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3.12 COASTAL ZONE MANAGEMENT ACT, HAWAIʻI SPECIAL MANAGEMENT AREAS

This section of the Final EIS discusses compliance with federal and State of Hawai'i coastal zone management regulations. The concerns under coastal zone management are twofold: ensuring that the Honoapiʻilani Highway Improvements Project (the Project) is consistent with acceptable uses in the coastal area, and analyzing the Project's consistency with federal coastal zone management goals and policies.

Following publication of the Draft EIS, the public was afforded an opportunity to review and comment on the effects of the Project with respect to the coastal zone management act and Hawai'i special management areas. Based on those comments, or other information gathered after the publication of the Draft EIS, no revision to the analysis contained within this section was warranted and no further analysis is required as part of this Final EIS.

3.12.1 Regulatory Context

In 1972, the U.S. Congress passed the federal Coastal Zone Management Act to encourage coastal states to manage development within their designated coastal areas and to balance conflicts between coastal development and the protection of resources within the coastal zone. As a part of the act, each coastal state was mandated to create a Coastal Zone Management program that set forth the state's actions to implement the rules and regulations of the act. The act also requires that federal actions within a state's coastal zone are consistent with that State's Coastal Zone Management program. Section 3.12.4 includes the analysis of the Project's consistency with the Coastal Zone Management Act.

The State of Hawai'i Coastal Zone Management Program is codified in Hawai'i Revised Statutes (HRS) Chapter 205A, which is administered by the Office of Planning and Sustainable Development. As codified, the State's Coastal Zone Management Program establishes objectives and policies for the preservation, protection, and restoration of coastal resources in Hawai'i. In Hawai'i, "coastal zone management area" means all lands of the State and the area extending seaward from the shoreline to the limit of the State's police power and management authority, including the U.S. territorial sea.

A Special Management Area (SMA) is the area of an island close to the shoreline. HRS Chapter 205A places special controls on developments along the shoreline to avoid permanent losses of valuable resources and to ensure that adequate access to publicly owned or used beaches, recreation areas, and natural resources. The SMA permitting system is part of the federally and State-approved Coastal Zone Management Program. HRS Chapter 205A designates the County of Maui as the regulatory authority for SMAs on the island of Maui.

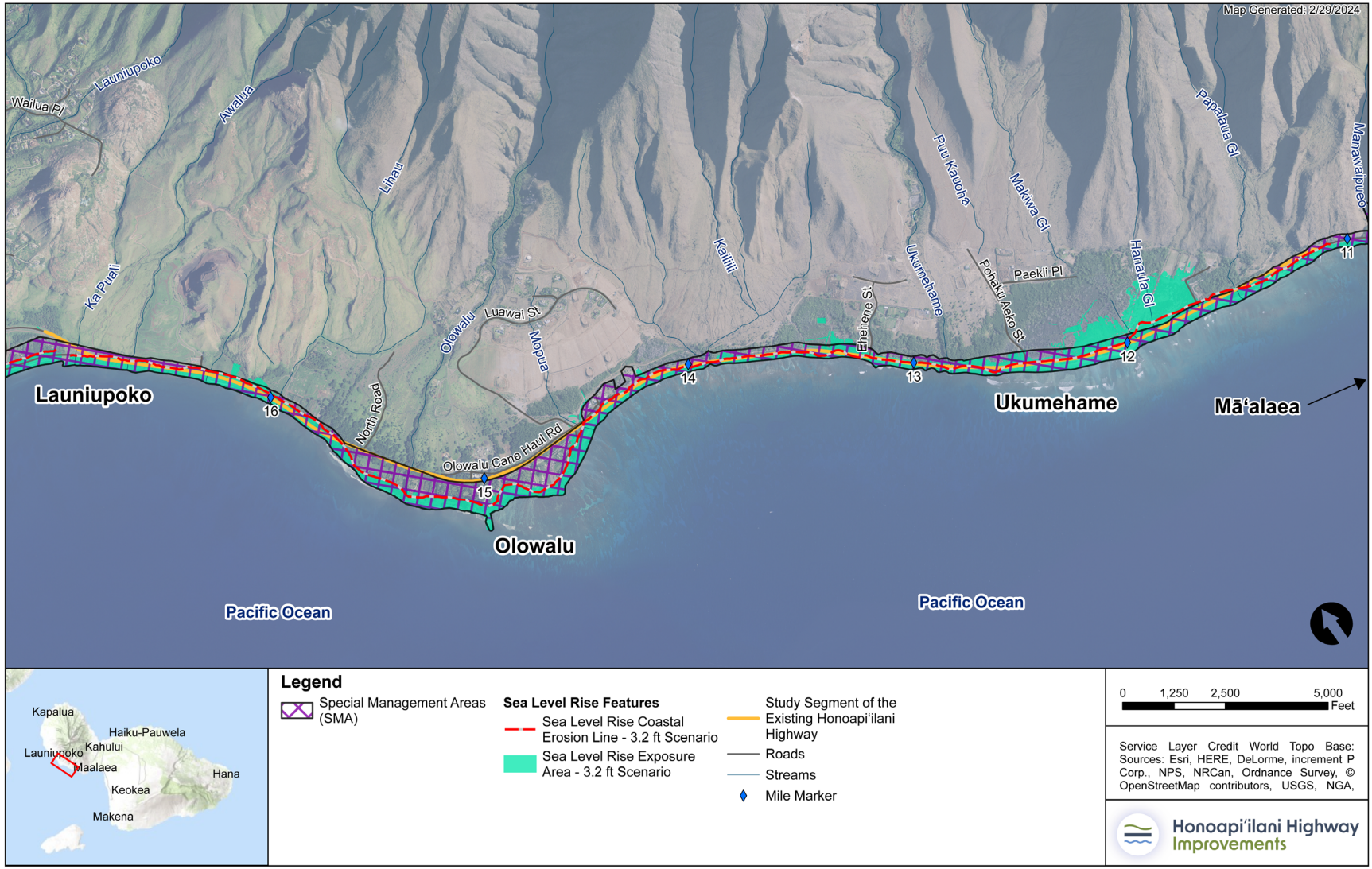
To ensure beach access, HRS Chapter 205A further prohibits development within the most coastal part of the SMA, which is referred to as the "shoreline setback area" (there are rare exceptions where a variance is granted). In 2024, Maui County enacted a new ordinance defining the shoreline setback area as the portion of the SMA seaward of the Pacific Islands Ocean Observing System 3.2-foot coastal erosion line.[1] The 3.2-foot coastal erosion line is generally more mauka than the currently defined

[1] https://www.pacioos.hawaii.edu/shoreline/slr-hawaii/.

shoreline, so a project complying with the new rules would also be compliant with the old rules. FIGURE 3.12-1 shows the SMA and the coastal erosion line.

Maui County Administrative Rules § 12-202 states that any "development" within the SMA requires an SMA Use Permit. The Maui County Code defines SMA Use Permit procedures for Maui but does not define "development." Instead, the definition of "development" is found in the State's HRS Chapter 205A and presumes that the construction of a new roadway would constitute "development" and therefore requires an SMA Use Permit.

FIGURE 3.12-1. **Special Management Area and Shoreline Setback Map**



3.12.2 Methodology

The Project and the Build Alternatives are analyzed in terms of any potential impacts they may have on coastal processes that are protected under HRS Chapter 205A. This analysis has two components:

- The anticipated extent and need for SMA permits.
- Compliance with Hawai'i's 10 coastal policies based on the analyses of project impacts presented throughout this Final Environmental Impact Statement.

3.12.3 Reasonably Foreseeable Effects

3.12.3.1 Special Management Area

The existing Honoapi'ilani Highway is largely located within the SMA with portions that are seaward of the 3.2-foot coastal erosion line. As described below, portions of all the Build Alternatives would occur within the SMA. In addition, the Project may affect portions of the Olowalu subdivision greenway which was established as part of the subdivision's SMA permit conditions from the year 2000.

No Build Alternative

The No Build Alternative would result in no change to the existing Honoapi'ilani Highway alignment. This existing alignment is mostly located within the coastal erosion line (with the exception of Olowalu village center where the highway is mauka of the coastline and a small area at the southern end of the highway before its connection with the Pali section of roadway). As a result, the No Build Alternative would leave the highway almost completely within the SMA. This would add uncertainty about the regulatory requirements of ongoing repairs and future investments necessary to maintain the highway, including shoreline hardening that can contribute to beach loss.

Build Alternatives

The Build Alternatives are located largely outside of the SMA and almost entirely mauka of the coastal erosion line in both Olowalu and Ukumehame. Since a portion of each alternative would occur within the SMA, it is anticipated that an SMA major permit would be required. The SMA permit would need to be obtained from the County of Maui during the design-build phase of the project, after the completion of NEPA/HEPA process, and before construction can begin. Consistent with the new SMA ordinance from Maui County in 2024, the following section highlights 3.2 SLR-XA characteristics of the Build Alternatives.

Olowalu

COMMON TO ALL BUILD ALTERNATIVES
All of the alignments are located mauka of the coastal erosion line in Olowalu.

Build Alternatives 2, 3, and 4 would all require acquisition of portions of the existing Olowalu Mauka Subdivision greenway. The greenway was a condition of the SMA permit obtained for that development and it is anticipated that the Project would require a modification to the original SMA permit.

BUILD ALTERNATIVE 1
Approximately 13% of Build Alternative 1 in Olowalu occurs within the SMA. This alignment is generally closer to the SMA than other alternatives in Olowalu.

BUILD ALTERNATIVE 2
Approximately 9% of Build Alternative 2 in Olowalu occurs within the SMA. The portion of the alignment that occurs with the SMA is the northern portion where all the alignments merge near Launiupoko. Build Alternative 2 would require relocation or realignment of a portion of the subdivision greenway which would require an amendment to the existing Olowalu subdivision or would be part of a Project-specific SMA.

BUILD ALTERNATIVES 3 AND 4
Less than 1% of Build Alternatives 3 and 4 in Olowalu occur within the SMA. The portion of these alignments that occur with the SMA are the northern portions where all the alignments merge together near Launiupoko. Build Alternatives 3 and 4 would require relocation, realignment, or elimination of a portion of the subdivision greenway which would require an amendment to the existing Olowalu subdivision or would be part of a Project-specific SMA.

FIGURE 3.12-2 shows the Build Alternatives in Olowalu relative to the SMA.

Ukumehame

COMMON TO ALL BUILD ALTERNATIVES
All of the alignments are located mauka of the coastal erosion line except where all Build Alternatives would join with the existing highway at the Pali. Connecting with the existing highway at the Pali could involve some work adjacent to and makai of the erosion line to protect the roadway from potential erodible soil conditions and from future coastal erosion. To avoid encroachment beyond existing highway’s paved area, a design commitment would be to use cutoff walls constructed within the highway’s makai shoulder. According to the new Maui County SMA rules, the erosion line would serve as the coastline setback line. Therefore, the need for a shoreline variance would need to be evaluated by the County of Maui once the highway design is completed.

BUILD ALTERNATIVE 1
Approximately 11% of Build Alternative 1 in Ukumehame occurs within the SMA. The County of Maui’s Pali to Puamana Plan calls for open space makai of the realigned Honoapi‘ilani Highway. Build Alternative 1 provides potential for open space makai of the realigned highway, as compared to the existing Highway and the co-located Build Alternatives 2 and 3.

As described in Section 3.6, Archaeological and Architectural Historic Properties, Build Alternative 1 would impact historic properties located in the vicinity of the Pali.

BUILD ALTERNATIVES 2 AND 3
Approximately 27% of Build Alternatives 2 and 3, which are the same in Ukumehame, occur within the SMA. These alignments are more coastal than the other alignments in Ukumehame.

BUILD ALTERNATIVE 4

Approximately 6% of Build Alternative 4 occurs within the SMA in Ukumehame. Build Alterative 4 provides the potential for open space makai of the realigned highway.

The alternatives in Ukumehame are shown relative to the SMA in FIGURE 3.12-3.

FIGURE 3.12-2. **Alternatives and Special Management Area in Olowalu**

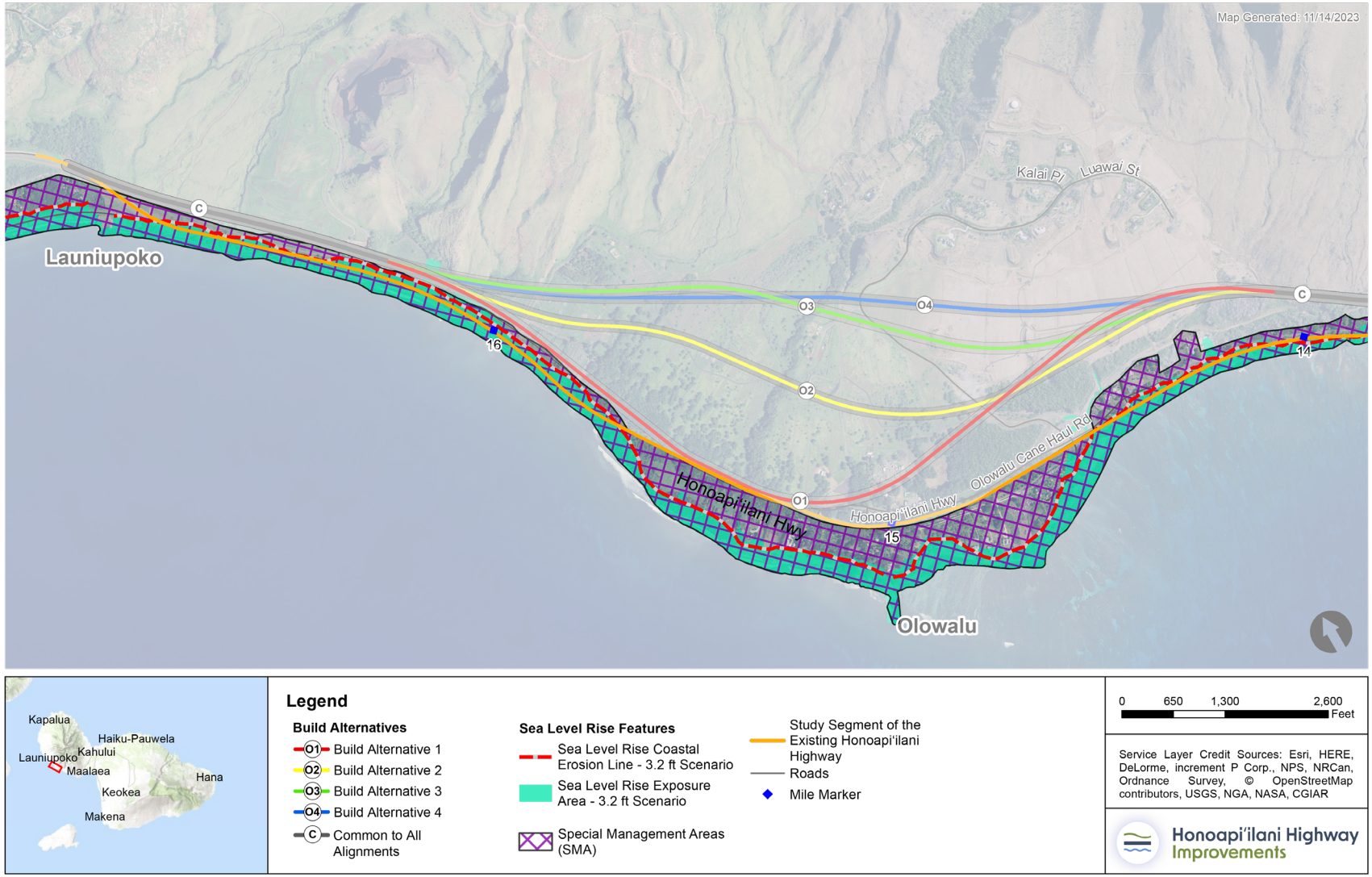
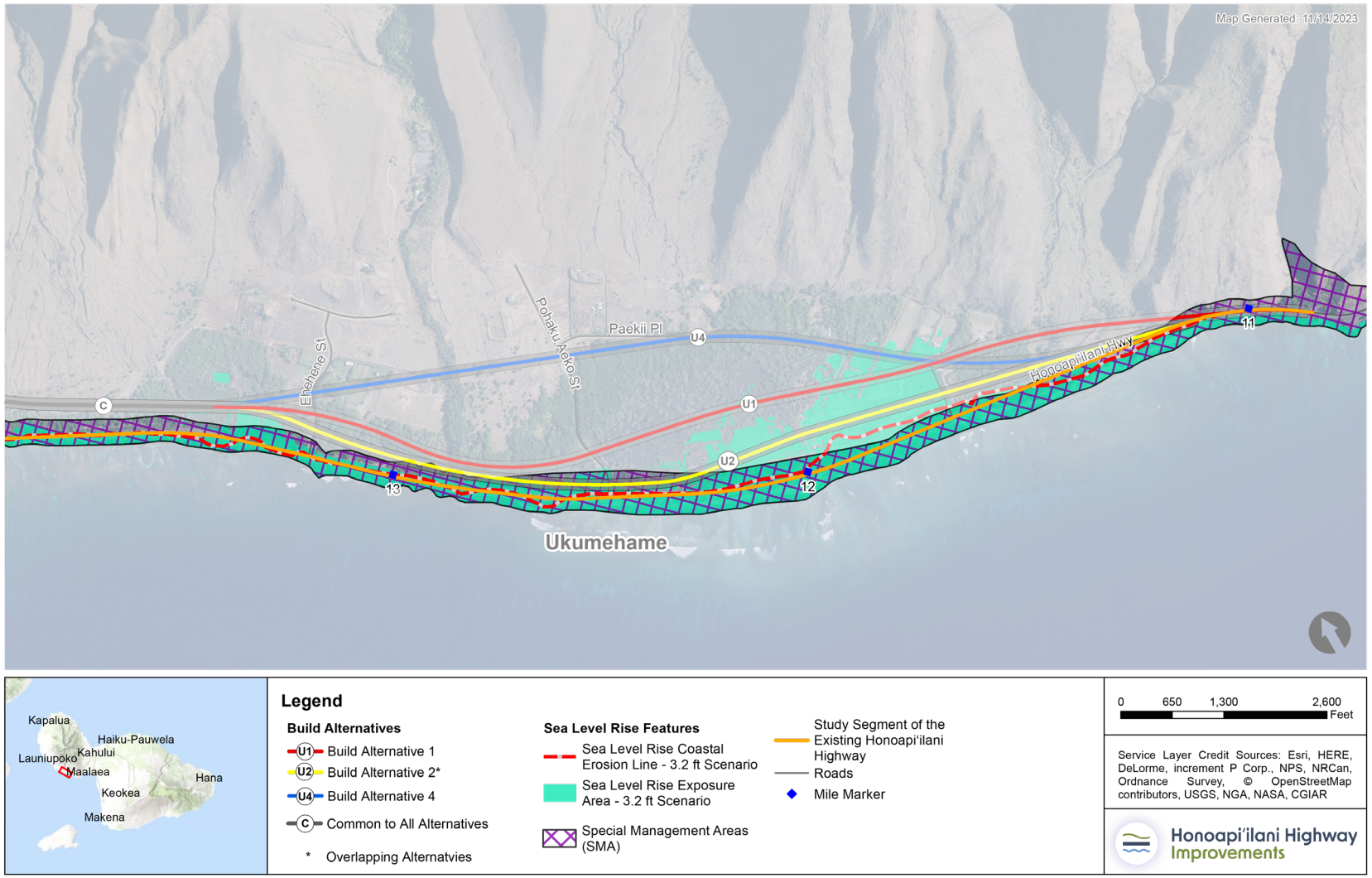


FIGURE 3.12-3. **Alternatives and Special Management Area in Ukumehame**



3.12.4 Coastal Zone Management Federal Consistency Review

HRS Chapter 205A requires lead federal agencies to review federal programs, permits, licenses, and development proposals for consistency with the Coastal Zone Management Program. The Project would require approvals from federal and State agencies; therefore, it is subject to consistency review in accordance with the policies set forth to implement the Coastal Zone Management Program.

The federal review evaluates a project's consistency with objectives and policies in 10 categories:

- Recreational resources
- Historic resources
- Scenic and open space resources
- Coastal ecosystems
- Economic uses
- Coastal hazards
- Managing development
- Public participation
- Beach and coastal dune protection
- Marine and coastal resources

An analysis of the consistency of the Project with Coastal Zone Management Program objectives and policies is presented in TABLE 3.12-1. The formal consistency review would begin during the design build process upon completion of the final design.

TABLE 3.12-1 **CZM Federal Consistency Analysis**

	NOT APPLICABLE (N/A)	SUPPORTS (S)	DOES NOT SUPPORT (NS)
RECREATIONAL RESOURCES			
Objective: Provide coastal recreational opportunities accessible to the public.			
Policies:			
Improve coordination and funding of coastal recreational planning and management.	N/A		
Provide adequate, accessible, and diverse recreational opportunities in the coastal zone management area by:		S	
a) Protecting coastal resources uniquely suited for recreational activities that cannot be provided in other areas.		S	
b) Requiring restoration of coastal resources that have significant recreational and ecosystem value, including but not limited to coral reefs, surfing sites, fishponds, sand beaches, and coastal dunes, when these resources will be unavoidably damaged by development; or requiring monetary compensation to the State for recreation when restoration is not feasible or desirable.	N/A		

	NOT APPLICABLE (N/A)	SUPPORTS (S)	DOES NOT SUPPORT (NS)
c) Providing and managing adequate public access, consistent with conservation of natural resources, to and along shorelines with recreational value.		S	
d) Providing an adequate supply of shoreline parks and other recreational facilities suitable for public recreation.	N/A		
e) Ensuring public recreational uses of County, State, and federally owned or controlled shoreline lands and waters that have recreational value consistent with public safety standards and conservation of natural resources.	N/A		
f) Adopting water quality standards and regulating point and nonpoint sources of pollution to protect, and where feasible, restore the recreational value of coastal waters.		S	
g) Developing new shoreline recreational opportunities, where appropriate, such as artificial lagoons, artificial beaches, and artificial reefs for surfing and fishing.	N/A		
h) Encouraging reasonable dedication of shoreline areas with recreational value for public use as part of discretionary approvals or permits by the land use commission, board of land and natural resources, and County authorities; and crediting that dedication against the requirements of Hawai'i Revised Statutes, Section 46-6.	N/A		
Consistency Analysis			
The No Build Alternative would retain public access to beaches and parks along the corridor, although the reliability of the roadway could jeopardize continuous access. Closures and repairs are already frequent, and future sea level rise and continued coastal erosion would further impair the roadway's reliability. In addition, the busy roadway has service disruptions from traffic turning on, off, and across the highway. The Build Alternatives would be consistent with the Hawai'i Coastal Zone Management Recreational Resources policies and would not adversely affect existing coastal recreation areas such as Pāpalaua Wayside Park, Ukumehame Firing Range, and Ukumehame Beach Park. Furthermore, the Project would be consistent with the County of Maui's 2005 *Pali to Puamana Parkway Master Plan*, which proposes recreation and open space development makai of the relocated Honoapi'ilani Highway and the 2022 *West Maui Community Plan*, which calls for the balanced distribution of parks and the development of a network of trails and greenways. The Project would include connection routes that maintain existing access to resources. Relocating the highway would allow for the development of open space makai of the newly constructed highway. Because community plans call for open space makai of the realigned highway in Ukumehame, Build Alternatives 1 and 4 would provide more opportunity for open space than the more coastal alignment of Build Alternatives 2 and 3. Section 3.1, Land Use and Zoning, and Section 3.5, Parklands and Recreational Resources/Beach Access, contain more detailed discussions.			
HISTORIC RESOURCES			
Objective: Protect, preserve, and, where desirable, restore those natural and human-made historic and prehistoric resources in the coastal zone management area that are significant to Hawaiian and American history and culture.			
Policies:			
1. Identify and analyze significant archaeological resources.		S	
Maximize information retention through preservation of remains and artifacts or salvage operations.		S	
Support State goals for protection, restoration, interpretation, and display of historic resources.		S	
Consistency Analysis			
The No Build Alternative would make no changes to the existing right-of-way and would have no adverse or beneficial effects on historic resources identified in the project area.			

	NOT APPLICABLE (N/A)	SUPPORTS (S)	DOES NOT SUPPORT (NS)
The Build Alternatives would have potential adverse effects on archaeological and historic resources, but such effects would be minimized or avoided to the extent practicable. An Executed Programmatic Agreement (PA) has been developed as part of the Section 106 consultation process to define additional testing requirements and development of mitigation as appropriate. The Executed PA was signed by key participating parties including the Federal Highway Administration, the Hawaiʻi Department of Transportation, and the Hawaiʻi State Historic Preservation Department. With the PA in place, the Build Alternatives would be consistent with this policy. Build Alternative 1 in Ukumehame would impact historic properties in the vicinity of the Pali. For a more detailed discussion, see Section 3.6, Archaeological and Architectural Historic Properties.			
SCENIC AND OPEN SPACE RESOURCES			
Objective: Protect, preserve, and, where desirable, restore or improve the quality of coastal scenic and open space resources.			
Policies:			
1. Identify valued scenic resources in the coastal zone management area.		S	
Ensure that new developments are compatible with their visual environment by designing and locating those developments to minimize the alteration of natural landforms and existing public views to and along the shoreline.	N/A		
Preserve, maintain, and, where desirable, improve and restore shoreline open space and scenic resources.		S	
Encourage those developments that are not coastal dependent to locate in inland areas.	N/A		
Consistency Analysis			
The No Build Alternative would result in no new construction and limited changes to the scenic resources in the area. To the extent that continued repair and hardening of the existing highway (that is, new seawalls or barriers) could impair scenic resources, the No Build Alternative would be incompatible with this policy. The Build Alternatives would move Honoapiʻilani Highway farther mauka of the existing highway and coastline. The existing roadway is proposed be transferred to the County of Maui to serve as a local connecter and access to waterfront recreational resources and beaches. The new alignments would be higher in elevation, including some portions on elevated viaducts and bridges. However, while the new alignments could be visible in a mauka viewshed from coastal areas, grade changes and vegetation would likely minimize the views of the new roadway from the beaches and shoreline (see Section 3.8, Visual and Scenic Character). The roadway—providing local access to beaches, shorelines, residences, and businesses—would carry substantially less traffic (see Section 3.14, Transportation). No development is associated with the Project, but it would remove volumes of traffic away from the coastline, making it compatible with the policy of seeking to move noncoastal dependent development inland of the coast.			
COASTAL ECOSYSTEMS			
Objective: Protect valuable coastal ecosystems, including reefs, beaches, and coastal dunes, from disruption and minimize adverse impacts on all coastal ecosystems.			
Policies:			
1. Exercise an overall conservation ethic, and practice stewardship in the protection, use, and development of marine and coastal resources.		S	
Improve the technical basis for natural resource management.		S	
Preserve valuable coastal ecosystems of significant biological or economic importance, including reefs, beaches, and dunes.		S	
Minimize disruption or degradation of coastal water ecosystems by effective regulation of stream diversions, channelization, and similar land water uses, recognizing competing water needs.		S	
Promote water quantity and quality planning and management practices that reflect the tolerance of fresh water and marine		S	

	NOT APPLICABLE (N/A)	SUPPORTS (S)	DOES NOT SUPPORT (NS)
ecosystems, and maintain and enhance water quality through the development and implementation of point and nonpoint source water pollution control measures.			
Consistency Analysis			
The No Build Alternative would retain the existing Honoapi'ilani Highway in its current alignment, thereby minimizing changes to coastal conditions that could adversely affect coastal resources. However, the current alignment has numerous conditions that are inconsistent with this policy. Preservation of the roadway from coastal erosion has required shoreline hardening and seawalls that have been identified as a potential source of coastal resource degradation. The existing roadway has no stormwater management infrastructure and has limited potential to enhance efforts to minimize sediment loading to the offshore reefs. The Build Alternatives would be consistent with this policy and would incorporate a mauka alignment to minimize direct effects on the coastal ecology. The Build Alternatives would also be designed with best practices in terms of stormwater management to capture and treat runoff from the roadway. A segment of Build Alternatives 2 and 3 in Ukumehame is within the Special Management Area and within potential County-designated wetlands. The Pali end of the Project would occur within a conservation district designated as "general." The roadway use, similar to the existing highway, would be consistent with the conservation district uses allowed by this designation. While the Lāhainā Bypass terminus would also be within the Special Management Area, it would be outside of the Sea Level Rise Exposure Area 3.2-foot sea level rise erosion line that the County of Maui has designated as the shoreline setback area.			
ECONOMIC USES			
Objective: Provide public or private facilities and improvements important to the state's economy in suitable locations.			
Policies:			
1. Concentrate coastal development in appropriate areas.	N/A		
Ensure that coastal dependent development and coastal related development are located, designed, and constructed to minimize exposure to coastal hazards and adverse social, visual, and environmental impacts in the coastal zone management area.	N/A		
Direct the location and expansion of coastal development to areas designated and used for that development and permit reasonable long-term growth at those areas, and permit coastal development outside of designated areas when:	N/A		
1. Use of designated locations is not feasible;			
2. Adverse environmental effects and risks from coastal hazards are minimized; and			
3. The development is important to the state's economy.			
Consistency Analysis			
The No Build Alternative would not be compatible with this policy because it would not improve the reliability of this critical transportation link to West Maui, which is critical to Maui's economy. For the Build Alternatives, improving the reliability of the highway would have an economic benefit for West Maui and for the entire county. Access to coastal resources would be more reliable. This improvement would facilitate more reliable transportation of people and goods, including tourists, tourist related goods, and workers who commute between Central Maui and West Maui.			
COASTAL HAZARDS			
Objective: Reduce hazard to life and property from coastal hazards.			
Policies:			
1. Develop and communicate adequate information about the risks of coastal hazards.		S	
Control development, including planning and zoning control, in areas subject to coastal hazards.	N/A		
Ensure that developments comply with requirements of the National Flood Insurance Program.	N/A		
Prevent coastal flooding from inland projects.	N/A		

	NOT APPLICABLE (N/A)	SUPPORTS (S)	DOES NOT SUPPORT (NS)
Consistency Analysis			
The No Build Alternative would not be compatible with this policy because it would not improve the reliability of this critical transportation link to West Maui with regular disruptions that could affect the ability of residents and workers to move away from hazardous conditions and to allow access for first responders to get to emergency locations. For the Build Alternatives, improving the reliability of the highway would allow for safer and more reliable travel with continues access through the project area.			
MANAGING DEVELOPMENT			
Objective: Improve the development review process, communication, and public participation in the management of coastal resources and hazards.			
Policies:			
1. Use, implement, and enforce existing law effectively to the maximum extent possible in managing present and future coastal zone development.	N/A		
Facilitate timely processing of applications for development permits and resolve overlapping or conflicting permit requirements.	N/A		
Communicate the potential short- and long-term impacts of proposed significant coastal developments early in their life cycle and in terms understandable to the public to facilitate public participation in the planning and review process.	N/A		
Consistency Analysis			
Overall, the Project would be consistent with this policy because it is subject to an environmental impact review process pursuant to State and federal regulations. The Project had extensive coordination with all levels of government and an active public engagement process. Agencies, stakeholders, and members of the public reviewed and gave input on the purpose and need for the Project, which is to improve the highway by reducing its vulnerability to coastal hazards including sea level rise and storm surge.			
PUBLIC PARTICIPATION			
Objective: Stimulate public awareness, education, and participation in coastal management.			
Policies:			
1. Promote public involvement in coastal zone management processes.		S	
Disseminate information on coastal management issues by means of educational materials, published reports, staff contact, and public workshops for people and organizations concerned with coastal issues, developments, and government activities.		S	
Organize workshops, policy dialogues, and site-specific mediations to respond to coastal issues and conflicts.		S	
Consistency Analysis Development			
Project stakeholders—including agencies, area residents, area lineal descendants, and other interested parties and individuals—were engaged in the Project's planning and evaluation by attending public meetings, participating in stakeholder engagement activities, and reviewing documents on the project website. These stakeholders were provided an opportunity to review and comment on the environmental planning documents throughout the project planning and development process, including pre-National Environmental Policy Act (NEPA) scoping, after the publication of the NEPA Notice of Intent and State Environmental Impact Statement Preparation Notice, and throughout Section 106 consultation. Chapter 8, Public Involvement and Agency Coordination, contains more details about Public and Agency outreach for the Project.			

	NOT APPLICABLE (N/A)	SUPPORTS (S)	DOES NOT SUPPORT (NS)
BEACH AND COASTAL DUNE PROTECTION			
Objective: 1. Protect beaches and coastal dunes for: a) Public use and recreation; b) The benefit of coastal ecosystems; and c) Use as natural buffers against coastal hazards; and Coordinate and fund beach management and protection.			
Policies:			
1. Locate new structures inland from the shoreline setback to conserve open space, minimize interference with natural shoreline processes, and minimize loss of improvements due to erosion.		S	
Prohibit construction of private shoreline hardening structures, including seawalls and revetments, at sites that have sand beaches and at sites where shoreline hardening structures interfere with existing recreational and waterline activities.	N/A		
Minimize the construction of public shoreline hardening structures, including seawalls and revetments, at sites that have sand beaches and at sites where shoreline hardening structures interfere with existing recreational and waterline activities.	N/A		
Minimize grading of and damage to coastal dunes.		S	
Prohibit private property owners from creating a public nuisance by inducing or cultivating the private property owner's vegetation in a beach transit corridor.	N/A		
Prohibit private property owners from creating a public nuisance by allowing the private property owner's unmaintained vegetation to interfere or encroach upon a beach transit corridor.	N/A		
Consistency Analysis			
The No Build Alternative would be inconsistent with this policy because the continued need to maintain the roadway would conflict with policies No. 1 and No. 3 above—seawalls and shoreline hardening are now and would continue to be needed within the shoreline area to ensure the continued operation of the highway. The Project would be consistent with this policy by proposing to move the highway away from the coast, and the Project's purpose and need are consistent with the protection of beach resources. The existing roadway would be transferred to the County of Maui and would be used for access to the coastline, beaches, and local businesses and residents. This reduced demand on the existing roadway would minimize the improvements necessary to ensure its operation as the key link to and from West Maui. Overall, the use of lands makai of the relocated highway would be consistent with the County of Maui's 2005 *Pali to Puamana Parkway Master Plan*, which calls for open space and recreational areas makai of the Build Alternatives in Ukumehame.			

	NOT APPLICABLE (N/A)	SUPPORTS (S)	DOES NOT SUPPORT (NS)
MARINE AND COASTAL RESOURCES			
Objective: Promote the protection, use, and development of marine and coastal resources to assure their sustainability.			
Policies:			
1. Ensure that the use and development of marine and coastal resources are ecologically and environmentally sound and economically beneficial.	N/A		
Coordinate the management of marine and coastal resources and activities to improve effectiveness and efficiency.	N/A		
Assert and articulate the interests of the State as a partner with federal agencies in the sound management of ocean resources within the United States exclusive economic zone.		S	
Promote research, study, and understanding of ocean and coastal processes, impacts of sea level rise, marine life, and other ocean resources to acquire and inventory information necessary to understand how coastal development activities relate to and impact ocean and coastal resources.	N/A		
Encourage research and development of new, innovative technologies for exploring, using, or protecting marine and coastal resources.	N/A		
Consistency Analysis			
By maintaining the existing highway alignment, the No Build Alternative would not introduce new competing uses for marine or coastal uses. But as a coastal roadway that has required extensive shoreline hardening to maintain its usability, the No Build Alternative would be less compatible with the policy's directive for better stewardship of these resources. The Build Alternatives, with associated stormwater and erosion control facilities, would be consistent with the policy's intent to provide for the best management of marine and coastal resources. As a separate project, The Nature Conservancy is studying nature-based solutions that can be implemented along the existing Honoapiʻilani Highway.			

3.12.5 Construction Effects

During construction, stormwater best management practices would ensure that water quality is not adversely impacted. Some noise impacts to area beaches are anticipated during construction, but these impacts would be temporary. Similarly, access to Pāpalaua Wayside Park may be temporarily impacted during construction.

3.12.6 Reasonably Foreseeable Indirect Effects

For a separate project, The Nature Conservancy is researching nature-based solutions that could be implemented along the existing Honoapiʻilani Highway. This could inform the County of Maui on potential uses of the existing highway and also methods to preserve wetlands and water resources in the area.

The relocation of the highway would allow the County of Maui to continue to develop their plans for open space in the area consistent with the *Pali to Puamana Parkway Master Plan*.

3.12.7 Build Alternatives Comparative Assessment

3.12.7.1 Olowalu

In Olowalu, Build Alternative 1 would have the highest percentage of alignment within the SMA (13%), and Build Alternatives 3 and 4 would have the lowest, with less than 1% occurring within the SMA.

As described above, Build Alternatives 2, 3, and 4 would require acquisition of portions of the existing Olowalu Mauka Subdivision greenway.

3.12.7.2 Ukumehame

All the Build Alternatives in Ukumehame have portions in the SMA, particularly at the Pali where they connect with the existing highway. Approximately 27% of Build Alternatives 2 and 3 would be within the SMA in the vicinity of Pōhaku 'Aeko Street.

The Pali end of the Project would occur within a conservation district designated as "general." The roadway use, similar to the existing highway, would be consistent with the conservation district uses allowed by this designation.

The County requires a Major SMA permit for projects whose construction costs exceed $500,000, therefore, the Project would require a Major SMA permit, which would be obtained during the design-build phase of the project. Further, given that all the alternatives would be makai of the erosion line at the Pali, a shoreline variance may also be required.