. Revise **Exhibit 4-1** in the **Plan** accordingly.
- Match proposed bikeway improvements from the various plans with the City’s road repaving schedule.
- Encourage better integration between mass transit and bicycle facilities.
- Prevent the removal of existing crosswalks. Support traffic calming measures. Improve existing crosswalks with additional signage and the addition of lights, bollards, flags, or raising the crosswalk.

**Table 2-4 Bikeway Facilities** (previously Table 4-2)

Route No.	Description	Type	Length (miles)	Priority and Code		By Year
				State	City	
-	Kalaniana'ole Highway (Kilauea Ave to Keahole St.)	(State) Lane Signed / Shared	5.0	Existing		Existing
-	Kalaniana'ole Highway (Lunalilo Home Rd. to Keahole St.)	(State) Route Signed / Shared	0.9	Existing		Existing
-	Hawai'i Kai Drive (Kealahou St to Lunalilo Home Rd)	Route Signed / Shared	1.1	Existing		Existing
-	Kealahou Street (Kalaniana'ole Hwy. to Hawai'i Kai Dr.)	Route	0.8	Existing		Existing
-	Lunalilo Home Road (Kalaniana'ole Hwy. to Hawai'i Kai Dr.)	Route	1.8	Existing		Existing
95	Kalaniana'ole Highway (Sandy Beach Park to Makapu'u)	(State) Shoulder Signed / Shared	2.2	1-95	2-34	2023
96	Kalaniana'ole Highway (Lunalilo Home Rd. to Sandy Beach Park via Hanauma Bay)	(State) Shoulder / Lane Signed/ Shared	2.6	2-96	2-33	2033
97	Portlock Road (Kalaniana'ole Hwy. to Lunalilo Home Rd.)	Route Signed / Shared	0.8	2-97	2-37	???
98	Ahukiki St (Lunalilo Home Rd. to Kamilo Iki Elem.)	Route Signed / Shared	0.7	3-98	3-16	???
99 A	Wailua Street (Hawai'i Kai Dr. to Lunalilo Home Rd.)	Lane	0.4	Completed		Existing
				3-99a	3-21	
99 B	Keahole Street (Kalaniana'ole Hwy. to Hawai'i Kai Dr.)	Route / Lane Signed / Shared	0.6	3-99b	2-36	2033+
99 C	Hawai'i Kai Drive (Kalaniana'ole Hwy. to Wailua St.)	Route / Lane Signed / Shared	1.7	3-99c	2-31	2033+
99 D	Kawaihae Street (Kalaniana'ole Hwy. to Hawai'i Kai Dr.)	Route / Lane Signed / Shared	0.9	3-99d	2-35	2033+
99 E	Halema'uma'u Street (Loop to Kalaniana'ole Hwy.)	Route / Lane Signed / Shared	0.8	3-99e	2-30	2033+
99 F	Hind Iuka Drive (E. Hind Dr. to Wailupe Valley School)	Route / Lane Signed / Shared	0.7	3-99f	3-20	2033+
99 G	West Hind Drive / East Hind Drive ('Āina Haina)	Route / Lane Signed / Shared	1.2	3-99g	2-38	2033+
100	Anali'i Street to Po'ola Street (Kalani Wai'alae Iki Park to Keikilani 'Āina Haina ES)	Path	0.9	2-100	3-17	2033
-	Hawai'i Kai Drive Extension (Wailua St. to Lunalino Home Rd. via Kamilo Nui)	Route	1.8	-	2-32	
-	Hanauma Bay Road	Route	0.3	-	3-18	
-	Hawai'i Kai Golf Course (Hawai'i Kai Drive to Kalaniana'ole Hwy.)	Path/ Route	0.9	-	3-19	

Priority 1 proposals have a timeframe of under 5 years; Priority 2 proposals have a timeframe of under 10 years; Priority 3 proposals have a timeframe of more than 10 years.

Source: Department of Transportation, Highways Division, **Bike Plan Hawai'i**, 2013

## Public Transit

- Update and move **Table 4-1: Bus Routes Servicing East Honolulu** from the **Plan** to this **Technical Report** as **Table 2-4**.

**Table 2-5 Bus Routes Servicing East Honolulu** (previously Table 4-1)

Route Number	Route Type	General Service Area Within East Honolulu
1 / 1L	Frequent Urban Route	Kalaniana'ole Hwy; Upper 'Āina Haina; Hawai'i Kai Dr; Lunalilo Home Road; Kaimuki – Koko Head Ave.
22	Local Route	Kalaniana'ole Highway; Hawai'i Kai; Hanauma Bay; Sandy Beach; Makapu'u; Sea Life Park
23	Local Route	Kalaniana'ole Highway; Hawai'i Kai, Lunalilo Home Road; Kalama Valley; Makapu'u
24	Local Route	Kalaniana'ole Highway ; 'Āina Haina
80	Commuter Route	Kalaniana'ole Highway; Lunalilo Home Road; Hawai'i Kai Park & Ride, Downtown and UH
80A	Commuter Route	Kalaniana'ole Highway; Lunalilo Home Road; Kalama Valley; Hawai'i Kai Park & Ride, UH Manoa
80B	Commuter Route	Kalaniana'ole Highway; 'Āina Haina, Downtown
82	Commuter Route	Kalaniana'ole Highway; Kalama Valley; Hawai'i Kai Park & Ride, Downtown
PH6	Commuter Route	Kalaniana'ole Highway; Hawai'i Kai Drive; Lunalilo Home Road; Hawai'i Kai Park & Ride, Pearl Harbor
234	Commuter Route	Kahala Mall; Wai'ala'e Nui; Halekoa Drive,
235	Commuter Route	Kahala Mall; Wai'ala'e Iki; Laukahi Street

### Recommendations for Improvement of Implementation

- Explore public roadway or walkway connections through Kamilo Nui. Meet with the farmers and the landowner, Bishop Estate, to explore how a regional transportation linkage project could impact them locally.
- Work with the HDOT to ensure all crosswalks across Kalaniana'ole Highway have a center median where medians are present.
- Encourage HDOT to reevaluate pedestrian crossings at Lunalilo Home Road and Kalaniana'ole Highway, especially if the Koko Marina Center is redeveloped.

### 2.3.4.3 Age-Friendly Community

#### Issue Analysis

- An “Age-Friendly” community actively implements and maintains an inclusive and accessible environment for all residents of all ages and abilities. Age-friendly

principles recognize the special needs of community elders while promoting health, safety and quality of life for all residents.

- In October 2015 the Mayor announced that AARP and the WHO accepted the **Making Honolulu an Age-Friendly City: An Action Plan** as part of the WHO Global Network of Age Friendly Cities and Communities initiative. This international initiative is aimed at preparing in tandem for rapid population aging and increased urbanization. At the time of announcement, Honolulu is one of only eight other communities in the nation with an approved **Age-Friendly Action Plan**. Accordingly, Honolulu is poised to be a national leader for meaningful action toward Age-Friendly community standards.
- While sharing the national and global trend of accelerating population aging, Hawai'i and East Honolulu has its own specific set of challenges:
  - By 2030 more than a quarter of Hawai'i's population will be over age 65.<sup>39</sup>
  - In a 2014 AARP survey of Hawai'i residents age 45+, nearly four in five (79%) say that it is very important or extremely important to stay in their own homes as they age. However, most of those surveyed said they would need to make modifications to their homes in order to do so.<sup>40</sup>
  - Over 23% of residents in the **Plan** coverage area are over 65, the highest percentage of any other DP or SCP area.<sup>41</sup>
  - Approximately 28% of **Plan** area residents 65 and over live alone.<sup>42</sup>
  - Hawai'i has a higher rate of pedestrian fatality among those 65 and over than the rest of the nation.<sup>43</sup>
- To make meaningful progress toward a more age-friendly community, many converging issues need to be addressed simultaneously. The **Honolulu Age-**

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<sup>39</sup> From the *Mayor's Letter* in the *Honolulu Age Friendly City Action Plan*. The current *Hawaii State Plan on Aging* cites that by 2020 one in four Hawaii residents will be over the age of 60.

<sup>40</sup> Livability For All: The 2014 AARP Livable Community Survey of Honolulu, Hawaii Adults Age 45+, June 2014.

<sup>41</sup> See the map: Basemap Demographics- Age Friendly City Honolulu "Population Age 65 and Over by Development Plan" <http://gis.hicentral.com/storyboards/basedemo/index.html>

<sup>42</sup> See the map: Social Involvement - Age Friendly City Honolulu "Living Alone" <http://gis.hicentral.com/storyboards/comm/index.html>

<sup>43</sup> "Even though pedestrian activity is estimated to occur in higher levels in Hawaii compared to other states, Hawaii ranks 30th for pedestrian safety (2010 Benchmarking Report)...Among the elderly, Hawaii leads the nation with a rate of 40.2 deaths per 100,000 people 65 years and older, nearly three times higher than that for the rest of the US." (*Hawaii Pedestrian Toolbox* pages P-5 and P-6). The *Toolbox* is a supplemental document to the *Hawaii State Pedestrian Master Plan*.

**Friendly City Action Plan** (AFCAP) covers six major “domains”: Outdoor Spaces & Buildings, Transportation, Housing, Communication & Social Involvement, Civic Participation & Employment, and Community Support & Health Services.

- Other documents providing guidance on Honolulu’s capacity to plan for aging residents include the **Hawai’i State Plan on Aging** (for the period Oct.1, 2015-September 30, 2017), the **Honolulu Complete Streets Design Manual**, **Housing O’ahu: Islandwide Housing Strategy** (DRAFT), the **State of Hawai’i 2050 Sustainability Plan** (January 2008), and the **Hawai’i Pedestrian Toolbox** (May 2013).
- The DOE is piloting a project using school property for commercial use to provide additional departmental funding in facilities no longer needed for schools.
  - In locations where homes are adjacent to school property, the effect on those neighbors must be considered before establishing commercial centers in residential areas.

#### **Affordable and Special Needs Housing**

- Seniors on a limited income may be especially vulnerable to market costs. The area’s senior demographic group as well as others can benefit greatly from alternative infill housing programs and allowances and mixed-use development.
- Ordinance 15-41 allows homeowners with a minimum 3,500 SF lot size to construct Accessory Dwelling Units (ADUs). East Honolulu capacity for ADUs is limited by the HOA-bound communities, existing lot coverage, and deed restrictions.
  - There is a minimum lease term requirement to prevent ADUs from converting to vacation rentals.
  - At the current pace, only 50 ADUs are estimated to be constructed in East Honolulu by 2040, which is not enough to meet the demand for the growing senior population.
- Another potential opportunity to the increase of rental housing stock in East Honolulu is allowing for residential development above commercial in B-1 and B-2 zoned areas.

- Residential inclusion over B-1 and B-2 zones supports the **Plan**'s stated Vision to "Promote an Efficient Pattern of Urban Development". See **Section 2.3.4.1** for further discussion.
- For seniors who desire to age-in-place in their own communities, there are many other considerations in addition to cost, including home safety and accessibility retrofits for home owners, and access to support services and care.
- The **Plan** area does not have any existing major medical and healthcare facilities, which may limit its appeal to new senior residents. There is only one assisted living facility in the **Plan** area; however, the **Plan** does include guidelines for future special needs housing.

#### Pedestrian Connectivity and Safety

- Pedestrian connectivity and safety are discussed in **Section 2.3.4.2 Complete Streets**.

#### Parks and Outdoor Space

- Outdoor space encompasses parks, public spaces and the physical environment outside the home. In addition to active and passive recreation spaces, "age-friendly" also means promoting user friendly public space that incorporates principles of Universal Design, such as gentle slope gradients, available seating, and ease of movement from one area to the next.
- Pocket parks and small neighborhood parklets should be encouraged in residential areas with a high proportion of senior residents.

#### Transit Access

- Most East Honolulu neighborhoods fall within a ¼ mile radius of public transit with the exception of a few ridge neighborhoods.<sup>44</sup>
- The Handi-Van paratransit service is limited in rural and urban fringe areas. In addition it was reported that wait times during peak hours and difficulty scheduling were issues of concern.<sup>45</sup>

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<sup>44</sup> See the map: Transportation- Age Friendly City Honolulu "Bus Access"  
<http://gis.hicentral.com/storyboards/transportation/index.html>

<sup>45</sup> AFCAP

### Emergency Preparedness

- Ensure that seniors are included and accounted for in Disaster Planning and Hazard Mitigation efforts.

### **Recommendations for Revision of the Plan**

- Add **Table 2-3** to the **Plan** to provide a better picture of the Silver Tsunami

**Table 2-6 Percentage of Population 65 Years and Older** (Table 2-3 in the **Plan**)

Area	1980 <sup>1</sup>	1990 <sup>1</sup>	2000 <sup>1</sup>	2010 <sup>1</sup>	2015 <sup>1</sup>	<b>2040</b>
East Honolulu	9.3%	11.7%	18.2%	21.6%	23.5%	<b>37%<sup>2</sup></b>
All O‘ahu	7.3%	10.9%	13.4%	14.5%	16.2%	<b>23.7%<sup>3</sup></b>

Sources: <sup>1</sup> U.S. Census & ACS 5-Year Est., 2015. <sup>2</sup> DPP Projections, 2018. <sup>3</sup> DBEDT 2045 Series, 2017.

- Create mixed-use hubs and increase rental housing stock by allowing residential uses above commercial in B-1 and B-2 zoned areas, with a priority given to Kalama Village Shopping Center and Koko Marina Shopping Center. Kalama Village has already been called out in the **Plan** as an under-utilized commercial development that should be re-designated for residential. Consideration should be given on how to keep such units affordable.
- Change language to encourage community basic needs and services in the Koko Marina Shopping Center based on neighborhood demographics<sup>46</sup> (the **Plan** currently calls for encouraging visitor-oriented uses in the Center for those en route to the recreation areas between Koko Head and Makapu‘u).
- Encourage the co-location of housing and community basic needs and services in the Kalama Village Shopping Center.
- Include a dedicated section of the **Plan** to Pedestrian Comfort and Safety with special attention paid to transit stop locations; include a map of the improved pedestrian access in Hawai‘i Kai Marina called for in the **Plan**, including the potential construction of a bridge to the Koko Marina Shopping Center.

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<sup>46</sup> According to the AFCAP demographic basemaps, the proportion of older adult population to total Island population of older adults for the neighborhood including the Koko Marina Shopping Center is ranked as “high”.

- Pocket parks and small neighborhood parklets should be encouraged in residential areas with a high proportion of senior residents.
- Emphasize importance of age-friendly design for any new parks and improvements such as the expansion of Koko Head Park and the proposed Kaiwi Scenic Shoreline.
- Move **Table 3-6: Commercial Centers in East Honolulu** to this **Technical Report**

**Table 2-7 Commercial Centers in East Honolulu** (previously Table 3-6)

Shopping Center	Year Opened	Site Area (Acres)	Gross Leasable Area
Hawai'i Kai Towne Center	1993	16.1	202,000
Koko Marina S.C.	1963	15.0	198,300
Hawai'i Kai S.C.	1981	9.4	133,600
Niu Valley Center	1962	4.5	89,910
'Āina Haina S.C.	1950	7.0	69,700
Hahaione Valley Center	1972	0.5	30,100
Kalama Village Center	1991	4.0	19,300

Source: International Council of Shopping Centers, 1992 Directory; interviews with property managers.

- Age-Friendly is a term that encompasses other issue. The **Plan** should discuss the need for the following:
  - New affordable and alternative housing options;
  - Pedestrian comfort, connectivity and safe access to transit (i.e., Complete Streets implementation);
  - Active and passive open space recommendations;
  - Improved transit options; and,
  - Emergency preparedness.
- Identify in the **Plan** the seven Principles of Universal Design to support the lifestyles of those wishing to age-in-place:
  - Equitable
  - Flexibility

- Simple and Intuitive
  - Tolerance for error
  - Size and Space
  - Perception information
  - Low physical Effort
- Sections of the **Plan** flagged for “Age Friendly” draft edits:
- Section 2: Key Elements of the Vision
- 2.2.5 Mauka-Makai Recreational Access
  - 2.2.7 Housing Stability and Age-Friendly Communities
  - 2.2.8 Refocus Commercial Centers
- Section 3: Land Use Policies and Guidelines
- 3.1.1 Planning Policies for Open Space Preservation
    - Provide Passive and Active Open Spaces
    - Promote Accessibility of Recreational Open Space
    - Dual Use of Roadway and Drainage Canals
  - 3.3.3 Planning Guidelines for Community-Based Parks
    - Particular focus on Kuli’ou’ou-Kalani Iki neighborhood
  - 3.6.3 Planning Guidelines for the Marina
  - 3.5 Residential Use
    - 3.5.1 Overview
    - 3.5.2 General Policies
    - 3.5.3 Planning Guidelines
      - 3.5.3.2 Special Needs Housing and Senior Housing
  - 3.6 Non-Residential Development
    - 3.6.1 Overview
    - 3.6.2 General Policies
    - 3.6.3 Planning Guidelines
- Section 4: Public Facilities and Infrastructure Policies and Principles
- 4.1 Transportation Systems
    - 4.1.2 Transit System

- 4.1.4 General Policies
- 4.1.5 Planning Guidelines / Local Trips
- 4.8 Civic and Public Safety Facilities
  - 4.8.1 General Policies

### **Recommendations for Improvement of Implementation**

- Promote Age-Friendly design and modifications via the building code (special booklets, checklists, etc.) to allow seniors to remain in their homes for as long as possible. Require certain Age-Friendly checklist items for all new residential construction.
- Promote access to “age-in-place” resources such as the Hawai’i Aging and Disability Resource Center (ADRC).
- Incorporate the Seven Principles of Universal Design into project reviews.
- Each SCP should be tracking the implementation of Complete Streets. This will provide another point in the feedback loop between DPP, transportation agencies and the community, as well as acknowledge progress toward street improvement goals.
- Participate in efforts to expand regional parks: Koko Head Park and the Kaiwi Scenic Shoreline to make sure that accessibility and ease of use for people of all ages and abilities is considered.
- Work with DOT to identify sites/assess need for additional bus stops in residential spur areas; identify bus stops where pedestrian comfort and safety improvements are needed.
- Ensure that seniors are included and accounted for in Disaster Planning and Hazard Mitigation efforts.

#### **2.3.4.4 Homelessness**

##### **Issue Analysis**

- There have been a number of concerns expressed by residents of Hawai’i Kai, more over the secondary impacts of the homeless on the public environment than on the wellbeing of the homeless themselves.
- State Representatives Ward and Chang who offered opposing solutions:

- Imprison or fine the homeless \$2,000 for public urination.
- Publish a map of homeless and harass them so that they feel that “Hawai‘i Kai is not a friendly community”<sup>47</sup> and “make sure that the homeless do not deny the rights of residents and destroy the quality of life in the community.”<sup>48</sup>
- Provide safe spaces for homeless to seek shelter and be offered services.
- Sites for outreach services to the homeless have been discussed, but not identified, for East Honolulu with vocal NIMBY groups pressuring then Councilmember Ozawa with him saying services are not wanted in his district.<sup>49</sup>

#### Other SCPs

- Ko‘olau Loa and North Shore SCPs include homelessness as a category of “special needs housing” but limit discussion to that one sentence.
- Waianae SCP includes discussion that the region’s population is potentially incorrect because it does not include homeless encampments, and those doubled up (hidden homeless).
- Waianae SCP also identifies the user conflicts that occur as a result of the homeless occupying underutilized, but still valued, spaces.

#### **Recommendations for Revision of the Plan**

- Consider adding language to the **Plan** that identifies the homeless as a category in need of “special needs housing.”
- Identify the need for short- and long-term planning, with both regional and neighborhood strategies.
- Emphasize the importance of affordable housing at all levels and identify gaps in East Honolulu.

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<sup>47</sup> <http://www.staradvertiser.com/2016/12/27/hawaii-news/lawmaker-issues-map-of-hawaii-kai-homeless/>

<sup>48</sup> November 2016 Newsletter, Rep. Gene Ward. Hawaii Kai Homeless Task Force Update.

<sup>49</sup> <http://www.staradvertiser.com/2016/04/17/hawaii-news/residents-dissuade-ozawa-on-homeless-centers-for-east-honolulu-waikiki/>

## Recommendation for Improvement of Implementation

- Reach out to social service providers and the homeless to identify unmet service or shelter needs and goals not typically addressed in SCPs.
- Reach out to NIMBY groups to determine concerns of locating services within their community and what suggestions they have.
- Assist in identifying potential sites for an outreach center, shelter, campground, etc.
- Identify any relationship with adjacent neighborhood strategies including sweeps of Waikiki with impacts to East Honolulu.

### 2.3.5 Hazards and Resiliency Planning

East Honolulu faces new and emerging challenges from climate change including: rising sea levels, increasing coastal erosion, storm surge flooding, salt water intrusion, a rising water table and groundwater inundation in low-lying areas, rainfall that may deviate from historical records including drought, and frequency and scale of flooding.<sup>50</sup>

Previously absent from the **Plan**, the Department, in partnership with the State Office of Planning and UH Sea Grant participated in a community facilitation to identify and review “low-regret” or “no regret” solutions to combat or remedy whatever the potential long-term impacts of climate change end up being.

In May 2016 the City and County of Honolulu was selected to become a member of the 100 Resilient Cities, a challenge initiated by the Rockefeller Foundation to encourage cities to “become more resilient to the physical, social, and economic challenges that are a growing part of the 21st century.”<sup>51</sup> Each Resilient City will have a coordinator to facilitate collaboration across agencies and jurisdictions. This process is independent of

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<sup>50</sup> National Oceanic and Atmospheric Administration (NOAA), NOAA Office of Ocean and Coastal Resource Management, **Adapting to Climate Change: A Planning Guide for State Coastal Managers** (2010), p. 8, accessed Oct. 16, 2019 at <https://coast.noaa.gov/data/digitalcoast/pdf/adaptationguide.pdf>

<sup>51</sup> <http://www.100resilientcities.org/>

the DP and SCP revision process but is noted here for its overlapping goals of reducing exposure to various hazards.

One of the deliverables from the 100 Resilient Cities partnership was the **O'ahu Resilience Strategy**, published in May 2019, near the end of the comment deadline for the **Plan Public Review Draft**. The **O'ahu Resilience Strategy** contains a number of goals and actions that overlap with the **Plan**. A number of these recommendations, though not in the Public Review Draft, have been incorporated into the **Proposed Revised Plan**. Particular items of note that have received positive community feedback to include in the **Plan** are listed below. The **Plan** is supportive of the other goals and actions of the **O'ahu Resilience Strategy** but want to highlight the three points below:

- Develop a Network of Community Resiliency Hubs (Action #15).
- Increase Coordination with Neighborhood Emergency Preparedness Groups (Action #35).
- Create a City-Community Liaison to Leverage Non-Profit and Volunteer Assets (Action #44).

### **2.3.5.1 Sea Level Rise**

#### **Issue Analysis**

- In 2017, the Hawai'i Climate Change Mitigation and Adaptation Commission published its findings and recommendations to the State Legislature in the **Sea Level Rise Vulnerability and Adaptation Report**.<sup>52</sup>
- On June 5, 2018, the City Climate Change Commission published **Sea Level Rise Guidance** and an accompanying **Climate Change Brief**. The Guidance was followed by Directive No. 18-2 in which the Mayor directed that all City departments and agencies are required to use the Guidance, Brief, and Report in their plans, program, and capital improvement decisions.

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<sup>52</sup> [https://climateadaptation.hawaii.gov/wp-content/uploads/2018/01/SLR-Report\\_-January-2018.pdf](https://climateadaptation.hawaii.gov/wp-content/uploads/2018/01/SLR-Report_-January-2018.pdf)

- The USACE is now requiring that all new USACE projects be designed, built, and operated in ways that take into account a possible future rise in sea levels between 1.6 feet and 4.9 feet by 2100.<sup>53</sup>
- Sea level rise can cause:
  - Higher waves from infrequent events like storm surge, high tides, and tsunamis;
  - Increased coastal erosion and increased exposure to coastal hazards; and
  - Increased groundwater ponding as areas no longer drain because they are below sea level.<sup>54</sup>
- It is prudent to assess the potential risk of such a rise for O‘ahu coastlines, to set up systems to monitor sea rise, and to design projects and buildings to take the risk of sea rise into account.

### **Recommendations for Revision of the Plan**

- Support the recommendations of the **O‘ahu Resilience Strategy**.
- Add a policy requiring analysis of the possible impact of sea level rise for new public and private projects in shoreline areas and incorporation of appropriate mitigations.
- Require analysis of the possible impact of SLR for new public and private projects over the projected lifetime of the project in shoreline areas and low-lying areas and incorporations of mitigations where appropriate and feasible.
- Explain that while the causes of sea level rise are global, the impacts are local.
- Incorporate all-hazard assessments in land development application process.<sup>55</sup>
- Recognition of the Precautionary Principle in changes in land uses, particularly to areas that are projected to be impacted by Sea Level Rise.

### **Recommendations for Improvement of Implementation**

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<sup>53</sup> U.S. Army Corps of Engineers, **Water Resource Policies and Authorities Incorporating Sea-Level Change Considerations in Civil Works Programs**, Engineering Circular 1165-2-211, July 1, 2009.

<sup>54</sup> For illustration of low-lying areas on O‘ahu, see <http://www.soest.hawaii.edu/coasts/sealevel/index.html>.

<sup>55</sup> Multi Hazard Pre-Disaster Mitigation Plan, DEM [http://www.honolulu.gov/rep/site/dem/dem\\_docs/plans/Executive\\_Summary\\_2012.pdf](http://www.honolulu.gov/rep/site/dem/dem_docs/plans/Executive_Summary_2012.pdf)

- Incorporate all-hazard assessments in land development application process.<sup>56</sup>
- Amend HRS to require the disclosure of Hazard Risks as Mandatory Seller Disclosures in Real Estate Transactions Act.<sup>57</sup>

### 2.3.5.2 Coastal Erosion

#### Issue Analysis

- Under a DPP contract, University of Hawai'i experts have completed study of coastal erosion at sandy beaches around the island, including East Honolulu.<sup>58</sup> The study provides a historic basis for establishing setbacks for new coastal developments. The following shorelines erode up to one foot per year:
  - Near the Kāhala Resort beach;
  - Just east of Wailupe Peninsula;
  - Paikō Peninsula; and,
  - Portlock area between the Hawai'i Kai Marina entrance channel and the former Henry Kaiser Estate.
- It is prudent to continue assessing the potential risk of coastal erosion for O'ahu coastlines, to set up systems to monitor erosion, and to design projects and buildings to take the risk of erosion into account.
- Coastal erosion is a localized natural process in which sand is deposited (accreted) or removed from the beach.
- Urbanization has altered the ways in which sediment from upland areas slowly erodes to the sea.
- Armoring and beach nourishment are two methods that effect long-term trends to beach erosion by also effecting the circulation of ocean water which carries sediment along beaches. Armoring may prove beneficial for one area while causing an adjacent area to erode at a greater rate.
- Hawaii Emergency Management Agency's **2018 Hazard Mitigation Plan** provides useful data, planning information, and vulnerabilities for Hawai'i.

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<sup>56</sup> Multi Hazard Pre-Disaster Mitigation Plan, DEM

<sup>57</sup> Multi Hazard Pre-Disaster Mitigation Plan, DEM

<sup>58</sup> UH Manoa, SOEST. Hawai'i Coastal Erosion Website – Coastal Geology Group. "O'ahu Shoreline Study Erosion Maps." Accessed on Oct. 16, 2019 at <http://www.soest.hawaii.edu/coasts/erosion/oahu>

## Recommendations for Revision of the Plan

- Add language clarifying that the policy calling for expansion of shoreline setbacks to 150 feet "where possible" should be based on historic or adopted projections of shoreline erosion rates.
- Identify the threats of coastal erosion and sea level rise as two distinct natural processes that will generally increase the long-term exposure of an area to marine hazards.
- Potentially include maps of areas of severe coastal erosion and potential hazard areas. Add disclaimer that maps are historic and could be exacerbated by climate change and sea level rise impacts. Alternatively the **Plan** can use SLR projection maps from UH but may not want to due to the rate models update.

## Recommendations for Improvement of Implementation

- Fund studies, similar to those done in 2009 for California,<sup>59</sup> which would model the likely impact of sea level rise on coastal erosion for O‘ahu and provide erosion risk assessments for use in deciding what adaptations and mitigations will be needed.
- Apply for access to the O‘ahu Coastal Erosion Shoreline study from the UH. Create a shapefile layer of coastal erosion in areas for publication.
- Assist the Resilient City coordinator and implement their findings and recommendations from the **O‘ahu Resilience Strategy** by establishing one of the Community Resilience Hubs in East Honolulu.
- Combine hazard plans in the update of **O‘ahu’s Multi-Hazard Pre-Disaster Mitigation Plan** per the recommendation of the **O‘ahu Resilience Strategy**.

### 2.3.5.3 Flooding

#### Issue Analysis

- Areas prone to 100-year flooding have not been recorded to be made easily accessible to the public. Coastal flooding is an important consideration in long-

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<sup>59</sup> Phillip Williams & Associates, Ltd., **California Coastal Erosion Response to Sea Level Rise – Analysis and Mapping** (San Francisco: March 11, 2009). Matthew Heberger, Heather Cooley, Pablo Herrera, Peter H. Gleick, and Eli Moore, **The Impacts of Sea-Level Rise on the California Coast** (Oakland, California: May 2009).

range planning, and should direct land use planning and guide future development.

- There are many structures in O‘ahu that were built prior to the early 1980s, before the City and County of Honolulu joined the National Flood Insurance Program (NFIP).
- Older pre-Flood Insurance Rate Maps (FIRMs) buildings are allowed to remain non-conforming until the building undergoes repairs and/or improvements that exceed 50% of the market value of the existing structure prior to improvements. When this occurs, the entire structure in a Special Flood Hazard Area (SFHA)—A and V zones—must comply with current floodplain standards. The most common requirement is raising the finish floor elevation of the existing structure to current Base Flood Elevations (BFE).<sup>60</sup>
- FIRMs are based on historical records and not on projected damages that may be vulnerable due to climate change impacts and its impacts to sea level rise and changes in precipitation.
- The City and County of Honolulu has not participated in FEMA’s Community Rating System (CRS). Because the City and County is compliant with NFIP, we are eligible to join the CRS program. By joining the CRS program, participating regions would be able to more easily map those communities that experience Repetitive Loss.<sup>61</sup>
- Repetitive Loss properties are those buildings for which two or more claims of more than \$1,000 have been paid by the NFIP during any rolling 10-year period since 1978. Claims must be at least 10 days apart but within 10 years of each other.
- The Army Corps of Engineers conducted a flood mitigation study of Wailupe Stream and made several recommendations. Among them was to harden most of the stream using a trapezoidal design and harden the bottom of the stream in the upper stream area above the Ani Street Bridge; raise the Kalaniana‘ole Highway Bridge, enlarge the existing debris basin and add another debris basin. After conducting a cost/benefit analysis the ACE paused the project citing the high cost/benefit ratio.

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<sup>60</sup> [http://dlnreng.hawaii.gov/nfip/wp-content/uploads/sites/11/2015/01/Jan\\_2015.pdf](http://dlnreng.hawaii.gov/nfip/wp-content/uploads/sites/11/2015/01/Jan_2015.pdf)

<sup>61</sup> [http://www.water.ca.gov/floodmgmt/lrafmo/fmb/fas/nfip/crs/Links/doc/502\\_Mapping\\_Repetitive\\_Loss\\_Areas\\_8-15-08.pdf](http://www.water.ca.gov/floodmgmt/lrafmo/fmb/fas/nfip/crs/Links/doc/502_Mapping_Repetitive_Loss_Areas_8-15-08.pdf)

- Wailupe Stream overflowed its banks in the flood of April 2018, flooding and damaging homes and businesses on both sides of Kalanianaʻole Highway. The design capacity of the channel was not able to handle the amount of water. There was stream bank erosion along the stream, which was especially severe above the Ani Street Bridge. Property owners lost portions of their backyards.

### **Recommendations for Revision of the Plan**

- Identify in the **Plan** areas most prone to coastal flooding. Consider adding an East Honolulu area map illustrating flood hazard areas identified on the Flood Insurance Rate Map (FIRM) within the SFHAs (2014 dataset). SFHA are defined as the area that will be inundated by the flood event having a 1-percent chance of being equaled or exceeded in any given year. The 1-percent annual chance flood is also referred to as the base flood or 100-year flood.
- Express desire to map Repetitive Loss areas and to determine how areas are built back in the event of a disaster.

### **Recommendations for Improvement of Implementation**

- Digitize Repetitive Loss properties into a City and County GIS layer using the NT. The National Flood Mitigation Data Collection Tool (National Tool or NT) is a Microsoft Access based program that communities can download from FEMA.<sup>62</sup>
- Consider participating in FEMA's CRS program.
- Collaborate and encourage the State government, DEM, and the Chief Resilience Officer to create a program to form a district in which property owners opt in to participate, wherein the district would use capital raised by issuing bonds to make resiliency improvements, which is paid back through a property tax assessment.
- Adopt a floodplain management ordinance that exceeds the minimum requirements of the NFIP to reduce potential risk from flood events that exceed the 100-year (1% annual chance) event.
- Determine when, where and how rebuilding will occur after a natural disaster, which areas will be rebuilt according to existing plans and codes, whether rebuilt homes will be encouraged or required to be more likely to withstand the effects of

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<sup>62</sup> <https://floodhelp.uno.edu/uploads/Guidebook%20for%20RLAAs%20FINAL.pdf>

future hazard events, and who will be in charge of coordinating and overseeing the recovery process through the development of a pre-disaster recovery plan. Determine a process for expediting permitting post-disaster.

#### **2.3.5.4 Precipitation Patterns and Climate Change**

##### **Issue Analysis**

- Climate change projections indicate that while the total amount of precipitation will be stable or see a slight reduction, it is likely that there will be an increase in the intensity of rainfall from individual storms.<sup>63,64</sup>
- Impacts include changes in the frequency of larger storms and the runoff amounts that must be accommodated by drainage systems.
- Increases in intense rainfall and increased stormwater runoff have the potential to exacerbate coastal flooding and erosion (see **Section 2.3.5.3**).

##### **Recommendations for Improvements to the Plan**

- Recognize that the impacts of climate change will lead to greater uncertainty that may deviate from historical records.
- Redevelopment of sites along drainage canals should incorporate landscaping that will intercept runoff prior to entering into drainage canal.

##### **Recommendations for Improvements to Implementation**

- Develop locally specific hazard maps (flood, tsunami, hurricane, and coastal erosion) to improve upon mapping resolution and, support more informed and nuanced decision-making about development and hazard mitigation, particularly in urban and urbanizing hazardous areas.
- Encourage or codify that development should be set back farther from drainage channels and encourage plantings that can be privately maintained adjacent to drainage channels to intercept stormwater runoff.

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<sup>63</sup> Chu, P.-S., Chen, Y. R., & Schroeder, T. A. (2010). Changes in precipitation extremes in the Hawaiian Islands in a warming climate. *Journal of Climate*, 23(18), 4881–4900. doi:10.1175/2010JCLI3484.1

<sup>64</sup>J. Lehmann, D. Coumou, K. Frieler. Increased record-breaking precipitation events under global warming. *Climatic Change*, 2015; DOI: 10.1007/s10584-015-1434-y.

- A comprehensive evaluation of the effectiveness of alternative adaptation strategies is needed as a basis for planning and management decisions.<sup>65</sup>

### 2.3.5.5 Storms and Climate Change

#### Issue Analysis

- Climate change studies project an increase in the number of high intensity storms and hurricanes worldwide, and in the Pacific.
- Hurricane Shelter Shortage. There is a shortage of public emergency shelters in East Honolulu to provide the desirable minimum amount of space (15 sq. ft./ person) required to shelter the 30 percent of the population expected to seek public shelter in case of a major hurricane.<sup>66</sup>
  - The current building code calculates occupancy of hardened areas on a 15 square feet/person basis. The State will calculate potential shelter occupancy for buildings erected since the current code was adopted on this basis.<sup>67</sup>
- Most existing shelters, principally school facilities like gyms and cafeterias, were not built with the secure roofs or window protection needed to withstand the wind pressure and flying debris caused by a Category 3 hurricane (sustained winds of 111-130 mph), and many would be unsafe even with a Category 1 hurricane (sustained winds of 74 to 95 mph).<sup>68</sup>
  - For comparison, Hurricane 'Iwa was a Category 1 hurricane with peak winds of 90 mph on its closest approach to Kaua'i.<sup>69</sup> Hurricane 'Iniki was a Category 4 hurricane with peak winds of 145 mph when it made landfall on Kaua'i.<sup>70</sup>
  - In some cases shelter managers are able to shelter people in certain rooms which offer protection against flying debris and have been built to withstand wind damage.
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<sup>65</sup> Keener, V. Climate Change and Pacific Islands: Indicators and Impacts. PIRCA, 2012.

<sup>66</sup> City and County of Honolulu, **Emergency Operations Plan** (January 12, 2007), Annex T, App. 1, p. 5.

<sup>67</sup> Phone conversation, Steve Yoshimura, State Civil Defense, May 6, 2014.

<sup>68</sup> Telephone interview with Gary Y.K. Chock, President, Martin & Chock, July 22, 2010.

<sup>69</sup> NWS, Central Pacific Hurricane Center, **The 1982 Central Pacific Tropical Cyclone Season**.

<sup>70</sup> NWS, Central Pacific Hurricane Center, **Hurricane 'Iniki Natural Disaster Survey Report**.

- The State building code requires all new State and City public buildings which could serve as public shelters to be built to withstand a Category 3 Hurricane.<sup>72</sup>
- There is a need for funding to retrofit existing public emergency shelters.
  - The State has been making improvements to existing school assembly areas, following an agreement among the State Department of Education, the Department of Accounting and General Services, and the Hawai'i Emergency Management Agency of the State Department of Defense.
  - While these improvements will make these facilities more suitable as shelters, none of the parties involved has committed to make shelters statewide meet the State Building Code minimum life safety design criteria for enhanced protection areas.
- Most of the public is not expected to go to a public shelter. Civil Defense agencies encourage the public to shelter at home if adequate shelter is provided.<sup>73</sup>
- Revisions to the State Building Code call for all new homes in areas susceptible to wind borne debris due to high wind speed to either have hurricane resistant glass or have a "safe room."<sup>74</sup>
  - The base wind used for designing buildings is the fastest wind that the structure is likely to have to withstand once in 50 years.
  - The requirement to either have a safe room or window protection that is hurricane resistant applies to buildings either in areas where the estimated base winds is 120 miles per hour and greater or in areas within a mile of the coast line where base wind is 110 miles per hour or greater. See **Figure 2-4**, below for the basic wind speed mapping for O'ahu.
  - For East Honolulu this includes mauka neighborhoods, Portlock, and Wailupe.

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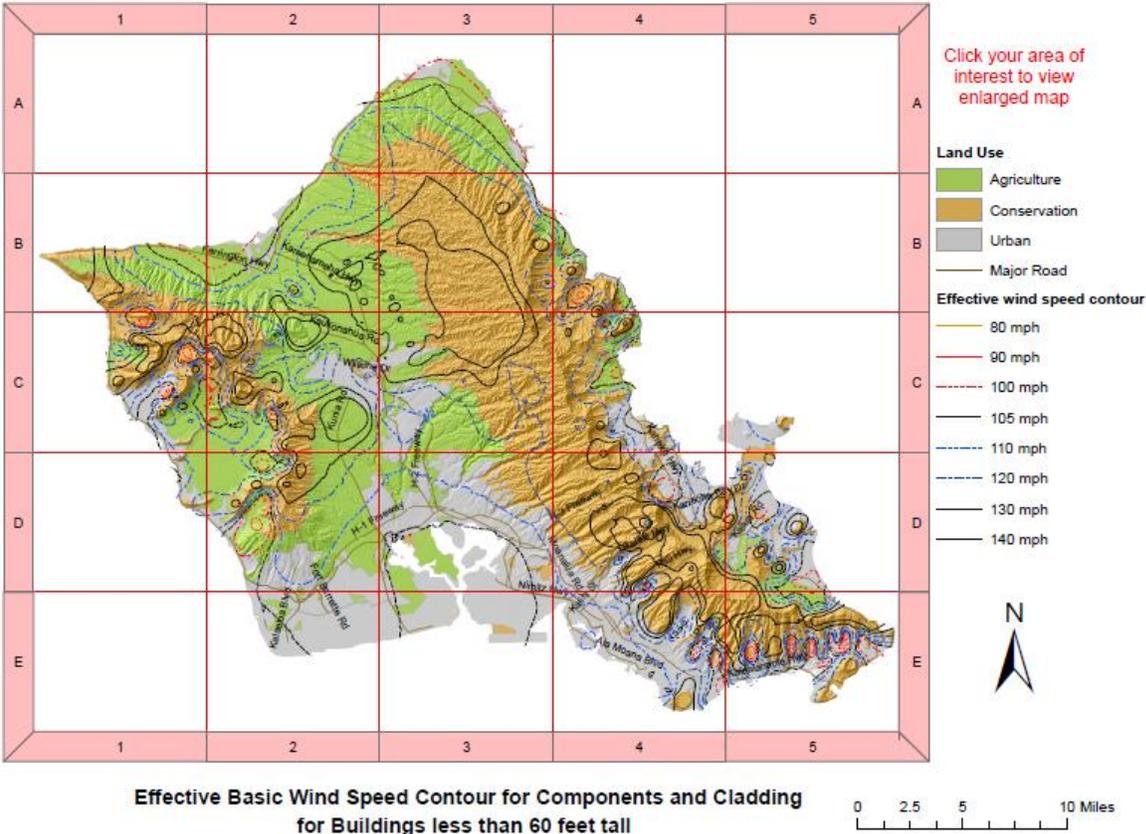
<sup>72</sup> The City and County Building Code includes this provision in Section.16-14.3c (per Ordinance 12-34).

<sup>73</sup> Telephone conversation with State Civil Defense staff, July 22, 2009.

<sup>74</sup> Travis Kaya, "Materials Tested for Building Hurricane-Proof Safe Rooms," **Honolulu Star-Advertiser**, August 20, 2010.

- State law provides legal immunity to private organizations which create hurricane resistant shelters or allow the City to use their building as an emergency shelter that meet State standards.<sup>75</sup>
- Private structures, like churches, can supplement public emergency shelters if they meet Federal Standards.<sup>76</sup>
- There are no State or City programs providing direct financial incentives or support for private organizations who create hurricane shelters or individuals who build hurricane-resistant "safe rooms" in their homes.

**Figure 2-4 Wind Speed Contour Map for O‘ahu<sup>77</sup>**



- Support should be given to individual home owners and community associations to build private hurricane resistant shelters in community

<sup>75</sup> HRS 127A-20.

<sup>76</sup> FEMA, **Safe Rooms for Tornadoes and Hurricanes: Guidance for Community and Residential Safe Rooms**. FEMA P-361, Third Edition (March 2015) pp. xii, A1-6, A2-6 through A2-8.

<sup>77</sup> <http://media3.hawaii.gov/media/dags/web/windmaps/honolulu-county-wind-maps.pdf>

association buildings or safe rooms in homes since this will reduce the pressure on the public shelters.

- In the past the State has provided financial support for such shelters.<sup>78</sup>
- A number of organizations are very active in East Honolulu communities educating members of the community on different threats and training households and volunteers on how to prepare or respond to disasters. The **Plan** process has been engaging with these organizations and stakeholders:
  - DEM
  - CERT
  - OCCSR
  - 'Āina Haina Prepared
  - NOAA
  - Hawai'i Kai Strong
  - UH Sea Grant

### **Recommendations for Improvements to the Plan**

- Add new policies to address the shortfall in shelter capacity and hurricane readiness.
- Keep or strengthen language that the DOE should coordinate with the O'ahu Civil Defense agency regarding the design of school facilities to be used as public hurricane shelters.

### **Recommendations for Improvements to Implementation**

- Support State funding for retrofits of existing public shelters to withstand Category 3 hurricanes.
- Digitize wind contour map into a shapefile to be made publically available.
- Study the feasibility and effectiveness of implementing property tax incentives for private organizations to establish hurricane resistant shelters in their buildings and for individual homeowners to build safe rooms in their homes.
- Provide tax breaks for owners who build a safe room in their home similar to Kaua'i.<sup>79</sup>

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<sup>78</sup> Hawai'i State Department of Commerce and Consumer Affairs Insurance Division, **Loss Mitigation Grant Program Report** (December 2009).

<sup>79</sup> Dennis J. Hwang and Darren K. Okimoto, **Homeowner's Handbook To Prepare for Natural Hazards** (University of Hawai'i Sea Grant Program: June 2007), p. 73.

- Safe rooms should not be considered in tsunami evacuation zones or flood prone areas. Evacuation should be encouraged for these areas.
- Develop a comprehensive shelter-in-place program to allow residents to remain in their homes after a disaster. Establish engineering criteria to determine shelter-in-place capacity, develop acceptable habitability standards for sheltering-in-place, and prepare and adopt regulations that allow for the use of these standards in a declared housing emergency period.
- Require any new development to ensure the project has:
  - Adequate Outdoor Warning Signal coverage;
  - Adequate Evacuation Routes; and
  - Adequate Emergency Shelter Access.
- Encourage coordination between DOE and the O‘ahu Civil Defense agency regarding the design of school facilities to be used as public hurricane shelters.

### **2.3.5.6 Slope Stability and Rockfalls**

#### **Issue Analysis**

- The City spent \$151,136 (Wailupe Valley) and \$736,250 (Hanauma Bay) to restore and stabilize hillsides in East Honolulu in the fall of 2015.
- Erosion is a natural process that is exacerbated with land disturbances from human activity including development and the introduction and spread of invasive species in upland areas.
- The spread of invasive species contribute to erosion as shallow root system plants out-compete native plants. Invasive ungulates such as pigs and goats can browse native forest species and break up soil with their hooves, increasing erosion.

#### **Recommendations for Revision of the Plan**

- Look into designating lands vulnerable to slides into Preservation and outside of the Community Growth Boundary. Tighten the Community Growth Boundary on ridge tops and near valley walls.
  - Consider placing outside the CGB undeveloped lands of Kamehame Ridge, Kalama Valley, and Wai‘alae Nui.

- Remove or revise **Figure 2-2** Suspect Areas for Land Movement if more recent information is available than the 1995 US. Geological Survey study<sup>80</sup>.
  - If data is available, include soils with a severe erosion hazard ranking in the back of Wailupe Valley, and the tops neighborhoods along Wiliwilinui Ridge, Wai'alaie Nui, and Hawai'i Loa Ridge.
  - Broaden the data behind **Figure 2-2** to include soils with moderate severe erosion hazard rating which encompasses Vertisols already mapped but not all or potentially sites with 10-15% slopes.
- Identify stockpiling issues and the potential impacts that runoff has on downstream water quality.

### **Recommendations for Improvement of Implementation**

- Amend the State Land Use District to be consistent with zoning and **Plan**.
- Work with the O'ahu Invasive Species Council (OISC) to combat the spread of invasive species in upland areas through public education.
- Encourage hiking organizations and their members to identify invasive species. Encourage the OISC to teach hiking organizations how to report or remove invasive species along trails.

### **2.3.5.7 Fire Hazards**

#### **Issue Analysis**

- There were 18 fires in Kamilonui in 2017. In 2018 there were only 3 fires.
- In 2017, the community completed the Kamilonui-Mariner's Cove Firewise Hazard Assessment with the Hawaii Wildfire Management Organization.
- A number of bills and ordinances have been signed and enacted since the Marco Polo building fire to require sprinklers to be installed in older condominiums and then tax incentives and other rebates for those buildings that retrofit.

### **Recommendations for Revision of the Plan**

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<sup>80</sup> U.S. Geological Survey, **Relation of slow-moving landslides to earth materials and other factors in valleys of the Honolulu District of O'ahu, Hawai'i**, Open-File Report 95-218, prepared in cooperation with the City and County of Honolulu, Department of Public Works (1995).

- Add a bullet on the Kamilonui-Mariner's Cove Firewise Hazard Assessment to Mountain Areas guidelines.

**Recommendations for Improvement of Implementation**

- Implement the findings and recommendations from the Kamilo Nui – Mariner's Cove Firewise Hazard Assessment.

## 3. RECOMMENDED CHANGES

### 3.1 Proposed Updates and Revisions to the Plan

The Department's Review of the Plan has revealed a need for amendments to the Plan to address the following issues:

- Become more age-friendly and focus on complete streets;
- Implement ahupua'a concept and low-impact development standards;
- Address, minimize, and adapt to potential impacts of climate change and sea level rise; and,
- Create resilient, disaster-ready communities.

The Plan's vision for the region's future, and the policies needed to realize that vision have widespread support. The most significant concerns are how we can more fully realize that vision and improve the implementation of key policies, especially those involving infrastructure adequacy. Most of the changes that are proposed for the Plan help clarify existing policy or are logical extensions of existing policy.

We have prepared two versions of the Proposed Revised Plan. To help reviewers understand how the Proposed Revised Plan differs from the 1999 Plan, a modified Ramseyer version has been prepared and provided as a reference guide. It shows how the following proposed changes are illustrated in the Plan:

- Updated factual data (numbers, dates, place and project names), revised exhibits and tables, and clarifications of context and background information which are identified with shading.
- Substantive revisions to the Plan vision, policies, or implementation actions which are identified with striketroughs for text that is deleted and underlining for text that is added.
- Changes made to the proposed revised Plan to put all policies and guidelines in active verb/object format, to correct spelling, to add Hawaiian

diacritical markings, or to correct grammar are not identified in the modified Ramseyer version.

If the reviewer wants to see exactly how the shaded text, exhibits, or tables differ from the background and context information in the existing **Plan**, comparisons can be made with the existing **Plan**, which is available online at: <http://www.honoluluodpp.org/Planning/DevelopmentSustainableCommunitiesPlans/EastHonoluluPlan.aspx>

A clean version of the **Proposed Revised Plan** is attached as **Exhibit A** for the draft adopting ordinance which has been transmitted to the Planning Commission and City Council for formal review and decision making. The clean version of the **Plan**, as amended by the City Council, will be adopted by reference as the new **East Honolulu Sustainable Communities Plan** replacing the existing **Plan** which was adopted by Council in 1999.

### **3.1.1 Changes Made Throughout the Entire Plan**

#### **Document Formatting**

All policies and guidelines have been put in an active verb/object format. For example, “Design golf courses to provide view amenities for adjacent urban areas” replaces “Golf courses should be designed to provide view amenities for adjacent urban areas.” However, the use of this format does not indicate a change in the role of the policies and guidelines. As with the 1999 **Plan**, the **Proposed Revised Plan** policies and guidelines, when adopted, will provide guidance to administrators and policymakers for how they should implement the vision for East Honolulu’s future in their decision making regarding land use and infrastructure approvals, rules and regulations, and best practices.

#### **Consistency with Other DPs and SCPs**

Some terminology in the **Plan** has been changed to be consistent with other DPs and SCPs. References to the Urban Community Boundary (UCB) have been replaced by Community Growth Boundary (CGB). There is no more reference to an Agriculture Boundary but agriculture uses are still identified in the **Plan**. Agriculture uses are located outside the CGB and are separate from preservation. The intent of this change

does not reflect any lessening of the desire to preserve the existing agricultural uses, it is merely to establish consistency with other DPs and SCPs.

Chapter 3 and Chapter 4 in the 1999 Plan included policies, principles, and guidelines. The proposed revised Plan has only policies and guidelines because, upon examination, it was felt that the principles from the 1999 Plan could be better stated as either policies or guidelines. The principles were sorted and moved either into the policy sub-section or guidelines sub-section. Again, this has been done across other DPs and SCPs.

### **Projections**

Revision of all population and housing figures reflect both 2040 projections. Recently revised DPs and SCPs have projections to the year 2035. 2035 numbers have been included in **Table 2-2** and certain discussions to allow the reviewer to be able to compare trends between different regions. Other projections, unless stated otherwise are to 2040 as they reflect the current forecasts for the Plan's 20-year horizon.

Information about changes in East Honolulu land uses and infrastructure is provided in Chapters 3 and 4. This information provides the context for policies and their implementation. Updated accounts of development to date and forecasts through 2035 and 2040 estimating the extent and location of future development have been included.

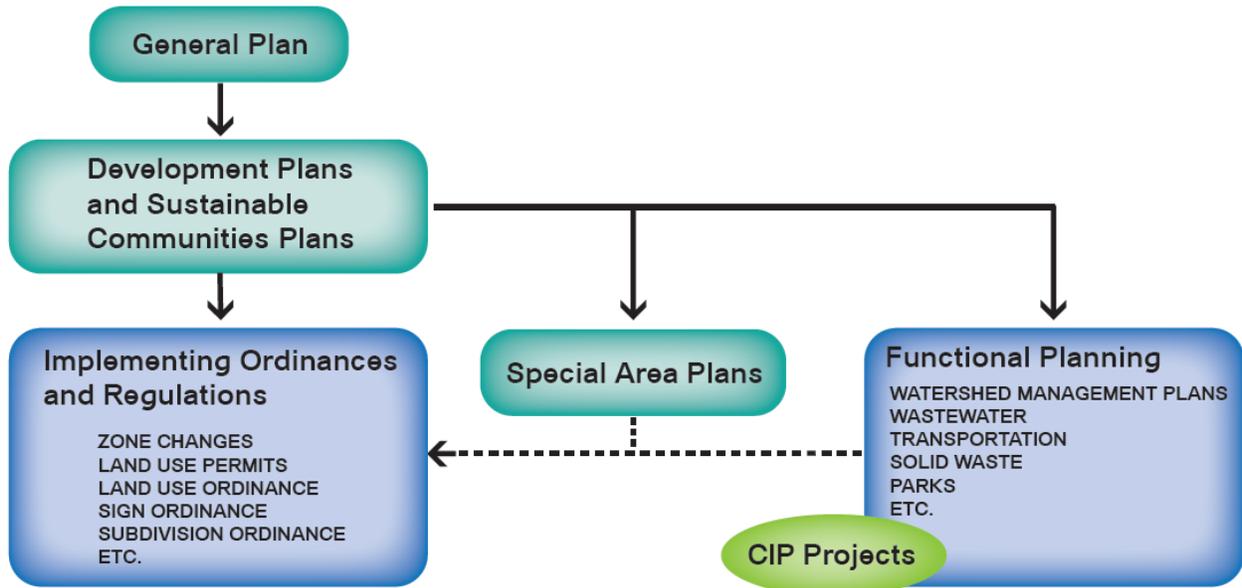
### **Other Plans and Sources**

The East Honolulu Sustainable Communities Plan is only one document in a series of documents that guides policy in shaping decisions affecting the future of the region. **Figure 3-1** below reflects the overarching planning framework guided by the General Plan.

Much like the Plan, other plans, rules, and standards are updated on a semi-regular or ongoing basis. Some of these plans overlap with the East Honolulu Sustainable Communities Plan, while others are cited as a reference in the Plan which needs to reflect newer publication. Therefore, the Plan needs to reflect updates to these

supplementary plans, ensuring consistency, or identifying where visions, policies, or guidelines, diverge.

**Figure 3-1 Planning Framework and Documents**



**General Changes**

Some language was added to the Plan to clarify various vision and plan components. Additional information has been included about recreational, scenic, cultural, historic, and natural resources in East Honolulu. Text and maps have been updated to reflect zone change approvals, development and revisions since 1999 and to provide for aesthetic consistency.

Some place names have been revised since the Public Review Draft based on comments received and to be consistent with the Place Names of Hawai'i by Mary Kawena Pukui, University of Hawaii Press; Revised edition, December 1, 1976, particularly changing “Ka Iwi” to a single word “Kaiwi.”

### 3.1.2 Substantive Changes by Section or Chapter

A summary of proposed substantive changes to the 1999 **Plan** are identified below and include their page number, where applicable, which corresponds to the modified Ramseyer version of the **Proposed Revised Plan**. Bullets identified with a “+” are issues that have been modified or added since the publication of the **Public Review Draft** in February 2019. Bullets identified with a “■” are text that has been modified since the publication of the Draft **Proposed Revised Plan** in April 2020.

As identified above in **Section 2.2** of this **Technical Report**, four issues that the Department has heard the most concerns regarding is below. These were the issues that the Department tried was diligently to address:

- How the **Plan** will address sea level rise and climate change and improve resiliency to coastal hazards;
- How to improve infrastructure and the community to be more friendly to pedestrians and active modes of transportation for all ages and abilities;
- How to reduce runoff and restore ecological function and improve the water quality of Maunalua Bay; and,
- How to maintain and restore recreational access to mauka and makai areas.

<b>Preface and Executive Summary</b>	<b><u>Page</u></b>
○ Revised and clarified roles of DPs and SCPs.	ES
○ Simplified Preface and Executive Summary to be consistent with other SCPs. <b>Exhibit ES-1</b> has been updated based on the proposed <b>General Plan</b> currently before City Council and added to the ES to be consistent with other DPs and SCPs.	ES
+ Expanded the generalized discussion of the community outreach process.	ES-3
■ Changed five year review to ten year review.	ES-3

- Added discussion on climate change and sea level rise developments including plans and reports that address these concerns. ES-4
- Reintroduce ahupua'a concept into the Plan. ES-5
- + Added recreation and support of the introduced and adopted O'ahu Resilience Strategy. ES-5 & 6
- Added the principles of age-friendly communities. ES-6
- Reformat Honolulu Land Use Planning and Management System, previous **Section P.2**. ES-6
- Revised wording and reference from Universal Design to recommendations in the Honolulu Age-Friendly City Action Plan ES-6
- + Add citations from the City Charter regarding the purpose of DPSCPs and revise background information on the City Charter. ES-7
- Combine **Sections P.3** and **P.4** discussing the City Charter. ES-7 & 8
- Combine the General Plan's allotment 5%, with the projected population 50,000 both of which are rounded but represent little to no growth in East Honolulu. ES-9 & 10
- Updated the Plan vision to reflect the horizon to 2040 and update projections. ES-9
- + Add Vision Statement where one was previously lacking. ES-10
- Consolidate and summarize Elements of the Visions. Remove **Sections P.5.2-P.5.4.8**, and **P.5.6**. ES-10 & 11
- + Add bullets on Complete Streets, the O'ahu Resilience Strategy, and climate change and natural disasters. ES-11
- Add reference to new Implementation Matrix. ES-12
- + Add disaster preparedness bullet. ES-12
- + Remove "starting five years after the adoption..." ES-13

## Chapter 1

- Add comparison of the projected 50,000 to the **General Plan**'s allotment of 5%, which is rounded up from other sources so it is not incompatible. 1-1
- Update **Exhibit 1-1** with map of the DPs and SCPs and their designated character based on the submitted **General Plan**. 1-2
- Existing commercial development could be re-oriented to better serve the neighborhood community needs. 1-3
- + Revise for consistent use of “neighborhoods” and “region.” 1-3
- Seek to redesign and repurpose infrastructure and programs to become a more age-friendly community with a focus on complete streets. 1-3
- Add bullets on resilient, disaster-ready communities and climate change and sea level rise. 1-3
- + Add sub-bullets on some of the recommendations from the **O’ahu Resilience Strategy**. 1-3
- Improve downstream water quality through improved upland management and the implementation of low-impact development when properties or infrastructure is redeveloped. 1-4

## Chapter 2

- + Add Vision Statement where one was previously lacking. 2-1
- Reflect that the population stabilization in East Honolulu is a result of nearing full buildout, the aging of the population, and shrinking household sizes. 2-1
- Add a second **Plan** horizon to reflect the vision and its impacts will extend beyond the traditional 20-year plan horizon date. 2-2
- Revise vision to incorporate climate change and sea level rise response, age-friendly communities, and complete streets. 2-1 to -3
- + Add clarification to protections from residential and commercial development and vehicle operations. 2-2

- Revise Key Elements of Vision by providing section number instead of bullets. Add Ahupua‘a, Age-Friendly, and Climate Change Adaptation. Consolidate commercial sections. Rename Koko Head-Makapuu to Kaiwi Scenic Shoreline. 2-4
- Reflect changes from Urban Community Boundary, Agriculture Boundary, and Preservation Boundary to Community Growth Boundary and its intent. 2-4
- Update **Exhibit 2-1** to reflect changes to interpretation of the Community Growth Boundary that the zoning present in Niu Valley and at the entrance of Kamilo Nui Valley (Leolani) prior to the publication of the 1999 **Plan** should have been incorporated with particular attention to the lands designated Urban within the Kaiwi Coast. 2-5
- Remove Exhibit (*previously Exhibit 2-2*) on suspect areas for land movement due to age of study. *Previously* 2-6
- Add Aina Haina Nature Preserve to areas outside of the CGB but within the State Urban District 2-6
- + Modify bullet heading to reflect that population will be stable and is not expected to grow. 2-7
- Update **Table 2-1** to reflect changes to developable lands. 2-8
- Remove Exhibit (*previously Exhibit 2-3*) on vacant usable lands to remove pressures and expectations. *Previously* 2-8
- Update **Exhibit 2-3** Exhibit title (*previously Exhibit 2-4*) to be more general. Add State maintained trails, and views from Koko Head which are included in the cover to this report. 2-9
- + Add Wailupe Nature Preserve to **Exhibit 2-3**, remove agricultural areas, add Wāwāmalu Beach label.
- Include undeveloped lands of historic, cultural, visual, or recreational significance as preservation lands. 2-10 to -12
- + Reformat new policies to match existing style.
- Add **Section 2.2.2 Ahupua‘a in Land Use and Natural Resource Management**. 2-12 to -14

- Revise the name of **Section 2.2.3 Kaiwi Scenic Shoreline** (previously Section 2.2.2). 2-14
- + Add discussion of critical habitats and endangered and endemic species found in the area. 2-14
- + Revised that there are actual and potential recreation opportunities. Add biking and bird watching. 2-16
- Add that lateral shoreline access will be threatened through erosion and sea level rise. 2-16
- Add discussion of Wāwāmalu Beach and that it should be improved as a nature park for protection and access. 2-16
- Add a number of natural areas that are included in **Exhibit 3-3**.
  - + Added Kānewai Spring and Fishpond, Kaiwi Mauka Lands, Wailupe Nature Preserve, Keawāwa Marsh and Wetlands, Kuli'ou'ou and Honolulu Watershed Forest Reserves, Hanauma Bay Nature Preserve, and Maunalua Bay. 2-17, 3-18 to -20
- Add access will be balanced with adverse impacts to habitats. 2-17
- Reflect public purchase for preservation of different areas and the roles stewardship organizations play. 2-17 & -18
- Alter Section 2.2.6 title to reflect Age-Friendly Community approach. 2-17
- + Remove some of the data narrative that can be found in the table. Reiterate that O'ahu's elderly population is also growing. 2-18
- Add **Table 2-2** and **Table 2-3**. 2-17 & -18
- Add statement of support from the **Making Honolulu an Age-Friendly City: An Action Plan**. 2-18
- + Remove unconfirmed, anecdotal information about potential demographic trends. 2-18
- + Add paragraph about the potential for mixed-use to create affordable and diverse options for seniors and others. 2-19
- Simplify Section 2.2.8 title (previously 2.2.7). 2-19

- + Remove sentence regarding the speculation of visitors to the Kaiwi Coast. 2-19
- Revise recommendation for Kalama Village Center from residential to mixed-use. 2-20
- Add Section 2.2.8 to discuss climate change adaptation. 2-20 to -23
- + Add support for the policies in the **O‘ahu Resilience Strategy** that was introduced and published after the release of the **PRD**. 2-20 to -22
- + Add specific areas of concern which are access and the service of Kalaniana‘ole Highway, particularly in the vicinity of Kuli‘ou‘ou. 2-21 & -22
- Add Exhibit 2-3. + Revised map to be consistent visually with other maps and to add a 6 foot layer. 2-23

### Chapter 3

- Add open space policies for: agriculture, endangered species, + native Hawaiian species habitats, + slow runoff, areas susceptible to natural hazards. 3-1 & -2
- Remove underline from Protect aesthetic and biological values as it was only moved (*previously from 3-5*). 3-1
- Move description of passive and active uses of open space into the relevant subsections as an introduction. 3-2, -32
- Add reference to HRS for mountain access (pp. 3-1 and 3-2). 3-2
- Add Wiliwilinui Ridge Trail as a State maintained trail. 3-3
- Add reference that liability for landowners of trails are protected. 3-3
- Remove unsanctioned trails from the **Exhibit 3-1** but include in a new **Table 3-1** so as to not advertise the location of trails that traverse private lands while still recognizing their existence. 3-4 & -5
- Add role of NGOs. 3-4 & 6
- Add HRS references. 3-6
- Add need for access easements, trail maintenance, more trails, and perhaps a City Resource Management Program to administer. 3-6 & -7

- + Implement findings of the **Kamilo Nui – Mariner’s Cove Firewise Hazard Assessment**. 3-7
- Move **Shoreline Areas** Section to 2.1.2.2 (*previously 3.1.3.6*). 3-7
- Cite HRS in protecting shoreline access. Recognize impacts that coastal erosion and sea level rise will have on lateral shoreline access in the short- and long-term. Discourage further armoring of the shoreline. 3-7, -8, -11, -28
- Discuss that Portlock Road has a number of access points but that it is through privately-owned driveways which the association is committed to keeping open. 3-8
- Recognize the State Scenic Byway Corridor. 3-9
- Encourage citizen reporting of shoreline issues and owners taking care of vegetation. 3-10
- Recognize and codify mauka-makai shoreline access into the Revised Ordinances of Honolulu (ROH). 3-10
- Protect existing infrastructure and proposed projects from Sea Level Rise. Revised shoreline rules, SMA, and building codes. Incorporate assessments of all hazards into application process. 3-11
- Use current information and projections. 3-11
- Map repetitive loss areas to implement a build back better strategy. 3-11 & -12
- Consider forming a redevelopment district. Develop Disaster Plans. 3-11
- + Implement the recommendations of the **O’ahu Resilience Strategy** by creating a network of community resilience hubs and increasing coordination. 3-12
- Encourage the drafting of an economic feasibility study for agriculture. + Tie the use of the agricultural lots to State and County goals of food sufficiency. 3-12 & -14
- Explain the Leolani development preceded the 1999 **Plan** and does not reflect an erosion of the **Plan**’s call for the protection of agriculture. Continue to preserve the CGB. 3-13 & -14

- Implement agricultural BMPs to mitigate stormwater runoff. 3-14
- + Revise title to **Section 3.1.2.4 Runoff, Natural Gulches, and Drainage Corridors**. 3-14
- + Add narrative for streams and springs. 3-14
- + Add description of why channelization adversely impacts downstream water quality and can contribute to flooding. Implement LID standards and increase permeability and retention. Improve parks to retain stormwater. Provide green incentives. 3-14 & -17, -46, -56
- Add Wetland Areas Map as **Exhibit 3-2** 3-16
- + Add Keawāwa Wetlands to the map
- Clean up contaminated areas. 3-17
- Incorporate landscaped pathways and bikeways into drainage corridor design. 3-17
- Revise **Exhibit 3-3** (*previously 3-2*) to include Natural Areas identified in **Section 2.2.6**. 3-19
- Revised date of purchase of Aina Haina Nature Preserve. 3-20
- + Add description of the Great Lawn and Rim Island 2 and call for a biological study. Add that Natural improvements could improve ecological function to the preservation area. 3-21
- Maintain and improve views around the marina while using vegetation to screen less aesthetically pleasing areas and as a buffer to intercept runoff. Implement Best Marina Practices. 3-22
- Make changes requested by the Department of Parks and Recreation regarding botanical gardens. 3-24, -28 & -29
- Added Aina Haina Nature Preserve to Table 3-3. Update acreages. Revised number of island-based parks from 8 to 10. 3-25
- Reflect on the importance of hiking for the community and preservation efforts. 3-26
- Improve Wāwāmalu Beach as a nature park. 3-27 & -30
- Identify Maunalua Bay users even if out of jurisdiction of the **Plan**. 3-27

- Improve neighborhood linkages to parks and develop additional trails and bike paths. 3-28
- + Implement BWS rules for using non-potable water for irrigation of large landscaped areas. 3-29, -32
- + Change Acquire to Expansion. Change Koko Head Regional Park to Sandy Beach Park 3-30
- Reduce light pollution. 3-31
- Combine golf course sections into one, 3.2.3.3 3-31 & -32
- Affirm public recreation facilities should be open to users of all skill levels and incomes, particularly Koko Crater Stables. 3-31
- Add discussion on private recreation though it does not count toward the tally of park area-to-population standard. 3-33, -34
- Revise Table 3-6 (*previously 3-4*) to add Private Recreation Facilities just to inventory. 3-34
  - + Add Hawai'i Kai Dog Park
- Remove increase park inventory and discussion of new residential development. 3-35 & -36
  - + Add more community gardens. 3-36
- Add narrative on importance and history of historic and cultural resources. 3-37 to -40
- Remove **Table 3-5** due to sensitivity concerns and major missing information not found in the two cited studies. 3-40
- Add cultural practitioners to consulting party. 3-41
- Identify changes to ADU / Ohana dwelling regulation despite limited application in East Honolulu. 3-43
- Create greater diversity of housing types. 3-44
  - + Including facilities that provide palliative and hospice care.
- Encourage the implementation of Complete Streets policy. 3-44 & -45
  - + Identify Complete Streets principles.
- Soften language on community-based redevelopment districts and sea level rise impacts on new structures. 3-45

- Remove bullet on new structures being designed to withstand Category 3 hurricanes 3-45
- Create an age-friendly community following the principles of universal design. 3-45 & -48
- Consider forming a community-based redevelopment district. 3-45
- Adopt maps and regulations for sea level rise. 3-45
- New development should be designed to anticipate the impacts of climate change and sea level rise over the lifespan of the building and withstand the impacts of a Category 3 hurricane. 3-45, -52, & -54
- Modify maximum density numbers to allow for housing similar to Kahala Nui to be developed per comments received. 3-48
- Move **Table 3-6: Commercial Centers in East Honolulu** to this **Technical Report**. 3-50
- Revised narrative on commercial centers. 3-50 & -53
- All for low-rise multi-family residential use over B-1 and B-2 zoned areas. 3-52
- Encourage businesses to develop evacuation plans. 3-55

#### Chapter 4

- + Add that projects shall comply with the Clean Water Act. 3-56
- Revised discussion on Hawaii Kai Drive Extension 4-2
  - + Removed discussion of some of the neighborhood objections.
- + Add paragraph discussing changing mobility habits. 4-2
- Update and move Tables 4-1 and 4-2 to this **Technical Report**. 4-2, -5
- Update bikeway section based on proposed and completed projects and updated plans. Revised descriptions per the plans. 4-3
- Add guidelines calling for safety and comfort improvements of all users. Remove point on delays as safety should be priority. 4-6 & -7
- + Add guidelines on reducing single-occupant or autonomous zero-occupant trips during commute times. 4-7

- Implement the pedestrian plans, Complete Streets, SRTS. 4-7
- Discourage the use of gated communities. 4-7
- + Preserve and enhance existing crosswalks. Install additional crosswalks. 4-8
- Landscape along roadways to capture stormwater. 4-8
- + Begin planning and implementing protections for SLR projections. 4-8
- Add discussion on the various water plans and their functions. 4-9
- Update water use statistics and projected impacts to rainfall from climate change. 4-10
- Water use projections and infrastructure need to consider SLR. 4-11
- + Implement HRS 174C-31, expanding use of reclaimed water. 4-11
- Implement LID standards and incentivize rain gardens and other green infrastructure. 4-12
- + Add Section 4.3.3 Cesspools and describe their negative impacts to downstream water quality. 4-14
- + Add bullet supporting connection of homes to existing sewer systems, or support upgrades where connections are not feasible. 4-15
- Identify State goals of 100 percent renewable portfolio standard by 2045. 4-16
- Add discussion on antennas and which agencies formulate policies and regulations. 4-16
- Remove in Hawaii's transportation sector to be factually accurate. 4-16
- Encourage co-location of antennas and that they should not adversely impact scenic resources. 4-17
- + Underground utilities and ensure that infrastructure accounts for SLR and a rising water table. 4-17
- Add flood study language. 4-20
- Encourage the formulation of a Watershed Partnership to manage ahupua'a, improve water quality, and restore streams. 4-21

- Identify repetitive loss areas and restrict rebuilding in those areas. 4-21
- Update Table 4-1 and Table 4-2, school enrollment numbers. 4-23 & -24
- Encourage shelters to withstand a Category 3 hurricane. 4-25
- + Revise police substation discussion to say there is no need. 4-25
- Add discussion on emergency shelters. 4-26
- Remove the previously new **Table 4-3 and reference.** 4-26 & -27
- New projects and infrastructure must take into account climate change and sea level rise impacts over the lifespan of the project. 4-27
- Encourage greater communication and collaboration. 4-27 & -28
- Supplement public shelters by encouraging the development of private shelters. Ensure seniors have access to shelters. 4-28
- Develop a Community Resilience Hub per the **O'ahu Resilience Strategy.** 4-28 & -29
- Remove points on satellite city hall, police and fire station and substation. 4-29

## Chapter 5

- Eliminate introductory language. 5-1
- Add develop a network of Community Resilience Hubs. 5-1
- Changed five year review to ten year review. 5-1
- Respect the intent and purposes of the agriculture uses. 5-2
- Have adequate required infrastructure in place before or upon completion of the project. 5-2
- Analyze the possible impact of sea level rise for new public and private projects near shoreline and low-lying areas. 5-2
- Reaffirm that there are no Special Area Plans within East Honolulu but other agencies may have master plans like the Kaiwi State Scenic Shoreline. 5-3
- Add narrative on potential benefit of a community-based redevelopment district. 5-3

- Expand on the need for functional planning within agencies. 5-4
- Clarify what will constitute a significant zone change, what projects will not be supported, what need an EA/EIS. 5-6 & -7
- Remove the need for master plans only from projects that trigger a significant zone change because they are larger than 25 acres. 5-7
- Changed five year review to ten year review. 5-8
- Update population and proposed **General Plan** numbers. 5-9
- Update code a standard references as applicable. 5-10 & -11
- Add discussion from the 2006 Development Plans Implementation Program review. 5-11 & -12
- Add an implementation matrix to better track how each of the policies or guidelines will be implemented and what are the respective agency roles. 5-12 to -39
- + Add **Streamlining the DP/SCP Update Process** narrative. 5-12

### Appendix Maps

- Identify Aina Haina Nature Preserve as outside of the CGB but within the State Urban District. A-3
- Change Urban Community Boundary to Community Growth Boundary for consistency with other DPSCPs. APX A
- Elimination of the Agriculture Growth Boundary but keep Agriculture Areas. APX A
- The shifting of the Community Growth Boundary to include areas of Niu Valley and Leolani to reflect the zoning just prior to the adoption of the 1999 **Plan**. APX A
- Slight increase of urbanization within the CGB around Koko Villas. APX A
- Elimination of the unsanctioned trails from the Open Space map. APX A
- Addition of Elementary schools to the Urban Land Use and Public Facilities maps unless they appear on **Exhibit 2-2 Scenic Resources**. APX A

- |   |  |       |
|---|--|-------|
| + | Addition of streams and Keawāwa Wetland to the Open Space Map.   | APX A |
| + | Removal of Koko Head from Park to Preservation.  | APX A |
| + | Removal of the recently acquired addition to the 'Āina Haina Nature Preserve from the Community Growth Boundary. | APX A |

### 3.2 Proposed Improvements to Implementation of Plan Vision and Policy

The revised **Plan** is more explicit than the current version with regard to policies and the responsibilities of agencies and developers to implement them. This is largely a matter of clarifying procedures and policies that have emerged over the last two decades. Key improvements to the **Plan** include:

- Actively support implementation of Complete Streets, (e.g. connectivity, the **O'ahu Bike Plan** and improved transit facilities, Age-Friendly Cities) to reduce dependence on automobiles;
- Increased attention to sustainability principles and protecting natural, historic and cultural resources by means of DPP policies and reviews of proposed development;
- Clarifications on agricultural land uses;
- Strive to meet community park ratio standards for residents and continue to improve access to mauka trails, the shoreline, and parks for non-motorized users;
- Reorient commercial centers to neighborhood services;
- Increased attention to stormwater management and water quality issues including retention and the implementation of LIDs and BMPs, water recycling, and better upland management;
- Encourage public-private partnerships and innovative funding mechanisms to facilitate implementation of **Plan** vision and policies;
- Clarification of procedures for zone change and other development applications, including criteria for finding a zone change “significant,”

needing an Environmental Assessment or Environmental Impact Statement; and,

- Provision of an implementation matrix that shows the roles and responsibilities of agencies involved in land use issues.

### **3.3 Proposed Follow-Up Studies and Research**

#### **3.3.1 Proposed Follow-up Studies**

- An economic feasibility study for agricultural uses in East Honolulu and the potential to utilize direct market sales in the event that the Hawai'i Kai Drive extension was ever completed.
- Additional studies on Maunalua Bay including continued water quality surveys, flooding studies, and user surveys.
- Ecological studies on the impacts of fill lands within Kuapā Pond / Hawai'i Kai Marina, particularly Rim Island 2.
- Upland erosion studies to determine if the presence of hikers deters the spread of invasive species encouraging better management and monitoring practices or exacerbates the spread of invasive species and increases erosion.
- Wastewater study to identify the improvement necessary that would enable the golf courses to use recycled water for irrigation.

#### **3.3.2 Outstanding Issues for Research and Consideration in the Next Years**

- The public publication of SHPD data regarding vulnerable and endangered sites, both historic and cultural.
- Results and actionable items from the flood control studies for Wailupe Stream.

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## 4. CHANGES TO FUTURE PLAN REVIEWS

A study is being undertaken by a consultant to review the Department's existing DP and SCP review and implementation processes with a publication date in 2020. Due to limited resources, it has been difficult to focus on implementation and comprehensive reviews every five years for each of O'ahu's eight regions. The study will look at how plans can be better implemented, as well as to how efficient and appropriate the five-year review window is.

### 4.1 Lessons and Input from Other Regions

O'ahu is divided into eight distinct plan areas which are all required for their plans to go through the same periodic reviews every five years. The current status of each of the areas is regularly sent to City Council and is shown in **Table 4-1, DPSCP Status**.

In addition to the review process is the planning document itself. The **Primary Urban Center Development Plan (PUC DP)**, which began their public outreach in early 2019, will be the next plan region slated for completion after East Honolulu. Rather than providing incremental amendments to policies, the new **PUC DP** will overhaul the plan format entirely, changing the appearance of the document to make it more user friendly with less narrative and more graphics to better in punch out the vision and policies and hopefully improve implementation. If the overhaul is acceptable to the community and City Council, the **PUC DP** will become the new standard which other plans will conform to. This ultimately means that the **East Honolulu Sustainable Communities Plan** will be the last of this iteration.

Other plan regions have voiced concerns about the effectiveness or implementation of the plans once adopted. Some regions requested that plans have more force behind them, perhaps unaware that earlier iterations were more regulatory, particularly when maps were considered parcel specific and zone changes were frequently associated with plan updates.

**Table 4-1 DPSCP Status**

Plan Area	Effective Date	Estimated Schedule	Status
O'ahu General Plan	October 2002	Pending	Introduced as Resolution 18-93 Re-introduced as Resolution 20-44
Primary Urban Center	June 2004	Winter 2021	Update underway
'Ewa	July 2013	None	Adopted under Ordinance 13-26
North Shore	May 2011	September 2022	Update underway
Waianae	March 2012	None	Adopted under Ordinance 12-3
Central O'ahu	December 2002	At City Council	Introduced as Bill 75 (2017) Re-Introduced as Bill 41 (2019)
Koolau Loa	October 1999	At City Council	Introduced as Bill 47 (2013) Re-introduced as Bill 53 (2015) Re-introduced as Bill 1 (2017) Re-introduced as Bill 1 (2019)
Koolau Poko	August 2017	None	Adopted under Ordinance 17-42
East Honolulu	May 1999	Fall 2020	Transmitting to Planning Commission and City Council

**APPENDIX A: DRAFT ADOPTING ORDINANCE FOR THE  
PROPOSED REVIED EAST HONOLULU  
SUSTAINABLE COMMUNITIES PLAN**





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**A BILL FOR AN ORDINANCE**

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TO ADOPT THE REVISED EAST HONOLULU SUSTAINABLE COMMUNITIES PLAN FOR THE CITY AND COUNTY OF HONOLULU.

BE IT ORDAINED by the People of the City and County of Honolulu:

SECTION 1. Purpose. The purpose of this ordinance is to repeal the existing Sustainable Communities Plan for East Honolulu, Chapter 24, Article 4, Revised Ordinances of Honolulu, and to adopt a new Article 4 incorporating the revised East Honolulu Sustainable Communities Plan.

This development plan ordinance adopts a revised sustainable communities plan for East Honolulu that presents a vision for East Honolulu’s future development consisting of policies, guidelines, and conceptual schemes that will serve as a policy guide for more detailed zoning maps and regulations and for public and private sector investment decisions.

This ordinance is enacted pursuant to the powers vested in the City and County of Honolulu by Chapter 46, and Section 226-58 Hawaii Revised Statutes.

SECTION 2. Article 4 of Chapter 24, Revised Ordinances of Honolulu 1999, as amended (“East Honolulu”), is repealed.

SECTION 3. Chapter 24, Revised Ordinances of Honolulu 1999, as amended, is amended by adding a new Article 4 to read as follows:

**"Article 4. East Honolulu**

**Sec. 24-4.1 Definitions.**

Unless the context otherwise requires, the definitions contained in this section shall govern the construction of this article.

"Charter" or “Revised Charter” means the Revised Charter of the City and County of Honolulu, as amended.

“City” means the City and County of Honolulu.

"Council" means the city council of the City and County of Honolulu.

"County" means the City and County of Honolulu.



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## A BILL FOR AN ORDINANCE

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"Department" or "department of planning and permitting" means the department of planning and permitting of the City and County of Honolulu.

"Development" means any public improvement project, or any public or private project requiring a zoning map amendment.

"Development plan" or "sustainable communities plan" means a plan document for a given geographic area which consists of conceptual schemes for implementing and accomplishing the development objectives and policies of the general plan for the several parts of the City and County of Honolulu.

"Director" means the director of the department of planning and permitting.

"East Honolulu SCP" means the East Honolulu Sustainable Communities Plan.

"Environmental assessment" and "EA" means a written evaluation prepared in compliance with the environmental council's procedural rules and regulations implementing Hawaii Revised Statutes, Chapter 343 to determine whether an action may have a significant environmental effect.

"Environmental impact statement" and "EIS" means an informational document prepared in compliance with the environmental council's procedural rules and regulations implementing Hawaii Revised Statutes, Chapter 343; and which discloses the environmental effects of a proposed action, effects of a proposed action on the economic and social welfare of the community and State, effects of the economic activities arising out of the proposed action, measures proposed to minimize adverse effects, and alternatives to the action and their environmental effects.

"Finding of no significant impact" and "FONSI" means a determination based on an environmental assessment that the subject action will not have a significant effect and, therefore, will not require the preparation of an environmental impact statement.

"Functional plan" means the public facility and infrastructure plans prepared by public agencies to further implement the vision, policies, and guidelines set forth in the East Honolulu Sustainable Communities Plan.

"General plan" means the general plan of the City and County of Honolulu as defined by Section 6-1508 of the Charter.

"Hawaii Revised Statutes" or "HRS" means Hawaii Revised Statutes.



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"Planning commission" means the planning commission of the City and County of Honolulu.

"Project master plan" means a conceptual plan that covers all phases of a development project. The project master plan shall be that portion of an Environmental Assessment or Environmental Impact Statement which illustrates and describes how the project conforms to the vision for East Honolulu, and the relevant policies and guidelines for the site, the surrounding lands, and the region.

"Revised Ordinances of Honolulu" or "ROH" means Revised Ordinances of Honolulu 1990, as amended.

"Significant zone change" means a zone change which involves at least one of the following:

- (1) Changes in zoning of 25 or more acres of land to any zoning district or combination of zoning districts, excluding preservation or agricultural zoning districts;
- (2) Any change in zoning of more than 10 acres to a residential or country zoning district;
- (3) Any change in zoning of more than five acres to an apartment, resort, commercial, industrial, or mixed use zoning district; or
- (4) Any development which would have a major social, environmental, or policy impacts, or major cumulative impacts due to a series of applications in the same area.

"Special area" means a designated area within the East Honolulu SCP area that requires more detailed planning efforts beyond what is contained in the East Honolulu Sustainable Communities Plan.

"Special area plan" means a plan for a special area.

"Unilateral agreement" means a conditional zoning agreement made pursuant to Section 21-2.80 ROH or any predecessor provision that imposes conditions on a landowner or developer's use of the property at the time of the enactment of an ordinance for a zoning change.



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## A BILL FOR AN ORDINANCE

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"Vision" means the future outlook for the East Honolulu region extending out to the year 2040 and beyond that entails the creation of a community growth boundary, an open space network for preserving natural features, scenery, and shoreline areas for recreational use by the public, protection of historic and community resources, and provision of adequate infrastructure and community facilities to address the anticipated impacts of climate change and to meet East Honolulu's future needs.

### **Sec. 24-4.2 Applicability and intent.**

- (a) The East Honolulu SCP encompasses the entire area from the mountains to the southern shoreline of Oahu stretching from Makapuu Point on the eastern sector, along the ridgeline of Koolau Mountain Range in a westerly direction to the Waialae Nui Gulch Stream.
- (b) It is the intent of the East Honolulu SCP to provide a guide for orderly and coordinated public and private sector development in a manner that is consistent with applicable general plan provisions, recognizing this urban fringe area as one of the principal stable areas in the county for low-density residential development.
- (c) The provisions of this article and the East Honolulu SCP are not regulatory. Rather, they are established with the explicit intent of providing a coherent vision to guide all new public and private sector development within East Honolulu. This article shall guide any development for East Honolulu, public investment in infrastructure, zoning and other regulatory procedures, and the preparation of the city's annual capital improvement program budget.

### **Sec. 24-4.3 Adoption of the East Honolulu SCP.**

- (a) This article is adopted pursuant to Revised Charter Section 6-1509 and provides a self-contained development plan document for East Honolulu. Upon enactment of this article, all proposed developments will be evaluated against how well they fulfill the vision for East Honolulu enunciated in the East Honolulu SCP and how closely they meet the policies and guidelines selected to implement that vision.
- (b) The plan entitled, "East Honolulu Sustainable Communities Plan," attached to this ordinance as Exhibit A, is hereby adopted by reference and made a part of Chapter 24, Article 4, ROH.



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## A BILL FOR AN ORDINANCE

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- (c) Chapter 24, Article 1, entitled "Development Plan Common Provisions," in its entirety, is no longer applicable to the East Honolulu SCP. The East Honolulu SCP, as adopted by reference by this ordinance, supersedes any and all common provisions previously applicable to the East Honolulu area.

### **Sec. 24-4.4 Existing zoning and subdivision ordinances, approvals, and applications.**

- (a) All existing subdivisions and zoning approved prior to the effective date of this ordinance for projects, including but not limited to those subject to unilateral agreements, shall continue to remain in effect following the enactment of this ordinance.
- (b) Subdivision and zoning ordinances applicable to the East Honolulu SCP area enacted prior to the effective date of this ordinance shall continue to regulate the use of land within demarcated zones of the East Honolulu SCP area until such time as the subdivision and zoning ordinances may be amended to be consistent with the revised East Honolulu SCP.
- (c) Notwithstanding adoption of the revised East Honolulu SCP, applications for subdivision actions and land use permits accepted by the department for processing prior to the effective date of this ordinance shall continue to be subject only to applicable ordinances and rules and regulations in effect at the time the application is accepted for processing.

### **Sec. 24-4.5 Consistency.**

- (a) The performance of prescribed powers, duties, and functions by all city agencies shall conform to and implement the policies and provisions of this ordinance. Pursuant to Revised Charter Section 6-1511.3, public improvement projects, subdivision, and zoning ordinances shall be consistent with the East Honolulu SCP, as adopted.
- (b) Any questions of interpretation regarding the consistency of a proposed development with the provisions of the East Honolulu SCP and the objectives and policies of the general plan shall ultimately be resolved by the council.
- (c) In determining whether a proposed development is consistent with the East Honolulu SCP, the responsible agency shall primarily take into consideration the



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## A BILL FOR AN ORDINANCE

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extent to which the development is consistent with the vision, policies, and guidelines set forth in the East Honolulu SCP.

- (d) Whenever there is a question regarding consistency between existing subdivision or zoning ordinances, including any unilateral agreement, and the East Honolulu SCP, the existing subdivision or zoning ordinances shall prevail until such time as they may be amended to be consistent with the East Honolulu SCP.

### **Sec. 24-4.6 Review of development and other applications.**

The review of applications for zone changes and other development approvals will be guided by the vision of the East Honolulu SCP. Decisions on all proposed developments should be based on the extent to which the project, enabled by the development approval, supports the policies and guidelines of the East Honolulu SCP.

The director may review other applications for improvements to land, as well to help the responsible agency determine whether a proposed improvement supports the policies and guidelines of the East Honolulu SCP.

### **Sec. 24-4.7 Zone change applications.**

- (a) All zone change applications relating to land in the East Honolulu SCP area will be reviewed by the department of planning and permitting for consistency with the general plan, the East Honolulu SCP, and any applicable special area plan provisions.
  - (1) The director shall recommend either approval, approval with conditions, or denial. The director's written review of the application shall become part of the zone change report which will be sent to the planning commission and then council.
  - (2) A project master plan shall be part of an EA or EIS for any project involving 25 acres or more of land. The director shall review the project master plan for its consistency with the East Honolulu SCP.
  - (3) Any development or phase of development already covered by a project master plan which has been fully reviewed under the provisions of this article shall not require a new project master plan, provided the director determines that the proposed zone change is generally consistent with the existing project master plan for the affected area.



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## A BILL FOR AN ORDINANCE

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- (4) If a final EIS has already been accepted for a development, including one accepted prior to the effective date of this ordinance, then a subsequent project master plan will not be required for the development.
  
- (b) Projects which involve a significant zone change will be required to submit an EA to the department of planning and permitting prior to an application for a zone change being accepted. Any development or phase of a development which has already been assessed under the National Environmental Policy Act (NEPA), HRS Chapter 343 (Hawaii Environmental Policy Act, HEPA), Chapter 25, ROH, or the provisions of this article, and for which a FONSI has been filed or a required EIS has been accepted, will not be subject to further EA or EIS requirements under this chapter, unless otherwise required by NEPA or HEPA.
  
- (c) The EA shall be reviewed by the department of planning and permitting. Based on review of the EA, the director will determine whether an EIS will be required or whether a FONSI should be issued.
  
- (d) If an EIS is required, the EIS must be accepted by the director prior to the acceptance of a zone change application.
  
- (e) Zone changes shall be processed in accordance with the provisions of Section 5.5 of the East Honolulu SCP and all applicable requirements under Chapter 21, ROH.

### **Sec. 24-4.8 Annual capital improvement program review.**

Annually, the director shall work jointly with the director of the department of budget and fiscal services and the applicable city agencies to review all projects in the city's capital improvement program and budget for compliance and consistency with the general plan, the East Honolulu SCP and other development plans, any applicable special area plan provisions, and the appropriate functional plans. The director of planning and permitting will prepare a written report of findings to be submitted to the council in accordance with Revised Charter Section 6-1503.

### **Sec. 24-4.9 Ten year review.**

- (a) The department of planning and permitting shall conduct a comprehensive review of the East Honolulu SCP, adopted by reference in Section 24-4.3(b), every ten years subsequent to the plan's adoption and shall report its findings and recommended revisions to the council.



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## A BILL FOR AN ORDINANCE

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- (b) The East Honolulu SCP will be evaluated to assess the appropriateness of the plan's regional vision, policies, guidelines, and implementing actions, as well as its consistency with the general plan.
- (c) Nothing herein contained shall be construed as a prohibition against processing a revision to the East Honolulu SCP in the event either the director or council recommends consideration of such a revision, pursuant to the Revised Charter.

### **Sec. 24-4.10 Authority.**

Nothing in this article shall be construed as an abridgement or delegation of the responsibility of the director, or of the inherent legislative power of the council, to review or revise the East Honolulu SCP pursuant to the Revised Charter and the above procedures.

### **Sec. 24-4.11 Severability.**

If any provision of this article or the application thereof to any person or property or circumstances is held invalid, such invalidity shall not affect other provisions or applications of this article which can be given effect without the invalid provision or application, and to this end the provisions of this article are declared to be severable.

### **Sec. 24-4.12 Conflicting provisions.**

Any provision contained in this article shall, with respect to the East Honolulu SCP area, prevail should there be any conflict with the common provisions or any other provisions under Chapter 24.”



**CITY COUNCIL**  
CITY AND COUNTY OF HONOLULU  
HONOLULU, HAWAII

ORDINANCE \_\_\_\_\_

BILL \_\_\_\_\_

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## A BILL FOR AN ORDINANCE

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SECTION 4. Insertion of Effective Date. The Revisor of Ordinances is hereby directed to date the East Honolulu Sustainable Communities Plan with the effective date of this ordinance.



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**A BILL FOR AN ORDINANCE**

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SECTION 5. The ordinance takes effect upon its approval.

INTRODUCED BY:

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\_\_\_\_\_  
\_\_\_\_\_  
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\_\_\_\_\_

DATE OF INTRODUCTION:

\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
Honolulu, Hawaii

\_\_\_\_\_  
Councilmembers

APPROVED AS TO FORM AND LEGALITY:

\_\_\_\_\_  
Deputy Corporation Counsel

APPROVED this \_\_\_\_\_ day of \_\_\_\_\_, 20 \_\_\_\_\_.

\_\_\_\_\_  
KIRK CALDWELL, Mayor  
City and County of Honolulu

**APPENDIX B: SUMMARY OF THE COMMENTS RECEIVED  
ON THE 2019 PUBLIC REVIEW DRAFT WITH  
THE DPP RESPONSES**



Written Comment	DPP Response	Section	Page #	Text Change from PRD	Reviewer
<b>Cover</b>					
The Plan needs to convey who we are as a community. The photos on the front cover of the Plan do not convey that. Some of the language is too "boilerplate." It is hard to find key words such as "agriculture." The Plan needs to distinguish between development and redevelopment. Priority issues include sea level rise, sustainability, and cultural and natural resources. We need to look at cumulative effects on our environment.	Almost all "development" in East Honolulu will be redevelopment since there is little virgin land left within the CGB. Other issues are addressed below.	Cover		See below	Townscape
Photos on the front cover are not representative of our community. Better photos to use should include one or more of the following: coastal view from Kohalepelepe to Diamond Head, the Kaiwi Coastline, 'Āina Haina/Niu Valley (Wailupe Stream- the last natural stream in Maunaloa Bay), Fishponds, View of Paikō Ridge and Lagoon.	No change. The cover shows the shoreline, a commercial center, infrastructure, preservation lands (Kaiwi), and homes and landscaping along Kalanianaʻole Highway.	Cover		-	Townscape
<b>Executive Summary</b>					
Development and Sustainable Communities plans should be closely integrated with County and State Hazard Mitigation Plans. As such, we suggest adding community resilience and hazard mitigation to the following paragraph on page ES-5 (suggested addition underlined):					DLNR
The issues addressed either directly or indirectly by these regional plans certainly overlap with other planning responsibilities of other departments, such as water delivery and consumption, wastewater services, <u>community resilience and hazard mitigation</u> , crime reduction, increasing public health, and developing responsive transportation systems.	<b>Revised Plan</b>	ES	ES-5	<u>wastewater services, community resilience and hazard mitigation, crime reduction</u>	DLNR
Similarly, we suggest adding another "principle of sustainability" on pages ES-5 and 6 related to improving community resilience to natural and man-made hazards (shocks and stressors) following the Framework, Pillars, Goals, and Actions of the recently completed O'ahu Resilience Strategy.	<b>Revised Plan</b>	ES	ES-6	Improve community resilience to natural and man-made hazards in accordance with the <b>O'ahu Resilience Strategy</b>	DLNR
The word "potential" is used in several instances when discussing climate change and sea level rise. Use of the word as written may be misconstrued such that sea-level rise and climate change impacts are treated as somewhat hypothetical, when in reality their impacts over the coming decades are imminent. We suggest removing the term from the following sentences:	See below, <b>Revised Plan</b> throughout	ES		-	DLNR
"Anticipating and mitigating against <del>potential</del> climate change and sea level rise impacts."	<b>Revised Plan</b> per another comment	ES	ES-11	<u>o Implementing the goals and actions of the O'ahu Resilience Strategy.</u>	DLNR
"After 2040, the <del>potential</del> impacts of climate change will become more evident, requiring East Honolulu to actively manage adaptation and improve resiliency to hurricane winds, coastal erosion, inundation, and flooding. "	<b>Revised Plan</b>	ES	2-1	<u>After 2040, the impacts of climate change will become more evident</u>	DLNR
"Exhibit 2-3 shows the <del>potential</del> impacts of static flooding and groundwater inundation in East Honolulu from 3. 2 feet of sea level rise as published in the Sea Level Rise Vulnerability Assessment and Adaptation Report."	<b>Revised Plan</b>	ES	2-21	<u>Exhibit 2-3 shows the anticipated impacts</u>	DLNR
Page 5-3, "As changes are made, new structures and facilities are designed to adapt to and mitigate the <del>potential</del> impacts of climate change. "	<b>Revised Plan</b>	ES	5-3	<u>...anticipated impacts of sea level rise</u>	DLNR
References to the Honolulu Board of Water Supply East Honolulu Watershed Management Plan (WMP) should be stated in the Executive Summary in addition to Section 4.2.	No change. Discussion and references to plans from other agencies will be in their topic specific sections and in the Technical Report	ES	ES-1	-	Townscape
Statement should explain the relationship between the Sustainable Communities Plans and the WMPs, including how both the plans should be in alignment with each other.					

Written Comment	DPP Response	Section	Page #	Text Change from PRD	Reviewer
Add discussion on agriculture and food sustainability in the section on "A Sustainable Future for O'ahu."	No change. This is a summary. The Plan does not touch much on food sustainability and the community has expressed their desire to keep farm lots isolated from residential areas	ES	ES-3	-	Townscape
Besides the Sea Level Rise Report, Hawaii Emergency Management Agency's 2018 Hazard Mitigation Plan provides useful data, planning information, and vulnerabilities for Hawaii. There is also a Statewide "zero emissions clean economy target"/carbon "neutrality" requirement by 2045 (Hawaii Revised Statutes (HRS) § 225P-5) Act 15, SLH 2018.	Added to Technical Report	ES	ES-4	<i>o Hawaii Emergency Management Agency's 2018 Hazard Mitigation Plan provides useful data, planning information, and vulnerabilities for Hawaii.</i> <i>o There is a Statewide "zero emissions clean economy target"/carbon "neutrality" requirement by 2045 (HRS § 225P-5) Act 15, SLH 2018.</i>	OP
There is also a requirement for one-hundred percent reclaimed water use in State and County facilities by 2045 with exception. (HRS § 174C-31, g (6)) Act 170, SLH 2016.	<b>Revised Plan</b>	ES	ES-4, 4-8	<i>o Expand use of reclaimed water in State and County Facilities in accordance with HRS 174C-31.</i> <i>o Encourage use of reclaimed water in redevelopment projects.</i>	OP
Revise the second paragraph to the following: "The issues addressed either directly or indirectly by these regional plans certainly overlap with other planning responsibilities of other departments, such as recreation (parks, trails, shoreline), water delivery and consumption, wastewater services ... "	No change, consistent with other DPSCPs	ES	ES-5	-	Townscape
Revise statement to the following: "A community that can successfully manage change with respect to natural and cultural resources will flourish and prosper in the future."	No change. Language is consistent with newly revised plans.	ES	ES-5	-	Townscape
This concept needs to permeate throughout the entire Plan.			ES-6		
Revise second bullet to the following: "Protect lands designated for <u>recreation</u> , agriculture, physical and biological resources, and where appropriate, open spaces and view planes. "	<b>Revised Plan</b>	ES	ES-5	<ul style="list-style-type: none"><li>• Protect lands designated for <u>recreation</u>, agriculture, physical and biological resources, and where appropriate, open spaces and view planes;</li></ul>	Townscape
Add the following concepts to the Executive Summary:	See below	ES	ES	-	Townscape
City and State agencies to collaborate and partner with the community to protect and manage resources.				<u>Encourage greater collaboration across agencies</u>	Townscape
Protect and manage the integrity of our resources to serve the residents first and then visitors secondary.	<b>Revised Plan.</b> Added a bullet	ES	ES-6	<u>and with the public to manage and protect community resources.</u>	Townscape
1st bullet: List the "seven principles of universal design."	No change. This is the summary. The concept will be discussed in the relevant sections.	ES	ES-7	-	Townscape
Use language directly from the City Charter relating to the Sustainable Communities Plan.	<b>Partially revised Plan.</b> The 2017 edition does not impact the description of the DPs put in place prior to the adoption of the 1999 Plan. Added purpose	ES	ES-8	<i>"to recognize and anticipate the major problems and opportunities concerning the social, economic and environmental needs and future development of the city and to set forth a desired direction and patterns of future growth and development." (Section 6-1507)</i>	Townscape
Establish a management plan for cultural, historical, and natural areas to protect and preserve these important resources for future generations.	No change. While the DPP may be supportive of a separate plan, this is partially the role of the Plan.	ES	ES	-	Townscape
Over usage of our resources is detrimental to the environment.	No change. Overly broad.	ES	ES	-	Townscape

Written Comment	DPP Response	Section	Page #	Text Change from PRD	Reviewer
Add the following: "DPP shall annually provide a written summary to the City Council outlining DPP's implementation of the East Honolulu Sustainable Communities Plan. The Department shall include on-going departmental staff training efforts on the plan, number of staff members trained and future plans."	No change. DPP already reports to Council on status. While potentially supportive of wanting additional staff, limited resources prevent more planners to be involved.	ES	ES	-	Townscape
Revise the first bullet to the following: "Population remains stable at approximately <del>50,000</del> 5% of O'ahu's population through 2035 and 2040." Need to make sure that the statement is consistent throughout the entire document.	<b>Partially revised Plan.</b> Section 1 and 2 says 50,000. The 2 references to five percent in the ES are now accompanied by the 50,000 figure	ES	ES-10	<u>or 50,000</u>	Townscape
Add the following to "Protect Community Resources by":	See Below	ES	ES-10	-	Townscape
o Maintaining park resources to primarily serve the residents of East Honolulu first	No change	ES	ES-10	-	Townscape
o Protecting and preserving the unique residential neighborhood characteristics and sense of place for East Honolulu (i.e., limit transient housing, no rail or alternative energy wind mills). [ i.e.? or e.g.,? Okay if just limited to the three items noted.]	No change. This is the executive summary, no talk of rail or windmills in the plan	ES	ES-10	-	Townscape
o Promoting stewardship of natural <u>and cultural</u> resources	<b>Revised Plan</b>	ES	ES-10	o Promoting stewardship of natural <u>and cultural</u> resources;	Townscape
o Creating more complete streets <del>comprised of landscaped pathways along roadways and drainage ways</del> <u>that are walkable, facilitate ease of use for pedestrians and cyclists, and are age-friendly.</u>	<b>Revised Plan</b>	ES	ES-10	o Creating more complete streets <del>comprised of landscaped pathways along roadways and drainage ways</del> <u>that are walkable, facilitate ease of use for pedestrians, cyclists, and other alternative mode uses, and are age-friendly;</u>	Townscape
This statement is not well stated. Complete streets should be walkable, and pedestrian and age friendly.					Townscape
Add to the vision the protection of critical wildlife habitat. For example, critical wildlife habitat for threatened and endangered species such as the yellow-faced bees are vulnerable to impacts from climate change.	No change. The is a summary of what is in Section 2.2. No where does the Plan discuss bees.	ES	ES-10	-	Townscape
Add sub bullet after "Anticipating and mitigation against potential climate change and sea level rise impacts" to read: "Establishing cooperative liaisons with community organizations engaged in emergency planning"	<b>Partially revised</b> to reflect intent while using language from the O'ahu Resilience Strategy. (OLA 35, 44)	ES	ES-10	o <u>Implementing the goals and actions of the O'ahu Resilience Strategy, particularly recommendations calling for greater coordination and partnerships between the City, neighborhood emergency preparedness groups, and Non-Governmental Organizations (NGOs).</u>	Andrea Wagner
Adapt to Changing Community Needs by—change second sub bullet to read: "Preparing the community and infrastructure for anticipated impacts from natural disasters and climate change by providing or supporting community-based training, and creating or strengthening existing shelters to withstand Category 4 hurricanes;"	<b>Partially revised</b> to be consistent with language on page 4-24.	ES	ES-11	o <u>Preparing the community and infrastructure for anticipated impacts from natural disasters and climate change by providing community-based training, and creating or strengthening existing shelters capable of withstanding Category 3 hurricanes;</u>	Andrea Wagner
Land use development policies and implementing guidelines are provided for—change fifth sub-bullet to read: "Assure residential communities and commercial redevelopment are designed to withstand potential hazards."	No change. There are other concerns than disaster preparedness that land use development policies address	ES	ES-11	-	Andrea Wagner
Move "and" from end of fifth bullet from top to end of sixth bullet, add seventh bullet to read: "Disaster Preparedness".	No change. These are the Subsections in Section 5	ES	ES-12	-	Andrea Wagner

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The means for implementing the Plan are provided through—change second bullet to read: "Guiding development within areas of critical concern with Special Area Plans, as needed;"	<b>Revised Plan</b>	ES	ES-13	• <u>Guiding development within areas of critical concern with Special Area Plans, as needed;</u>	Andrea Wagner
Greenhouse gas emissions goals for 2020 were enacted by Act 234 (2007). There was a mandate in 2015 that 100 percent of Hawaii's energy...resources by Act 97 (2015).	A more traditional way to cite is: Act 234 (2007); easier to note the year that relates to the Act # than including the year at the beginning of the sentence in the current text. <b>Revised Plan</b>	ES	ES-4, 1st para	enacted by Act 234 (2007)	Jeanne Ohta
Include link to the report: <a href="https://climateadaptation.hawaii.gov/wp-content/uploads/2017/12/SLR-Report_Dec2017.pdf">https://climateadaptation.hawaii.gov/wp-content/uploads/2017/12/SLR-Report_Dec2017.pdf</a>	Helps the reader reference the report.	Added to the <b>Technical Report</b> . Do not want to include links in the Plan which could become outdated. The state website is already inactive.	ES	TR: <a href="https://climateadaptation.hawaii.gov/wp-content/uploads/2018/01/SLR-Report_-January-2018.pdf">https://climateadaptation.hawaii.gov/wp-content/uploads/2018/01/SLR-Report_-January-2018.pdf</a>	Jeanne Ohta
Include Definition of 7 principles of universal design that this plan is using	To avoid confusion and misunderstanding since there may be more than one accepted definition	No change. This is a summary, principles will be discussed in the document	ES	ES-6, 1st bullet	Jeanne Ohta
understanding of the <u>cumulative</u> effects such decisions...	<b>Revised Plan</b>	ES	ES-6	<u>cumulative</u> effects	Jeanne Ohta
Delete: " <del>Although the Development Plans and Sustainable Communities Plans are not themselves regulatory,</del> "	Contradictory and confusing since they are adopted by ordinance.	No change. The LUO, SMA, zone changes, etc. are the regulations that implement the DPSCPs. Those regulations may require the applicants to show conformance with the DPSCPs, but alone, the plans are policy guides consisting of conceptual schemes, per Charter.	ES	ES-7 last para	Jeanne Ohta
The plans are policies and are to be used, in conjunction with the programs and budgets of the City, to accomplish the objectives of the City as guides for the decisions made in the <u>public and private sectors.</u>	More accurate	<b>Revised Plan</b> to be more consistent with other DPSCPs	ES	<u>guides for decisions. The plans are also intended to aid decisions made in the private sector by clearly indicating what the City's development priorities are, where development is appropriate, and what kinds of development are appropriate in each location.</u>	Jeanne Ohta
Replace with actual text of Chapter 15, Section 6-1509. Development Plans: "Development Plans shall consist of conceptual schemes for implementing and accomplishing the development objectives and policies of the general plan within the city. A development plan shall 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..."	Quote the actual language of the City Charter, not an interpretation of it. See Revised Charter of the City & County of Honolulu 1978 (2017 Edition); June 30, 2017; (1998 General Election Charter Amendment Question No. I(III); 2016 General Election Charter Amendment Question 6) The charter doesn't say that they should not be deemed regulatory as is written in the paragraph. In fact, the Hawaii Supreme Court has ruled that development plans have the force and effect of law.	<b>Revised Plan</b> . The PRD already quoted the City Charter which says "to serve as a policy guide for more detailed zoning maps and regulations." The charter is already summarized in the PRD on the following page.	ES	...the plans shall serve as a policy guide for regulations which will implement the plans.	Jeanne Ohta

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To be transparent and fair, include a reference to Hawaii Supreme Court Decision Lum Yip Kee, Ltd. v City & County of Honolulu, 70 Haw. 179,767	Here is more information: Both the Hawaii Supreme Court and the EHSCDP itself have consistently rejected the EHSCDP "advisory" impact, by ruling that the Sustainable Communities Plans do indeed <b>"carry the weight, force and effect of law."</b>	ES		-	Jeanne Ohta
<u>P.2d 815 (1989) GATRI v. Blane, 962 P.2d 367 (Haw. 1998)</u> the court held that in the development plan is a binding land use regulation, and thus has the force and effect of law.	Over the past two decades, the Hawaii Supreme Court has consistently held, that a County's General Plan or Development Plan (which has been adopted after extensive public input and enacted into the County's code) <b>carries the weight, force and the effect of law.</b> See <b>Lum Yip Kee v. City &amp; County of Honolulu</b> , 70 Haw. 179, 767 P.2d 815 (1989), at 817-818, <b>GATRI v. Blame</b> , 88 Hawaii 108, 962 P.2d367 (1998), at 374, and <b>Save Sunset Beach Coalition v. City &amp; County of Honolulu</b> , 102 Haw 465, 78 P.3d 1 (2003), at 18.	ES		-	Jeanne Ohta
	See also <b>Leone v. County of Maui</b> , 128 Hawaii 183, 284 P.3d 956 (Haw.App. 2012). Likewise, in <b>Save Sunset Beach Coalition v. City &amp; County of Honolulu</b> , 78 P. 3d at 18, (citing <b>GATRI v. Blane</b> , 962 P2d 367, at 374) the Hawaii Supreme Court clearly held that where the County's zoning conflicts with the County's Development Plan (which carries the weight, force and effect of law), any development for which a permit is sought <b>must be consistent with both zoning and the development plan.</b> (Emphasis added.) Most pointedly, the GATRI Supreme Court held that the permit applicant who is subject to the development plan and the zoning ordinance <b>"is entitled only to the more restrictive uses allowed by the development plan."</b> (Emphasis added.).	ES		-	Jeanne Ohta
Add "public": decisions made by the public and private sectors.	As written in the City Charter.	Revised Plan	ES	ES-8, 1st para	Jeanne Ohta
Use the actual text from 1998 City Charter Chapter 15, 6-1509.	Isn't the 1998 version current?	No change. It is in the bullets in the PRD. The citation has 1998 but it was in the 1992 Charter Amendment Q No. 5 and Charters prior to 1998	ES	ES-8, 2nd para	Jeanne Ohta

Written Comment	DPP Response	Section	Page #	Text Change from PRD	Reviewer
<p>A vision is more than a statement of predicted demographic. Replace with: EAST HONOLULU IS A SAFE, CLEAN, SELF-SUSTAINING COMMUNITY WITH UNIQUE LANDSCAPES AND NATURAL/CULTURAL RESOURCES. EACH OF OUR RESIDENTIAL NEIGHBORHOODS HAS ITS OWN SPECIAL QUALITY AND SENSE OF PLACE. THE SUBURBAN DEVELOPMENT PATTERNS OF THE LATE 20TH CENTURY HAVE BEEN MODIFIED TO PROVIDE FOR MORE WALKABLE STREETS AND LOCAL CONVENIENCE STORES. WE HAVE A FULL RANGE OF COMMERCIAL, MEDICAL AND LEGAL SERVICES TO MEET THE NEEDS OF OUR MANY ELDERLY COMMUNITY MEMBERS. OUR FEW AGRICULTURAL AREAS HAVE BEEN PRESERVED AND ARE PRODUCING FOOD FOR OUR COMMUNITY. VISITOR TRAFFIC AND ACTIVITIES ARE LIMITED TO A LEVEL THAT DOES NOT DETRACT FROM THE QUALITY OF LIFE FOR OUR RESIDENTS. OUR COMMUNITY MEMBERS HAVE DEVELOPED PLANS AND STRATEGIES TO ADAPT AND RESPOND TO THE CHALLENGES OF CLIMATE CHANGE, SEA LEVEL RISE, FLOODING, SEVERE COASTAL STORMS AND THE INUNDATION OF COASTAL AREAS AND KALANI'ANAOLE HIGHWAY. OUR COMMUNITY HAS ALSO IMPLEMENTED A RANGE OF BEST MANAGEMENT PRACTICES TO RETAIN STORM WATER RUNOFF, REPLENISH VALUABLE GROUND WATER RESERVES AND IMPROVE THE QUALITY OF OUR NEARSHORE OCEAN WATERS.</p>	<p><b>Revised Plan</b> per another comment</p>	<p>ES</p>	<p>ES-10</p>	<p><u>East Honolulu is a safe, clean community with unique landscapes and natural and cultural resources. Each residential neighborhood has its own special quality and sense of place. The suburban development patterns of the 20th century have been modified to provide for more walkable streets and local convenience stores. There is a full range of commercial, medical and legal services to meet the needs of the elderly community members.</u></p>	<p>Jeanne Ohta</p>
				<p><u>Agricultural areas have been preserved and are producing food for the East Honolulu community. Community organizations partner with government agencies and develop plans and strategies to adapt and respond to the challenges of climate change, sea level rise, flooding, severe coastal storms and the inundation of coastal areas and Kalaniana'ole Highway.</u></p>	<p>Jeanne Ohta</p>
				<p><u>Best management practices have been implemented to retain storm water runoff, replenish valuable ground water reserves and improve the quality of nearshore ocean waters.</u></p>	<p>Jeanne Ohta</p>
<b>Chapter 1</b>					
<p>Please provide the boundaries of the East Honolulu district.</p>	<p><b>Revised Plan.</b> Added first sentence.</p>	<p>1</p>		<p><u>The East Honolulu region spans from Makapu'u Point in the east to Wai'alaie Nui stream and gulch in the west and is further defined by the peaks of the Ko'olau Range, the shoreline, and Maunaloa Bay.</u></p>	<p>Townscape</p>
<p>Change last line of the first paragraph to conform with comment on Page ES- 10 above: "...maintaining East Honolulu's existing population at <del>around 50,000</del> approximately 5% of O'ahu's population.</p>	<p>No change. Other numbers have been added whenever percent appears.</p>	<p>1</p>	<p>1-1</p>	<p>-</p>	<p>Townscape</p>

Written Comment		DPP Response	Section	Page #	Text Change from PRD	Reviewer
Kalaniana'ole Highway, the region's key component of transportation is currently at its design capacity which will manage urban growth.	DOT stated that the highway is at capacity.	No change. DOT submitted no such comment to DPP and stated to DPP that capacity is relative and not necessarily a measure of efficiency.	1	1-3, last bullet	-	Jeanne Ohta
Bullet 7: add the need to improve evacuation area designations and procedures and to harden shelter structures.		<b>Revised Plan</b>	1	1-3	<u>o Harden emergency shelters to be capable to withstand winds from at least a Category 3 hurricane;</u>	Townscape
First bullet "Limit the potential for substantial new housing" needs clarification—what does "substantial" mean? Does "new housing" include ADUs, which can add significant numbers to population.		No change. Substantial would be large scale subdivisions that would expand East Honolulu's population beyond the General Plan allowance of 5%.	1	1-3	-	Andrea Wagner
Fifth bullet "Avoid flood damage..." needs clarification—how will this be achieved?		No change. This is the vision from 1999 which will remain as it is still relevant. This is introduction to be expanded upon by policies and guidelines found in the remainder of the Plan.	1	1-3	-	Andrea Wagner
Change sixth bullet "Create resilient, disaster-ready communities..." to read: "Create resilient, disaster-ready communities that are strategically and physically prepared for disasters and environmental stressors through cooperative liaisons with community-based organizations"		<b>Revised Plan</b> per Oahu Resilience Strategy.	1	1-3	<u>o Increase cooperation with neighborhood emergency preparedness groups;</u> <u>o Create a City-community liaison to leverage non-profit and volunteer assets;</u>	Andrea Wagner
Last bullet: Clarify "Utilize the design capacity of Kalaniana'ole...as a means to manage urban growth"—what does this mean? Kalaniana'ole is the sole means of travel through East Honolulu communities. Any additional construction or disruption of other main arteries increases traffic on Kalaniana'ole.		No change. It recognizes that any residential growth without corresponding employment growth will increase traffic along Kalaniana'ole Highway.	1	1-3	-	Andrea Wagner
Change second bullet to read: "Promote access to mountain and shoreline resources for recreational purposes and traditional hunting, fishing, gathering, <u>hiking</u> , religious, and cultural practices."		<b>Revised Plan</b>	1	1-4	• Promote access to... <u>hiking</u> , ...	Townscape
Change first bullet to read: "Preserve scenic views of ridges, valley slopes, and shoreline areas from Kalaniana'ole Highway, including along the Ka'iwi coast;"		<b>Revised Plan</b>	1	1-4	• Preserve scenic views <u>of</u> ridges, upper valley slopes, <u>and</u> shoreline areas <u>along</u> Kalaniana'ole Highway, popular hiking trails, <u>and the Kaiwi Scenic Shoreline;</u>	Townscape
Change second bullet to read: "Promote responsible access to mountain and shoreline resources for recreational and cultural purposes; and".		No change. Change per another comment.	1	1-4	-	Townscape
<b>Chapter 2</b>						
2.1 VISION STATEMENT, The Vision to 2040—add paragraph: To forestall anticipated impacts of climate change, East Honolulu must take active steps to improve resiliency to hurricanes, coastal and inland erosion, inundation, and flooding. Sensitive infrastructure and communities need to be relocated or strengthened to improve resiliency to hurricanes, erosion, inundation, and flooding. [Reasoning: erosion is not just coastal—it is occurring in our valleys as well.]		<b>Partially revised Plan</b>	2	2-1	<u>To forestall anticipated impacts of climate change, East Honolulu must begin taking active steps to improve resiliency to hurricanes, coastal and inland erosion, inundation, and flooding.</u>	Andrea Wagner
Amend the Vision Statement to the following:		Revised plan based on following:	2.1	2-1	-	Tommy Waters
East Honolulu is a safe, clean, self-sustaining community with unique landscapes and natural/cultural resources.		Remove "self-sustaining." During BWS outreach, water importation was a divisive topic. Split Natural and cultural.	2.1	2-1	<u>East Honolulu is a safe, clean community with unique landscapes and natural and cultural resources.</u>	Tommy Waters

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Each of our residential neighborhoods has its own special quality and sense of place.	Remove "of our"	2.1	2-1	<u>Each residential neighborhood has its own special quality and sense of place.</u>	Tommy Waters
The suburban development patterns of the late 20th century have been modified to provide for more walkable streets and local convenience stores.	Remove "late"	2.1	2-1	<u>The suburban development patterns of the 20th century have been modified to provide for more walkable streets and local convenience stores.</u>	Tommy Waters
We have a full range of commercial, medical and legal services to meet the needs of our many elderly community members.	Change "we have" to "there is"	2.1	2-1	<u>There is a full range of commercial, medical and legal services to meet the needs of the elderly community members.</u>	Tommy Waters
Our few agricultural areas have been preserved and are producing food for our community.	Remove "our few" and replace "our" to "East Honolulu"	2.1	2-1	<u>Agricultural areas have been preserved and are producing food for the East Honolulu community.</u>	Tommy Waters
Visitor traffic and activities are limited to a level that does not detract from the quality of life for our residents.	No change.	2.1	2-1	-	Tommy Waters
Our community members have developed plans and strategies to adapt and respond to the challenges of climate change, sea level rise, flooding, severe coastal storms and the inundation of coastal areas and Kalani'anaole Highway.	Revise members to organizations and add government agencies. Correct 'okina placement	2.1	2-1	<u>Community organizations partner with government agencies and develop plans and strategies to adapt and respond to the challenges of climate change, sea level rise, flooding, severe coastal storms and the inundation of coastal areas and Kalaniana'ole Highway.</u>	Tommy Waters
Our community has also implemented a range of best management practices to retain storm water runoff, replenish valuable ground water reserves and improve the quality of our nearshore ocean waters.	Revised to remove "our community has also"	2.1	2-1	<u>Best management practices have been implemented to retain storm water runoff, replenish valuable ground water reserves and improve the quality of nearshore ocean waters.</u>	Tommy Waters
Beyond 2040, change first paragraph to read: There will be little residential development capacity available in East Honolulu beyond 2040. [Reasoning: current push for ADUs, 'ohana units, etc., will likely reach capacity by 2040; waiting until after 2040 to actively manage adaptation is too late.]	No change proposed, matches PRD	2.1	2-1	-	Andrea Wagner
Revise first paragraph fourth line to conform with comment on Page ES-10 above.	<b>Revised Plan</b>	2.1	2-1	<u>50,000, or roughly five percent of O'ahu's total population, which is consistent with the General Plan</u>	Townscape
The current vision statement just provides demographic information. It does not describe our vision for East Honolulu. The vision statement should include these key elements: "Maintain beautiful viewplanes, Safe, Clean, Walkable, Shady sidewalks, Homey, Unique landscapes and natural/cultural resources, Moderate pace/lifestyle, Maintain neighborhood characteristics, Bedroom community, Age-friendly, Agriculture/community gardens, Quiet, Strong sense of community and neighbors, Self-sustaining community."	<b>Revised Plan</b>	2.1	2-1	<u>East Honolulu is a safe, clean community with unique landscapes and natural and cultural resources. Each residential neighborhood has its own special quality and sense of place. The suburban development patterns of the 20th century have been modified to provide for more walkable streets and local convenience stores. There is a full range of commercial, medical and legal services to meet the needs of the elderly community members.</u>	Townscape

Written Comment	DPP Response	Section	Page #	Text Change from PRD	Reviewer	
<ul style="list-style-type: none"> <li>Here is a suggested vision statement: “East Honolulu is a safe, clean, self-sustaining community with unique landscapes and natural/cultural resources. Each of our residential neighborhoods has its own special quality and sense of place. The suburban development patterns of the late 20th century have been modified to provide for more walkable streets and local convenience stores. We have a full range of commercial, medical and legal services to meet the needs of our many elderly community members. Our few agricultural areas have been preserved and are producing food for our community. Visitor traffic and activities are limited to a level that does not detract from the quality of life for our residents. Our community members have developed plans and strategies to adapt and respond to the challenges of climate change, sea level rise, flooding, severe coastal storms and the inundation of coastal areas and Kalani’anaole Highway. Our community has also implemented a range of best management practices to retain storm water runoff, replenish valuable ground water reserves and improve the quality of our nearshore ocean waters.”</li> </ul>	Revised Plan	2.1	2-1	<u>Agricultural areas have been preserved and are producing food for the East Honolulu community. Community organizations partner with government agencies and develop plans and strategies to adapt and respond to the challenges of climate change, sea level rise, flooding, severe coastal storms and the inundation of coastal areas and Kalani’anaole Highway. Best management practices have been implemented to retain storm water runoff, replenish valuable ground water reserves and improve the quality of nearshore ocean waters.</u>	Townscape	
coastal, mountain, stream bank and watershed erosion.	Climate change affects mountains and watersheds too, not just coastal	Revised Plan	2.1	2-1, Beyond 2040	<u>...coastal and inland erosion, inundation, flooding, and impacts to watersheds.</u>	Jeanne Ohta
Revise the first sentence of the first bullet to the following: "Significant scenic views of ridges, upper valley slopes, and shoreline areas from Kalani’anaole Highway and scenic views from popular hiking trails, and areas along the <u>Kaiwi Scenic Coast Mauka to Makai Ka Iwi Scenic Shoreline</u> are protected <u>from development and degradation by vehicle operations.</u> " [vehicular? bullet pt. as well.]	Revised Plan	2.1.1	2-2	<u>and areas along the Kaiwi coast, mauka to makai, are protected from development and degradation by vehicle operations.</u>	Townscape	
o Vehicle operations are causing degradation of scenic views of dunes, vegetation and beach at Wāwāmalu Beach.	Revised Plan by adding bullet to 2.2.1.2	2.1.1	2-2	<u>• Limiting vehicle operations which could cause degradation to the dunes, vegetation, and beach at Wāwāmalu Beach.</u>	Townscape	
Protect Natural and Scenic Resources—Change first two sentences to read: Significant scenic views of ridges, valley slopes, and shoreline areas from Kalani’anaole Highway, particularly along the Ka’iwi coast, are protected. Access to shoreline areas and mountainous regions are improved and provided for all to use responsibly...	Revised Plan to match bullet from 1-4 and another comment and added responsibly.	2.1.1	2-2	<u>...along Kalani’anaole Highway, popular hiking trails, and the Kaiwi Scenic Shoreline, mauka to makai, are protected from residential and commercial development and degradation by vehicle operations... use responsibly.</u>	Andrea Wagner	
Address Changing Demographics—“...growing elderly population...younger families who want to move in...’multi-generation’ households...” Seems to acknowledge population will not simply continue to age, but will get younger. This seems to be in conflict with other statements about aging population.	No change. The rate at which this development will occur to attract younger families will not outweigh how rapidly the community is aging. The Plan can promote wanting greater diversity while realizing what is likely.	2.1.2	2-2	-	Andrea Wagner	
OK with <b>Exhibit 2-1</b> showing CGB and Ka Iki Mauka Lands outside of the CGB in State Urban. Group has considered getting them reclassified.	No change	2.2.1	2-5	-	Elizabeth Reilly	
Add map to accompany Table 2-1: Potential Housing within CGB on Lands Zoned for Residential Use. A similar map is included in the 1999 Plan as Figure 2-3 “Vacant Usable Lands Available for Development Within the Urban Community Boundary”.	Map was removed to be consistent with other DPSCPs. Do not need to further pressure infill development, it will happen.	2.2.1	2-7	-	Townscape	

Written Comment	DPP Response	Section	Page #	Text Change from PRD	Reviewer
Change the last paragraph to the following: "The Community Growth Boundary is generally coterminous with the State Urban District boundary, but excludes the following areas of the State Urban District. <u>These exclusions highlight the need for City planners and community members to guard against State decisions for its State Urban District that may negatively impact this and other Sustainable Communities Plans.</u> " The rationale for this revision is the need to flash a "red light" of warning regarding the dichotomy existing between City's CGB and State's LUD.	Revised Plan	2.2.1	2-4	<u>...State Urban District listed below and shown in Exhibit 2-1. These exclusions highlight the need for City planners and community members to guard against State decisions for its State Urban District that may negatively impact this and other Sustainable Communities Plans.</u>	Townscape
Revise last sentence of last bullet to conform with comment on Page ES-10 above.	Revised Plan	2.2.1	2-6	<u>Provide Sufficient Capacity for Projected Population Stability –...50,000 residents to counteract shrinking household sizes.</u>	Townscape
Exhibit 2-2 Scenic Resources: o Add the following names to the map: <u>Wāwāmalu Beach Nature Park, Queen's Beach, Queen's Rise.</u> o Change "Panoramic View" to " <u>Kaiwi Scenic Coast Mauka to Makai Panoramic Views</u> " o In the key at bottom of page show a plain arrow and explain as " <u>Panoramic View Points (general)</u> "	o Added Wāwāmalu. o No change, consistent with other DPSCPs and panoramic views are along H-1, and Kalanianaʻole Hwy. o No change	2.2.1	2-9	-	Townscape
Change second paragraph, last sentence to read: ...These areas, while inside the boundary, shall not be developed. [Reasoning: they are meant to be preserved as open space or pose hazards if developed. Leave them alone.]	No change. Previous sentence refers to park and preservation related development.	2.2.1	2-4	-	Andrea Wagner
Paragraph three, "...A more compact form of development will result in...more efficient utilization of existing urban infrastructure systems, and reduced reliance on the automobile by making transit ridership, walking, and bicycling more feasible and attractive as modes of travel." How? This sounds like wishful thinking that increasing density will increase traffic to the point that people will be forced out of vehicles, which is not realistic or responsible.	No change. Higher density environments have less reliance on single-occupancy vehicles. No suggestion of forcing people out; rather trying to create an environment that does not force people into cars.	2.2.1	2-4	-	Andrea Wagner
Section of map for 'Āina Haina shows preservation areas of upper valley as being within State Urban District. Is this an error?	No change. The purpose of the map is to illustrate the inconsistencies with the State Land Use District and areas zoned and designated for preservations. The map in the Plan is not in error.	2.2.1	2-5	-	Andrea Wagner
fifth bullet Provide Sufficient Capacity for Projected Growth: "About 300 new housing units can be identified as probable or possible..." This is in addition to ADUs, 'ohana units, second story residences? Where is the infrastructure to go with this increased growth?	No change. <b>Table 2-1</b> shows this to include ADUs. Second story residences were not included because the LUO will need to be revised to allow for such a use and is not anticipated soon.	2.2.1	2-6	-	Andrea Wagner
Table 2-1—For 'Āina Haina, 10 probable units are listed with two in upper 'Āina Haina and eight in lower 'Āina Haina. What is division between upper and lower 'Āina Haina? Where are these properties? Recent efforts to do new construction have been on slide properties and/or property that exceeds the 20% slope.	No change. The 2 Upper Aina Haina units are on the hillside above the park and school. They did not require a discretionary permit and had zoning and entitlements prior to 1999. The 20% slope policy is reliant upon development to come in for discretionary permits.	2.2.1	2-7	-	Andrea Wagner

Written Comment		DPP Response	Section	Page #	Text Change from PRD	Reviewer
Promote an Efficient Pattern of Urban Development, second sentence—"...A more compact form of development on the coastal plain will result in relatively lower site development costs, more efficient utilization of existing urban infrastructure systems, and reduced reliance on the automobile..." Based on what? Observed development has not decreased automobiles, but quite the contrary.		No change. As opposed to development further up ridges which the Plan does not support.	2.2.1	2-7	-	Andrea Wagner
Remove Mariners Ridge trail from map—trail is now closed.		No change. The trail is accessible to groups with agreements with KS and desirable for its scenic views. Also, there is hope from some groups to reopen the trail.	2.2.1	2-9	-	Andrea Wagner
Remove third bullet. [Reasoning: preservation lands are located at various elevations from mauka to makai.]		No change. This represents 1 type of land that should be preserved and is not seen as exclusive to mauka lands as there are also bullet for mauka areas.	2.2.1	2-10	-	Andrea Wagner
Move eighth bullet to end of next section "In addition to undeveloped lands, preservation lands also include areas of recreational lands..."; place after second bullet at top of page 2-11.		No change.	2.2.1	2-10	-	Andrea Wagner
Really like <b>Table 2-1</b> . It is very useful and informative. Want to know more info on Kuliouou lots and if they have entitlements.		No change. Lots have entitlements	2.2.1	2-8	-	Elizabeth Reilly
Comment: The description of preservation lands on pp. 2-8 through 2-9 is too narrowly constrained because it does not refer to lands important to watershed, and current or potential habitat for native (i.e., indigenous and endemic) Hawaiian plants and invertebrates. On the other hand, the description is too broad because it includes alien wildlife such as feral goats and pigs. Alien wildlife challenges the sustainability and existence of many Hawaiian birds – the primary native Hawaiian wildlife in East Honolulu.		<b>Revised Plan per comment below</b>	2.2.1	2-8	Such lands include important <u>native (i.e., indigenous and endemic) Hawaiian plant, invertebrate and wildlife habitat, archaeological or historic sites, significant landforms or landscapes over which significant views are visible, recreational areas, agricultural areas, areas important to the health of the watershed, and areas hazardous to potential development.</u>	Geary S. Mizuno
Suggested Resolution: Such lands include important <u>native (i.e., indigenous and endemic) Hawaiian plant, invertebrate and wildlife habitat, archaeological or historic sites, significant landforms or landscapes over which significant views are visible, recreational areas, agricultural areas, watersheds, and development-related hazard areas.</u>		<b>Revised Plan</b>	2.2.1	2-8		Geary S. Mizuno
Add note to <b>Table 2-1</b> that the table does not account for potential housing at commercial centers as discussed elsewhere in the Plan.		No change. This would require greater changes prior to development. <b>Table 2-1</b> shows lands currently entitled.	2.2.1	2-7	-	KS
Add "Existing adjacent homes and property must be protected from adverse effects of compact developments on infill sites" to the end of the paragraph.	Building should not be the expense of existing homes.	No change. Unsure of concern.	2.2.1	2-4, 2nd para	-	Jeanne Ohta
Change "will" to "may." A more compact form of development may result in relatively lower site development cost.	It's not definitive that there will be lower site development costs, that is an assumption that may not be true.	No change. Not new narrative and relatively is already in the sentence.	2.2.1	2-4, 3rd para	-	Jeanne Ohta

Written Comment	DPP Response	Section	Page #	Text Change from PRD	Reviewer
Revise the statement to the following: "Are necessary for the conservation, preservation and enhancement of sites with scenic, recreation, historic, cultural archaeological, or ecological significance;"	<b>Revised Plan</b>	2.2.1.2	2-10	Are necessary for the conservation, preservation, and enhancement of sites with scenic, <u>recreational, historic, cultural, archaeological, or ecological significance.</u>	Townscape
We are concerned with building on unstable slopes. Add in language to curtail developing on mountain slopes, particularly any existing slopes of 20 percent or more.	No change. Language already on slopes of 20 percent or more already in the 1999 Plan and to remain.	2.2.1.2	2-11	-	Townscape
Comment: The detailed description of preservation lands in the second bullet on p. 2-10 incorrectly excludes indigenous plants, and indigenous and native invertebrates as part of the natural ecosystems.	<b>Revised Plan per comment below</b>	2.2.1.2	2-10	Are necessary for providing and preserving <u>parklands, wilderness, and beach reserves, and for conserving natural ecosystems of indigenous and endemic plants, invertebrates, fish and wildlife, for forestry, and other activities related to these uses;</u>	Geary S. Mizuno
Suggested Resolution, 2nd Bullet: Are necessary for providing and preserving parklands, wilderness, and beach reserves, and for conserving natural ecosystems of <u>indigenous and endemic plants, invertebrates, fish and wildlife, for forestry, and other activities related to these uses;</u>	<b>Revised Plan. Also revised 2.2.6</b>	2.2.1.2	2-10		Geary S. Mizuno
Comment: The detailed description of preservation lands in the first bullet on p. 2-11 is too constraining by excluding the views from valley and shoreline hiking trails.	<b>Revised Plan per comment below</b>	2.2.1.2	2-11		Geary S. Mizuno
Suggested Resolution, 1st Bullet: Retaining visual landmarks and significant vistas including the Ka Iwi Scenic Shoreline, views of Maunalua Bay and other shoreline areas from Kalaniana'ole Highway, and views from ridge, <u>valley and shoreline hiking trails;</u>	<b>Revised Plan</b>	2.2.1.2	2-11	...views from ridge, <u>valley, and shoreline hiking trails</u>	Geary S. Mizuno
First full paragraph—delete second sentence, "The ahupua'a were managed by konohiki..." [Reasoning: although there were recognized fishing rights allocated to konohiki under the Organic Act, konohiki were not performing their traditional roles of mauka to makai land management.]	<b>Revised Plan</b> but added more per another comment in Section 3.4.1	2.2.2	2-12	<del>The ahupua'a were managed by konohiki until the twentieth century.</del>	Andrea Wagner
Second full paragraph—change first sentence to read: East Honolulu previously contained several fishponds, including Wailupe, Kanewai, and Kuapā, one of the largest fishponds on O'ahu...	<b>Revised Plan.</b>	2.2.2	2-12	<u>East Honolulu previously contained several fishponds including Wailupe, Kānewai, and Kuapā Pond, one of the largest inland fishponds in Hawai'i.</u>	Andrea Wagner
Add " <u>protect and preserve existing property lines of individual property owners</u> " We should address the lost of land and flooding cost to residents.	No change. The Plan is recommending instituting a buffer area, not purchasing or condemning land.	2.2.2	2-12	-	Stephen Zane
Add "and reefs". Protect water quality and aquatic resources and reefs	The Board of Water Supply in their watershed plan is using "from mountains to reefs"	<b>Revised Plan</b>	2.2.2	2-12, 4th para <u>aquatic resources and reefs.</u>	Stephen Zane
References to the Ka Iwi Scenic Shoreline throughout the Plan should be revised to <b>Kaiwi Scenic Coast Mauka to Makai</b> , which would encompass mauka lands in addition to lands along the coast. According to Places Names of Hawai'i by Mary Kawena Pukui et al., "Kaiwi" should be one word.	<b>Revised Plan</b> to Kaiwi	2.2.3		Kaiwi	Townscape
Revise the last line of the first paragraph to the following: "Preserving one of O'ahu's most popular visitor resources is critical to our economy since tourism, our base industry, continues to grow in significance <u>and demands for recreational venues.</u> Adding this phrase makes this ordinary statement germane to the topic of the page: 2.2.3 KAIWI SCENIC COAST MAUKA TO MAKAI.	<b>Revised Plan</b>	2.2.3	2-13	Preserving O'ahu's <u>open space resources</u> is critical to the economy since tourism <u>is the base industry.</u>	Townscape

Written Comment	DPP Response	Section	Page #	Text Change from PRD	Reviewer
<p>Change the last sentence of the third paragraph to the following: “Visual resources of the Queen’s Beach and Queen’s Rise sections should be protected as part of the <u>Kaiwi Scenic Coast Mauka to Makai Scenic Shoreline despite their Urban District designation by the State. This area also provides critical habitat for the endangered native Yellow-Faced Bee, which is managed by the DLNR, is in close proximity.”</u></p> <p>The rationale for this revision is the need to flash a "red light" of warning regarding the dichotomy existing between City's CGB and State LUD.</p> <p>Sand dunes and native vegetation have been significantly impacted from vehicular access in this area. Habitat for the endangered native Yellow- Faced Bee, which is managed by the DLNR. is in close proximity.</p> <p>The vehicular issue needs to be addressed and the important critical habitat needs to be acknowledged in the Plan. Wāwāmalu is a City park area. It should be a nature park. There should be demarcated parking areas and barriers to protect this natural shoreline from vehicular traffic and illegal dumping.</p>	<p><b>Revised Plan</b></p>	2.2.3	2-13	<p><u>Visual resources of the Queen’s Beach and Queen’s Rise sections should be protected as part of the Kaiwi coast despite being located within the State Urban District. This area also provides critical habitat, as designated by the U.S. Fish and Wildlife Service, for at least six endangered native or endemic plants, and potentially habitat for the endangered native yellow-faced bee, which is managed by the State Department of Land and Natural Resources (DLNR).</u></p>	Townscape
<p>Resources of the Ka’iwi coast from Koko Head Regional Park to Makapu’u Head should be protected and enhanced. Recreational opportunities at Koko Head Regional Park, which includes Hanauma Bay Beach Park and Sandy Beach Park, should continue for residents and visitors alike, but must be protected from overuse.</p>	<p>Changes throughout per other comments received.</p>	2.2.3	2-13	-	Andrea Wagner
<p>Third paragraph - change paragraph as follows: The resources of the Ka Iwi region should be protected and enhanced. The publicly owned Koko Head Regional Park, which includes Hanauma Bay <b>Nature Preserve Beach Park</b> and Sandy Beach Park, should continue to provide world-class <b>educational and</b> recreational opportunities for residents and visitors alike. At the same time the value of these resources <b>must be</b> are protected from overuse. Visual resources of the Queen’s Beach and Queen’s Rise sections should be protected as part of the Ka Iwi Scenic Shoreline.</p>	<p><b>Revised Plan</b> for first 2 comments. "Are" remains as active voice</p>	2.2.3	2-14	<p>Hanauma Bay <u>Nature Preserve</u> ...world-class <u>educational and</u> recreational...</p>	Friends of Hanauma Bay
<p>Comment: The initial discussion – especially the first paragraph on p. 2-13 – focuses on the scenic attributes of the Ka Iwi shoreline. However, the ecological/natural and cultural resources of the area are as important, even if they are not well-known to the general public. The unduly constrained focus on scenic value is ironic, given that the second paragraph makes a comparison to the Ka’ena Coastline. The Ka’ena Natural Areas Reserve was established because of the uniqueness of the indigenous and endemic Hawaiian plants at Ka’ena Point; in addition, Ka’ena has several archeological, cultural and historic resources of value. Suggested Resolution: Revise the three paragraphs of Section 2.2.3 to include the natural, cultural and archeological resources of the Ka Iwi coastal lands.</p>	<p>Revised Plan to add historic, cultural, and ecological resources in the second and third paragraphs, in addition to recreational.</p>	2.2.3	2-14	<p><u>Historic, cultural, ecological, and recreational resources</u> of the Kaiwi region ...</p>	Geary S. Mizuno
<p>Comment: Recreational activities in the mauka areas of the Ko’olau Mountains could involve more than hiking, hunting and camping. Some possible activities include trail biking, mountain biking, birdwatching,</p>	<p><b>Revised Plan per comment below</b></p>	2.2.4	2-15	<p>The Ko’olau Mountain Range provides a wealth of actual and potential recreational opportunities <u>including, but not limited to, hiking, hunting, biking, bird watching, and camping</u> opportunities.</p>	Geary S. Mizuno
<p>Suggested Revision: The Ko’olau Mountain Range provides a wealth of <u>actual and potential recreational opportunities, including hiking, hunting, trail biking, mountain biking, birdwatching, and camping.</u></p>	<p><b>Revised Plan</b></p>	2.2.4	2-15		Geary S. Mizuno
<p>Comment: The concerns and rationales for private landowners’ and communities’ opposition to Ko’olau Mountain and ridge access for hiking (and other recreational activities) are not identified or addressed in this discussion. Furthermore, these concerns and rationales are not evaluated as to their legitimacy, nor are a range of possible approaches to mitigate or eliminate these concerns described. This is a missed opportunity to have engagement with stakeholders and to develop possible solutions that could be used in the future.</p>	<p>No change. This discussion can be addressed in the Technical Report.</p>	2.2.4	-		Geary S. Mizuno

Written Comment		DPP Response	Section	Page #	Text Change from PRD	Reviewer
Suggested Resolution: At minimum, the discussion should be revised to provide a list of key private landowners' and communities' concerns underlying their opposition to mauka access. These can be obtained from a specific question asked at community meetings, or by reaching out to key private landowners (e.g., Kamehameha Schools). If time and resources allow, evaluate these concerns and identify a range of possible approaches for mitigating the concerns. If not, then recommend that the State and City work convene a joint working group on this issue, and engage the key stakeholders with the express purpose of identifying concerns and a range of viable and preferred mitigation/elimination measures.		No change. This discussion can be addressed in the Technical Report.	2.2.4	-	-	Geary S. Mizuno
last sentence on 2-13 and continuing to 2-14, change to read: ...The first areas to develop, in approximate order, were the coastal plains of Wai'alaie, the Wailupe coastal plains and flatter valley floors (now known as 'Āina Haina), Kuli'ou'ou, and Niu...		<b>Revised Plan.</b>	2.2.4	2-13	coastal plains of <u>Wai'alaie, the Wailupe coastal plains and flatter valley floors (now known as 'Āina Haina).</u>	Andrea Wagner
Change the last sentence of the second paragraph to the following: "Most of these areas have been fully developed except for Queen's Beach, which has been designated for preservation <u>although it is still designated as Urban under that State Land Use Districts.</u>		<b>Revised Plan</b>	2.2.4	2-14	Most of these areas have been fully developed except for Queen's Beach, <u>which is zoned preservation but is still within the State Urban District.</u>	Townscape
The rationale for this revision is the need to flash a "red light" of warning regarding the dichotomy existing between City's CGB and State LUD.						Townscape
Revise statement to the following: "It is a major route for joggers and bicyclists, as well as vehicles, and its <del>attractively</del> landscaped median helps to unify the image of East Honolulu as a distinct region."		No change. Language is aspirational and will remain.	2.2.4	2-14	-	Townscape
Waialae and Wailupe and <del>the flatter</del> the valley floors of Wailupe, Kuliouou.	The valley is Wailupe, the development of homes is Aina Haina.	<b>Revised Plan</b> per anther comment	2.2.4	2-13	the Wailupe coastal plains and flatter valley floors (now known as 'Āina Haina).	Jeanne Ohta
its <del>attractive</del> landscaped median.	Not everyone will agree that the landscaping is attractive.	No change. Language is aspirational	2.2.4	2-14, 2nd para	-	Jeanne Ohta
Existing mauka-makai beach access and rights-of-way in East Honolulu should [remain] <u>be maintained</u> and new <u>perpendicular and lateral</u> shoreline access ways should be provided as the opportunities arise.		<b>Revised Plan</b>	2.2.5	2-15	Existing <u>mauka-makai</u> beach access and rights-of-way in East Honolulu should <u>be maintained</u> and new <u>perpendicular and lateral</u> shoreline access...	OP
Add " <u>while protecting from overuse and misuse</u> "	It is important that access to publicly owned trails be made as unrestricted as possible while protecting from overuse and misuse.	<b>Revised Plan</b> per anther comment	2.2.5	2-15, 1st para	as open as possible while balancing the potential ecological impacts of hikers.	Jeanne Ohta
Communities and the State should work together to ensure that visitor parking...	Many times communities ask for State cooperation, not the other way around.	<b>Revised Plan</b>	2.2.5	2-16	<u>The State and communities, both open and gated, should collaborate.</u>	Jeanne Ohta
Add " <u>while also protecting and maintaining the residential nature of adjoining</u> " ...ensure that visitor parking and access to trails are provided to the public while also protecting and maintaining the residential nature of adjoining communities.	public access to trails cannot override existing residential communities' need for peace and quiet	No change. Others in the community do not want Plan used as an excuse to close more trails pushing further congestion to adjacent valleys. Overcrowding is partly caused by trail closures in other areas and Plan does not support this.	2.2.5	-	-	Jeanne Ohta

Written Comment		DPP Response	Section	Page #	Text Change from PRD	Reviewer
Delete: sentence starting with "in particular"	repeated in next paragraph	<b>Revised Plan</b> by deleting sentence as it is repeated in the next paragraph	2.2.5	2-15, 2nd para	In particular, at least three public access points should be acquired along Portlock Road in order to meet the City's standard of public shoreline access at approximately one-quarter mile intervals.	Jeanne Ohta
The language from the 1999 EHSCP on recreational access needs to be re-inserted into this section.		No change. There were no subtractions from the 1999 Plan to the PRD. The previous Section 2.2.4 Expand Access to Recreational Areas is now Section 2.2.5 Mauka-Makai Recreational Access.	2.2.5	2-15	-	Townscape
This section should describe how to acquire new access ways so that enforcement and implementation can take place.		No change. The City has been hesitant to buy out land or use condemnation and does not want to rule these options out or preference others.	2.2.5	2-15	-	Townscape
(1st paragraph) Revise the second sentence to state: "The State and City should coordinate with the community to ensure that visitor parking and access to trails are provided to the public."		No change. Access to public trails should not be watered down to prevent what is occurring in other neighborhoods with trails closing.	2.2.5	2-15	-	Townscape
The City's standard of public shoreline access is approximately one access corridor at every ¼-mile. This standard is not being implemented. The City needs to provide more public shoreline access including in 'Āina Haina, Niu Valley, and Portlock.		Added <b>Figure 2-1 to Technical Report</b>	2.2.5	2-15	-	Townscape
Add references to the 1.3-mile stretch of shoreline known as the Portlock Beach Reserve that is owned by Kamehameha Schools. This beach is commonly used by fishermen.		Added to <b>Technical Report</b> (1-21)	2.2.5	2-15	-	Townscape
The Portlock Beach Reserve along Portlock Beach, Maunalua Bay, and the community's right to access the ocean should be included in the EHSCP.		<b>Revised Plan.</b> The Plan is not intended to be parcel-specific so it will not include the Reserve. The PRD already quotes HRS 115-1 regarding access to shoreline, though it appears in 3.1.2.1.	2.2.5	2-15	It is important that access to <u>the shoreline and...</u>	Townscape
Hanauma Bay is a community resource in addition to mostly serving as a visitor attraction.		No change	2.2.5	2-15	-	Townscape
Change first paragraph, first sentence, to read: The Ko'olau Mountain Range provides opportunities for hiking and hunting. It is important that access to publicly owned trails be provided in balance with local communities and native species.... [Reasoning: access should be provided, but must work with the residential communities, not supersede them, and avoid further damage to fragile ecosystems.]		<b>Partially revised Plan.</b> Camping is allowed on Kuliouou so language stays. Revised second sentence to be consistent with balancing ecological demands. Others in the community do not want Plan used as an excuse to close more trails pushing further congestion to adjacent valleys.	2.2.5	2-15	It is important that access to <u>the shoreline</u> and publicly owned trails be made as <u>open as possible while balancing the potential ecological impacts of hikers.</u>	Andrea Wagner

Written Comment	DPP Response	Section	Page #	Text Change from PRD	Reviewer
Change second paragraph to read: Existing beach access and rights-of-way in East Honolulu should remain and new shoreline access ways should be provided as opportunities arise. Erosion and sea level rise are expected to continue to reduce lateral shoreline access, furthering the need for better beach access... [Reasoning: mauka-makai designation does not apply in East Honolulu, where beach access points are mostly in developed areas along very narrow strips of coastal land.]	<b>Revised Plan</b> per another comment. Mauka makai access is in reference to perpendicular access which does exist.	2.2.5	2-15	Existing <u>mauka-makai</u> beach access and rights-of-way in East Honolulu should <u>be maintained</u> and new <u>perpendicular and lateral</u> shoreline access...	Andrea Wagner
Add the following to the third paragraph: " <u>Wāwāmalu Beach should be developed as a Nature Park with the addition of much needed, demarcated parking and installation of barriers to protect natural dunes, native and other vegetation, beach rock and beach.</u> "	<b>Revised Plan</b>	2.2.5	2-15	Wāwāmalu Beach should be developed as a <u>Nature Park with the addition of demarcated parking and installation of barriers to protect natural dunes, native vegetation, beach rock, and beach.</u>	Townscape
Wāwāmalu Beach is designated as a City park, yet has been ignored, allowing vehicular degradation of the natural dunes, native vegetation and beach. Further, there are natural, barren parking zones at either end that can easily be demarcated with barriers and thereby provide much needed parking that is in high demand for the recreational public and visitors enjoying the Kaiwi Scenic Coast Mauka to Makai.					Townscape
Change third paragraph to read: Along Portlock Road, public access to the shoreline should be provided at approximately one quarter mile intervals. This should be accomplished by opening public access to existing private shared driveways that provide access to the shoreline. Access to the Ka'iwi shoreline between Sandy Beach and Queen's Rise should be improved through directed parking and barriers. [Reasoning: The coast between Koko Head and Sandy Beach is extremely hazardous. People should not be encouraged to hike or seek ocean access in this area.]	<b>Partially Revised Plan.</b> Reference to City's quarter-mile shoreline access intervals is sufficient. Revised access past Sandy Beach per another comment.	2.2.5	2-15	Wāwāmalu Beach should be developed as a <u>nature park with the addition of demarcated parking and installation of barriers to protect natural dunes, native vegetation, beach rock, and beach.</u>	Andrea Wagner
Comment: City or State acquisition of lands and easements through condemnation is mentioned, but open market purchase s(directly or through a non-profit group) of lands are not mentioned. Suggested Resolution: If these agreements do not work, consideration should be given to <u>open market purchases of land, or condemnation of land and easements.</u>	<b>Partially revised Plan</b>	2.2.5	2-15	If these agreements do not work, consideration should be given to <u>purchasing or condemning land and easements.</u>	Geary S. Mizuno
Comment: No funding mechanism is provided for acquisition of lands and easements. Unless possible funding mechanisms are identified and made public law, the discussion in this section is likely to remain aspirational and never translated into actuality. It also is fiscally irresponsible not to present possible funding mechanisms, so that the general public can weigh in on the desirability of each funding alternative.	No change. Acquisition can also mean through private fundraising as was done in the case of the fishponds or public-private as was done with the Kaiwi Mauka land purchase.	2.2.5	-		Geary S. Mizuno
Suggested Resolution: Describe a range of possible funding mechanisms, and recommend that appropriate governmental units evaluate and adopt one or more of the funding mechanisms. Some possible alternatives are: 1) Tax (flat amount or by percentage of sold value) on property sales. 2) Surcharge on property tax. 3) Sales tax surcharge on recreational goods (e.g., packs, outdoor footwear, fishing tackle) and recreational services (e.g., helicopter rides) on Oahu.	No change. Goes beyond the scope of the regional plan. Existing language has served community well as stated above.	2.2.5	-		Geary S. Mizuno

Written Comment		DPP Response	Section	Page #	Text Change from PRD	Reviewer
Beaches are part of the State Conservation District and shall be protected and preserved. As such, we suggest adding beaches throughout the sustainable community plan area to Section 2.2.6 on page 2-15 Protection and Preservation of Natural Areas, Natural Areas in East Honolulu include ...		<b>Partially revised Plan.</b> The intro sentence was modified to express natural areas are not limited to the following. Beaches were not included in the list as these were named areas that will be discussed in 3.1.2.5.	2.2.6	2-15	-	DLNR
Comment: The introductory paragraph does not identify the land area mauka of Kalaniana'ole Highway above the Ka Iwi Coast Scenic Shoreline up to the main ridgeline (summit) of the Ko'olau Mountains. The mauka land area is considered part of the Ka Iwi Coast Scenic Shoreline; see third paragraph in this section (p. 2-16): "Mauka lands within the Ka Iwi Scenic Shoreline area were recently purchased as a means to protect the area's rich recreational and scenic resources." From the standpoint of recreational, archeological and scenic resources and consequent management challenges, the mauka lands are different from the makai lands below Kalaniana'ole Highway. For example, there is no currently authorized public recreational use of the lands mauka of the highway. Identifying the mauka lands as a separate area with its own name (e.g., Ka Iwi Coast mauka lands) would distinguish between these two areas.		<b>Revised Plan.</b> Bullet added to 2.2.6 for Kaiwi Mauka. Language changed from within to near.	2.2.6	2-16	<ul style="list-style-type: none"> <li>• <u>Kaiwi Mauka.</u></li> </ul> <u>Mauka lands near the Kaiwi Scenic Shoreline...</u>	Geary S. Mizuno
Suggested Resolution: Add another bullet for "Ka Iwi Coast mauka lands" or some other, more descriptive name. Revise the third paragraph in this section (p. 2-16) to reflect the differences between these two areas.		<b>Revised Plan</b>				
add bullets for Kanewai Spring, Ka'iwi Mauka, upper Wailupe Valley, and Pia Valley.		<b>Revised Plan.</b> Added other areas per other comments. Revised <b>Exhibit 3-3.</b> Pia Valley not added to <b>Exhibit 3-1.</b>	2.2.6		-	Andrea Wagner
Second paragraph—change last sentence to read: "...Other areas have been examined for purchase agreements, including Paikō Ridge and upper valley areas in 'Āina Haina. [Reasoning: Kānewai Spring has been purchased.]"		<b>Revised Plan</b> and added sentence on Kanewai Spring.	2.2.6	2-16	<u>Kānewai Spring was also purchased to protect and restore the culturally and ecologically important spring and fishpond. Other areas have been examined for purchase agreements including Paikō Ridge and upper valley areas in 'Āina Haina.</u>	Andrea Wagner
Add • <b>Hanauma Bay Nature Preserve</b> (Explanation: The Hanauma Bay Nature Preserve is separate from the Hanauma Bay Marine Life Conservation District (MLCD), but they are both natural areas requiring protection.)		Revised Plan <b>throughout</b>	2.2.6	2-15	Hanauma Bay Nature Preserve	Friends of Hanauma Bay
Change "should" to "must." These natural areas must continue to be protected.	stronger language	<b>Revised Plan</b> to active	2.2.6	2-16, 1st para	These natural areas <u>will</u> be protected	Jeanne Ohta
Last sentence, add upper Wailupe Valley. Including Kanewai Spring, Paiko Ridge, and upper Wailupe Valley.	The city is currently negotiating the purchase of the last 10 acres not in preservation, at the end of Hao Street.	<b>Revised Plan</b> per another comment	2.2.6	2-16	<u>Mauka lands near the Kaiwi Scenic Shoreline area and in the back of Wailupe Valley were purchased...Other areas have been examined for purchase agreements including Paikō Ridge.</u>	Jeanne Ohta
Use data instead of "observed."	After 20 years, this observation should be represented by data rather than using anecdotal information. Data would be more accurate, after 20 years it's no longer an observational trend.	<b>Revised Plan</b> per another comment. Removed paragraph and bullets as it was anecdotal and did not necessarily see younger families moving in	2.2.7	2-18, 2nd paragraph	Removed sentence and bullets	Jeanne Ohta

Written Comment		DPP Response	Section	Page #	Text Change from PRD	Reviewer
Add "limitation of existing infrastructure."	Zoning, limitation of existing infrastructure and other community guidelines.	<b>Revised Plan</b>	2.2.7	2-18, 3rd para	Zoning, <u>infrastructure</u> , and other community guidelines	Jeanne Ohta
Housing stability and age-friendly communities should be discussed as separate sections. Move discussion on age-friendly communities as its own section as it is the City's future projection for the area.		No change. While how to create age-friendly communities is a major issue facing issue face East Honolulu, we did not want to overstep into other processes and plans.	2.2.7		-	Townscape
The second paragraph provides an observation on population trends from "realtors". Data should be provided to support this trend rather than simply citing a reference to a 20+ year old observation from "realtors."		<b>Revised Plan</b>	2.2.7	2-18	(Removed intro and bullets)	Townscape
Suggest noting that: "Sea level rise could reduce residential zones along the coast, and this could mean reduced population capacity for East Honolulu."		No change. Projections are to 2040. The larger SLR impacts belong mostly to after 2050.	2.2.7		-	Townscape
Add to the vision, policies and guidelines where appropriate in the Plan that addresses the following concerns and issues relating to redevelopment/commercial use for East Honolulu:		See below	2.2.8		-	Townscape
o There is a lot of focus on ocean recreation facilities at the shopping centers in Hawai'i Kai. These ocean recreation facilities should be "consolidated" and be aligned with the permits allowed in Maunalua Bay. Shopping centers should not shift retail space to cater to the visitor industry but rather service the local residents.		No change. These shopping centers are considered "regional" compared to "neighborhood commercial."	2.2.8		-	Townscape
o Commercial areas should serve the local communities with little emphasis on the visitor industry.		No change. Neighborhood commercial centers should serve communities, but not necessarily Regional Town Centers	2.2.8		-	Townscape
o Incorporate green infrastructure into any redevelopment.		No change. The Plan already discusses LIDs and rain gardens and other solutions to retain stormwater	2.2.8	3-50	-	Townscape
o Need for a small industrial area (such as car repairs, etc.) within existing commercial footprints to service the local community.		<b>Revised Plan</b>	2.2.8		and <del>in</del> <u>in</u> <del>door</del> small- to medium-size "service-industrial" establishments.	Townscape
I don't feel comfortable about dictating use of retail space in private shopping centers. Also not sure of the statement of consolidating facilities – not sure what that means.		No change to previous comments	2.2.8		-	Townscape
Revise the third paragraph to the following: "The smaller Koko Marina Shopping Center serves a dual market, containing specialty stores and services oriented to both local residents and tourists., particularly visitors to Hanauma Bay. Since it is likely that the number of visitors to the Ka Iwi Scenic Shoreline will increase, the future tenant mix at Koko Marina may shift to accommodate more visitor oriented services."						Townscape
The current paragraph is not aligned with our vision for East Honolulu and contradicts our concerns with aging in place. As written, the statement promotes and caters to the visitor industry instead of supporting aging in place for the residents of East Honolulu. We need to serve the local community first. There may be opportunities to buffer visitor stresses, but more visitor-oriented business and more visitors to this district are not desirable.		<b>Revised Plan</b>	2.2.8	2-19	(removed)	Townscape
Third paragraph—replace "Ka Iwi Scenic Shoreline" with "Ka'iwi coast".		Changed to Kaiwi throughout per Place Names of Hawai'i and another comment	2.2.8	2-19	<u>Kaiwi</u>	Andrea Wagner

Written Comment	DPP Response	Section	Page #	Text Change from PRD	Reviewer	
<p>Fourth paragraph, second sentence change to read:            ...The market areas of the 'Āina Haina, Niu Valley, Haha'ione Valley, Hawai'i Kai, and Kalana Valley shopping centers provide a mix of community and visitor offerings... [Reasoning: Each of these centers is seeing shift from local community focus to more visitor-oriented offerings such as recreation rentals.]</p>	<p>No change. While there may be some shifting of market forces, and while the Plan does not attempt to limit this, other community members have expressed a desire for these centers to continue to cater to the neighborhoods they are present in.</p>	2.2.8	2-19	-	Andrea Wagner	
<p>Delete the paragraph starting with "The smaller Koko Marina Shopping Center."</p>	<p>Inaccurate and speculative</p>	<p><b>Revised Plan.</b> Kept first sentence, removed second.</p>	2.2.8	2-19, 2nd para	<p><del>Since it is likely that the number of visitors to the Kaiwi coast will increase, the future tenant mix at Koko Marina may shift to accommodate more visitor-oriented services.</del></p>	Andrea Wagner
<p>East Honolulu [will face] <u>faces</u> new and emerging challenges within both of its planning horizons as a result of climate change. Some of these changes [may] <u>likely</u> result in rising sea levels, increasing coastal erosion, storm surge flooding, salt water intrusion, a rising water table and groundwater inundation in low-lying areas, rainfall that may deviate from historical records including drought, and frequency and scale of flooding.</p>	<p><b>Revised Plan</b></p>	2.2.9	2-20	<p><u>East Honolulu faces new and emerging challenges within both of the Plan's horizons...Some of these changes likely include:...</u></p>	OP	
<p>Climate change and sea level rise [will] increase disaster risk and the cost of disasters. In the aftermath of a disaster, East Honolulu will "build back better and smarter" by incorporating adaptive design and resiliency strategies into the location, structure, and operations plans for any [reconstruction] <u>new development and redevelopment.</u></p>	<p><b>Revised Plan;</b> removed reconstruction line per another comment</p>	2.2.9	2-21	<p><u>Climate change and sea level rise increase disaster risk...</u></p>	OP	
<p>We appreciate the discussion of sea level rise vulnerabilities on page 2-20 and 21 and in Exhibit 2-3. We recommend a few corrections and additions on these pages (suggested deletions in strikethrough, suggested additions underlined):</p>	<p><b>Revised Plan</b> throughout</p>	2.2.9	2-20	<p><u><b>Sea Level Rise Vulnerability and Adaptation Report</b></u></p>	DLNR	
<p>The first sentence on page 2-20: The State of Hawai 'i published the Sea Level Rise Vulnerability <del>Assessment</del> and Adaptation Report in December 2017.</p>						

Written Comment	DPP Response	Section	Page #	Text Change from PRD	Reviewer
<p>The third sentence on page 2-20: <del>The Report, Guidance, and Brief and companion online Hawaii Sea Level Rise Viewer detail projected sea level rise impacts on from passive flooding (still water high tide flooding), annual high wave flooding (over wash during the largest wave events of the year), and coastal erosion and an overall Sea Level Rise Exposure Area (SLR-XA) combining the three projections: coastal flooding, erosion, groundwater inundation, episodic tidal flooding, the "100-year" coastal and riverine flooding, and tsunami flooding with sea level rise of 0.5 feet, 1.1 feet, 2.0 feet, and 3.2 feet. The Guidance recommends that the SLR-XA at 3.2 feet be adopted as a vulnerability zone (hazard overlay) for planning by the City. Further, the Guidance recommends that it is reasonable to set as a planning benchmark up to 6 feet of sea level rise for critical infrastructure projects with long expected lifespans and low risk tolerance. The Guidance was followed by Directive No. 18-2 in which the Mayor directed that all City departments and agencies are required to use the Guidance, Brief, and Report in their plans, program, and capital improvement decisions.</del></p>	<p><b>Partially Revised Plan.</b> Kept City references</p>	<p>2.2.9</p>	<p>2-20</p>	<p><u>The <b>Sea Level Rise Vulnerability and Adaptation Report</b> and accompanying online Hawai'i Sea Level Rise Viewer project sea level impacts from passive flooding, annual high wave flooding, coastal erosion, and groundwater inundation for an overall Sea Level Rise Exposure Area (SLR-XA) with sea level rise of 0.5 feet, 1.1 feet, 2.0 feet, and 3.2 feet. The <b>Sea Level Rise Guidance</b> recommends that the SLR-XA at 3.2 feet be adopted as a vulnerability zone (hazard overlay) for planning by the City. Further, the <b>Sea Level Rise Guidance</b> recommends that it is reasonable to set, as a planning benchmark, up to six feet of sea level rise for critical infrastructure projects with long expected lifespans and low risk tolerance. City shoreline maps and regulations will be updated based on guidance from the City Climate Change Commission. Proposed projects should reflect up-to-date data from the most current versions of the <b>Sea Level Rise Guidance</b> and <b>Climate Change Brief</b>.</u></p>	<p>DLNR</p>
<p>Following the Commission's Guidance, we recommend replacing the map in Exhibit 2-3 with a map showing passive flooding with 6 feet of sea level rise from the NOAA SeaLevel Rise Viewer along with the SLR-XA with 3.2 feet of sealevel rise.</p>		<p>2.2.9</p>	<p>2-23</p>	<p>(See Exhibit)</p>	<p>DLNR</p>
<p><del>The second paragraph on page 2-20: Exhibit 2-3 shows the potential impacts of static flooding and groundwater inundation in East Honolulu from SLR-XA with 3.2 feet of sea level rise as published in the Hawaii Sea Level Rise Vulnerability Assessment and Adaptation Report. Exhibit 2-3 also shows passive flooding with 6 feet sea level rise from the NOAA Sea Level Rise Viewer, and inundation, which could include episodic tidal and storm surge flooding, which would place an additional two feet of water on top of passive flooding and inundation caused by the sea-level rise which development will need to address.</del></p>	<p><b>Revised Plan and Exhibit 2-3</b></p>	<p>2.2.9</p>	<p>2-20</p>	<p><u>Exhibit 2-3 shows the SLR-XA with 3.2 feet of sea level rise as published in the <b>Sea Level Rise Vulnerability and Adaptation Report</b>, and passive flooding with 6 feet of sea level rise from the NOAA Sea Level Rise Viewer.</u></p>	<p>DLNR</p>
<p>Exhibit 2-3 caption: <del>Projections of Static Flooding and Groundwater Inundation from Sea Level Rise Potential chronic flooding in the SLR-XA with 3.2 feet of sea level rise (blue) and additional chronic flooding with 6 feet of sea level rise (pink).</del></p>	<p><b>Revised Exhibit</b>, caption is now in legend.</p>	<p>2.2.9</p>	<p>2-23</p>	<p>(See Exhibit)</p>	<p>DLNR</p>
<p>Add "wildfire"</p>	<p>Increased threat of hurricanes, higher intensity rainfall, and wildfires.</p>	<p><b>Revised Plan</b></p>	<p>2.2.9</p>	<p><u>and increased threat of hurricanes, higher intensity rainfall, and wildfires.</u></p>	<p>Jeanne Ohta</p>
<p>first paragraph, change last sentence to read: ...To counter the increase in risk associated with these hazards, the communities of East Honolulu will mitigate and minimize the vulnerability of social and physical infrastructure while increasing community resiliency as outlined in the O'ahu Resilience Strategy.</p>	<p><b>Revised Plan.</b></p>	<p>2.2.9</p>	<p>2-20</p>	<p><u>... as outlined in the <b>O'ahu Resilience Strategy</b>.</u></p>	<p>Andrea Wagner</p>

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last paragraph, change to read: Climate change and sea level rise are increasing disaster risk and the cost of disasters. In recognition of this, the City's Office of Climate Change, Sustainability and Resiliency has prepared the O'ahu Resilience Strategy to guide preparation and recovery from potential disasters. Redevelopment and disaster recovery in East Honolulu will incorporate adaptive design and resiliency strategies that consider location, structure, and operations plans.	<b>Revised Plan</b> per another comment.	2.2.9	2-21	<u>...Redevelopment and disaster recovery in East Honolulu will "build back better and smarter" by incorporating adaptive design and resiliency strategies that consider location, structure, and operations plans.</u>	Andrea Wagner
The section is too general and needs to be more specific to East Honolulu. It currently provides an overview of climate change adaptation efforts at the state and city level. This section should provide climate change adaptation measures specific to East Honolulu and discuss HOW these measures could be implemented. Should add a summary section here that points to key sections/ideas for climate change adaptation with specific information for East Honolulu. Reference strategies from local community groups.	<b>Partially revised Plan</b> per other comments. It is difficult to address as a stand-alone issues. General Policies and Guidelines are found in Chapter 3 with relevant recommendations found in existing sections.	2.2.9	-		Townscape
The Plan needs a lot more information and discussion on resilience.	No change. Island-wide policies were introduced after the PRD was published and adopted prior to the publication of the Revised Plan. The main objective of forming a Resilience Hub can assist with more localize responses and resiliency.	2.2.9	-		Townscape
The Plan does not address "how to prepare in advance." Needs more emphasis on pre- disaster preparation and pre-recovery activities.	No change. Agree which is why it is being recommended in the PRD.	2.2.9	-		Townscape
Redevelopment agency should be implemented to coordinate pre-disaster, mitigation, and recovery planning for East Honolulu communities.	No change. Agree which is why it is being recommended in the PRD.	2.2.9	-		Townscape
Ground water rise should be addressed too.	Revised Plan per other comments	2.2.9		<ul style="list-style-type: none"> <li>• <u>Research and prepare for the potential impacts of sea level rise on ground water aquifers and water supply infrastructure.</u></li> <li>o <u>The design in undergrounding utilities shall account of the potential adverse impacts of sea level rise impacting increases in the elevation of the water table and other groundwater inundation.</u></li> </ul>	Townscape
Revise the last sentence that states "In the aftermath of a disaster, East Honolulu will 'build back better and smarter' by incorporating adaptive design and resiliency strategies into the location, structure, and operations places for any reconstruction."	<b>Revised Plan</b>	2.2.9	2-21	<u>In recognition of this, the City's Office of Climate Change, Sustainability and Resiliency has prepared the O'ahu Resilience Strategy to guide preparation and recovery from potential disasters. Redevelopment and disaster recovery in East Honolulu will "build back better and smarter" by incorporating adaptive design and resiliency strategies that consider location, structure, and operations plans.</u>	Townscape
This statement seems to suggest we do not need to do anything until after the disaster - at which point we "build back better and smarter." We need to be pro- active and develop a coordinated effort to educate businesses and shopping center management in advance of disasters to mitigate as much damage and loss as possible. This may also prevent injuries and loss of life in a major event.	The DPP is supportive of preventative measures and pre-disaster planning. However, as the Plan is primarily a land use plan with improvements only made during redevelopment, it may take a disaster to change some of the hardscape.	2.2.9			Townscape
Exhibit 2-3: "Projections of State Flooding and Groundwater Inundation from Sea Level Rise" needs to be updated to include the 6ft of SLR . Consider enlarging the map and inserting it in the appendix.	<b>Revised Plan</b> and <b>Exhibit 2-3</b> to include the 3.2 foot SLR-XA and 6 foot passive flooding and to be graphically consistent with other exhibits.	2.2.9	2-22	-	Townscape
Suggest spelling out, unless there is a list of acronyms.	No change. SLR is not used in the Plan	2.2.9		-	Townscape

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The tsunami evacuation maps should be included in this Plan.	No change. Maps can be changed. The Plan can refer to those maps. SLR maps are included as the community may not be as familiar with them.	2.2.9		-	Townscape
Suggest noting that: "Sea level rise could reduce residential zones along the coast, and this could mean reduced population capacity for East Honolulu."	No change. Projections are to 2040. The larger SLR impacts belong mostly to after 2050	2.2.9		-	Townscape
The Plan does not lay out how the communities will become:	No change. This is not a disaster plan	2.2.9		-	Townscape
o Educated on various probable disasters and what risk each community faces					
o Prepared for each family to become self-sufficient for 14 days likely before substantial help can arrive					
o How the communities will survive for those days until help arrives					
o What to do to begin the recovery process immediately after the disaster					
Add in policies/guidelines in the Plan that address improving evacuation routes, shelters, access to emergency supplies, and coordination of first responders for East Honolulu. The government needs to work with community groups in all stages of disaster planning, including disaster-readiness groups such as 'Āina Haina Prepared and Hawai'i Kai Strong. Need public/private partnerships. See strategies from local groups such as maintaining emergency supplies "cache." Adaptation areas could be important.	<b>Revised Plan</b> per another comment to respond to the since published Oahu Resilience Strategy	2.2.9		<ul style="list-style-type: none"> <li>• <u>Develop a Community Resilience Hub in East Honolulu that will serve critical roles during and immediately following an emergency as well as enhance social resilience ahead of a disaster.</u></li> </ul>	Townscape
The Plan needs to discuss Kalaniana'ole Highway and its vulnerability to flooding due to climate change and natural disasters. The corridor serves as the only access to East Honolulu. We need to ensure that we maintain access to East Honolulu communities so that it does not become isolated. This element needs to be incorporated into the vision statement for East Honolulu.	<b>Revised Plan</b>	2.2.9		<u>Access between neighborhoods needs to be maintained and restored in a timely manner after flooding to ensure the safety of residents and the efficiency in distribution of emergency resources and supplies. Additional protections should be made to Kalaniana'ole Highway, particularly in the vicinity of Kuli'ou'ou, to mitigate the anticipated impacts from sea level rise.</u>	Townscape
Need to also address this issue in Chapter 4.	<b>Revised Plan</b>	2.2.9	4-8	<ul style="list-style-type: none"> <li>• <b>Resiliency</b> – <u>Roadway design, particularly along Kalaniana'ole Highway in the vicinity of Kuli'ou'ou, should take into account the anticipated impacts of sea level rise to ensure safe and efficient access between neighborhoods is maintained.</u></li> </ul>	Townscape
The Sea Level Rise Exposure Areas (SLR-XA) maps, and associated sea level rise viewer, is another tool for identifying areas affected by sea level rise over time, providing a form of zoning overlay within which adaptation strategies can be selected. The State of Florida has adopted such an approach via a state statute authorizing local governments to identify "Adaptation Action Areas" within their jurisdictions to address the impacts of sea level rise. Under Florida Law, adaptation strategies include Protection, Accommodation, Retreat, and Avoidance. Similar adaptation strategies are being developed by the State of Hawai'i Climate Commission.	The Plan will defer to the island-wide and State-wide strategies being developed by the City and State commissions, at least until the next Plan update.	2.2.9		-	Sierra Club
<b>Chapter 3</b>					
Grammatical Error in the first paragraph. Should be "The Ka Iwi Scenic Shoreline, or the makai lands, contains <u>one</u> of O'ahu's last undeveloped, rugged coastlines."	<b>Revised Plan</b>	3.1	3-18	contains <u>one</u> ...	BWS

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Add a bullet to call for protection from floodwater ingress into residential areas by slowing the flow of water and increasing ground absorption.	Revised Plan	3.1.1	3-1	<ul style="list-style-type: none"> <li>• Slow the rate of stormwater runoff into <u>drainageways through increasing ground absorption and reducing the amount of impermeable surfaces on both public and private lands; and</u></li> </ul>	Townscape
Section 3.1.1 General Policies, page 3-1 we ask that you add beaches and the nearshore marine environment to the seventh bullet following Open space will be used to (suggested additions underlined):	Revised Plan	3.1.1	3-1	<ul style="list-style-type: none"> <li>• <u>Protect aesthetic and biological values of wetlands, beaches, nearshore marine environments, natural streams, and other drainage ways;</u></li> </ul>	DLNR
Protect aesthetic and biological value of wetlands, <u>beaches, the nearshore marine environment</u> , natural streams, and other drainage ways;					DLNR
Comment: The open lands in the valleys, ridges separating the valleys, and the Ko'olau Mountains summit ridge east of Niu Valley have been severely altered by man. In these areas, little of the original native (indigenous and endemic) Hawaiian vegetation, and native Hawaiian invertebrate, bird and mammal population (Hawaiian hoary bat) remain. Instead, these areas are dominated by alien species. The focus on protection of endangered species (6th bullet on p. 3-1), while commendable and necessary, is insufficient as a general policy. The overall vision should be to restore native Hawaiian plant, invertebrate and animal species in this open space, where appropriate and feasible.	Revised Plan. Added vision bullet below endangered species bullet.	3.1.1	3-1	<ul style="list-style-type: none"> <li>• <u>Re-establish and restore native Hawaiian plant, animal, and invertebrate species and habitats in open space areas;</u></li> </ul>	Geary S. Mizuno
Suggested Resolution: Re-establish native Hawaiian plant, invertebrate, bird, and mammal habitat.	Revised Plan. Added vision bullet below endangered species bullet.				
Parking near trailheads is addressed in the section titled "Guidelines Pertaining to Mountain areas." Similarly parking management should also be addressed in "Guidelines Pertaining to Shoreline Areas."	No change. The difference in need to address mountain parking but not shoreline parking shows the impacts of having relatively more abundant options for beaches, but shrinking number of public trails.	3.1.2.1	-		DTS
Revise to: " <b>Kuli'ou'ou Valley Trail</b> – Beginning at the back of Kuli'ou'ou Valley, this trail runs for <del>0.6</del> <u>1.0</u> miles to approximately the <del>440</del> <u>520</u> -foot contour."	Revised Plan to match Ball. Previously, reference was just for the maintained trail and not to the second waterfall chute but Plan was revised to encourage greater access.	3.1.2.1	3-2	this trail runs for <u>1.0</u> miles to approximately the <u>520</u> -foot contour.	Townscape
Confirmed accuracy according to the Hikers Guide to O'ahu, Ball, UH Press 2013.					Townscape
Exhibit 3-1: Public Parks, Recreation Areas, and Trails, change markings/graphic to show that Kaiwi Scenic Coast Mauka to Makai stretches from Koko Head to Makapu'u Head.	No change. The map shows recreational space and showing the City maintains Wāwāmalu Beach and Sandy Beach is helpful to understanding maintenance.	3.1.2.1	3-3	-	Townscape
As currently marked, it only points to the State's so-designated space beyond Alan Davis wall. The use of the same name for two places is problematical.					Townscape
At the end of the first paragraph, insert the following: " <u>Note: Regarding liability, HRS §520, 1998 is referred to as the Hawai'i Recreational Use Statute. It protects landowners who provide, or are required to provide, public access-from liability regarding members of the public exercising such public access.</u>	Revised Plan and added to the Technical Report	3.1.2.1	3-5	<u>Landowners, however, are protected from liability in making their land and water areas available to the public for recreational purposes in accordance with HRS 520.</u>	Townscape
o Inserting this reminder about Hawai'i law can do much to educate the public that is not aware of this law when frequently referring to "liability".					Townscape
Add the following guideline pertaining to mountain areas: <u>Improve trail maintenance.</u>	Revised Plan	3.1.2.1	3-6	<ul style="list-style-type: none"> <li>• <u>Trail Maintenance – Increase trail maintenance to mitigate the impacts from hikers on the natural environment and improve safety.</u></li> </ul>	Townscape

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o The Plan should reference the Kamilonui-Mariner's Cove nationally recognized Firewise Community designation per Hawai'i Wildfire Management Organization. There is a plan that can be referenced. The Plan and community action were completed after 18 fires in Kamilonui Valley in 2017 and 3 fires in 2018. May be a good example for other communities as well.	<b>Revised Plan and Technical Report</b>	3.1.2.1	3-6	<ul style="list-style-type: none"> <li>• <b>Wildfire Hazards</b> – Implement the findings and recommendations from the Kamilo Nui – Mariner's Cove Firewise Hazard Assessment.</li> </ul>	Townscape
Change first paragraph to read: Access to mountain areas for passive uses and resource gathering, including parking areas, should be made available in accordance with Hawaii Revised Statutes (HRS) 115, 171, and 264...	<b>Revised Plan.</b>	3.1.2.1	3-2	Access to mountain areas for passive uses and resource gathering, including parking areas, should be made available...	Andrea Wagner
Add after "Passive areas include...." sentence: Where access is through existing residential communities, the well-being of the communities will be considered so as to minimize negative impacts to the communities	No change. Community groups do not want Plan used as an excuse to close more trails and push further congestion to adjacent valleys.	3.1.2.1	-	-	Andrea Wagner
NOTE: Section 3.1.2.1 is riddled with inconsistencies. It talks about opening ready access to trails while simultaneously protecting forests and endangered species. These actions are in opposition to one another as making trails more readily accessible results in heavier use, erosion, introduction of alien species, and general degradation of the land. Given the high number of trails already identified in East Honolulu, I would delete "More Trails" on page 3-6. There are already too many people forging new trails to the detriment of East Honolulu and our island.	No change. People forging new trails reflects a need for more sanctioned trails. Hikers can deter the spreading of undulates which also cause erosion and spread invasive species. Not in opposition, just not clear understanding of how they can compliment each other. Much of the management is done by individuals.	3.1.2.1	-	-	Andrea Wagner
Koko Head/ 'Ihi'ihilauākea Nature Preserve ( <b>within Hanauma Bay Nature Preserve</b> )	<b>Revised Plan</b>	3.1.2.1	3-4	'Ihi'ihilauakea Preserve (within Hanauma Bay Nature Preserve)	Friends of Hanauma Bay
Remove "Proposed Recreation areas from <b>Exhibit 3-1</b> . Can add trail instead.	<b>Revised Plan</b>	3.1.2.1	3-3	Color of Ka Iwi Mauka lands will be similar to Ka Iwi Scenic Shoreline. Will add trail to <b>Exhibit 3-3</b> and <b>Exhibit 2-2</b> . (Not mentioned but need to add Mariners Ridge back to <b>Exhibit 3-1</b> .)	Elizabeth Reilly
Comment: The discussion and Table 3-1 are inaccurate because they fail to identify a trail in Ka'alākei Valley and up the un-named ridge separating Kuli'ou'ou and Ka'alākei valleys. Access to this trail is now blocked because of development and City and County of Honolulu fencing.	<b>Partially revised Plan.</b> Revised introductory paragraph to clarify that the trails that appear in <b>Table 3-1</b> are from a DLNR database. It appears the State calls the area you are describing as Haha'ione Valley Trail.	3.1.2.1		Other trails that are not actively managed by the DLNR Nā Ala Hele Trail and Access Program, are included in <b>Table 3-1</b> . In <b>Table 3-1</b> : Haha'ione Valley ( <u>Ka'alākei Valley</u> )	Geary S. Mizuno
Suggested Resolution: Revise Table 3-1 by adding this currently-unnamed trail. Revise the textual discussion in Section 3.1.2.1 to include this trail, which originally followed a jeep road in Ka'alākei Valley, and then switchbacks up to the ridge and thence to the Ko'olau Mountains summit.	<b>Partially Revised Plan.</b> Revised <b>Table 3-1</b> by adding in name with Haha'ione Valley.	3.1.2.1		Haha'ione Valley ( <u>Ka'alākei Valley</u> )	Geary S. Mizuno
Comment: The bullet on Native Forests apply only to "upland native forests." This is too limiting. Historically, at least as much – if not more – land was occupied by lowland native grasslands, mixed grasslands/shrublands, and dry forests in areas outside the State-designated Conservation District, as compared to the "upland forests" at the Ko'olau Mountain summit ridge which are within the Conservation District. Furthermore, hiking to these upland forests virtually always involves long traverses through lower elevation habitats currently dominated by alien plants. The uninformed hiker, who is unable to distinguish between alien versus native plants, often leaves with an erroneous understanding of the nature of the Hawaiian forest.	<b>Partially Revised Plan.</b>	3.1.2.1	3-6	<ul style="list-style-type: none"> <li>• <b>Native Upland Forests</b> - ...</li> <li>• <b>Lowland Forests and Vegetation</b> – Maintain, protect, and/or restore native Hawaiian plant communities in lowland native grasslands and scrublands and dry forests.</li> </ul>	Geary S. Mizuno

Written Comment	DPP Response	Section	Page #	Text Change from PRD	Reviewer
<b>Native Vegetational Communities:</b> Maintain, protect, and/or restore native Hawaiian <u>plant communities occurring in East Honolulu where appropriate and feasible.</u>	<b>Partially Revised Plan.</b> Added bullet for lowland forests.	3.1.2.1	3-6	<ul style="list-style-type: none"> <li>• <b>Lowland Forests and Vegetation –</b> Maintain, protect, and/or restore native Hawaiian <u>plant communities in lowland native grasslands and scrublands and dry forests.</u></li> </ul>	Geary S. Mizuno
The discussion in the <i>Alien Species</i> bullet is incomplete because it only refers to alien <u>animal</u> species. Alien plants are as significant a threat as alien animal species as the two work often in tandem. Feral animals destroy native plants through their activities and browsing; this opens up habitat for alien plants to establish on lands once occupied by native Hawaiian plants. The ridges and Ko’olau Mountain summit ridge east of Kuli’ou’ou are largely alien, with scattered infrequent pockets of a few native Hawaiian plants. Even in the mountain areas west of Niu Valley, including Wai’alae Nui and Wailupe, the native vegetation is subject to alien plant invasion. Finally, the bullet only refers to “control” of the number and range of alien animals. For feral animals such as goat and pig, elimination is feasibly achieved.	The underline is not how it appears in the text (it is "alien species"). The bullet is not intended to be limited to animals or else "feral animals" would be the bullet header.	3.1.2.1	3-6	<ul style="list-style-type: none"> <li>• <b>Alien Species –</b> Control the number and range of feral animals and other alien species which could lead to the destruction of habitats of native or endangered species and erosion. <u>Prevent the establishment of new alien species.</u></li> </ul>	Geary S. Mizuno
Suggested Resolution: The <i>Alien Species</i> bullet should be revised to include the control and <u>elimination</u> of alien <u>plant</u> and animal species.	<b>Partially revised plan.</b> Did not add elimination as the OISC does not see elimination of some of the established species as possible. Bullet is not limited to feral animals as stated above. Added a line regarding the establishment of new pests per OISC mission.	3.1.2.1	3-6		Geary S. Mizuno
The bullets, <i>Access, Access Easements, Parking, and More Trails</i> , generally deal with gaining access to trails which were once publicly-accessible, but for which State and City-approved suburban development have now eliminated access. Although these bullets set forth admirable goals, these bullets obscure the real issues leading to lack of access: no public right of way or easement permitting public access to trails; concerns about vandalism, trash, and rowdiness at trailheads next to private residences which have led private landowners to withdraw their tolerance of illegal trespassing over their lands; and liability concerns of the landowners on whose lands the trails traverse (primarily Kamehameha Schools in the lands behind Hawaii Kai). Until these landowner concerns are effectively addressed – which will require disparate actions on a number of different fronts – the planning guidelines in these three bullets will not be effective.	No change	3.1.2.1	3-6	-	Geary S. Mizuno
Suggested Resolution: (i) expressly refer to securing rights of way and easements to trail heads; and (ii) recommending action to identify and address landowners’ concerns about trail access and recreational travel over their land.	No change. PRD already added bullet on acquiring and maintaining easements to trailheads.	3.1.2.1	3-6	-	Geary S. Mizuno
Comment: The bullet, <i>More Trails</i> , refers to “congestion” on East Honolulu trails. It is not clear what definition and data are the bases for this statement. It should be recognized that a definition of “congestion” in a Federally-designated wilderness area, for example, is not the same as, and would be an inappropriate measure for congestion in areas immediately adjacent to developed suburban residential areas where tourist activities are a significant economic driver. In my opinion, the “congestion” lies with inadequate or no parking at trailheads.	See below	3.1.2.1	3-6	<ul style="list-style-type: none"> <li>• <b>More Trails –</b> Balance trail demands across <u>East Honolulu and alleviate overcrowding at residential trailheads through the opening and sanctioning of additional trails, particularly in Mariners Ridge, Niu Valley, and Kamilo Nui Valley.</u></li> </ul>	Geary S. Mizuno
Suggested Resolution: Rewrite this bullet to remove the reference to trail congestion absent supporting information. Instead or in addition, discuss lack of parking at trailheads as contributing to traffic congestion and conflicts with nearby residents.	<b>Revised Plan.</b> Congestion was the word used by some members of the community but is not the correct word.	3.1.2.1	3-6		Geary S. Mizuno

Written Comment		DPP Response	Section	Page #	Text Change from PRD	Reviewer
Add “destruction, vandalism, and theft of cultural sites”	Community residents and large landowners are concerned about liability, security, destruction, vandalism, and theft of cultural sites, loss of privacy and parking congestion.	No change. These concerns are covered already.	3.1.2.1	3-5, 1st para	-	Jeanne Ohta
Add “protect residential communities”	Mitigate the social impacts of congestion and protect residential communities. Residents near trails must be protected from over tourism.	No change. Keeping trails open protects other neighborhoods with trails from becoming overwhelmed. No evidence it is tourists using trails.	3.1.2.1	3-5, last bullet point	-	Jeanne Ohta
While the causes of climate change are global, its impacts - sea level rise, ground water inundation, and increased rainfall intensity- will [be felt] <u>take place</u> locally.		<b>Revised Plan</b>	3.1.2.2	3-7	<u>will occur locally</u>	OP
<b>Vegetation</b> - [Encourage] <u>Require</u> landowners along the shoreline to maintain vegetation so as not encroach into the public right-of-way, particularly as the shoreline erodes pushing the right-of-way inland.		<b>Revised Plan</b> per another comment	3.1.2.2	3-10	• <b>Vegetation</b> – Landowners along the shoreline <u>shall maintain...</u>	OP
<b>Setbacks</b> - Increase minimum <u>shoreline</u> setbacks [for structures near the shoreline] and implement other management strategies to account for anticipated impacts from the climate change and coastal erosion. Revise and amend shoreline rules and regulations to incorporate sea level rise into the determination of shoreline setbacks and Special Management Area (SMA) [considerations] <u>use requirements</u> .		<b>Revised Plan</b>	3.1.2.2	3-10	Increase minimum <u>shoreline</u> setbacks <del>for structures near the shoreline...</del> <u>(SMA) use requirements</u>	OP
<b>Armoring</b> - Conserve and enhance a natural, dynamic shoreline <u>processes</u> wherever possible. [Permitting permanent shoreline armoring is discouraged and] <u>Restrict shoreline hardening, and shoreline hardening should</u> [only] be [considered as] a last resort where it supports significant public benefits and will result in insignificant negative impacts to coastal resources and natural shoreline processes.		Partially <b>Revised Plan</b>	3.1.2.2	3-10	• <b>Armoring</b> – Conserve and enhance a natural, <u>dynamic shoreline wherever possible. Restrict shoreline hardening. Shoreline hardening should</u>	OP
We suggest revising the last sentence of paragraph two to provide a more complete description of sea level rise vulnerability in the plan area (suggested deletions in strikethrough, additions underlined): A number of residential neighborhoods <del>seaward and portions</del> of Kalaniana'ole Highway <u>along with portions of the highway</u> will become more vulnerable to routine flooding <u>and coastal erosion</u> as a result of sea level rise, particularly <u>between Wai'alaie Beach Park and Portlock and low-lying areas around the Hawai'i Kai lagoons and marina around Paiko Drive and makai areas of Kuli'ou'ou</u> (see Exhibit 2-3, above).		<b>Revised Plan</b> per another comment. We want to be more specific in saying the entire coastline to highlight the first areas to be impacted.	3.1.2.2	3-8	<u>A number of residential neighborhoods bordering Maunalua Bay and portions of Kalaniana'ole Highway will become more vulnerable to routine flooding and coastal erosion as a result of sea level rise, particularly around Paikō Drive and makai areas of Kuli'ou'ou (see Exhibit 2-3, above).</u>	DLNR
In the last paragraph on page 3-7, it is important to note that existing seawalls and revetments in the plan area are causing extensive beach narrowing and loss. Beach loss will accelerate in the coming decades with sea level rise, especially if widespread coastal armoring (seawalls and revetments) continues to be permitted.		<b>Revised Plan.</b> Added and revised sentences.	3.1.2.2	3-7	<u>Seawalls and revetments have caused beach narrowing and loss in nearby unhardened areas which disrupt natural processes. Beach loss will accelerate in the coming decades with sea level rise, especially if widespread coastal armoring is permitted.</u>	DLNR
Change “encourage” to “require”	Vegetation-Require landowners along the shoreline. Stronger language.	<b>Revised Plan</b> per another comment	3.1.2.2	3-10, 1st bullet	• <b>Vegetation</b> – Landowners along the shoreline <u>shall maintain vegetation ...</u>	Jeanne Ohta
Sites in this portion of East Honolulu consist of shelters, heiau, burial caves, and <u>burial cliffs</u> .	Several burial caves in the located near each other have been identified as burial cliffs; entire mountainside of burials.	<b>Revised Plan</b>	3.1.2.2	3-35, 1st para	<u>shrines, heiau, burial caves, and burial cliffs.</u>	Jeanne Ohta

Written Comment	DPP Response	Section	Page #	Text Change from PRD	Reviewer
Comment: The bullet on <i>Vegetation</i> is not relevant to the Ka Iwi Scenic Shoreline.	No change. Bullet is from "Guidelines pertaining to shoreline areas" and is not limited to Ka Iwi	3.1.2.2	3-10	-	Geary S. Mizuno
Suggested Resolution: Vegetation – Encourage landowners along the <u>Wai’alae to Koko Head</u> shoreline to maintain vegetation so as to not encroach into the public right-of-way, particularly as the shoreline erodes pushing the right-of-way inland.	No change. Parks should also be maintained	3.1.2.2	3-10	-	Geary S. Mizuno
As the EHSCPRD notes, much of the East Honolulu shoreline from Wai’alae to Koko Head is armored with seawalls or other devices intended to protect against coastal erosion. Many of these structures were granted permits before passage of the Hawai’i Coastal Zone Management Act (HCZM).	No change proposed	3.1.2.2	3-7	-	Sierra Club
We strongly support these guidelines. (Lateral Access, Feedback, Armoring)	No change proposed	3.1.2.2	3-6	-	Sierra Club
Elsewhere in Section 3.1.2.2, however, we find the following statements: “Vertical seawalls and revetments have been constructed along many of the properties between Wai’alae and Koko Head, but chronic erosion or accretion are being observed where the shoreline has not been hardened. Additionally, unhardened areas adjacent to these modified shorelines may be eroding at a greater rate because of the modifications.”	<b>Revised Plan.</b> Removed middle sentence.	3.1.2.2		...between Wai’alae and Koko Head. <u>Unhardened areas adjacent to these modified shorelines may be eroding at a greater rate because of the modifications to natural processes.</u>	Sierra Club
These statements could be interpreted as encouraging hardening of those areas not already hardened, in order to prevent “chronic erosion.”					Sierra Club
As mentioned previously, formation of a Redevelopment District would provide means for developing and implementing a shoreline protection and restoration strategy for the entire coastline.	No change. While the DPP is supportive of shoreline protection and restoration, the Plan is hesitant of going into too much detail on what a redevelopment district could entail	3.1.2.2		-	Sierra Club
We also find this statement: “Lateral shoreline access along this stretch of coastline is a desirable goal but difficult to achieve because of physical constraints, land ownership patterns, the extent of urban development, and geophysical changes that are a result of beach erosion and sea level rise.”	No change. Where armoring has been allowed, there is no longer beach. The Plan would be supportive of larger efforts taken perhaps at a State level, but is unsure how to proceed due to the stated difficulties.	3.1.2.2		-	Sierra Club
A major challenge for protecting East Honolulu beaches and lateral access is the need to address the coastal hardening which the City and County has already allowed through previous permitting decisions, many made prior to adoption of the Hawai’i Coastal Zone Management Act. This cannot be achieved by the current parcel-by-parcel approach to permitting. Although this goal may be difficult to achieve, it should be pursued.					Sierra Club
Change first paragraph to read: Shoreline access is protected under HRS 115-1, referenced in Section 3.1.2.1. Loss of mauka-makai access to the shoreline is largely the result of the intensity of urban development and policy decisions in maintaining access routes.	<b>Revised Plan.</b>	3.1.2.2	3-7	...The absence or loss of mauka-makai access to the shoreline is largely the result of the intensity of urban development and policy decisions in maintaining remaining access routes.	Andrea Wagner
Change last sentence of second paragraph to read: ...A number of residential neighborhoods bordering Maunalua Bay and portions of Kalaniana’ole Highway will become vulnerable to routine flooding as a result of sea level rise.	<b>Revised Plan.</b>	3.1.2.2	3-7	...neighborhoods bordering Maunalua Bay and portions of Kalaniana’ole Highway will become more vulnerable to routine flooding as a result of sea level rise, particularly around Paikō Drive and makai areas of Kuli’ou’ou (see <b>Exhibit 2-3</b> , above).	Andrea Wagner
Change third paragraph to read: In addition to recreational and ecological value, shoreline areas in East Honolulu, particularly along the <u>Ka’iwi coastline</u> , offer unparalleled scenic value. As such, views from Kalaniana’ole Highway to the shoreline should be preserved.	<b>Partially revised Plan.</b> Kaiwi now consistent throughout per another comment	3.1.2.2	3-7	-	Andrea Wagner

Written Comment	DPP Response	Section	Page #	Text Change from PRD	Reviewer
Wai'alaie to Koko Head—change first paragraph to read: Few areas along this shoreline are accessible to the public due to residential <u>and resort development</u> along Kalaniana'ole Highway. Access points to the shoreline along this stretch exist at Wailupe, Kawaiku'i, Kuli'ou'ou, and Maunalua Bay beach parks, in addition to a few public pedestrian easements.	No change. The country club is a bigger obstacle.	3.1.2.2	3-7	-	Andrea Wagner
Ka Iwi Scenic Shoreline bullet— change to read: Ka'iwi Coastline—Mauka-makai and lateral shoreline access is more prevalent between Koko Head and Makapu'u Head, particularly between Sandy Beach and Makapu'u Head...The portion of this shoreline that extends from Koko Head Regional Park to Makapu'u Head was nominated by the Livable Hawai'i Kai Hui and then designated by the State of Hawaii Department of Transportation as a State of Hawaii Scenic Byway in 2013 (see Section 3.2.1.2). The Ka'iwi Scenic Shoreline at the east end of the Ka'iwi Coastline was established to preserve the area's natural and scenic resources and to provide educational and passive recreation opportunities. There are continuous views of the ocean along the Ka'iwi coastline, as well as shoreline access between Sandy Beach and the Makapu'u Point trail. This segment of Kalaniana'ole Highway is the highlight of a continuous visual sequence of the coastline extending from Hawai'i Kai to Waimānalo.	<b>Revised Plan.</b> Other revisions based on NB comments.	3.1.2.2	3-8	<u>...Makapu'u Head, particularly beginning at Sandy Beach. The shoreline between Koko Head Regional Park and Makapu'u Head...The 354-acre Kaiwi Coast area is located along the Maunalua-Makapu'u State Scenic Byway Corridor, that was nominated by the Livable Hawai'i Kai Hui in addition to the Hawai'i Kai Neighborhood Board, and, designated by the State of Hawai'i Department of Transportation as a State of Hawai'i Scenic Byway in 2013. The State Scenic Byway Corridor extends from Hawai'i Kai Drive to Makai Research Pier. A Corridor Management Plan focused on preserving and protecting the resources along Kaiwi coastline was prepared in 2018 by Livable Hawai'i Kai Hui and the Ka Iwi Coalition (see Section 3.2.1.2). The Kaiwi Scenic Shoreline, was established to...</u>	Andrea Wagner
Change second bullet as follows: • Natural Landscape—Maintain the natural landscape quality of the Ka'iwi coastline viewshed as a high priority...	<b>Revised Plan.</b>	3.1.2.2	3-9	• <u>Natural Landscape – Maintain the natural landscape quality of the Kaiwi coast, mauka to makai, as a high priority viewshed.</u>	Andrea Wagner
Change third bullet as follows: • Ka'iwi Coastline—Protect and preserve the long-term recreational and scenic value of the shoreline between Koko Head and Makapu'u Head through responsible maintenance.	<b>Revised Plan.</b>	3.1.2.2	3-9	<u>...Makapu'u Head through responsible maintenance</u>	Andrea Wagner
Change fourth bullet as follows: • Lateral Access—Improve, protect, and maintain lateral shoreline access along Maunalua Bay from Portlock to Wai'alaie where feasible.	<b>Revised Plan</b> per other comments as well	3.1.2.2	3-9	• <u>Lateral Access – Improve, protect, and maintain lateral shoreline access <del>along reaches of the beach</del> from Koko Kai Beach Park to Wai'alaie Beach Park.</u>	Andrea Wagner
Correct fourth bullet, Setbacks, second sentence, to read: ...Revise and amend shoreline rules and regulations to incorporate sea level rise into the determination of shoreline setbacks...	<b>Revised Plan.</b>	3.1.2.2	3-10	<u>sea level</u>	Andrea Wagner
Correct sixth bullet, Protect Infrastructure, to read: ...Identify critical public and private infrastructure subject to sea level rise exposure and mitigate these impacts through...	<b>Revised Plan</b> per other comments	3.1.2.2	3-10	• <u>Protect Infrastructure – Mitigate impacts to critical public and private infrastructure subject to sea level rise exposure through elevation, relocation, or other adaptation measures.</u>	Andrea Wagner

Written Comment	DPP Response	Section	Page #	Text Change from PRD	Reviewer
<p>Change seventh bullet, Sea Level Rise Impact on New Projects, second sentence, to read:            ...If it is likely that sea level rise will increase the risk of flooding during the lifespan of the project, incorporate measures to reduce risks and increase resiliency to impacts of sea level rise.</p>	No change.	3.1.2.2	3-10	-	Andrea Wagner
<p>fifth bullet, Disaster Plans—change to read:            Develop short- and long-term resiliency and recover plans to:            o develop a network of Community Resilience Hubs;            o increase coordination with neighborhood emergency preparedness groups;            o ensure access to fuel supplies to aid response and expedite recovery; and o outline the vision and methods for how East Honolulu can “build back better and smarter” following disasters.</p>	<b>Revised Plan.</b>	3.1.2.2	3-11	<ul style="list-style-type: none"> <li>o <u>Develop a network of Community Resilience Hubs;</u></li> <li>o <u>Designate evacuation routes;</u></li> <li>o <u>Increase coordination with neighborhood emergency preparedness groups;</u></li> <li>o <u>Encourage residents to have their own emergency supplies and be knowledgeable about what they will do in the event of a disaster;</u></li> <li>o <u>Expedite the recovery of East Honolulu; and</u></li> <li>o <u>Outline the vision and methods for how East Honolulu can “build back better and smarter” following disasters.</u></li> </ul>	Andrea Wagner
<p>Revise the bullet on the Ka Iwi Scenic Shoreline to reflect the following: “<del>The portion of this shoreline 354-acre Ka Iwi Scenic Shoreline area is also located along the Maunaloa-Makapu‘u State Scenic Byway Corridor that extends from Koko Head Regional Park to Makapu‘u Head was</del> nominated by the Livable Hawai‘i Kai Hui in addition to the Hawai‘i Kai Neighborhood Board and then designated by the State of Hawai‘i Department of Transportation as a State of Hawai‘i Scenic Byway in 2013 encompassing much of the 354-acre scenic shoreline area. <u>The State Scenic Byway Corridor extends from Hawai‘i Kai Drive to Makai Research Pier. A Corridor Management Plan focused on preserving and protecting the resources along Ka Iwi coastline was prepared in 2018 by Livable Hawai‘i Kai Hui and the Ka Iwi Coalition.</u>”</p>	<b>Revised Plan.</b> Text changes will appear grey instead of Ramseyer as these are not policy statements.	3.1.2.2	3-8	<p>The <u>354-acre Kaiwi Coast area is located along the Maunaloa-Makapu‘u State Scenic Byway Corridor, that was nominated by the Livable Hawai‘i Kai Hui in addition to the Hawai‘i Kai Neighborhood Board, and, designated by the State of Hawai‘i Department of Transportation as a State of Hawai‘i Scenic Byway in 2013. The State Scenic Byway Corridor extends from Hawai‘i Kai Drive to Makai Research Pier. A Corridor Management Plan focused on preserving and protecting the resources along Kaiwi coastline was prepared in 2018 by Livable Hawai‘i Kai Hui and the Ka Iwi Coalition (see Section 3.2.1.2).</u></p>	Townscape
<p>Re-insert the guidelines pertaining to shoreline areas from the 1999 Plan.</p>	No change. Previous Section 3.1.3.6 is now 3.1.2.2. The 1999 guidelines are still in the Plan.	3.1.2.2	3-9	-	Townscape
<p>(1st bullet) Regarding the Makai Views guideline, two working group members suggested removing the guideline. They were concerned with the reference to “avoid obstructions such as walls and landscaping, designed to screen out traffic noise”. Kalaniana‘ole Highway has become a de facto freeway. Adjacent homeowners along Kalaniana‘ole Highway have issues with traffic noise because there seems to be a lack of enforcement of the existing speed limit.</p>	No change. Noise is a concern for other areas as well and has improved since passing of moped laws. Complete Streets improvements could further improve noise.	3.1.2.2	3-9	-	Townscape

Written Comment	DPP Response	Section	Page #	Text Change from PRD	Reviewer
(4th bullet) Revise the Lateral Access guideline pertaining to shoreline areas to: "Improve, protect, and maintain lateral shoreline access along reaches of the beach from Maunalua Bay to Wai'alaie Beach Park" <del>where feasible.</del>	<b>Revised Plan.</b>	3.1.2.2	3-9	<ul style="list-style-type: none"> <li>• <b>Lateral Access</b> – Improve, protect, and maintain lateral shoreline access along reaches of the beach from <u>Koko Kai Beach Park</u> to Wai'alaie Beach Park, <del>where feasible.</del></li> </ul>	Townscape
(5th bullet) Regarding the Shoreline Access guideline, there is currently a lack of shoreline access. The City needs to provide more public shoreline access including in 'Āina Haina, Niu Valley, and Portlock. Explain "pursue opportunities." Implementation ideas are needed. What is the process?	<b>Revised Plan</b> to include specific places and added map to the Technical Report. Means of providing access are varied and are not detailed in the Plan	3.1.2.2	3-9	<ul style="list-style-type: none"> <li>• <b>Shoreline Access</b> – <u>Pursue opportunities to secure additional pedestrian rights-of-way...particularly in the areas of Kai Nani, Wailupe Peninsula, and Niu Peninsula.</u></li> </ul>	Townscape
(Page 3-10, 1st bullet) Regarding the Vegetation guideline, revise to the following: " <del>Encourage</del> <u>Landowners</u> along the shoreline <del>to must</del> maintain vegetation so as to not encroach into the public right-of-way, particularly as the shoreline erodes pushing the right-of-way inland."	<b>Partially revised Plan</b>	3.1.2.2	3-10	<ul style="list-style-type: none"> <li>• <b>Vegetation</b> – <u>Landowners along the shoreline shall maintain vegetation so as to not encroach into the public right-of-way, particularly as the shoreline erodes pushing the right-of-way inland.</u></li> </ul>	Townscape
There are currently only four public right of ways along the shoreline from Maunalua Bay to Wai'alaie Beach Park. The City's standard of public shoreline access is at approximately every ¼-mile. The City needs to implement this standard.	<b>Revised Plan</b> to include specific places and added map to the <b>Technical Report</b>	3.1.2.2	3-10, 5-18	<ul style="list-style-type: none"> <li>• <b>Shoreline Access</b> – <u>Pursue opportunities to secure additional pedestrian rights-of-way...particularly in the areas of Kai Nani, Wailupe Peninsula, and Niu Peninsula.</u></li> </ul>	Townscape
Section 3.1.2.2 Add to the bottom 2 blocks: "DLNR OCCL should assign staff people to work with the community and to report to the Neighborhood Boards of East O'ahu (Kahala, Kuli'ou'ou Kalani-Iki and Hawai'i Kai Neighborhood Board) on current ocean front issues.	<b>Revised Plan</b>	3.1.2.2	3-10	<ul style="list-style-type: none"> <li>• <b>Feedback</b> – <u>...DLNR should report back to the communities of East Honolulu the status of oceanfront issues.</u></li> </ul>	Townscape
Under the guidelines pertaining to shoreline areas:	See below	3.1.2.2	3-9	-	Townscape
o (2 <sup>nd</sup> bullet) Revise to the following: " <b>Natural Landscape</b> - Maintain the natural landscape quality of the Kaiwi Scenic Coast Mauka to Makai <del>Scenic Shoreline</del> viewshed as a high priority. <u>Preclude, by use of barriers if necessary, vehicular degradation of natural dunes, native and other vegetation, beach rock and beach.</u> Any modification to this shoreline area will be done in a manner that preserves the aesthetic values of the undeveloped xerophytic landscape (plants adapted to a dry environment)."	<b>Revised Plan</b>	3.1.2.2		Maintain the natural landscape quality of the Kaiwi coast, <u>mauka to makai</u> , as a high priority viewshed. <u>Limit vehicle operations which could cause degradation to the dunes, vegetation, and beach at Wāwāmalu Beach.</u>	Townscape
▪ Need to protect natural areas from vehicular degradation.					
o (Page 3-10, 4 <sup>th</sup> bullet) Revise the last sentence to the following: "Revise and amend shoreline rules and regulations to incorporate <u>sea level</u> <del>sea level</del> rise into the determination of shoreline setbacks and Special Management Area (SMA) considerations."	<b>Revised Plan</b>	3.1.2.2		<u>sea level rise</u>	Townscape
o (Page 3-10, 6 <sup>th</sup> bullet) Revise to the following: " <b>Protect Infrastructure</b> - <del>Identify</del> <u>Mitigate impacts to critical public and private infrastructure such as Hawai'i America Water (wastewater treatment plant) and cesspools that are subject to sea level rise exposure and to mitigate these impacts through elevation, relocation, or other adaptation measures.</u> "	<b>Partially Revised Plan.</b> Did not identify individual parcels, particularly those above 20 feet MSL.	3.1.2.2		<ul style="list-style-type: none"> <li>• <b>Protect Infrastructure</b> – <u>Mitigate impacts to critical public and private infrastructure subject to sea level rise exposure through elevation, relocation, or other adaptation measures.</u></li> </ul>	Townscape
Act 125 requires all cesspools to be upgraded, converted to a septic system, or connected to a sewer system by Jan. 1, 2050.	Added to the <b>Technical Report</b>	3.1.2.2		-	Townscape
Under the last bullet for <b>Disaster Plans</b> , the focus is on after the disaster rather than pre-disaster. Mitigation efforts should include designation of evacuation routes, improvement of shelters, availability of emergency supplies and a plan for official recognition of the volunteer group first responders and coordination of these with official responders when they arrive on scene, which may be 7 to 14 days after the disaster.	<b>Revised Plan</b>	3.1.2.2	3-11	<ul style="list-style-type: none"> <li>o <u>Designate evacuation routes</u></li> <li>o <u>Encourage residents to have their own emergency supplies and by knowledgeable about what they will do in the event of a disaster;</u></li> </ul>	Townscape

Written Comment	DPP Response	Section	Page #	Text Change from PRD	Reviewer
Similar recommendations to “consider” formation of a community-based redevelopment district appears in Section 3.1.1.2, Shoreline Areas, and page 5-19 of the Implementation Matrix. RECOMMENDATION: We recommend that the final version of the EHSCP go beyond simply suggesting consideration of the formation of a Redevelopment District, e.g. “Form a community-based redevelopment district to assist in preparing for the potential impacts of sea level rise, etc.”	Revised Plan	3.1.2.2	3-12	Form a community-based redevelopment district	Sierra Club
The plan should be consistent with the <u>Maunaloa-Makapuu Scenic Byway Corridor Management Plan</u> .	The plans appear consistent	3.1.2.2	3-9	-	Natalie Iwasa
Permanent (dedicated at least for 25 years) agriculture in Kamilonui Valley would increase community resiliency since it could serve as a food source.	No change	3.1.2.3	-	-	Townscape
In general, the policies and guidelines relating to Agriculture is vague and needs to be improved.	Revised Plan, see below	3.1.2.3	3-13	<ul style="list-style-type: none"> <li>• <b>Food Sufficiency</b> – The existing agricultural lots should be maintained to support State and County goals.</li> </ul>	Townscape
The small areas of agriculture in East Honolulu should be maintained to support State and County goals.	Revised Plan				Townscape
The description is not accurate. At minimum, revise the 1st paragraph to the following: “ <del>The physical and economic conditions of East Honolulu preclude large-scale agricultural operations.</del> There are, however, two concentrations of small-scale <u>diversified</u> agricultural operations- the larger one in Kamilo Nui Valley and the other above Kaiser High School on the slopes of Koko Crater- which should be preserved as being consistent with the overall community vision underlying this Plan.”	Partially revised Plan	3.1.2.3	3-11	The physical and economic conditions <u>and suburban development pattern</u> of East Honolulu preclude large-scale agricultural operations. There are two concentrations ...	Townscape
Expand description of Kamilo Nui Valley agriculture operation, including community gardens at Aloha ‘Āina.	No change	3.1.2.3	3-11	-	Townscape
Add the following statement: “Community groups are actively working to protect agricultural lands in perpetuity through fee purchase, easements or land swaps.”	Revised Plan	3.1.2.3	3-11	<u>Community groups are working to protect agricultural lands in perpetuity through fee purchase, easements, or land swaps.</u>	Townscape
Agriculture in the Kamilo Nui Valley is envisioned for food protection, and not for agritourism or solar farms. Agriculture worker housing is not envisioned for this area.	No change	3.1.2.3	3-11	-	Townscape
Add Keawāwa wetlands to Exhibit 3-2 Wetland Areas	Revised Plan	3.1.2.4	3-14	-	Townscape
Add description about Keawāwa wetlands to this section.	No change. Description will remain in 3.1.2.5	3.1.2.4	3-13	-	Townscape
Under the bullet for <b>Low-Impact Development</b> , add permeable and water retentive alterations to drainage canals.	Revised Plan	3.1.2.4	3-15	<u>o Improve drainage channels, not just to convey runoff downstream as quickly as possible, but to increase permeability and retention.</u>	Townscape
Drainage Ways Setbacks—Preserve and restore the aesthetic values and biological functions...by requiring setbacks, where practical, as part of the open space system... [Rationale: Original setbacks along Wailupe stream have been reduced or eliminated over the years due to erosion.]	Revised Plan.	3.1.2.4	3-13	<u>...requiring setbacks, where appropriate and feasible,</u>	Andrea Wagner
change fourth open bullet to read: o For other streams, including intermittent streams, require applicants for development to show that...	Revised Plan.	3.1.2.4	3-15	<u>...require applicants for development to show...</u>	Andrea Wagner

Written Comment	DPP Response	Section	Page #	Text Change from PRD	Reviewer
<p>Comment: The first paragraph of this discussion accurately states that the purpose of channelization of streams is to convey storm water from valley watersheds to the sea as quickly as possible. What is left unstated is that this objective is currently being questioned by scientists and planners as appropriate. There are several projects on the Mainland US where dechannelization have been pursued in order to restore natural water flows, groundwater recharge, and the re-establishment of the natural vegetation and habitat for native invertebrates, reptiles, birds and mammals. One of the most cited projects is dechannelization of the Los Angeles River. In Hawaii, with coral reefs, rapid runoff without settlement of carried solids and debris contributes to the deterioration of the reefs. In essence, to save the reefs, one needs to look upland and upstream. The discussion in this paragraph ignores these concerns over channelization.</p>	<p><b>Revised Plan.</b> Added second paragraph naming a few impacts of channelization and benefits of dechannelization.</p>	3.1.2.4	3-13	<p><u>The swift conveyance of stormwater through the channelization of streams in East Honolulu impacts downstream water quality, particularly when those waters reach Maunalua Bay. If stormwater is not given time to settle, it will often carry sedimentation and other particulate matter downstream leading to the deterioration of nearshore waters and reefs.</u></p> <p><u>Dechannelization, or restoration of natural stream beds, can improve downstream water quality, increase groundwater recharge, and help in re-establishing habitats for native species.</u></p>	Geary S. Mizuno
<p>Suggested Resolution: The discussion should be expanded to accurately convey the current concerns with channelization as a method of storm water management.</p>	<p><b>Revised Plan</b></p>	3.1.2.4	3-14		Geary S. Mizuno
<p>Comment: The first paragraph also states that during periods of intense rainfall, a number of these drainage ways have experienced “flooding problems.” The use of the term, “problem” suggests that overtopping of streams and drainages are either engineering problems or maintenance problems (the use of the caveat, “if properly maintained”). A more accurate understanding is that “flooding problems” are human-created issues stemming from, among other things:</p> <ol style="list-style-type: none"> <li>1) Inappropriate clearing of upland areas where water recharge would have otherwise occurred.</li> <li>2) Transformation of native Hawaiian forests, which have demonstrated higher capability to absorb and discharge over a greater period of time, water from severe precipitation events, to alien-dominated vegetation.</li> <li>3) Inappropriate development which allowed buildings to be built in natural or man-created areas of flooding.</li> <li>4) Lack of enforceable requirements for water pervious surfaces where feasible and practical.</li> <li>5) High levels of allowed impervious surfaces without requirements for precipitation catchment and delayed discharge (e.g., rainwater cisterns).</li> </ol>	<p>Included in Technical Report</p>	3.1.2.4	-		Geary S. Mizuno
<p>The language of this paragraph, by failing to reflect these matters, fails to provide the necessary bases for many of the Guidelines, on pp. 3-13 through 16, which are intended to address storm water management in East Honolulu.</p>	<p>Technical Report provides background and includes justification for recommendation</p>	3.1.2.4	3-13 to 16	-	Geary S. Mizuno
<p>Suggested Resolution: Revise and expand the discussion to reflect these points, which then provide the proper context for the Guidelines.</p>					Geary S. Mizuno
<p>Channelizing streams will minimize debris flowing into the ocean and protect erosion from existing property lines.</p>	<p>No change. Concern over debris flow and sedimentation are different issues. Channelization has lead to the degradation of downstream sources by not allowing time for sediment carried into the stream by rains to settle.</p>	3.1.2.4	-		Stephen Zane

Written Comment	DPP Response	Section	Page #	Text Change from PRD	Reviewer
Comment: The second paragraph (p. 3-13) correctly suggests the role of wetlands in storm water management. However, a comprehensive approach to storm water management would first look to controlling the runoff from the upper reaches of the watershed. For East Honolulu this would mean the upper valleys, ridges between valleys, and the Ko'olau Mountain summit ridge. The degradation of these areas due to deliberate plantings of alien species to address the denudement by grazing and feral animals, and the invasion of native areas by introduced alien plant species is not mentioned as factors in the reduced capacity of these upland areas to absorb and lengthen the period of discharge of precipitation events (including "normal" precipitation events). This is reflected in the lack of Guidelines (pp. 3-13 through 3-16) specifically addressing control and removal of alien plant species and re-establishment of native vegetational plant communities.	Lack of guidelines are primarily because the scope of the Plan is typically limited to lands not within the conservation designated areas. Added a sentence in the narrative.	3.1.2.4	3-13	<u>Restoration of upland areas and reestablishment of native vegetation can also assist in controlling and absorbing precipitation and lengthen the period of discharge potentially reducing flood rates.</u>	Geary S. Mizuno
Suggested Resolution: Revise the discussion on p. 3-13 to add a new paragraph describing the role of native Hawaiian vegetation to absorb and lengthen the period of discharge of precipitation events. In the Guidelines on pp. 3-13 through 3-16, add a guideline recommending control and removal of alien plant species and the re-establishment of native vegetational plan communities.		3.1.2.4	3-13 to 16		Geary S. Mizuno
<b>Exhibit 3-3:</b> Natural Areas, change markings to show that Kaiwi Scenic Coast Mauka to Makai stretches from Koko Head to Makapu'u Head.	No change. The preservation lands map identified by the pink are mostly out of the State Conservation District and map points this out.	3.1.2.5	3-17	-	Townscape
o As currently marked, it only points to the State's so-designated space beyond Alan Davis wall.					Townscape
(1 <sup>st</sup> bullet) Revise to the following: " <b>Kaiwi Coast</b> - ... These lands contain beaches, <u>dunes</u> , trails, rocky cliffs, historic sites, and viewpoints. "	<b>Revised Plan</b>	3.1.2.5	3-18	<u>dunes</u>	Townscape
o Dunes are the building blocks of a successful shoreline. When dunes are left natural and allowed to be covered with vegetation, they hold the line against king tides and stormy weather. They are also aesthetically pleasing to hikers, strollers and viewers.					Townscape
District should read as follows: Hanauma Bay Marine Life Conservation District (MLCD) – Established in 1967 by the Department of Land and Natural Resources, the Hanauma Bay MLCD was once a popular site for fishing and throw netting. State law now protects wildlife within Hanauma Bay. The adjoining <b>Hanauma Bay Nature Preserve</b> beach park is part of Koko Head Regional Park, administered by the City. In order to protect the marine resources and limit crowding of this popular visitor destination, the City <b>must restrict</b> restricts the daily number of visitors that have access to the bay. <del>and closes the bay once per week.</del> <b>The City closes the Nature Preserve once per week for maintenance.</b> The City also collects entry and parking fees used to fund maintenance and capital projects at Hanauma Bay. (Explanation: the City closes Hanauma Bay Nature Preserve once per week for maintenance, not to restrict the daily number of visitors.)	<b>Revised Plan.</b> Restricts remains as active	3.1.2.5	3-18	<u>Hanauma Bay Nature Preserve... The City closes the Nature Preserve once per week for maintenance.</u>	Friends of Hanauma Bay
Comment: The discussion on the Ka Iwi Coast treats as a single entity the shoreline/coastal areas makai of Kalaniana'ole Highway with the lands mauka of the highway. As discussed in the Comment on Section 2.2.6, the areas below the highway are distinct form and have management challenges which differ from the areas above the highway.	<b>Revised Plan</b>	3.1.2.5	3-18	<ul style="list-style-type: none"> <li><u>Kaiwi Mauka Lands - Kaiwi mauka lands contain lands between Koko Head and Makapu'u Head located mauka of Kalaniana'ole Highway. The Kaiwi Mauka Lands were acquired with public and private funds for the purposes to preserve the undeveloped region as an open, rugged landscape.</u></li> </ul>	Geary S. Mizuno
Suggested Resolution: Consistent with the Suggested Resolution on Section 2.2.6, the discussion should address these two areas under separate and distinct subtitles.					
Guidelines relating to wildlife preserves in East Honolulu are as follows' Change Management bullet to read as follows:	See below	3.1.2.5	3-19	-	Friends of Hanauma Bay

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Management – Implement management programs in areas where intense human activities threaten <del>threatens</del> the sustainability of resources. This could include, for example, admission fees such as at the Hanauma Bay Nature Preserve, impact monitoring studies, and limits on the number of visitors. <del>impact monitoring studies, limits on the numbers of visitors, and admission fees such as at Hanauma Bay.</del>	Revised threaten, did not reorder.	3.1.2.5	3-19	<u>threaten</u>	Friends of Hanauma Bay
(4 <sup>th</sup> bullet) Please provide clarification on the proposed location of the pedestrian bridge between the Hawai'i Kai Towne Center and the Hawai'i Kai Shopping Center. Is this intended to cross the water and, if so, how do we prevent it from being an obstruction or hazard to pedestrians and those using the Marina? This comment also applies to the first bullet on Page 3-49 (under Section 3.6.3).	No change. Bridges are intended to cross water. It would not be any more of an obstruction than Keahole St. Bridge. A pedestrian bridge would not be an obstruction to pedestrians as it is a bridge	3.1.2.6	3-20	-	Townscape
Consider a shared-use path, available for pedestrians and bicyclists.	<b>Revised Plan</b>	3.1.2.6	3-20	<ul style="list-style-type: none"> <li>• <b>Pedestrian Access</b> – Improve access to and along the marina's edge by way of a <u>multi-use path</u> for people walking and biking.</li> </ul>	Townscape
bullet 2, Shoreline Areas: It is important to note that all beaches should be designated for preservation and are located within the State Conservation District and outside the Community Growth Boundary. Development practices, particularly construction of seawalls and rock revetments has had a severe negative impact on beaches in the plan area, particularly between Wai'alae and Portlock.	<b>Revised Plan</b>	3.1.3	3-21	<u>All beaches and shoreline areas ...Construction of seawalls and rock revetments has had a severe negative impact on beaches in the Plan area, particularly between Wai'alae and Portlock.</u>	Townscape
Table 3-2 Types of Island-Based Parks, revise the second category of Beach/Shoreline Parks to the following: "Areas and sites along the shoreline that may include facilities and support services for water activities, <u>hiking</u> , sunbathing, picnicking, and other passive activities."	<b>Revised Plan</b>	3.2	3-22	<u>hiking</u>	Townscape
Add, where appropriate, references to keep the entrance to Hawai'i Kai (also referred to as the "Great Lawn") as open space. We want to protect the viewshed.	<b>Revised Plan.</b> Created a new list of bullets in 3.2.1 with preservation lands descriptions. Included with Rim Island 2.	3.2.1	3-21	<ul style="list-style-type: none"> <li>• <b>Great Lawn</b> – The "Gateway to Hawai'i Kai" is <u>an unimproved grassy space bounded by Hawai'i Kai Drive, Kalaniana'ole Highway, Keāhole Street, and the marina. The lawn primarily serves as open space, and, for two weeks a year, a carnival.</u></li> </ul>	Townscape
Table 3-3 DPR Island-Based Parks in East Honolulu, on the second column under <b>Nature Parks/Preserves</b> , add a line for " <u>Wāwāmalu Beach Nature Park (acreage is about 15).</u>					Townscape
o This park has been designated as "park" on city land use maps for a long time. This shoreline area bordered by Kalaniana'ole Highway and Alan Davis Wall was marked with City park signage until winter of 2018/2019 (Do Not Drive on the Beach, the prohibition signs forbidding animals, alcohol, vehicles, etc...). Its natural dunes, native and other vegetation, beach rock and beach are severely in need of protection behind barricades (like boulders, old pilings, etc.). Besides these Nature Park features, at each end of this park land there are barren places that can be demarcated for much needed parking of recreational users of the coast.	<b>Revised Plan.</b> DPR administers Wāwāmalu Beach Nature Park under Sandy Beach	3.2.1	3-23	<u>Sandy Beach Park (including Wāwāmalu Beach Park)</u>	Townscape

Written Comment	DPP Response	Section	Page #	Text Change from PRD	Reviewer
Why is Hawai'i Job Corps Center included under the list of recreational areas? This facility no longer exists. Also, why are private recreation facilities such as Mariners Cove and the Esplanade included as meeting some of the demand for neighborhood parks when they are not available for the community/general public?	<b>Partially Revised Plan.</b> The facility is still within the Park and could be renovated for another use. While the public cannot access those facilities those who can might not use public parks with the same frequency. There is no shortage of public parks, not counting the private facilities in area.	3.2.1.1	3-27	• <u>Old Hawai'i Job Corps Center</u>	Townscape
Same comment for Section 3.3.1 Overview of Community Based Parks	This section uses the public park acreage, 120.9 acres, and does not include the private facilities for the reasons you stated	3.2.1.1	3-27, 3-30	-	Townscape
What is Koko Head District Park? Is this the park at the base of Koko Crater? If so, should the name be corrected to "Koko Crater" District Park?	No change. It is the official name used by the City Dept. of Parks and Rec. If there is a name change, it should change prior to the Plan changing. Parks does not want name changed to avoid any conflicts with ongoing trail discussions. Also park encompasses Koko Head area around Hanauma Bay.	3.2.1.1	3-23	-	Andrea Wagner
Table 3-3 Chart: <del>DPR Island-Based</del> DPR Island-Based Parks in East Honolulu	<b>Partially Revised Plan.</b> This is a classification in comparison to community-based parks.	3.2.1.1	3-23	Table 3-3 DPR Island-Based Parks <u>and Preserves</u> in East Honolulu	Friends of Hanauma Bay
Delete Hanauma Bay Nature Park from chart. There is no Hanauma Bay Nature Park.	Revised name and revised Table Name	3.2.1.1	3-23	Hanauma Bay Nature <u>Preserve</u>	Friends of Hanauma Bay
There is a Hanauma Bay Nature Preserve, but it is NOT a park. Therefore, create a new table, called DPR Nature Preserves in East Honolulu, and list Hanauma Bay Nature Preserve with 50 acres.					
Hanauma Bay Nature <b>Preserve</b> Park					
Any reduction in speed limits for Hawaii Department of Transportation (HOOT) roads for either a scenic roadway or any roadway type should be reviewed and approved by HOOT.	No change. Not proposing changing speed limit along the highway.	3.2.1.2		-	DTS
o Hiking along shorelines is a very popular form of recreation and should be mentioned.	<b>Revised Plan</b>	3.2.1.2	3-22	<u>Hiking is a very popular form of recreation along the Kaiwi coast. (3-28)</u>	Townscape
Comment: The third paragraph of this section (p. 3-24) discusses the areas makai of Kalaniana'ole Highway with the lands mauka of the highway (here, referred to as the "Queen's Rise"). As discussed in the comments on Section 2.2.6 and 3.1.2.5, the areas below the highway are distinct from, and have management challenges which differ from the areas above the highway.	No Change. This is just a description of the area. Mauka lands not different enough from Makapuu to need its own section.	3.2.1.2		-	Geary S. Mizuno
Suggested Resolution: Consistent with the Suggested Resolution on Section 2.2.6 and 3.1.2.5, the discussion should address these two areas under separate and distinct subtitles.					
Revise first sentence to the following: "East Honolulu's <del>six</del> <u>seven</u> existing beach parks are Maunalua Bay, <u>Wāwāmalu Beach Nature Park</u> , Sandy Beach, Kawaiku'i, Kuli'ou'ou, Wai'alae, and Wailupe"	No change as Wāwāmalu Beach Nature Park is not yet independent of Sandy Beach	3.2.1.3	3-25	-	Townscape

Written Comment	DPP Response	Section	Page #	Text Change from PRD	Reviewer
<ul style="list-style-type: none"> <li>Insert a sub-bullet that states: <u>“Develop Wāwāmalu Beach Nature Park with demarcated parking and barriers to protect natural dunes, native and other vegetation, beach rocks and beach.”</u></li> </ul>	Revised Plan	3.2.1.3	3-27	<ul style="list-style-type: none"> <li><u>Wāwāmalu Beach Nature Park – Develop Wāwāmalu Beach as a nature park with the addition of demarcated parking and installation of barriers to protect natural dunes, native</u></li> </ul>	Townscape
Perhaps “Install” would be better terminology.					Townscape
East Honolulu’s six existing beach parks are Maunalua Bay, Sandy Beach, Kawaiku’i, Kuli’ou’ou, Wai’alae, and Wailupe. In addition, Hanauma Bay is designated by the DPR as a Nature Park. The DPR has no current plans for additional beach park development in East Honolulu following acquisition of lands comprising the Ka’Iwi Scenic Shoreline at Queen’s Beach/Makapu’u Head.	Revised Plan	3.2.1.3	3-25	Removed next line as well	Friends of Hanauma Bay
3.2.1.4 Aquatic Recreation—Correct second sentence to read: ...Maunalua Bay extends from Kūpikipiki’ō (Black Point) to Kawaihoa Point, spanning two ahupua’a of East Honolulu... [Reasoning: Plan previously correctly identifies East Honolulu as including parts of the Waikiki and Waimānalo ahupua’as.]	Revised Plan.	3.2.1.4	3-25	<u>Maunalua Bay extends from Kūpikipiki’ō (Black Point) to Kawaihoa Point spanning two ahupua’a (Waimanalo and Waikīkī) and seven watersheds (Wai’alae Nui, Wailupe, Niu, Kuli’ou’ou, Kamilo Nui, Kamilo Iki, and Portlock).</u>	Andrea Wagner
Add the following policy under General Policies relating to Island-Based Parks and Recreational Areas: <u>Develop additional trails and bike paths to balance over use of existing trails and paths and to serve both residents and visitors alike.</u>	Revised Plan	3.2.2	3-25	<ul style="list-style-type: none"> <li><u>Develop additional trails and bike paths to balance trail demands across East Honolulu and alleviate potential overuse at existing trails.</u></li> </ul>	Townscape
Access to trails could be improved if there was a mechanism in place to allow private landowners along the hillside trailheads to have liability waivers	Revised Plan per another comment on 3-5	3.2.2	3-25	<u>Landowners, however, are protected from liability in making their land and water areas available to the public for recreational purposes in accordance with HRS 520.</u>	Townscape
The addition of more trails would reduce impacts on existing trails.	Revised Plan	3.2.2	3-25	<u>Develop additional trails and bike paths to balance trail demands across East Honolulu and alleviate potential overuse at existing trails</u>	Townscape
Change third bullet from top to read: <ul style="list-style-type: none"> <li>Preserve the Ka’iwi coast as one of O’ahu’s last undeveloped rugged coastlines.</li> </ul>	Kaiwi changed throughout	3.2.2	3-26	<u>Kaiwi</u>	Andrea Wagner
o Revise first sub-bullet to the following: Convert the portion of Kalaniana’ole Highway between Lunalilo Home Road and <del>Sandy Beach</del> <u>Wāwāmalu Beach Nature Park</u> to a 25-mile per hour scenic roadway.”	Revised Plan	3.2.3.1	3-27	...between Lunalilo Home Road <u>and Wāwāmalu Beach Nature Park</u>	Townscape
▪ Wāwāmalu Beach Nature Park is the natural end of this recreational zone that requires reduced speed for comfort and safety reasons.					Townscape
Change first filled bullet, Ka Iwi and Koko Crater, to read: <ul style="list-style-type: none"> <li>Ka’iwi Coast and Koko Crater—Preserve and enhance the Ka’iwi Coast’s recreational and educational resources by implementing, when funding is available, the following:</li> </ul>	Partially Revised	3.2.3.1	3-27	Preserve and enhance <u>the Kaiwi Scenic Shoreline’s coastal-oriented</u> recreational and educational resources by implementing, <del>when funding is available,</del> the following:	Andrea Wagner
Change fourth open bullet to read: o Prohibit access to any trails or paths outside Koko Crater Botanical Garden from within the garden or from Kalaniana’ole Highway.	Revised language but does not specifically include Kalanianaole Highway (from stairs)	3.2.3.1	3-27	o <u>Prohibit access to any trails or paths from outside of Koko Crater Botanical Garden to the garden.</u>	Andrea Wagner

Written Comment	DPP Response	Section	Page #	Text Change from PRD	Reviewer
<b>Management</b> – Protect fragile natural resources, such as the wildlife at Hanauma Bay Nature <b>Preserve</b> Park, from overuse through continued management, control of visitor numbers, and minimizing visitor impacts such as walking on the reef and sunscreen pollution. <del>from overuse through continued management and control of visitor numbers and impacts.</del>	<b>Revised Plan</b>	3.2.3.1	3-27	<ul style="list-style-type: none"> <li>• <b>Management</b> – Protect fragile natural resources, such as the wildlife at Hanauma Bay Nature <u>Preserve</u>, from overuse through <u>continued management and control of visitor numbers and impacts such as walking on the reef and sunscreen pollution.</u></li> </ul>	Friends of Hanauma Bay
Last item in chart: change to: Protect fragile natural resources, such as the wildlife at Hanauma Bay Nature <b>Preserve</b> Park, from overuse through continued management, control visitor numbers, and minimizing visitor impacts such as walking on the reef and sunscreen pollution. <del>from overuse through continued management and control of visitor numbers and impacts</del>		3.2.3.1	5-22		Friends of Hanauma Bay
Add open bullet to read: o Create demarcated parking area near Queen’s Beach with barriers to protect shoreline and native plants.	No change. Added bullet for Wāwāmalu Beach Nature Park and associated parking per another comment	3.2.3.1	3-27	-	Andrea Wagner
Change second bullet, Preservation and Recreation, to read: "Maintain the Ka’iwi Coast in a manner that preserves the area’s natural scenic quality and provides educational and passive recreation opportunities."	Kaiwi changed throughout	3.2.3.1	3-27	<u>Kaiwi</u>	Andrea Wagner
I fully support Koko Crater Stables as a community asset that should be maintained for public use.	<b>Revised Plan.</b> Added bullet to 3.2.3.2	3.2.3.2		<ul style="list-style-type: none"> <li>• <u>Public recreation facilities should be available to users of all skill levels and incomes, particularly Koko Crater Stables.</u></li> </ul>	Natalie Iwasa
fourth bullet, Transit—replace “within the park” with “along Kalaniana’ole Highway”.	No change. This section deals with Island-based parks	3.2.3.2	3-28	-	Andrea Wagner
o Public park space should not be given to private entities for management . For example, the stables at Koko Head Crater has been taken out of community use which is not compatible with the Koko Head Park Master Plan. Removing public recreation elements, such as with Koko Crater Stables, erodes the sense of community and character of the place and dishonors the gift from Kamehameha Schools.	<b>Revised per another comment</b>	3.2.3.2		<ul style="list-style-type: none"> <li>• <u>Public recreation facilities should be available to users of all skill levels and incomes, particularly Koko Crater Stables.</u></li> </ul>	Townscape
Koko Crater Stables is considered part of the Koko Head Regional Park acreage, which is supposed to provide park and recreational space for the public. Note that Koko Crater Stables is used for commercial purposes. Commercial uses limit local public access.	<b>Partially revised Plan</b> per another comment	3.2.3.2	3-23	<ul style="list-style-type: none"> <li>• <u>Public recreation facilities should be available to users of all skill levels and incomes, particularly Koko Crater Stables.</u></li> </ul>	Townscape
Add as appropriate to either General Policies or Guidelines for Parks: The Board of Water Supply (BWS) Rules and Regulations require the use of nonpotable water for irrigation of large landscaped areas. For large landscaped areas, the feasibility of using nonpotable water for irrigation should be investigated. If non-potable water is either unavailable or infeasible, a report of the investigation should be coordinated and submitted to the Board of Water Supply prior to considering the use of potable water.	<b>Revised Plan.</b> Added a new bullet under 3.2.3 Island Based Parks and Recreation Planning Guidelines	3.3	3-33	<ul style="list-style-type: none"> <li>• <u>Irrigation</u> – The Board of Water Supply (BWS) Rules and Regulations require the use of non-potable water for irrigation of large landscaped areas. For large landscaped areas, the feasibility of using non-potable water for irrigation should be investigated. If non-potable water is either unavailable or infeasible, a report of the investigation should be coordinated and submitted to the Board of Water Supply prior to considering the use of potable water.</li> </ul>	BWS
delete fourth paragraph. Private recreation facilities are only open to members, which may not include adjacent neighbors.	Added second clarifying sentence.	3.3.1	3-30	<u>While privately facilities might not be accessible to the general public, they have the ability to reduce demands on nearby public recreation facilities.</u>	Andrea Wagner

Written Comment	DPP Response	Section	Page #	Text Change from PRD	Reviewer
Change third paragraph to read: The composition of the Kuli'ou'ou-Kalani Iki community is changing as housing owned by elderly residents is gradually turned over to younger households. There is also an increase in "multi-generation" households (i.e., aging parents living with adult children and pre-school or school-age grandchildren) as children of elderly residents either move in to care for their aging parents or are unable to live on their own due to economic pressures and high housing costs. These trends are playing an important role in the life cycle of the Kuli'ou'ou-Kalani Iki communities and are increasing the requirements, by amount, type, and mixture of active and passive recreation facilities...	Removed first sentence as it was anecdotal. Census estimates show that the area (Block 2) from 2000 with 20.3% are under 18 and 18.8% are 65 and older. In 2010 18.5% are under 18 and 18.6% are 65 and older. In 2017 estimates that 19.8% are under 18 and 21.5% are 65 and older. Revised multi-generational comment.	3.3.1	3-32	<u>There is the potential for an increase in "multi-generation" households (i.e., aging parents living with adult children and pre-school or school-age grandchildren), particularly in the Kuli'ou'ou-Kalani Iki community...</u>	Andrea Wagner
Dog Parks should be included in the inventory of park space.	<b>Revised Plan.</b> Added 1.8 acre Hawaii Kai Dog Park to Table 3-6	3.3.1		<u>Hawai'i Kai Dog Park 1.8</u>	Sierra Club
o Protect and increase pockets of green spaces and encourage more community gardens in City parks.	<b>Partially Revised Plan.</b>	3.3.2	3-35	<u>, particularly community gardens</u>	Townscape
This section needs a more detailed explanation and understanding of the cultural history of Maunalua and East O'ahu. This is paramount to include in the opening narrative of this section.	<b>Revised Plan</b> per another comment	3.4	3-34		Townscape
The 1930 archeological survey cited, which is not clearly footnoted to know exactly what survey is being cited, is not adequate to fully learn and appreciate the storied history of Maunalua. The history of Maunalua reaches back over 1,000 years of mo'olelo. The writing speaks of Maunalua in 1930 when many cultural practitioners and keepers of knowledge were not included in the gathering of important cultural and archeological information. This section needs to be more robust.		3.4	3-34	-	Townscape
The writers of the EHSCP Historical and Cultural Resources section should meet with cultural practitioners and historians of the East O'ahu area to fully understand its cultural importance.	No change. There have been practitioners at meetings and some have submitted comments.	3.4	3-34	-	Townscape
While Hāwea Heiau and Pahua Heiau are mentioned, there are numerous sites not mentioned that we still have evidence of or which our community works at today including Keawāwa wetlands, cultural sites along the Kaiwi coastline makai and mauka, Kanewai Fishpond, Kuli'ou'ou Bluff Shelter, Kalauha'iha'i fishpond, Loko l'a o Maunalua, Ka Lapa O Maua, Wailupe Valley and Wailupe Burial cliff among others.	No change. Previously, some sites in the 1999 Plan were asked to be removed to not attract more attention	3.4	3-34	-	Townscape
It should be noted there are archaeological sites not only located on undeveloped parcels "deep within region's valleys" but they are also located on cliff faces along East O'ahu which are being threatened/impacted by development.	<b>Revised Plan</b>	3.4	3-34	There are also archaeological sites on undeveloped parcels located <u>along cliff faces and deep ...</u>	Townscape
It should also be noted that historical and cultural resources have been impacted or destroyed by development in East O'ahu, however, the community has been very active in preserving, protecting and engaging with the remaining cultural and historic sites in East O'ahu.	<b>Revised Plan</b>	3.4	3-34	<u>A number of historical and cultural resources has been impacted or destroyed by development in East Honolulu. However, the community has been very active in preserving, protecting and engaging with the remaining cultural and historic sites in the region. Remaining ...</u>	Townscape
It is important that this section of the EHSCP clearly demonstrates how the Plan can be used to protect and preserve these sites through enforcement by the City.	No change. Many of the policies and guidelines merely point to recommendations made by the State or existing law	3.4	3-34	-	Townscape
Add the following overview information describing the historic and cultural history and landscape of East Honolulu:	See below	3.4.1		-	Townscape

Written Comment	DPP Response	Section	Page #	Text Change from PRD	Reviewer
<p>The historic and cultural resources of East Honolulu are notably characterized by the former Maunalua Fishpond which was 523 acres. This ancient fishpond was the largest in the Hawaiian Islands. It belonged to Maui Mua (First Maui) who is recorded in the Hawaiian creation genealogy, the Kumulipo. Chiefess Mahoe, followed by menehune were credited with the construction. In the 1960s this monument of sustainability and Hawaiian engineering was dredged. It now serves as the private Hawai'i Kai Marina.</p>	<p><b>Revised Plan</b></p>	<p>3.4.1</p>	<p>3-38</p>	<p><u>Much of East Honolulu is defined by the old Maunalua Fishpond. Maunalua Fishpond, sometimes referred to as Kuapā Pond or Keahupuaomaunalua, was 523 acres and the largest ancient fishpond of the Hawaiian Islands. The Maunalua Fishpond was reportedly connected via a tunnel to Ka'ele'pulu Pond, now known as Enchanted Lake, in Kailua. In the 1960s, Kamehameha Schools leased much of what is now Hawai'i Kai to Henry J. Kaiser who dredged and filled the fishpond to create a subdivision and the private marina.</u></p>	<p>Townscape</p>
<p>Place names in East Honolulu still tie to ancient mo'olelo (histories) and voyaging migrations from across Polynesia. While many of the ancient fishponds have been filled, wall remnants of large fishponds remain visible. At Wailupe is the 41-acre Loko Nui o Wailupe with its 2,500-foot-long wall. At Niu is the former Kupapa Fishpond with its 2,000-foot-long wall.</p>	<p><b>Partially revised Plan</b></p>	<p>3.4.1</p>	<p>3-39</p>	<p><u>While many of the ancient fishponds have been filled, wall remnants of large fishponds remain visible. At Wailupe is the 41-acre Loko Nui o Wailupe with its 2,500-foot-long wall. Niu Peninsula is the former Kūpapa Fishpond with its 2,000-foot-long wall.</u></p>	<p>Townscape</p>
<p>Maunalua's cultural landscape is believed to have developed over at least 1,000 years ago. Cultural and natural resources were carefully conserved by Hawaiian konohiki (land managers) under the practice of mālama 'āina (taking proper care of the land). The health of the Hawaiian people and the natural resources are deeply intertwined. An advanced system of land and ocean management once fed the populace sustainably. 'Uala (sweet potato), ama'ama (mullet) and limu (seaweed) were among the sustainable foods cultivated in East Honolulu. Feral pigs are another traditional food source. Community subsistence hunters continue to hunt the large population in the valleys and mauka areas.</p>	<p><b>Revised Plan</b></p>	<p>3.4.1</p>	<p>3-39</p>	<p><u>Cultural and natural resources were carefully conserved by Hawaiian konohiki, or land managers. An advanced system of land and ocean management once fed the regional population sustainably. 'Uala (sweet potato), ama'ama (mullet) and limu (seaweed) were among the foods cultivated in East Honolulu. Feral pigs are another traditional food source. Community subsistence hunters continue to hunt the large population in the valleys and mauka areas.</u></p>	<p>Townscape</p>

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<p>Fish catches were historically shared with kūpuna from the Lunalilo Home for elderly Hawaiians. The Home is a historic landmark that has been in the Maunaloa region since the 1920s. Fish and limu were also sold and bartered within the community. Kapu or rest periods for fishing were instituted during fish spawning and managed by the konohiki (manager). In Maunaloa Bay, Joseph Lukela, the longtime konohiki used a flag system to alert boaters when fish were spawning. Muliwai (stream estuaries that meet the ocean), umu (nearshore fish houses) and ko'a (ocean fish gathering areas) were part of the sustainable aquacultural production system.</p>	<p><b>Revised Plan</b></p>	<p>3.4.1</p>	<p>3-39</p>	<p><u>Fish catches were historically shared with kūpuna from the Lunalilo Home for elderly Hawaiians. The Home is a historic landmark that has been in the Maunaloa region since the 1920s. Fish and limu were also sold and bartered within the community. Kapu or rest periods for fishing were instituted during fish spawning and managed by the konohiki. In Maunaloa Bay konohiki used a flag system to alert boaters when fish were spawning. Muliwai (stream estuaries that meet the ocean), umu (nearshore fish houses) and ko'a (ocean fish gathering areas) were part of the sustainable aquacultural production system.</u></p>	<p>Townscape</p>
<p>While unmarked today, these historic fish gathering sites remain high value areas for community sustainability. Named ko'a were Keahupua o Maunaloa (the shrine of the baby mullet) located near the bridge at Kuli'ou'ou Beach Park. Pali'alaea and Huanui were shrines where mullet gathered, while Hina was for akule. These now destroyed sites were located along the Portlock shoreline. Traditional muliwai sites are located at Kapakahi Stream in Kahala, Wai'alii Stream near Wailupe Beach Park, Niu Stream, Kuli'ou'ou Stream, Kamilonui Valley and Kaloko at Wāwāmalu.</p>	<p><b>Revised Plan</b></p>	<p>3.4.1</p>	<p>3-39</p>	<p><u>While unmarked today, these historic fish gathering sites remain high value areas for community sustainability. Named ko'a were Keahupua o Maunaloa located near the bridge at Kuli'ou'ou Beach Park. Pali'alaea and Huanui were shrines where mullet gathered, while Hina was for akule. These now destroyed sites were located along the Portlock shoreline. Traditional muliwai sites are located at Kapakahi Stream in Kahala, near Wailupe Beach Park, Niu Stream, Kuli'ou'ou Stream, Kamilonui Valley and Kaloko at Wāwāmalu.</u></p>	<p>Townscape</p>
<p>The country residence of Kamehameha I and Ka'ahumanu once graced the area near Kalauha'iha'i Fishpond at Niu Valley. It was here where the Kapu system was broken for O'ahu and a break in the reef commemorates the historic spot. Hanauma Bay also was favored greatly by the ali'i for its fishing grounds and was the marine residence for Kamehameha V.</p>	<p><b>Revised Plan</b></p>	<p>3.4.1</p>	<p>3-39</p>	<p><u>Hanauma Bay also was favored greatly by the ali'i for its fishing grounds.</u></p>	<p>Townscape</p>
<p>Large scale ranching like Maunaloa Ranch and numerous dairies were active in the 19<sup>th</sup> and first half of the 20<sup>th</sup> century. Piggeries and poultry operations were also part of the agricultural production. The latter part of the 20<sup>th</sup> century saw a shift away from sustainability. Native Hawaiians and farming families suffered evictions and land loss, which paved the way for rapid urbanization. The farms at Kamilonui Valley and Koko Head as well as the Koko Head Stables retain the historic legacy of the area and should be perpetuated.</p>	<p><b>Revised Plan</b></p>	<p>3.4.1</p>	<p>3-39</p>	<p><u>Large scale ranching and numerous dairies were active in the 19th and first half of the 20th century. Piggeries and poultry operations were also part of the agricultural production. The latter part of the 20th century saw a shift away from agricultural sustainability with rapid urbanization. The farms at Kamilonui Valley and Koko Head as well as the Koko Head Stables retain the historic legacy of the area and should be perpetuated.</u></p>	<p>Townscape</p>

Written Comment	DPP Response	Section	Page #	Text Change from PRD	Reviewer
<p>Today Native Hawaiians and the community at large are working to access, perpetuate and steward East Honolulu's resources. Invasive species currently envelop large acreages and active management is necessary. Historic trails and mauka/makai pathways should be maintained. Well known examples of these can be found in the ahupua'a trail in the back of Wailupe Valley, and the Kealaikapapa paved roadway near Makapu'u. Access to traditional resource gathering also should be preserved. These include the former salt making area at the bridge mauka of Joe Lukela Beach Park.</p>	<p><b>Revised Plan</b></p>	<p>3.4.1</p>	<p>3-40</p>	<p><u>Today, Native Hawaiians and the community at large are working to access, perpetuate, and steward East Honolulu's resources. Invasive species currently envelop large acreages and active management is necessary. Historic trails and mauka to makai pathways should be restored and maintained. Well known examples of these can be found in the ahupua'a trail in the back of Wailupe Valley, and the Kealaikapapa paved roadway near Makapu'u. Access to traditional resource gathering should also be preserved. These include the former salt making area at the bridge mauka of Joe Lukela Beach Park.</u></p>	<p>Townscape</p>
<p>Access for surfing, fishing, hunting and diving should be maintained and improved to reopen more customary paths to resources. Buffer and kapu areas also play a role in managing sensitive resources within the landscape.</p>	<p><b>Revised Plan</b></p>	<p>3.4.1</p>	<p>3-40</p>	<p><u>Access for surfing, fishing, hunting and diving should be maintained and improved to reopen more customary paths to resources. Buffer and kapu areas also play a role in managing sensitive resources within the landscape.</u></p>	<p>Townscape</p>
<p>In 1930, the first archaeological survey of O'ahu documented approximately 60 sites in the area now defined as East Honolulu. Many of these sites have since been destroyed by land-altering activities such as beach development, cattle ranching and construction. Numerous archaeological sites however do remain. Many have not been formally recorded and lie in undeveloped areas.</p>	<p><b>Revised Plan</b></p>	<p>3.4.1</p>	<p>3-40</p>	<p><u>Many of these sites, however, have since been destroyed by the 1946 tsunami, erosion, or other land-altering activities such as ranching, development, and construction. Numerous archaeological sites do remain though they have not been formally recorded, and lie in undeveloped areas.</u></p>	<p>Townscape</p>
<p>Water springs sustain life in this low rainfall region. Noted springs are found at Ka'alawai, Wai'alaie, Wailupe Beach Park, Kalauha'ihai Fishpond at Niu, Kawaiku'i Beach Park, Kanewai Spring and Elelupe Spring at Kuli'ou'ou, Keawaawa Wetland and Kawaiakane at Kawaihoa Point. Smaller seeps are located along the shoreline.</p>	<p><b>Revised Plan, in 3.1.2.4</b></p>	<p><del>3.4.1</del></p>	<p>3-15</p>	<p><u>Water springs sustain life in this low rainfall region. Springs are found at Ka'alawai, Wai'alaie, Wailupe Beach Park, Kalauha'ihai Fishpond at Niu, Kawaiku'i Beach Park, Kanewai Spring and Elelupe Spring at Kuli'ou'ou, Keawaawa Wetland, and Kawaiakane at Kawaihoa Point. Smaller seeps are located along the shoreline.</u></p>	<p>Townscape</p>
<p>Streams in the region also play an important role in the traditional sustainability of the region. Kapakahi Stream was once rich with o'opu. Many of East Honolulu's streams have lost their essential functions when they were concreted and channelized.</p>	<p><b>Revised Plan, in 3.1.2.4</b></p>	<p><del>3.4.1</del></p>	<p>3-15</p>	<p><u>Streams in the region also play an important role in the traditional sustainability of the region. Kapakahi Stream was once rich with o'opu. Many of East Honolulu's streams have lost their essential functions when they were concreted and channelized. Nevertheless, they retain potential for restoration. Wailupe Stream is one of the only streams that has not been concreted completely.</u></p>	<p>Townscape</p>

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Nevertheless, they retain potential for restoration. Wailupe Stream is one of the only streams that has not been concreted completely.	<b>Revised Plan</b> , in 3.1.2.4	<del>3.4.1</del>	3-15	<u>Wailupe Stream is one of the only streams that has not been concreted completely.</u>	Townscape
Pohaku markers and stone boundary walls distinguish resource districts. Many remain today on hillsides and play a part in water management in addition to their historic value. Exceptional dry stack walls can still be found along the slopes above Kahala, Wailupe and Niu as well as scattered eastward.	<b>Revised Plan</b>	3.4.1	3-40	<i>Same as proposed</i>	Townscape
Coconut groves that were planted in traditional times remain today. Near Wai'ala'e Beach Park are the remnants of what was the second largest grove on O'ahu. The shoreline retains groves near Kahala, Kawaiku'i Beach Park and Kānewai Spring in Kuli'ou'ou.		3.4.1	3-40	<i>Same as proposed</i>	Townscape
Traditional burials remain throughout the region. Cliffside and caves in each valley as well as sand dunes are known burial grounds. Many of these sites have been looted or had the iwi removed to the Bishop Museum. Burial sites retain cultural significance for the descendants and community and should be preserved without disturbance. Lava tubes often contain burials as well as act as conduits for freshwater. They are of great age and care should be taken to maintain their integrity whenever possible. One noted lava tube was said to be a fish passage between Ka'ele'pulu Fishpond in Kailua and the Maunalua Fishpond.		3.4.1	3-40	<i>Same as proposed</i>	Townscape
Within the Koko Head Regional Park, a survey conducted in 1988 located one of five sites identified in the 1930 archaeological study. This site, the Koko Head Petroglyphs, was discovered in 1899 and is situated near the Lāna'i Lookout. The petroglyphs have been extensively altered by erosion and vandals since the 1930 survey, but nevertheless remain significant examples of petroglyph art.		3.4.1	3-41	<i>Same as proposed</i>	Townscape
Similarly, in the Queen's Beach area, approximately 20 sites were documented in the 1930 survey. The features included fishing shrines, house platforms, and a habitation cave. Although survey work done in 1984 found none of these sites, the large quantity of sites recorded earlier make it likely that subsurface cultural deposits and scattered human burials remain in the areas within and surrounding Koko Head Regional Park.		No change as none is proposed	3.4.1	-	
West of Koko Head, the archaeological sites consist of shelters, shrines, heiau, and burial caves. A system of Heiau were once found often at ridge elevations overlooking Maunalua Bay. While many have been destroyed, these sites remain worthy of preservation and restoration when appropriate. Many of the sites require a line of site view plane to the next heiau as well as to the ocean. Often elevations were used as kilo or fish spotting points where a spotter would find fish schools and signal to the fisherman out in the ocean. Kilo points include Kawaihoa Point and Hawai'i Loa Ridge.	<b>Revised Plan</b>	3.4.1		<i>Same as proposed</i>	Townscape
The Hāwea Heiau complex contains ancient walls, petroglyphs, terraces, a coconut grove, and heiau and is located near the intersection of Hawai'i Kai Drive and Keāhole Street. Pahua Heiau, located at the end of Makahū'ena Place, underwent restoration work during the 1980s. Besides its significance as a fifteenth to eighteenth century heiau, Pahua Heiau is also the Office of Hawaiian Affairs' first landholding.	No change as none is proposed	3.4.1		-	Townscape
Makani'olu Shelter in Kuli'ou'ou is on the Hawai'i Register of Historic Places. Two sites have been placed on the register in East Honolulu. Adding additional sites will strengthen existing protections. Makani'olu is a pre-contact cave studied extensively by the Bishop Museum. It was also where the first radio-carbon dating in the Pacific was done. The U.S. Coast Guard Makapu'u Point Lighthouse is also on the National Register of Historic Places.	<b>Partially Revised Plan</b>	3.4.1		Makani'olu is a <u>pre-contact</u> cave in good condition and is a good representative of its class. <u>Makani'olu is where the first radio-carbon dating in the Pacific was done.</u>	Townscape
There are also archaeological sites on undeveloped parcels located deep within the region's valleys. These areas have not been impacted by the tsunami of 1946 nor by previous development activity. Some of these areas, however, have been subject to intensive agricultural use in the past.	No proposed changed but revised per another comment	3.4.1		located <u>along cliff faces and</u> deep within the region's valleys	Townscape

Written Comment	DPP Response	Section	Page #	Text Change from PRD	Reviewer	
A privately initiated pedestrian survey of surface and possible subsurface material remains was conducted on a parcel located in Kamilo Nui Valley near Hawai'i Kai Drive. Three archaeological sites were identified: a single, isolated rock pile feature; a small bedrock cavity containing a human molar; and a historic wall which was probably a remnant of a larger complex.	<b>Revised Plan</b>	3.4.1		For example, a privately...	Townscape	
first paragraph—remove “beach” from second sentence and change to read: ...Many of these sites, however, have since been destroyed by the 1946 tsunami, erosion, or other land-altering activities such as development and construction...	<b>Revised Plan.</b>	3.4.1	3-34	Many of these sites, however, have since been destroyed by land-altering activities such as <u>ranching, development, and construction, as well as by erosion and the 1946 tsunami.</u>	Andrea Wagner	
Revise to the following: “Preserve <u>and actively maintain</u> significant historic features from earlier periods.	<b>Revised Plan</b>	3.4.2	3-36	• Preserve <u>and actively maintain</u> significant ...	Townscape	
Preservation and Protection should not only include a State Historic Preservation Officer, but also representatives from the Office of Hawaiian Affairs and Cultural Practitioners and Historians representatives of the area.	<b>Revised Plan</b>	3.4.3	3-36	...in consultation with the State Historic Preservation Officer <u>and cultural practitioners</u>	Townscape	
Preservation and appropriate protection should be made and decided upon by consultation with the representatives mentioned above.		3.4.3	3-36		Townscape	
The community needs to know how ENFORCEMENT of Guidelines will take place. How this will be done should be written in this plan. This way it is clear to the community and potential developers of lands in East O'ahu how historic and cultural sites are protected.	No change. The Plan is intended to make policy recommendations. The enforcement comes in through the adoption of rules and regulations like updating the LUO. Inclusion of the Implementation Matrix in the PRD is a step forward in identifying which parties are responsible or impacted by the policy proposals.	3.4.3	3-36	-	Townscape	
In addition, the Department of Planning and Permitting should also be required to do a yearly workshop to go over section EHSCP 3.4 Historic and Cultural Resources since it is their permitting with lack of historic and cultural knowledge which has created numerous problems in East O'ahu.	No change.	3.4.3	3-36	-	Townscape	
change first paragraph to read: The treatment of a particular historic or cultural site should depend upon its characteristics and preservation value...[Also delete extra spacing in second sentence of first paragraph.]	<b>Revised Plan.</b>	3.4.3	3-36	<u>preservation value</u>	Andrea Wagner	
Add DPP must establish a process that complies with 6E-42 (HAR §13-284 Rules Governing Procedures for Historic Preservation Review to Comment on Section 6E-42, HRS). A process must be established to consult with the State Historic Preservation Officer before the issuance of grading or other permits in previously undeveloped areas.	DPP claimed that only identified historical sites need consultation with SHPD, that properties could not have been identified because they were undeveloped. SHPD has confirmed where the permit was not sent to SHPD prior to issuance, "thus depriving SHPD of requiring an AIS before the project started.". DPP has failed to notify SHPD prior to issuing permits as required under 6E-42 (HAR §13-284 Rules Governing Procedures for Historic Preservation Review to Comment on Section 6E-42, HRS)In Aina Haina alone, 2 properties were given permits without the AIS that SHPD would have required had they been notified of the permit application.	No change. The process is the 6E-42 process.	3.4.3	3-36	-	Jeanne Ohta

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Suggest LID options be included in the General Policies or General Guidelines throughout the SCP for "uses" that have large water demands (existing or potential).	No change. There are LID handbooks that builders can use when redeveloping their properties. This is meant to be general	3.5	3-40	-	BWS
second paragraph we recommend that infill by construction of ohana units or accessory dwelling units be restricted in the Sea Level Rise Exposure Area.	No change. The number of anticipated ohana units is not significant. Other policies should discuss not developing in the SLR-XA, ohana units do not need to be signled out.	3.5.1	3-37	-	DLNR
Change first bullet to read: Enable long-term rental housing opportunities affordable to...	<b>Revised Plan.</b>	3.5.1	3-37	<ul style="list-style-type: none"> <li>• <u>Enable long-term rental housing opportunities affordable to low- and moderate-income, gap group, elderly, and single person households;</u></li> <li><u>and</u></li> </ul>	Andrea Wagner
Delete second bullet—this is already covered by first bullet.	No change. Points are addressing ADUs from different perspectives of renter and owner.	3.5.1	3-37	-	Andrea Wagner
first paragraph—see previous comments re predictions of reduced reliance on automobiles. As bus fares rise and ridership increases without an increase in service, automobiles become more attractive.	No change. The section is on residential density and not wanting to create further sprawl. Transit is more effective in a dense urban environment as opposed to single-family suburban development.	3.5.1	3-38	-	Andrea Wagner
<b>Complete Streets Principles.</b> The Plan should contain further discussion of compliance with County and State Complete Streets policies, pursuant to Act 54, Session Laws of Hawaii 2009, HRS §264-20.5 and ROH 12-15. The Plan should emphasize Complete Streets policies, including specific adherence to the following key Complete Streets principles: 1) safety, 2) Context Sensitive Solutions, 3) accessibility and mobility for all, 4) use and comfort of all users, 5) consistency of design guidelines and standards, 6) energy efficiency, 7) health and 8) green infrastructure.	<b>Revised Plan.</b> Other references included in the Technical Report.	3.5.2		<ul style="list-style-type: none"> <li>• <u>Safety;</u></li> <li>• <u>Context sensitive solutions;</u></li> <li>• <u>Accessibility and mobility for all;</u></li> <li>• <u>Use and comfort of all users;</u></li> <li>• <u>Consistency of design;</u></li> <li>• <u>Energy efficiency;</u></li> <li><u>Health; and</u></li> <li>• <u>Green infrastructure.</u></li> </ul>	DTS
(2nd bullet) Revise to the following: “Create an inclusive and accessible <del>urban or</del> suburban environment that encourages active and healthy aging, specifically age-in-place principles, that addresses or includes the following concepts: equitable, flexibility, simple and intuitive, perception information, tolerance for error, low physical effort, and size and space.”	No change. Language is from AARP description of an age-friendly city and in the Age-Friendly City Action Plan.	3.5.2	3-39	-	Townscape
We do not support “un-hosted” transient vacation rentals. Revise policy statement to the following: “Improve management and enforcement of regulations relating to the operation of <u>hosted</u> transient vacation units, <del>and hosted and un-hosted,</del> in residential neighborhoods.”	No change. Policy does not describe preference about hosted or un-hosted units. Policy conveys support to the forthcoming enforcement of however the two types will be differentiated.	3.5.2	3-39	-	Townscape

Written Comment		DPP Response	Section	Page #	Text Change from PRD	Reviewer
o East Honolulu is currently not a walkable community. Streets are hazardous for pedestrians, especially for older residents. East Honolulu should be more pedestrian friendly, which may require more crosswalks, wider setbacks, and shade and places to sit and rest. Some new buildings are built up to the property line, and we suggest new or redeveloped homes and buildings honor a 15 feet setback (not the standard 10 feet).		Partially <b>Revised Plan</b> . Setbacks can also reduce walkability by creating a separation from residences from the street encouraging that area to be used not by sidewalks and benches, but longer driveways used to store more cars.	3.5.2		...landscaping with shade trees. Methods <u>include, but are not limited to: slowing travel speeds, less direct routes, adding and improving crosswalks, and converting on-street automobile parking spaces into seating areas and shaded landscaping.</u>	Townscape
o There needs to be provisions for medical care in East Honolulu . Need facilities that provide care through end of life.		<b>Revised Plan</b>	3.5.2	3-45	<u>o Encourage the development of medical care facilities, including, but not limited to, facilities that provide palliative and hospice care.</u>	Townscape
o East Honolulu is a neighborly, bedroom community and should be kept that way. It is 20 minutes from Waikīkī, the mecca of the visitor industry. While we prepare for aging in place, the cumulative effect of visitor units (i.e., TVUs, B&Bs) must be considered to avoid conflict with aging in place. There is already a resort-zoned district in East Honolulu, which should serve the needs of the visitor industry. As we prepare for aging in place, we don't advocate for visitor units as they are in direct conflict with aging in place.		No change. There is no proposed zone changes or land use changes encouraged by the Plan.	3.5.2	-		Townscape
Remove language that hedges the need to make changes in street design to improve the safety of pedestrians and others. For example, phrases such as "where appropriate and feasible" and "may be required" should be removed. The following statement also discounts the changes: " <u>even if this requires somewhat slower travel speeds, less direct routes and fewer on-street parking spaces for automobiles.</u> " This wording implies that automobile traffic deserves a higher priority than pedestrians and bicycle riders and that neighborhood streets are not for the comfort of neighborhoods, but for cars.		<b>Revised Plan</b>	3.5.2	3-39	Modify residential neighborhood street design; <del>where appropriate, to ...</del> <u>and landscaping.</u> Methods include, but are not limited to: slowing	Townscape
Delete " <del>improve management</del> " Enforce regulations relating to the to the operation of hosted transient vacation units in residential neighborhoods.	"Improve" is a low standard since there has been no enforcement; un- hosted vacation rentals should not be allowed.	<b>Revised Plan</b>	3.5.2	3-39 last bullet	<u>• Enforce regulations relating to the operation of transient vacation units in residential neighborhoods.</u>	Jeanne Ohta
add bullet before Transit, Bicycle and Pedestrian-Oriented Residential Streets. Note: first sentence mention of "seeking to reduce the number of vehicle miles traveled per person" is at odds with earlier provisions to focus job opportunities in the urban core and west side. A more distributed manner of job opportunity would do more to limit commutes.		No change. The Plan calls for potentially more mixed-use development. To bring a significant number of jobs to East Honolulu would require new development which the community has previously opposed in favor of preserving the "Great Lawn." Aging trends will reduce number of commuters added to 4-2.	3.5.3	3-40		Andrea Wagner
<u>or are collocated on a site designated for Commercial use and propose mixed-use development.</u>	Justification: The above revision supports the PRD policy to promote mixed use development, especially to encourage greater walkability and convenience to services for a growing senior population in East Honolulu. This, in turn, complements the City's plan to promote Honolulu as an age-friendly community.	<b>Revised Plan</b>	3.5.3.1	3-47		Nancy Schoocraft

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Suggest adding special needs housing and group living facilities as permitted uses in business mixed-use districts.		No change. These are already permitted in BMX districts per the LUO, though there is no BMX in the Plan area.	3.5.3.2	3-47	-	KS
Allow designated affordable housing projects and continuing Care Retirement Communities of up to <del>30</del> 40 units per acre if designed in a manner compatible with the character of the surrounding residential community.	Justification: An incentive such as a density increase should be provided for affordable housing, as well as CCRCs, which offer not just housing but lifetime care for residents. A density of 40 units per acre is comparable to Kahala Nui, which is a CCRC comparison that is specifically mentioned in the PRD. Without the assurance of lifetime housing and care that a CCRC provides, seniors with dwindling incomes, especially in advanced age, could be displaced from conventional age-restricted housing projects or assisted living facilities that do not cover care for seniors needing intensive medical services. Finally, the phrase about designing "in a manner compatible with the character of the surrounding residential community" should be stricken because it is too vague and subject to wide and subjective interpretation. The last bullet point above provides more specific and meaningful guidance for design in a residential setting.	<b>Revised Plan</b>	3.5.3.2	3-49	10-40 units per acre, not including beds in skilled nursing facilities. <u>Allow</u> designated affordable housing projects of up to 40 units per acre if designed in a manner compatible with the character of the surrounding residential community.	Nancy Schoocraft
Suggest LID options/requirements be more pronounced for commercial and non-residential, as they may have large impervious land areas (bldg, parking ... ).		<b>Revised Plan</b>	3.6	3-49	<u>o Require the use of low-impact development standards for any significant new construction or redevelopment, particularly areas that may have large impervious surfaces, in order to hold stormwater on-site instead of discharging it into storm drains or stream channels.</u>	BWS
last paragraph—change second sentence (continues to page 3-44) to read: ...In all of these smaller centers except 'Āina Haina, additional floor area could be developed within their existing land areas with more efficient site design, provided adequate parking is available...		No change. Anticipated automobile use and ownership changes will result in the need for less parking than currently available. Added paragraph in 4-2 expressing this.	3.6.1	3-43	-	Andrea Wagner
last paragraph—change first sentence to read: There is a probable demand for certain light industrial uses to serve the East Honolulu communities... [Note: Whatever demand exists, cost has been the limiting factor for many businesses that might serve East Honolulu.]		<b>Revised Plan.</b>	3.6.1	3-44	<u>East Honolulu communities</u>	Andrea Wagner

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Regarding "Mixed Uses in Business Districts," we support redevelopment of shopping centers for mixed uses, but there needs to be restrictions in place to maintain existing building heights and footprints. We oppose redevelopment that may result in higher building heights and larger footprints, thus impacting viewsheds. Existing shopping centers are also in the tsunami zone.	No change. The policy does not propose change to building heights, rezoning to higher density. Commercial areas being located in tsunami zones, and SLR areas is a concern. Redevelopment will need to take these into account.	3.6.2	3-46	-	Townscape
o Aging in place/mixed uses has to be within current heights, including green infrastructure and native plants and streets. New mixed-used buildings should not be constructed at the expense of our viewsheds. We need to maintain the integrity of our viewsheds mauka to makai and the entrance to Hawai'i Kai where mountain to sea and iconic landmarks are part of the area's identity.	No change. Under current zoning, shopping centers already have the entitlements to build to 40-60 feet with transitional height setbacks. Zone changes already take into account views during the review process.	3.6.2		-	Townscape
Add a bullet that prohibits construction of new structures that are not designed to survive major natural disasters and sea level rise.	<b>Revised Plan</b>	3.6.2	3-46	<ul style="list-style-type: none"> <li>• <u>New structures shall be designed to withstand the anticipated impacts of sea level rise over the building's lifespan.</u></li> <li>• <u>New structures shall be designed to minimally withstand the impacts of a Category 3 hurricane.</u></li> </ul>	Townscape
KS disagrees with the prohibition of any new or expanded land areas for resorts as the need for this land use is not correlated to the residential population forecast, but rather the tourism industry.	No change. As most of the Plan area is already developed, a new resort area would mean either removing housing or developing in preservation areas, which this Plan does not support.	3.6.2	3-52		KS
Planned improvement of pedestrian access along the marina edge is discussed, however consideration is lacking regarding reinforcement, heightening or otherwise adapting the marina edge to mitigate sea-level rise related damages. It seems likely that the marina edge will require such reinforcement within the subject planning horizon since it is already breached in some locations during king tide events.	No change. Pedestrian access can be accomplished concurrently with reinforcement.	3.6.3		-	DLNR
KS encourages flexibility in how resort use is regulated as tourism is a major economic driver of the local economy.	No change. While the Plan is supportive of the existing resort use, it also respects the community desire to remain "quiet bedroom communities."	3.6.3	3-46, 5-28		KS
Suggest allowing limited service hotels as a permitted use for regional town centers.	No change. A similar recommendation in the PUCDP has not been effective. Other comments have sought to keep visitors out of the quiet bedroom communities.	3.6.3	5-29, 5-30	-	KS
Both Koko Marina and Hawai'i Kai Center focus on ocean recreation to a large extent. There is a need to consolidate this focus into either one center or the other to leave room for services for residents.	No change. Or both could better orient their centers around the marina drawing more pedestrian activity inward allowing residents to better experience the marina	3.6.3		-	Townscape
o East Honolulu needs more stores that serve the local and aging community.	Partially <b>Revised Plan.</b>	3.6.3	3-53	<u>These centers should be oriented to serve the local community.</u>	Townscape

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Note that the three Hawai'i Kai centers along the Marina are all in the flood zone for major tsunamis, hurricanes and other flooding disasters. To our knowledge, the commercial centers do not have any emergency preparedness plans nor do the individual businesses. Since East Honolulu could be isolated in the event of a major disaster, these issues need to be addressed. One possible option would be hardening of structures to withstand storms and floods more effectively. Another possible option would be the development of evacuation plans and guidelines for store personnel and patrons.	<b>Revised plan</b> for business to have an evacuation plan. Hawaii Kai businesses have a higher elevation	3.6.3	3-53	<u>o Encourage businesses to develop evacuation plans and guidelines in the event of a disaster</u>	Townscape
<b>Chapter 4</b>					
We do not have any objections to the subject communities plan. However, any proposed action or projects affecting the State Highways should be consulted with the HDOT. A Traffic Impact Analysis Report may be required to be submitted to the HDOT for review and acceptance to evaluate and identify any potential traffic impacts to our state highways system.	No change	4.1.1	-	-	DOT
Delete " <del>portions of the highway were widened and upgraded</del> " "The entire 4.2 mile stretch between ... consists of six lanes...and has reached its carrying capacity."	Since it has been so long since the widening	<b>Revised Plan</b>	4.1.1.1	4-1, last paragraph <u>Kalaniana'ole Highway</u> consists of six lanes (three lanes in each direction)	Jeanne Ohta
Regarding transit systems, current and future use of the East Honolulu park and ride facility may need to be evaluated. Currently the facility seems underutilized such that alternate uses may be considered. Potential uses may include repurposing the lot as a carshare facility for residents and commuters. Additionally, solar photo voltaic panels could be installed to provide shade and power for use by the electric vehicle carshare facility and/or the general public.	No change. PRD already tries to activate area by bridging pedestrian connections to other areas.	4.1.2	-	-	DLNR
Remove the last paragraph that states: "There is an uncompleted section of Hawai'i Kai Drive in the Kamilo Nui Valley. While this project is not included in the 2040 ORTP, it was included in the 2008 plan as it would be desirable to provide for more direct travel and an alternate route from Lunalilo Home Road to Kamilo Nui Place and also to create a new bicycle route (see Section 4.1.3). The completion of this connection would require the acquisition of a 56-foot right-of-way, part of which is in private ownership, and the resolution of drainage issues that may involve bridge construction." The statement is misleading. Previous planning efforts have shown that the community does not support the completion of this road connection. The road connection is not needed.	No change. It would provide an additional access to homes that would be blocked if routes more makai were blocked.	4.1.1.2	4-2	-	Townscape
o Better (more frequent) transportation and access to transportation are needed, especially if aging in place is envisioned for this district. There needs to be the availability of transportation facilities for seniors, and the Park and Ride can serve as the hub. Frequent local shuttle service serving the inner neighborhoods are less obtrusive [intrusive] on narrow streets where autos and bikes have to compete for safe road space. Large city buses should not be used in the upper valley neighborhoods.	Partially <b>Revised Plan</b> .	4.1.2	4-3	<u>shifting to smaller vehicles for upper valley neighborhoods, and</u>	Townscape
The City has reduced the number of bus stops along Kalaniana'ole Highway.	<b>Revised Plan</b> saying adding bus stops would enhance service.	4.1.2	4-3	<u>Additional service enhancements are also possible by adding more bus stops,</u>	Jeanne Ohta
<b>Bicycle Connectivity.</b> The East Honolulu Plan shall be consistent with the 2019 Draft Oahu Bike Plan update, since these are concurrent plan updates. An updated map of the existing and proposed bicycle facilities in East Honolulu should be provided in the Plan and replace exhibit 4-1 . Please contact Chris Sayers at 808-768-8335 to ensure that the latest network for existing and proposed is used. Please reference the Bicycle Facility Design Guide with regard to the specific facility types since these have changed.	No change. The Oahu Bike Plan does not propose any additional bike facilities not in the past update or the Bike Plan Hawaii.	4.1.3	-	-	DTS
<b>Bikeshare Expansion.</b> Contact Bikeshare Hawaii for possible expansion of bikeshare facilities to this area. If Bikeshare expansion is agreed upon for the area, please include a plan map of the proposed bikeshare stations in the Plan.	No change.	4.1.3	-	-	DTS

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Kalaniana'ole highway features a bike lane delineated by a white line. High traffic speed in the adjacent lane and use of the bike lane by mopeds cause safety concerns for bicyclists. A potential remedy to these concerns may be to install a raised partition that delineates the lane from adjacent lanes. Additionally, we suggest that design recommendations included in the Complete Streets design manual be reviewed as part of the design process for bike and pedestrian lanes.	No change. These transportation plans referenced would be the more appropriate avenue to address these concerns.	4.1.3		-	DLNR
<b>Exhibit 4-1</b> shows a future bike route along Kalaniana'ole Highway around the Ka Iwi coastline. We are concerned for the safety of cyclists and motorists along the highway. A carrying capacity study for this section of Kalaniana'ole Highway needs to be conducted to examine the safe use of the highway by various modes of transportation including cyclists, motorists, City buses and tour buses. The usage of smaller shuttle buses as tour buses should be explored.	No change. Map reflects the projects of the Oahu Bike Plan. The projects proposed in the Oahu Bike Plan are intended to make bicycling safer and reduce conflicts with other modes. Many cyclists already use this section of highway. Improvements for non-motorists should not have to go through additional studies not required for other modes which conflicts with Complete Streets.	4.1.3	4-5	-	Townscape
Does the State's Bike Plan say nothing about provision for biking along Kaiwi Scenic Coast?	No change. Kalaniana'ole Highway is listed as Project Code 2-36 as a Priority 2 project as bike route as is designated on Exhibit 4-1.	4.1.3	4-4	-	Townscape
s/b consistent with the byways management plan					
Exhibit 4-1 Bikeway System: change marking/graphic to show that Kaiwi Scenic Coast Mauka to Makai stretches from Koko Head to Makapu'u Head.	Changed label but map doesn't show boundary	4.1.3	4-5	-	Townscape
Policy/Guideline states "Increase person-carrying capacity on Kalaniana'ole Highway for commuter travel....by constructing facilities to increase safety and comfort for alternative modes of travel."	No change. See below	4.1.3	5-31	-	Townscape
Define the "alternative modes of travel."	In the Oahu Bike Plan it is all modes alternative to private automobiles, ex. walking, biking and transit.	4.1.3	5-31	-	Townscape
Kalaniana'ole Highway is already at capacity.	According to whom? For what users? shifting from single use cars to alternative modes improves capacity. Roadway efficiency is typically measured in Level of Service (LOS).	4.1.3	5-31	-	Townscape
<b>Oahu Pedestrian Plan.</b> A section in the plan should be dedicated to the Oahu Pedestrian Plan after Section 4.1.3, since this is a concurrent plan. Please contact Nicola Szibbo at 808-768-8359 for the latest pedestrian plan infrastructure maps and priority areas.	No change. The PRD discusses walkability. The Plan is intended to be stand-alone.	4.1.4		-	DTS
o There are too many tour buses on Kalaniana'ole Highway as well as cutting through residential neighborhoods. The visitor industry needs to be brought into the discussion. Tour buses are too big. We should not allow the visitor industry needs to change the sense of our community.	No change. The Plan does not propose limits on what types of vehicles can drive of public streets or highways.	4.1.4		-	Townscape
<b>Safe Routes to School (SRTS).</b> Please contact Yamato Sasaki at 808-768-8312 to ensure that all SRTS projects are	No change.	4.1.5		-	DTS

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Regarding transportation systems, roadways are discussed; however, traffic demand management strategies do not address congestion or associated greenhouse gas emissions. Methods of addressing such concerns may include increasing the number of HOV lanes and/or increasing the vehicle occupancy requirement for riding in HOV lanes (currently 2). Supporting this with a rideshare app may provide the necessary overall framework to bring riders together.	<b>Revised Plan</b>	4.1.5	4-7	o Decrease the use of single-occupant, or even zero-occupant, automobile trips during commute times by: • <u>Converting regular automobile lanes into additional HOV lanes during regular or rush hour times.</u> • <u>Increasing the vehicle occupancy requirement of the use of the HOV lane.</u>	DLNR
(Page 4-6) Under Commuter Travel, revise the statement to the following: “Expand improved park-and-ride facilities, including possible relocation and provision of compatible accessory uses.” We support the current location of the park-and-ride because it also serves as open space for the community and is used for community events such as farmers market.	No change.	4.1.5	4-6	-	Townscape
(Page 4-7) Under Local Trips (1st bullet), remove the following statement: “Complete the link between the two built portions of Hawai'i Kai Drive in the Kamilo Nui Valley area, thereby providing an additional mauka access route linking Maunalua Bay to Kalama Valley.” As stated above, completion of this road connection is not needed. We do not support linking the two areas.	No change. Under promote alternative modes of travel, completing the connection of the two Hawaii Kai Drives could shift bicycle travel to streets with slower speeds.	4.1.5	4-7	-	Townscape
(Page 4-7) Under Streetscape (3rd bullet), revise the statement to the following: “Ensure all lighting is shielded and pointed downward <u>to protect the night sky, reduce light pollution, protect wildlife particularly in key areas such as along the Ka Iwi coastline.</u> Any additional lighting or changes to existing lighting should maintain or improve night sky visibility while also creating places that feel safe and secure.”	<b>Revised Plan.</b>	4.1.5	4-7	Ensure all lighting is shielded and pointed downward <u>to protect the night sky, reduce light pollution, and protect wildlife, particularly in key areas such as along the Kaiwi coastline.</u>	Townscape
(Page 4-8, 4th bullet) The City should install more crosswalks especially near open spaces, parks, and shopping centers.	<b>Revised Plan</b> by adding as bullet 3. Added language about preserving and enhancing existing crosswalks.	4.1.5	4-8	o <u>Preserve and enhance existing crosswalks. Install additional crosswalks, especially near open spaces, parks, shopping centers, and other public gathering places.</u>	Townscape
Please remove the wording regarding completion of Hawaii Kai Drive in Kamilo Nui Valley. The valley is our last remaining “little bit of country” and should not be developed to allow more traffic into the area.	No change. It has been in the Plan since 1999 with no implementation. Implementing the policy could benefit the farmers, increasing access to potential fruit and vegetable stalls for residents. Provides secondary access to some neighborhoods in the event of Kalaniana'ole Highway being impacted by flooding.	4.1.5	4-7		Natalie Iwasa
fourth open bullet is not clear—Explain. Kalaniana'ole Highway design does not allow for additional lanes for bicycles or sidewalks in several sections along Maunalua Bay. The Ka'iwi Coast drive is already hazardously shared by bicyclists, automobiles, tour vans, and tour buses, with no room to expand except by destroying more of the sensitive coastline. Closure of even a single lane on Kalaniana'ole causes major backups between Wai'alae and Hawai'i Kai. How will these challenges be addressed as the population of East Honolulu continues to grow, even at a slow rate?	No change. If it is hazardous, there should be "facilities to increase the safety and comfort of users of active modes of travel." The population of East Honolulu is not anticipated to grow.	4.1.5	4-6	-	Andrea Wagner

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Regarding the O'ahu Water Management Plan, add a bullet noting the need to address the impact of sea level rise on groundwater (i.e., increased salinity).	Revised Plan. Added a paragraph discussing the Water Resource Protection Plan and added policy bullet.	4.2	4-8	<p>Another component of the Hawai'i Water Plan is the Water Resource Protection Plan (2019). According to the CWRM, "the objective of the [Water Resource Protection Plan] is to protect and sustain ground and surface water resources, watersheds, and natural stream environments statewide. Such protection requires a comprehensive study of occurrence, sustainability, conservation, augmentation, and other resource management measures."</p> <ul style="list-style-type: none"> <li>• Research and prepare for the potential impacts of sea level rise on ground water aquifers and water supply infrastructure</li> </ul>	Townscape
Revise sentence FROM: The Board of Water Supply (BWS) also published a public draft of the Water Master Plan (WMP) in July 2016. TO: The Board of Water Supply's (BWS) Water Master Plan (WMP) was adopted by the Board in October 2018.	<b>Revised Plan</b>	4.2	4-8	The BWS's <b>Water Master Plan</b> was adopted by the Board in October 2018. The Water Master Plan...	BWS
Suggest DPP confirm with CWRM the current PU values and untapped SY discussion in this section and as applicable throughout the document.				sustainable yield of <u>2.5 mgd</u> , of which <u>2.797 mgd</u> is permitted and <u>1.75 mgd</u> is used. The Wai'alae East aquifer has a sustainable yield of 2 mgd, of which <u>0.79 mgd</u> is permitted and <u>0.16 mgd</u> is used	BWS
It's mentioned the Wai'alae aquifer SY = 2.59 mgd (Wai'alae West aquifer SY = 1.99 mgd and Wai'alae East aquifer SY = 0.6 mgd). Where did these permitted quantities come from? According to our records, CWRM wanted to reduce the total Wai'alae aquifer SY from 2.49 mgd to 2 mgd. BWS testified to keep the Wai'alae aquifer SY at 2.5 mgd. After listening to BWS's testimony, CWRM agreed to keep the Wai'alae aquifer SY at 2.5 mgd.	<b>Revised Plan</b> and added numbers in Technical Report to the Water Resource Protection Plan 2019 Update	4.2.1	4-9		BWS
CWRM shows the Wai'alae East aquifer has a sustainable yield (SY) = 2 mgd. What reference shows SY = 10 mgd?	<b>Revised Plan</b> back to 2 MGD. Not sure why it was changed.	4.2.1	4-9	The Wai'alae East aquifer has a sustainable yield of 2 mgd.	BWS
Move the Watershed Management Plan (The BWS is .... non-potable water sources.) paragraph to page 4-8's discussion about OWMP. Revise sentence FROM: The BWS is scheduled to develop a Watershed Management Plan for East Honolulu upon completion of the Primary Urban Center Watershed Management Plan, and will publish the plan in the next few years. TO: The Honolulu Board of Water Supply (BWS) and Department of Planning and Permitting (DPP) have begun the development of the East Honolulu Watershed Management Plan (EHWMP). The EHWMP will be prepared in accordance with the State Water Code Chapter 174C, HRS and the City and County of Honolulu Ordinance Chapter 30, ROH. The EHWMP will be one of eight district water management plans that together will comprise the Oahu Water Management Plan. For more information on the EHWMP, see: <a href="https://www.boardofwatersupply.com/water-resources/watershed-management-plan/east-honolulu-plan">https://www.boardofwatersupply.com/water-resources/watershed-management-plan/east-honolulu-plan</a>	<b>Moved up and Revised Plan.</b> Added middle sentence with compliance referencesw to the Technical Report	4.2.1	4-9	The BWS has begun the development of the <b>East Honolulu Watershed Management Plan</b> , one of eight district water management plans that comprises the <b>O'ahu Water Management Plan</b> . <b>The East Honolulu Watershed Management Plan</b> will detail any new water source development or redistribution changes that would impact East Honolulu's water importation from Primary Urban Center or Windward water sources.	BWS
"BWS does not have plans to develop any groundwater sites in East Honolulu due to decreasing demand and economic feasibility." Change feasibility to infeasibility?	No change, not incorrect.	4.2.1	4-9	-	BWS

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The 5 year average (CY2013-2017), East Honolulu consumed about 6 percent of the island wide potable water, a total 8.4 mgd, down from 9.3 mgd in 2010. According to the BWS, by 2040 East Honolulu will continue to experience the similar average demand for potable water of approximately 8.6 mgd due to continued conservation efforts and low population growth.	<b>Revised Plan</b>	4.2.1	4-9	<u>Between 2013 and 2017, East Honolulu consumed about 6 percent of the island wide potable water, a total 8.4 mgd, down from 9.3 in 2010. According to the BWS, by 2040 East Honolulu will continue to experience a similar average demand for potable water of approximately 8.6 mgd due to continued conservation efforts and little to no anticipated population growth.</u>	BWS
second paragraph, last sentence—The sentence is inaccurate. The sustainability plan states slow growth for East Honolulu, not no population growth. Table 2-2, page 2-17, shows East Honolulu population continuing to grow through 2040. While the big picture population status is projected to be stable as a percentage of overall island growth, it is in fact projected to increase.	No change. Table 2-2 starts in 2000, near the publication of the last Plan. The current population estimate is 50,000 which is the projected estimate for 2040 which is no significant growth.	4.2.1	4-9	-	Andrea Wagner
first paragraph again highlights problems with statement cited above on page 4-9.	No change, see above.	4.2.1	4-10	-	Andrea Wagner
4.2.2/4.2.3: Suggest add LID terminology in consistent locations and similar text (as applicable) within the document: under either or both General Policies or Planning Guidelines.	No change. Language is already included in the PRD in 4.2.3	4.2.3	4-10	-	BWS
references to data that needs to be updated. For example, the Plan references City’s wastewater plans with projections until 2020.	Removed sentence on 2008 study and revised the 2010 data to 2018 based on the <b><u>Water Resource Protection Plan</u></b>	4.3.2	4-12	<u>Between 2013 and 2017, East Honolulu consumed about 6 percent of the island wide potable water, a total 8.4 mgd, down from 9.3 in 2010. According to the BWS, by 2040 East Honolulu will continue to experience a similar average demand for potable water of approximately 8.6 mgd due to continued conservation efforts and little to no anticipated population growth.</u>	Townscape
				<u>In addition to the majority of homes that are connected to the two sewer systems, there are many homes in East Honolulu which are served by cesspools or septic tanks with leaching fields. Many locations that host cesspools in East Honolulu feature critically narrow depths to groundwater and/or are located within 200ft of a shoreline.</u>	

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<p>Wastewater treatment services are discussed, including the expansion of Sand Island Wastewater Treatment Plant's capacity. However, we suggest that discussion be added regarding the use of cesspools in the East Oahu area and resulting impacts to nearshore waters. According to a document prepared by the State Department of Health (DOH), 205 active cesspools are located in the Hawaii Kai area, 96 in Kuliouou, and 220 in the Waialae and Kahala. Cesspools do not treat sewage effluent and inject raw sewage into groundwater, which has the potential to spread disease and contaminate recreational waters. Many locations that host cesspools in East Oahu feature critically narrow depths to groundwater and/or are located within 200ft of a shoreline. The DOH has identified limited vertical and horizontal distances to water as being one of the main factors that increase the potential of contamination. This is because unsaturated soil provides the primary method of filtering cesspool effluent. Further, as sea level continues to rise, this method of effluent filtration will be progressively hindered as vertical and horizontal distances to water decrease or are lost altogether. State rules implemented in 2015 incentivize the upgrade of cesspools to sewer or septic systems. However, in areas that feature narrow depths to groundwater, septic tanks are known to buoy, which causes structural damage to the septic system and causes and mixing of effluent with surrounding waters. Overall, it is important that these issues be identified in sustainability planning efforts.</p>	<p><b>Revised Plan.</b> There were already policies that homes should connect to regulated or municipal sewer systems so no policy change. <b>Added Section 4.3.3</b></p>	<p>4.3.3</p>	<p>4-14</p>	<p><u>Cesspools do not treat sewage effluent and inject raw sewage into groundwater, which has the potential to spread disease and contaminate recreational waters. The DOH has identified limited vertical and horizontal distances to water as being one of the main factors that increase the potential of contamination. This is because unsaturated soil provides the primary method of filtering cesspool effluent. Further, as sea level continues to rise, this method of effluent filtration will be progressively hindered as vertical and horizontal distances to water decrease or are lost altogether.</u></p> <p><u>State rules implemented in 2015 incentivize the upgrade of cesspools to sewer or septic systems. However, in areas that feature narrow depths to groundwater, septic tanks are known to buoy, which causes structural damage to the septic system and causes and mixing of effluent with surrounding waters.</u></p>	<p>DLNR</p>
<p>Add discussion on the need for disaster planning given that the wastewater treatment plant is vulnerable to flooding in disasters and is in the flood zone for extreme tsunamis. Action items are needed to mitigate flooding and sewage spills in the event of a hurricane, flood or other disaster and to restore service rapidly.</p>	<p>No change. Sand Island is outside of the Plan area. American Wastewater is in Flood Zone D. The tsunami map is not for flooding but for evacuation.</p>	<p>4.3.4</p>	<p>4-14</p>	<p>-</p>	<p>Townscape</p>
<p>The design of electric power sub-stations and transmission lines is described. It is stated that the design is intended to avoid or mitigate potential adverse impacts on scenic and natural resource values. We suggest that such design include consideration of sea-level rise induced increases in water table elevation since groundwater inundation has the potential to cause damage to buried infrastructure and in-turn service interruption.</p>	<p>Revised Plan by adding a subbullet</p>	<p>4.4.1</p>	<p>5-35</p>	<p><u>o The design in undergrounding utilities shall account of the potential adverse impacts of sea level rise impacting increases in the elevation of the water table and other groundwater inundation.</u></p>	<p>DLNR</p>
<p>add fifth bullet:  <ul style="list-style-type: none"> <li>• Move electrical and communication systems underground. [Reasoning: to reduce risk of sparking fires or outages due to severe weather.]</li> </ul> </p>	<p><b>Revised Plan.</b></p>	<p>4.4.1</p>	<p>4-16</p>	<p><u>• Relocation of electrical and other overhead utility lines underground wherever feasible.</u></p>	<p>Andrea Wagner</p>
<p>Insert second sentence:  ...Transmission lines should be located underground wherever possible...</p>	<p><b>Revised Plan.</b></p>	<p>4.4.2</p>		<p><u>Utility lines should be located underground wherever feasible.</u></p>	<p>Andrea Wagner</p>
<p>Second bullet—change to read: "Efficient Solid Waste Collection – Expand the use of automated refuse collection in residential areas to ensure provision of adequate solid waste collection."</p>	<p><b>Revised Plan.</b> Following sentence previously not underlined is now underlined.</p>	<p>4.5.2</p>	<p>4-18</p>	<p><u>...to ensure provision of adequate solid waste collection. Have residents pay their fair share of all costs needed to ensure provision of adequate solid waste collection facilities</u></p>	<p>Andrea Wagner</p>

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The document states that possible impacts of sea-level rise on new public and private projects will be analyzed in shoreline areas. We suggest that such analyses be conducted in all low-lying areas regardless of shoreline proximity. Sea-level rise induced flooding will not be limited to shoreline areas and will extend inland by mechanisms such as drainage backflow and groundwater inundation.	Revised Plan	4.5.8	5-38	in shoreline and low-lying	DLNR
Add that flooding has resulted partially from residents and others dumping items into the drainageways. Overgrown vegetation has not been well maintained, thus resulting in blocked drainage ways that overflow during heavy storms and damage homes. City clearance actions in Wailupe stream have been observed to leave cut vegetation lying in the stream. Flooding in Haha'ione Valley in 1989 that did so much damage was not just, or even primarily, due to falling rocks. Repeated flooding of lower 'Aina Haina has been due to vegetation catching on the center bridge support at Kalaniana'ole Highway.	Revised Plan and Technical Report	4.6	4-18	<u>Flooding has been exacerbated by residents dumping items into drainageways as well as overgrown vegetation.</u>	Townscape
city is in process of installing pressure-sensitive gates on storm drains.	Added to the Technical Report	4.6	4-18	-	Townscape
Residents need to be educated more thoroughly on their responsibilities if drainage canals cut through or abut their properties in order to prevent this type of flooding.	No change	4.6	4-18	-	Townscape
change in law requires city to inspect and maintain all city streams.					
the above has past. where are we now, where are we going, and when do we expect completion of the plan. Channelizing streams will minimize debris flowing into the ocean and protect erosion from existing property lines.	No change. Concern over debris flow and sedimentation are different issues. Channelization has lead to the degradation of downstream sources by not allowing time for sediment carried into the stream by rains to settle.	4.6		-	Stephen Zane
Add expected completion as guide. (for example as soon as possible but completion prior to 2020? Adding dates will enable the government and public to track goals and achievements.)	No change. Drainage project outside the scope of Plan and under Federal contract	4.6		-	Stephen Zane
(Add to protect existing property boundaries from erosion. Channelize will also minimizing erosion and minimize blocking downstream)	No change. Channelizing streams has lead to building closer to the stream and potentially exacerbated flood damages when those channels are not maintained or blocked.	4.6		-	Stephen Zane
What is the periodicity of maintenance and the organization responsible.	No change. Differs by stream, annual and prior to storms	4.6		-	Stephen Zane
The Army Corps of Engineers conducted a flood mitigation study of Wailupe Stream and made several recommendations. Among them was to harden most of the stream using a trapezoidal design and harden the bottom of the stream in the upper stream area above the Ani Street bridge; raise the Kalaniana'ole Highway bridge, enlarge the existing debris basin and add another debris basin. After conducting a cost/benefit analysis the ACE paused the project citing the high cost/benefit ratio.	Added to the Technical Report.	4.6	4-19, Wailupe	TR: o The Army Corps of Engineers conducted a flood mitigation study of Wailupe Stream and made several recommendations. Among them was to harden most of the stream ... o Wailupe Stream overflowed its banks in the flood of April 2018, flooding and damaging homes and businesses on both sides of	Jeanne Ohta

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The stream overflowed its banks in the flood of April 2018, flooding and damaging homes and businesses on both sides of Kalanianaʻole Highway. Lack of stream maintenance and debris accumulation under the bridge contributed to the flood. There was stream bank erosion along the stream, which was especially severe above the Ani Street bridge. Property owners lost portions of their backyards.				Stream	<i>Kalanianaʻole Highway. Lack of stream maintenance and debris accumulation under the bridge contributed to the flood. There was stream bank erosion along the stream, which was especially severe above the Ani Street Bridge. Property owners lost portions of their backyards.</i>	Jeanne Ohta
Drainage Systems, General Policies, the proposed study of local flooding and drainage problems should include consideration of climate change and sea level rise projections.		<b>Revised plan.</b> Added to first bullet.	4.6.1		<u>The study should include the potential impacts to drainage systems from climate change and sea level rise.</u>	DLNR
LID mentioned under general policies, why not under planning policies? Suggest including LID terminology in consistent locations and similar text (as applicable) within the document: under either or both General Policies or Planning Guidelines.		No change. There is no major intention behind choosing it as a policy or guideline as long as it is mentioned.	4.6.1	4-20	-	BWS
first bullet—change to read: • Debris Basins—Conduct inspections of boulder and debris basins at least twice a year and after major storms to determine whether basin cleanout, or other maintenance or repair, is needed. Clean out boulder and debris basins if they are 25% full.		<b>Partially revised Plan</b> per other comments	4.6.2	4-20	Conduct maintenance of <del>large capacity</del> boulder and debris basins in <del>upper valleys above urbanized areas</del> <u>at least twice a year and after major storms</u> to prevent	Andrea Wagner
Use more current data, the DOE has published School Year 17-18	Does the capacity include the “portables”? If so, wouldn’t a more accurate capacity be the capacity that the school was built for, which would exclude portables.	<b>Revised Plan.</b> Lowered capacity to exclude portables	4.7	4-21, Table 4-1	-	Jeanne Ohta
The DOE is piloting a project using school property for commercial use to provide additional departmental funding. In locations where homes are adjacent to school property, the effect on those neighbors must be considered before establishing commercial centers in residential areas.	Commercial businesses do not belong in residential neighborhoods.	Added to Technical Report but having a greater mix of commercial uses does not harm residential neighborhoods.	4.7	4-22, 2nd para	-	Jeanne Ohta
Waldorf high school just closed.		<b>Revised Plan</b> with an updated phone survey	4.7	4-22, Table 4-2	-	Jeanne Ohta
The DOE should coordinate structural design of school buildings with the Hawaii Emergency Management Agency and the Department of Emergency Management so that....” This is a statewide issue and HI-EMA has been working with DOE and DAGS. Pertaining to DOE facilities on Oahu, DEM would be a stakeholder.		<b>Revised Plan</b>	4.7.2		<u>Hawai’i Emergency Management Agency and the Department of Emergency Management so that these facilities may also be used as public hurricane shelters capable to minimally withstand winds from a Category 3 hurricane.</u>	DEM
Aina Haina Elementary school is NOT a tsunami refuge, it is in a tsunami zone. The former Wailupe Elementary School is a tsunami refuge.		<b>Revised Plan</b>	4.8	4-25, Table 4-3	-	Jeanne Ohta

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(4 <sup>th</sup> paragraph) Consideration of moving EMS to the dog park/Park and Ride site is not advisable since that location will be impacted with sea level rise and is within the tsunami evacuation zone area. The area around Kaiser High School and the fire station is far less vulnerable. This should be factored into any decisions on re-location.	Removed from Plan. An EA will likely be required which will analyze different sites.	4.8	4-24	<del>EMS is considering locating it's facilities with the dog park on City owned land near the Park and Ride site.</del>	Townscape
Table 4-3: Emergency Shelters list: Koko Head District Park and Kamilo Iki Community Park are not emergency shelters; they are simply temporary evacuation zones for tsunamis. This may also be true of other locations on the table and should be verified.	Partial Change. The table title reflects the inclusion of refuges, added potential to title.	4.8	4-25	<u>Table 4-3: Potential Public Emergency Shelters and Refuges</u>	Townscape
o Provide clarification on shelters vs. refuge centers.	<b>Revised Plan</b>	4.8	4-25	<u>Public refuges also are not rated to withstand the effects of storms as they are merely designated areas setup to gather people temporarily displaced by an emergency situation.</u>	Townscape
o Some religious institutions could also serve as storm shelters. Some have access to federal funds.	<b>Revised Plan.</b> Added public to the title of <b>Table 4-3.</b>	4.8	4-25	Supplement the public emergency shelters by identifying private structures, <u>like churches,</u> ...	Townscape
First full paragraph—add new second sentence to read: ...Emergency shelters need to be upgraded or constructed to withstand effects of more intense wind storms and hurricanes...	No change. This belongs in the policy section and is already there.	4.8	4-25	-	Andrea Wagner
Table 4-3—correct following: Title should read Emergency Shelters and Refuges and Purpose in 2017 'Āina Haina Elementary = Yes for hurricane shelter, no for tsunami refuge, no for high surf Wailupe Valley Elementary = Yes for tsunami refuge, yes for high surf	<b>Revised Plan</b> and added Potential Public	4.8	4-27	<u>Potential Public Emergency Shelters and Refuges</u>	Andrea Wagner
<b>Chapter 5</b>					
Page 5-1, add eighth bullet: • Developing a network of community resilience hubs.	<b>Revised Plan.</b> Also added bullets on 4-27	5	5-1	• <u>Develop a network of Community Resilience Hubs; and</u>	Andrea Wagner
Recent state and City and County policies discourage shoreline hardening and encourage natural or managed retreat of the shoreline. We urge that the EHSCPRD include specific measures for carrying out these policies, including formation of a community-based Redevelopment District as recommended above.	<b>Revised Plan</b> based on above language	5.3		<u>Form a community-based redevelopment district</u>	Sierra Club
Add to end of paragraph on review of zoning and other development applications that state zone change applications already assessed under Chapter 343 will not require a new EA when DPP determines the desired zoning and land use generally conform to that described in the existing EA/EIS <u>"provided it meets the visions of the current EHSCP."</u>	<b>Revised Plan</b>	5.5	5-7	<u>...EA/EIS provided it meets the visions of the Plan.</u>	Townscape
Adequate Facilities Requirement. Change "should" to "shall"	Stronger requirement language	5.5.1	5-7	zone changes <u>shall</u> be reviewed	Jeanne Ohta
	That statement is misleading.				

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Delete: ...the revised Plan will become a self-contained document.	1. Hawaii Supreme Court has ruled than any development for which a permit is sought <b>must be consistent with both zoning and the development plan.</b> (Emphasis added.) Most pointedly, the GATRI Supreme Court held that the permit applicant who is subject to the development plan and the zoning ordinance <b>"is entitled only to the more restrictive uses allowed by the development plan."</b> (Emphasis added.).	No change. The intention of the statement is to reference other regulations like zoning or other stand-alone plans.	5.6.1	5-8	-	Jeanne Ohta
	2. East Honolulu Watershed management Plan must align and also be incorporated with the Plan, as well as other plans, like Bikeway, Climate Change, Transportation, etc.	No change. The Plan has done its best to incorporate the findings of other plans. The East Honolulu Watershed Management Plan is likely not due out until 2022 and will be incorporated in future updates.			-	Jeanne Ohta
first bullet: The "4.6 percent of O'ahu's total population in 2040" is in conflict with other citations in the Plan. The Plan currently states 5 percent.		<b>Revised Plan.</b> Earlier GP Drafts did not round, but the one currently at Council does.	5.6.2	5-9	<u>5</u> percent of O'ahu's total population in <u>2040</u>	Townscape
Page 5-10, under 5.6.3 Review and Revision of Development Codes of the communities plan, it states, "State Highways Division Procedures Manual (State Department of Transportation, Vol. 8 Chapter 5, Section 4). These State highway standards needs to be reviewed to identify provisions which may conflict with the transportation policies and guidelines in the Plan." We recommend this paragraph should be expanded with further clarification on how this Section 4 of Chapter 5 titled Property Management Function specifically applies to future development reviews.		No change. The DPP is not currently proposing any change to the Procudres Manual, and there are no changes to the 1999 recommendations, but, like the other standards referenced, wants to keep everything consistent.	5.6.3	5-10	-	DOT
Add a timeline to paragraph starting with "Revision and updating..." projecting the projects major milestones	Add a timeline to this paragraph projecting the projects major milestones until it is completed since it was initiated in 2006. 12 years seems a long time for the study; a timeline would provide context for the completion of the study.	No change. A new study of DPSCPs and implementation just began.	5.6.3	5-12, 1st para	-	Jeanne Ohta
Add to the 3rd line, agencies and roles: DPP as regulator	See my comments on 5.6,1	No change. The DPP will enforce, through building codes SHPD's determinations	5.7	5-25	-	Jeanne Ohta
One of the major faults in these plans is implementation. For example, how do you organize a redevelopment district? Implementation of policies doesn't happen unless the community takes action. How do we work together to make things happen?		Implementation of the Plan occurs on various levels. The Plan calls for greater coordination with community groups and government agencies. Added Section 5.7 Implementation Matrix to identify organizations and their roles.	5.7		<b>Section 5.7</b>	Townscape
Implementation matrix for 3.2.3.1 Passive or Nature Parks, revise the first policy/guideline to the following: "Provide educational and passive recreation opportunities to preserve the Kaiwi <u>Scenic Coast Mauka to Makai Shoreline</u> . <u>Develop Wāwāmalu Beach Natural Park to increase demarcated parking on the Kaiwi Coast shoreline and preserve its dunes, native and other vegetation, beach rocks, and beach.</u> "				5-22		Townscape

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Not sure we want to develop to increase parking?	Revised implementation matrix per earlier revisions to the Plan	5.7			Natalie Iwasa
The implementation matrix in Chapter 5 is a good tool, but it is missing key elements such as adaptation to sea level rise.			5-31		Townscape
Add in the following: "Develop implementation strategies to improve the resilience of Kalaniana'ole Highway and to encourage rapid recovery of the highway from storm-related flooding due to climate change."					
Same change as above, change HSCD to HI-EMA. Update agency listing, change HSCD to HI-EMA	Revised Plan	5.7	5-16, 5-37	HI-EMA	DEM
<b>Appendix</b>					
As stated on page 2-6, the first main objective of the Community Growth Boundary is to "Avoid development of hazardous areas." Consider revising the Community Growth Boundary to remove areas within the 3.2-foot Sea Level Rise Exposure Area (SLR-XA) from the State of Hawaii Sea Level Rise Vulnerability and Adaptation Report or consider making the SLR-XA a sub-area within the Community Growth Boundary where infill and incremental intensification of existing residential lots will be restricted and Resilience Actions including increased shoreline building setbacks will be implemented. Include a map in Appendix A and/or Exhibit 2-1 showing the SLR-XA overlying the Community Growth Boundary.	No change. The community growth boundary is primarily concerned with growth and sprawl with its application on properties not currently entitled, which properties in East Honolulu's SLR-XA already are. This would not be able to be implemented. The SMA or shoreline setbacks are better avenues or State-lead initiatives.	APX			DLNR
On all three maps, the land comprising Koko Head/Hanauma Bay should be light green for "Preservation Areas" instead of dark green designating "Regional, District and Beach Parks".	<b>Revised Plan</b>	A-1, A-2, A-3 maps			Friends of Hanauma Bay
Under Parks, it states that "smaller community-based parks, including community parks, neighborhood parks, and mini parks are not shown." Please include all parks on the map.	No change. Language is consistent with other DPSCPS. A park map has been added to the <b>Technical Report</b> as <b>Figure 2-1</b> . The Plan map is not intended to be parcel specific and including smaller parks would make it so.	A-4			Townscape
Add map with 6 feet of sea level rise to the Plan (11"x17").	Revised Exhibit 2-3 to include 6 feet but not appendix. Appendix maps are consistent with other DPSCPs.	APX			Townscape
Add major cultural and natural resources to the "A-1: Open Space" map. For example, streams, mountain peaks and ridges, and wetlands should be identified. Add place names to the map.	<b>Revised Plan maps</b>	APX	A-13		Townscape
<b>General Comments</b>					
We highly encourage all agencies to consult with Hawaiian Homestead community associations and other (N)native Hawaiian organizations when preparing environmental assessments in order to better assess potential impacts to cultural and natural resources, access and other rights of Native Hawaiians.	No change as no Hawaiian Home Lands are located in East Honolulu.				DHHL

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Some of the language is too “boilerplate.” It is hard to find key words such as “agriculture.” The Plan needs to distinguish between development and redevelopment. Priority issues include sea level rise, sustainability, and cultural and natural resources. We need to look at cumulative effects on our environment.	<b>Partially Revised Plan.</b> Agriculture has not changed significantly as there are only 2 areas with no changes proposed to those areas and is identified in the PRD in Section 3.1.1. Most development in East Honolulu will be redevelopment as most areas within the CGB are built out. Unclear on the comment of the priorities of the PRD.	-	-		Townscape
Comments on the PRD were received from agencies which either expressed support, had no comments, or did not propose any changes to the PRD: DOH, DDC, DCS, HPD, DPR, DOT-Airports, DAGS, & USACE.	No change as none is proposed	-	-		DAGS, DDC, DCS, HPD, DPR, DOT-Airports, DOH, USACE
Upon review of the materials submitted, there are no Hawaiian Home Lands landholdings located within the SCP boundaries. However, a portion of the DHHL landholdings are adjacent to the proposed SCP planning area. Lands along the ridgeline as well as those identified as the Ka Iwi Scenic shoreline in the SCP are adjacent to DHHL's Ko 'olaupoko- Waimanalo lands. DHHL has developed land uses designations for these lands that are described in the DHHL 2014, O'ahu Island Plan. The activities and designations identified within the SCP complement DHHL's land use designations. Therefore, DHHL does not anticipate any impacts to our lands or beneficiaries from the project.	No change as none is proposed	-	-		DHHL
Oahu Civil Defense Agency is now Department of Emergency Management (DEM). The changes appears to have been made in most places.	<b>Revised Plan</b>	-		<u>Department of Emergency Management</u>	DEM
Hawaii State Civil Defense (HSCD) is now Hawaii Emergency Management Agency (HIEMA).	<b>Revised Plan</b>	-		<u>Hawaii Emergency Management Agency</u>	DEM
Priorities: Development, disaster preparedness, pedestrian safety, transportation.	No change. PRD has those as priorities	-			Townscape
Use location names familiar to the community. Need citations for legal parts/references. Some of the data needs to be updated. Hard to track key issues. Concerned with development on steep slopes.	Some of the names have been revised based on the Place Names of Hawaii and other comments received. Most references will be in the Technical Report.	-			Townscape
Concerned with historical and cultural resources and public rights of way. The Plan doesn't celebrate the cultural history of the place. The Plan needs more “teeth.” The Plan should be a usable document.	Discussion on historical and cultural resources have been updated per other comments. The intent of the Plan is to provide guidance and policy recommendations, not regulations. Those come after per the City Charter.	-			Townscape
One of my priority issues is the land-water connection. The language is very vague. References to privately-owned companies should be called out (i.e., Hawai'i American Water Company) or references to a community organization should be called out.	No change. Not sure of the intent of identifying companies, which could change over the life of the Plan.	-			Townscape
Some pertinent data from the 1999 Plan has been deleted. There is no enforcement from DPP.	No change. Comment vague. The Plan is intended to provide guidance and policy recommendations, not regulations. Enforcement comes after.	-			Townscape

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"Red" mark for Ka Iwi cabins- still on map.	No change. The red mark is to ID inconsistency with the State Designation.	-	-	-	Townscape
Priority issues include safety concerns resulting from hillside movement.	No change. It has been in the Plan since 1999.	-	-	-	Townscape
The Plan is too vague and not specific enough. The font in the 1999 Plan is better.	Sans serif fonts have replaced serif fonts in all DPSCPs.	-	-	-	Townscape
Clarify and define terms, such as references to "modes of transportation." Terms are not defined, such as "complete streets." The Plan is too vague.	Modes of transportation has not changed from 1999. Complete streets has been revised per DTS comment.	-	-	<ul style="list-style-type: none"> <li>• Safety;</li> <li>• Context sensitive solutions;</li> <li>• Accessibility and mobility for all;</li> <li>• Use and comfort of all users;</li> <li>• Consistency of design;</li> <li>• Energy efficiency;</li> <li>Health; and</li> <li>• Green infrastructure.</li> </ul>	Townscape
Maintain preservation lands, mauka to makai access, recreational resources	No change. Already in PRD.	-	-	-	Townscape
Public access to shoreline and mountains, vacation rentals, development on unstable slopes.	No change. Comment is vague	-	-	-	Townscape
The Plan is convoluted and vague. Water quality, recreation, preservation of conservation lands.	No change. Comment is vague	-	-	-	Townscape
Add more language about the Wailupe Stream Flood Control Study.	No change. If more information is made available by publication, it will be included in the <b>Technical Report</b> .	-	-	-	Townscape
The Plan needs to address the commercial food trucks near Makapu'u Beach and Sandy Beach.	No change. DOT (Lincoln Stevens) says it is within DOT ROW and they do not permit vending in the ROW. DOT wants DPR to permit vendors in the park where it is safer. DPR does not permit. Issue is enforcement of DOT rules.	-	-	-	Townscape
The Plan needs to better integrate watershed concepts.	<b>Revised Plan</b> per comments other comments received.	-	-	-	Townscape
What about ahupua'a concepts? How does it apply for East Honolulu?					Townscape
The EHSCP needs to be linked with the BWS Watershed Management Plan (WMP) and be in alignment with other relevant plans. Review of the final EHSCP by the Planning Commission and the City Council should be deferred until after the BWS WMP has completed community discussions on policies, recommendations, and projects to address watershed issues for East Honolulu. Findings from the BWS WMP should be incorporated into policies and guidelines for the EHSCP.	No change. This is a five-year Plan. BWS East Honolulu WMP will not be completed for another 3 years.	-	-	-	Townscape
o The Honolulu City & County Multi-Hazard Plan (currently in update status) should also be noted with an indication that they should be integrated in planning for East Honolulu.	Added a line in the <b>Technical Report</b> per OLA's comment on consolidating plans.	-	-	TR: <i>Combine hazard plans in the update of O'ahu's Multi-Hazard Pre-Disaster Mitigation Plan per the recommendation of the O'ahu Resilience Strategy.</i>	Townscape
o The City recently released a report titled "Ola: O'ahu Resilience Strategy." Proposed strategies should be integrated into the EHSCP, including strategies on climate security and community cohesion.	<b>Revised Plan.</b> Specifically # 35 and 44	-	-	-	Townscape
Reasonable time is needed for the review process of the EHSCP via the City's Neighborhood Board (NB) process. In addition to the DPP workshops, additional time should be respected so NBs can first form the Permitted Interaction Group "PIG," conduct meetings to discuss the Plan, and then to submit the findings to the NB plus follow the Sunshine Law. At least a 4-month review period (not including the holiday season) is needed to allow for the formation of the PIG/Committee reporting and NB review and action.	No change. The comment period extended from Jan/Feb to July.	-	-	-	Townscape

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Add to the vision, policies and guidelines where appropriate in the Plan that addresses the following concerns and issues relating to housing stability and aging in place for East Honolulu.	Addressed in relevant sections.	-		-	Townscape
Check usage of Hawai'i vs. Hawaii. Hawaii is the correct spelling to use for the state in government documents, while Hawai'i is correct for the island. The name of the state, Hawaii, is not written with an 'okina between the two "i", because our Statehood Act in 1959 used the spelling "Hawaii." An Act of Congress is required to "correct" the name of the state to Hawai'i. Thus, the name of the state is Hawaii, while the name of the island of the same name is Hawai'i, unless this has now been corrected by Act of Congress.	No change. Most style guides recognize Hawai'i as acceptable. It is not in many government documents based on administrative decision to not include diacriticals.	-		-	Andrea Wagner
Aina Haina should be 'Āina Haina	No change. Plan already reflects this	-		-	Andrea Wagner
Ka Iwi should be Ka'iwi	<b>Revised Plan.</b> Plan will be consistent with other official documents and write as "Kaiwi" with no 'okina. It is written as one word with no 'okina in "Place Names of Hawai'i."	-		-	Andrea Wagner
Waialae should be Wai'alae	No change. Plan already reflects this	-		-	Andrea Wagner
Ka Iwi Scenic Shoreline should be Ka'iwi coast, except where the section identified in official documents as the Ka Iwi Scenic Shoreline specifically referred to (the area roughly from Queen's Beach to Makapu'u) it is the entire coastline between Koko Head (site of Hanauma Bay) and Makapu'u that needs to be protected from further development.	<b>Revised Plan</b> to Kaiwi per Place Names of Hawai'i	-		-	Andrea Wagner
We are pleased that the East Honolulu Sustainable Communities Public Review Document (EHSCPRD) has been extensively revised to incorporate measures for dealing with sea level rise and associated climate change impacts. We also find the Implementation Matrix in Chapter 5 very helpful for tracking how the Plan's goals and objectives would be implemented, and by whom.	No change proposed	-		-	Sierra Club
Climate change, especially sea level rise, is an unprecedented challenge that completely alters the planning framework for East Honolulu. The EHSCP must now become a dynamic, rather than relatively static, document based on a fixed sea level.	No change proposed	-		-	Sierra Club
We need new tools for identifying and managing the actions which will be required to adapt to the gradual, but inexorable, sea level rise which eventually will inundate much of the makai areas of East Honolulu, including the single major highway leading into and out of the community.	No change. This is not an issue unique to East Honolulu and will be addressed at a City- or State-wide level	-		-	Sierra Club
We note that the Board of Water Supply has been holding community discussions on policies, solutions, and catalytic projects to be included in the East Honolulu Watershed Management Plan for adoption by the end of 2019.	No change. The plans are at different stages. The BWS plan will likely not be finalized until 2022. During that time other plans will be in the process of being updated. Future updates of the Plan will take into account the BWS plan.	-		-	Sierra Club
RECOMMENDATION : We recommend that submission of the final draft of the EHSCP be deferred until completion of the East Honolulu Watershed Management Plan so the final version of the EHSCP can incorporate recommendations from that Plan.					Sierra Club
We are pleased to see that the East Honolulu Sustainable Communities Public Review Document (EHSCPRD) includes language dealing with sea level rise and the related issues of coastal erosion, protection of the East Honolulu beaches, and lateral access to the shoreline.	No change proposed	-		-	Sierra Club
As sea level rises, the shoreline migrates inland if not otherwise blocked by man-made structures. Where, as is the case for much of the East Honolulu shoreline, there are such structures the beach narrows and, will ultimately disappear —resulting in degradation or loss of public trust resources, including lateral access to the shoreline.	No change proposed	-		-	Sierra Club

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Submitted comments are duplicates of those prepared by Townscape, Inc. in consultation with Neighborhood Boards #1 & #2.	The comments have previously been addressed in the Townscape comments	-		-	Sierra Club
Submitted comments are very similar or near duplicates of those prepared by Townscape, Inc. in consultation with Neighborhood Boards #1 & #2.	The comments have previously been addressed in the Townscape comments	-		-	Maunaloa Fishpond