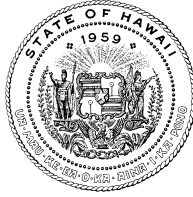


JOSH GREEN, M.D.  
GOVERNOR

SYLVIA LUKE  
LT. GOVERNOR



DEAN MINAKAMI  
EXECUTIVE DIRECTOR

## STATE OF HAWAII

DEPARTMENT OF BUSINESS, ECONOMIC DEVELOPMENT, AND TOURISM

### HAWAII HOUSING FINANCE AND DEVELOPMENT CORPORATION

677 QUEEN STREET, SUITE 300

HONOLULU, HAWAII 96813

FAX: (808) 587-0600

IN REPLY REFER TO:  
24:PECB/91

August 14, 2024

Ms. Mary Alice Evans, Director  
Office of Planning and Sustainable Development  
P.O. Box 2359  
Honolulu, Hawaii 96804-2359

Dear Ms. Evans:

**Subject:** Determination of No Additional Environmental Review to Satisfy Chapter 343, Hawaii Revised Statutes for the Gateway Rentals at Ho‘opili Project (Project)  
Parcels A21 and A28; East Kapolei, Oahu – Tax Map Key (1) 9-1-018:012 (portion)

Pursuant to Section 11-200.1-11, Hawaii Administrative Rules (HAR), this letter serves as notification and a request for publication in the next issue of *The Environmental Notice* that the Hawaii Housing Finance and Development Corporation (HHFDC) has determined no additional environmental review is required for the subject Project.

In 2008, the *Ho‘opili Final Environmental Impact Statement (EIS)* was accepted by the Land Use Commission and Honolulu City Council. The EIS assessed potential environmental impacts and provided mitigation measures for the full build-out of the Ho‘opili Master Planned Community. The Applicant proposes to build affordable rentals on a 12.22-acre parcel within that community to meet housing demand, which will replace the business / commercial use initially contemplated on that parcel and in the EIS. This document accounts for the change in use on the subject parcel.

After careful analysis and as described in the attachment, HHFDC as the approving agency is invoking HAR 11-200.1-11 that the EIS is applicable to the Project and that additional environmental review is not required.

Sincerely,

Dean Minakami  
Executive Director

Attachment

## **GATEWAY RENTALS AT HO‘OPILI PROJECT DETERMINATION OF NO ADDITIONAL ENVIRONMENTAL REVIEW NOTICE**

The Gateway Rentals at Ho‘opili Project (Project) is a 348-unit affordable rental housing development located within the Ho‘opili Master Planned Community and situated mauka of the University of Hawaii – West Oahu and Tokai University campuses, and west of Kualaka‘i Parkway. The Project will be built in two phases on two parcels totaling 12.22 acres. Phase 1 will be built on Parcel A21 and will consist of 192 units and provide 373 vehicular parking stalls. Phase 1 will include four, four-story mid-rise buildings. Phase 2 will be built on Parcel A28 at an undetermined future date and will consist of 156 units in three, four-story mid-rise buildings and provide 290 vehicular parking stalls. The Project will include a centrally located Community Center with administrative space and a tot lot.

The Applicant commits to setting aside units based on the following income and rent restrictions listed below for a period of 75 years.

<b>Restricted at the Area Median Income (AMI)</b>	<b>One-Bedroom</b>	<b>Two-Bedroom</b>	<b>Three-Bedroom</b>
30% of the AMI	5 units	9 units	4 units
50% of the AMI	9 units	17 units	9 units
60% of the AMI	82 units	141 units	71 units
Total Affordable Units	96 units	167 units	84 units
Manager Unit	0 units	1 unit	0 units
<b>Total Number of Units</b>	<b>96 Units</b>	<b>168 Units</b>	<b>84 Units</b>

Apartment floor areas will start at 542 square feet for the one-bedroom units and go up to 983 square feet for the three-bedroom units. Each mid-rise building will be serviced by a single-loaded corridor to promote natural ventilation of the units. Each unit will be constructed with attention paid to sound attenuation so that households will be less disturbed by their neighbors' activities.

At a higher level, the master plan developer of the Ho‘opili Master Planned Community is D.R. Horton, who will convey the land at no cost to Mutual Housing Association of Hawai‘i, Inc. (Mutual Housing or Applicant), who will in turn develop affordable rental units. Mutual Housing will serve as the general partner, ground lessor and developer of the Project.

### **AS ORIGINALLY PROPOSED IN THE FINAL EIS (2008)**

In 2008, the Land Use Commission and the Honolulu City Council approved the *Ho‘opili Final Environmental Impact Statement (EIS)*.<sup>1</sup> The EIS addressed potential impacts and provided mitigation measures for the full build-out of the Ho‘opili Master Planned Community, which consists of the development of 11,750 residential units, five schools, community centers, parks, and commercial and light industrial uses on 1,600 acres.

The EIS provided regional, location, and site maps such as flood insurance rate maps, floodway boundary maps, United States Geological Survey topographic maps, United States Department of Agriculture soil maps, and technical reports on the Project area. These included geological

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<sup>1</sup> [https://files.hawaii.gov/dbedt/erp/EA\\_EIS\\_Library/2008-08-23-OA-FEIS-Acceptance-Hoopili-Vol-1.pdf](https://files.hawaii.gov/dbedt/erp/EA_EIS_Library/2008-08-23-OA-FEIS-Acceptance-Hoopili-Vol-1.pdf)

surveys, hydrological surveys, biological surveys, historic and cultural surveys, and traffic studies. The EIS identified and analyzed potential impacts, including but not limited to environmental and cultural impacts, impacts to traditional or customary practices, and alternatives considered. The EIS also included proposed measures for avoidance, minimization, or mitigation for limiting the potential environmental or cultural impacts.

The proposed land uses are shown in the Ho'opili Conceptual Land Use Plan (Page 19 and as illustrated in Figure 2.9 in the EIS) and are deemed as "approximate land use" areas that were to possibly be refined through the land use review and approval processes. Since the initial publication of the EIS, the Honolulu High-Capacity Transit Corridor alignment and other features within Ho'opili have been finalized.

### **THE PROJECT, NOW AS PROPOSED (2024)**

The Project site is located within Parcel A, which is a 52-acre property identified with TMK (1) 9-1-018:012 (portion). As originally envisioned and disclosed in the EIS, Parcel A was proposed to have business / commercial use. Owned by D.R. Horton, a 12.22-acre portion of Parcel A will be subdivided and conveyed to the Applicant for the construction of affordable rentals now known as the Gateway Rentals at Ho'opili Phase 1 and Phase 2.

The change in use is needed for two reasons:

1. To meet the ongoing high demand for affordable rental housing in the Kapolei area as evidenced by the SMS Hawai'i market study titled *Market Analysis of Affordable Housing in Leeward, O'ahu* (SMS 2018). The study noted that demand for rentals within the affordable range for low-income households is anticipated to significantly exceed supply for the foreseeable future. The 60% of the AMI and below households generally have a greater tendency to be overcrowded or doubled up.

Other studies such as the *Hawai'i Housing Planning Study* (HHFDC 2019) identified the need for affordable rental housing units to address demand through 2025. While the methods employed by each study produce differing results, they both conclude that the need for affordable rental housing for Honolulu's low-income households is significant.

2. To repurpose underutilized allowable commercial use floor area due to softened demand.

Under the Revised Ordinances of Honolulu, the Project site is zoned B-2 Community Business District, and as such residential dwellings are not permitted in the underlying B-2. On May 13, 2024, HHFDC certified the Project as an affordable housing project under the Governor's Sixth Proclamation Relating to Affordable Housing dated April 19, 2024, suspending Chapter 46-4, Hawaii Revised Statutes, and related Revised Ordinances of Honolulu as they relate to the Project to the extent necessary to allow the construction of multifamily residential affordable housing units.

The Applicant will seek State funding and Low-Income Housing Tax Credits.

## ENVIRONMENTAL ANALYSIS

Below is a summary of the relevant environmental analysis of the Project.

1. *Land Use and Zoning.* The Project site is within the City and County of Honolulu B-2 (Business) zoning district. The Applicant requested and was granted a suspension of HRS 46-4, County Zoning, and related county code(s), to the extent necessary to allow the construction of multi-family residential affordable housing units on any lot that is zoned for commercial or mixed commercial use. See above for additional details.
2. *Traffic.* A comprehensive Traffic Impact Assessment Report was completed for the overall planned community in the EIS, conducted by Wilbur Smith Associates. The overall Project will generate significant additional vehicle trips in phases of completion, with comprehensive traffic mitigation measures implemented tied to the scheduled completion of Project increments. As a significant new commercial service area, the Project is anticipated to generate a significant number of vehicle trips. With the planned conversion of a portion of the Project to the subject affordable housing project, the expected number of daily vehicle trips and the timing of ingress and egress will change. Weekday morning and afternoon peak period traffic will be more associated with commuter and school traffic. Weekend peak periods will reflect a residential community traffic flow and less commercial traffic flow. Mitigation measures planned for the overall master-planned community are anticipated to accommodate the changes in traffic flow with the Project.
3. *Archaeological and Cultural Resources.* An Archaeological Inventory survey (AIS) report was completed for the overall planned community in the Final EIS, by Cultural Surveys Hawaii, Inc. The survey included the Project area.

There were no historic property findings in the AIS of the Ho'opili area in the portion including the Project. The State Historic Preservation Division (SHPD) concurred with the findings of the AIS in their letter dated November 6, 2006 (SHPD Log No. 2006.3670).

The AIS identified five historic properties nearly 1.5 miles from the Project site, in the vicinity of Old Fort Weaver Road. These historic properties consist of historic period agricultural features, such as water pumping stations and the plantation railway berm. The Project included mitigation measures relating to the treatment of these five historic properties under a SHPD approved Preservation Plan and Archaeological Monitoring Plan.

4. *Biological Resources.* Faunal and botanical surveys were conducted for the EIS. The area inclusive of the Project site contained either cleared land or active corn (*Zea mays*) cultivation with sparse weedy species such as castor bean (*Ricinus communis*), lion's ear (*Leonotis nepetifolia*), partridge pea (*Chamaecrista nictitans*), and kikania (*Xanthium strumarium* var. *canadense*). None of the plant species which occurred on the Project site were considered a threatened or endangered species or a species of concern. Mammalian surveys revealed only alien species, including house mouse (*Mus musculus domesticus*), dog (*Canis f. familiaris*), mongoose (*Herpestes a. auropunctatus*), horse (*Equus c. caballus*) and cat (*Felis catus*). Avian surveys recorded 24 avian species, including two indigenous migratory shorebird species, the Pacific Golden Plover

(*Pluvialis fulva*) and Ruddy Turnstone (*Arenaria interpres*). The remaining 22 species were alien and included pheasants, partridges, herons, pigeons and doves, bulbuls, larks, starlings, sparrows, mockingbirds and finches. The Short-eared Owl, or Pueo (*Asio flammeus sandwichensis*) and the Hawaiian hoary bat (*Lasiurus cinereus semotus*) were not detected during the survey. The site does not contain any unique habitat. The Final EIS concluded that the modification of the present habitat will have no deleterious effect on mammalian or avian species currently listed as endangered or threatened, or proposed for listing under either the federal or state endangered species statutes.

## 5. *Infrastructure.*

*Sewer.* Sewer service is available at the Project site, and additional capacity will be built by D.R. Horton. Sewer will be discharged through an existing 15-inch sewer lateral located at the southeast corner of the project site. Downstream of the sewer lateral, a series of sewer mains ranging from 10-inch to 24-inch convey sewage through the University of Hawaii West Oahu property to Kualaka'i Parkway. At Kualaka'i Parkway, sewage continues south through 30-inch and 42-inch trunk lines towards the 42-inch Kapolei Interceptor located on the north side of Franklin D. Roosevelt Avenue. Within the Kapolei Interceptor, sewage is conveyed eastward towards the Honouliuli Wastewater Treatment Plant located on the northeast border of Kalaeloa.

*Water.* Potable water service is available at the Project site, and additional capacity will be built by D.R. Horton. The potable water source for domestic use will be from the East Kapolei 440-foot Water System. Potable water will be drawn from an existing 20-inch water main through an 8-inch water lateral connection with a 4-inch bypass lateral connection located to the west of the project site and south of the future Driveway B. The non-potable water source for irrigation use will be from the future East Kapolei 215-foot non-potable water system. A 4-inch non-potable water connection will be made to a future 16-inch water main located to the west of the project site and south of the future Driveway B.

*Drainage.* Drainage systems are available to the Project site, and additional capacity will be built by D.R. Horton. The drainage system will connect to a future permanent drainage basin that will be built as part of the planned Gateway Development. Drainage will flow water from the building sites to an underground system with a connection to the drainage system in the future Driveways A and B of the planned Gateway Development. The drainage basin will be utilized in conjunction with various on-site detention systems to reduce the runoff exiting the project site to pre-developed conditions.

*Roadways.* There are no existing roadways to the Project, site but D.R. Horton will construct new roads. There are plans to construct an internal roadway system for the larger lot that the Project site will tie into. In addition, a connection of the larger lot to Farrington Highway is planned as part of the Farrington Highway Widening project by the Department of Transportation, Highways Division. Direct access to the Project site will be available through the future Driveways A and B, which feed into the subdivision off Kualaka'i Parkway and Farrington Highway, respectively.

*Electrical.* There is no existing electrical service to the Project site, but D.R. Horton and/or Hawaiian Electric Company will construct electrical service.

6. *Visual.* The Project site is within the B-2 zoning district, and the zoning map for the area where the Project site is located allows for building heights of up to 150 feet. The proposed residential structures will be 4 stories and 57 feet high.
7. *Environmental Site Assessment.* A Phase 1 Environmental Site Assessment (ESA) of the entire Project site found no evidence of recognized environmental conditions, controlled recognized environmental conditions, or historical environmental conditions. Based on the findings, the ESA recommends no further investigation.
8. *Noise.* The construction of the Project will cause an incremental increase in construction-related noise, but it will be temporary and is not anticipated to be significant in the surrounding area where the predominant source of noise would be from vehicular traffic. If the noise emissions are above standards stipulated in Section 11-46, HAR (Community Noise Control), a permit will be required to regulate the permissible noise levels.
9. *Air.* The Project may have some short-term impacts on air quality in the form of fugitive dust emissions because of construction activities. Fugitive dust emissions can be controlled mostly by watering of active work areas, using wind screens, keeping adjacent paved roads clean and covering of open-bodied trucks.

In addition, the Applicant will obtain all required permits and comply with permit conditions to mitigate construction-related impacts.

## CONSULTATIONS

The following parties were consulted as part of the public outreach and exemption processes (excluding consultations undertaken through the EIS).

AGENCY / ORGANIZATION	NAME	CONSULTATION DATE
D. R. Horton Hawaii LLC	President Tracy Tonaki and staff	Throughout planning and design phases 2022 to 2024
Makakilo / Kapolei / Honokai Hale Neighborhood Board		February 28, 2024
Department of Planning and Permitting	Director Dawn Takeuchi Apuna and staff	Multiple meetings in 2023 and 2024
Hawaii Department of Transportation	Director Ed Sniffen	2022 and 07/10/2024
Hawaii Department of Education	Superintendent Keith Hayashi	07/10/2024
Office of Planning and Sustainable Development	Director Mary Alice Evans	07/10/2024
CCH Department of Planning and Permitting	Director Dawn Takeuchi Apuna	07/10/2024
CCH Mayor’s Office of Housing and Homelessness	Director Denise Iseri-Matsubara	07/10/2024
CCH Department of Transportation Services	Director J. Roger Morton	07/10/2024
CCH Department of Design and Construction	Director Haku Milles	07/10/2024
CCH Department of Parks and Recreation	Director Laura Thielen	07/10/2024

The following comments were received during the comment period. Responses are provided in italics.

1. Hawaii Department of Transportation (DOT).

- a. Comment: The Project site is approximately 2.75 miles from the property boundary of John Rodgers Airfield. All projects within 5 miles of State airports are advised to read the Technical Assistance Memorandum for guidance with development and activities that may require further review and permits.

*Response: The Applicant has reviewed the Technical Assistance Memorandum for development activities within 5 miles of state airports and will follow its guidance. Development activities will be undertaken in a manner to avoid impacts on Rodgers Airfield operations.*

- b. Comment: The Federal Aviation Administration (FAA) regulation requires the submittal of FAA Form 7460-1 Notice of Proposed Construction or Alteration pursuant to the Code of Federal Regulations, Title 14, Part 77.9, if the construction or alteration is within 20,000 feet of a public use or military airport which exceeds a 100:1 surface from any point on the runway of each airport with its longest runway more than 3,200 feet. Construction equipment and staging area heights, including heights of temporary construction cranes, shall be included in the submittal.

*Response: The Applicant has reviewed the requirements for submitting a FAA Form 7460-1 and assessed that the construction of the Gateway Rentals would not trigger the requirement to submit an FAA Form 7460-1 to the DOT Airports Planning Section.*

- c. Comment: Due to the proximity to the airport, the developer and future residents should be aware of potential noise from aircraft operations. There is also a potential for fumes, smoke, vibrations, odors, etc., resulting from occasional aircraft flight operations over or near the project location. These impacts may increase or decrease over time and are dependent on airport operations.

*Response: Future residents of the Project will receive a disclosure in their lease concerning Rodgers Airfield and its operations. Such a disclosure will advise residents of the possible impacts of airport operations, such as fumes, noises, and vibrations.*

- d. DOT requires that the Project does not provide landscape and vegetation that will create a wildlife attractant, which can potentially become a hazard to aircraft operations. Please review the FAA Advisory Circular 150/5200-33C, *Hazardous Wildlife Attractants On Or Near Airports* for guidance. If the Project creates a wildlife attractant, the Applicant shall immediately mitigate the hazard upon notification by the DOT and/or FAA.

*Response: The Applicant has reviewed the FAA Advisory Circular 150/5200-33C, Hazardous Wildlife Attractants on or near Airports. The Circular will be shared with the Project's landscape architects, who will follow its guidance so that no landscape features will become a wildlife attractant.*

- e. If a solar energy photovoltaic (PV) system is going to be installed, be aware that PV systems located in or near the approach path of aircrafts can create a hazardous condition for pilots due to possible glint and glare reflected from the PV panel array. If glint or glare from the PV array creates a hazardous condition for pilots, the owner of the PV system shall be prepared to immediately mitigate the hazard upon notification by the DOT and/or FAA.

FAA requires a glint and glare analysis for all solar energy PV systems near airports. The [www.sandia.gov/glare](http://www.sandia.gov/glare) website has information and guidance with the preparation of a glint and glare analysis. A separate FAA Form 7460-1 will be necessary for the solar energy PV system. After the FAA determination of the Form 7460-1 glint and glare analysis, a copy shall be provided to the DOT Airport Planning Section by the owner of the solar energy PV system.

Solar energy PV systems have also been known to emit radio frequency interference (RFI) to aviation-dedicated radio signals, thereby disrupting the reliability of air-to-ground communications. Again, the owner of the solar energy PV system shall be prepared to immediately mitigate the RFI hazard upon notification by the DOT and/or FAA.

*Response: A PV system is planned for the Project's office and maintenance buildings. The Applicant's design team has been apprised to specify non-glint and non-glare solar panels, and the development team will prepare a glint and glare analysis for the Project. The Applicant acknowledges that if it is determined that its PV array creates a hazardous condition for pilots, it will take immediate action to mitigate the situation.*

2. Office of Planning and Sustainable Development (OPSD).

- a. Comment: The site plan, displayed in Exhibit 2, would benefit from improved internal and external transportation connectivity.
  - i. The Project should provide more vehicular connections to Farrington Highway and Kualaka'i Parkway. Considering fire and emergency safety issues, it appears the Project has only one driveway onto a public right of way. The two western driveways are contingent on the adjacent development's site plans and construction schedule, which are not part of this current proposal.

*Response: The Applicant understands that vehicular connections to Farrington Highway and Kualakai Parkway were coordinated with and approved by DOT and limited to the two access points provided. The Project is designed to comply with fire and emergency access requirements.*

*The Applicant understands that site work for the adjacent development is currently scheduled to commence in October 2024, with the roads and infrastructure completed in the summer of 2025.*



- ii. The Project is located approximately 0.38 miles from the Keone'ae rail station and is adjacent to planned mixed-use, transit-oriented development (TOD) projects. Internal pedestrian/bicycle circulation and facilities should be thoughtfully developed for the Project Site. This would involve multi-use paths and trails located primarily outside the parking lots and crosswalks at conflict points. The internal circulation networks should be connected to external networks. A parking structure would be a more efficient use of land as an alternative to surface parking and would create an environment that is not as autocentric.

*Response: For the purposes of this response, "internal roads" are roads within the Project while "external roads" are roads for the adjacent development that will connect the Project to Farrington Highway and Kualakai Parkway.*

*Pedestrian/bicycle circulation and facilities are accounted for in the site and internal road design of the Project. The design currently provides for both short- and long-term parking for 196 bicycles and 42 bicycles, respectively.*

*External roads include multi-use paths. Applicant understands that although not required, these multi-use paths were elected to be included to enhance pedestrian/bicycle circulation. Additionally, the Applicant understands that the Farrington Highway Widening project by DOT will improve Farrington Highway in the vicinity of the Project to include sidewalks and bike lanes allowing for increased pedestrian/bicycle circulation within the Project area.*

*Although a standalone parking structure may be considered a more efficient use of land than surface parking, the construction cost is cost-prohibitive given that the Gateway development is an affordable rental project.*

- b. OPSD is developing the *East Kapolei Infrastructure Implementation Master Plan (EKMP)*, with completion expected in 2026. The EKMP will identify regional public and private infrastructure improvements required to support TOD, including the provision of affordable housing on State lands and the development of State facilities on lands near the East Kapolei rail stations. When available, we would appreciate it if HHFDC or the Applicant could share information detailing the development schedule for infrastructure improvements and final buildout. Information regarding the timing of the subdivision and buildout of the larger lot would also benefit the coordination of regional infrastructure.

*Response: As previously mentioned, the Applicant understands that site work, including infrastructure (utilities and road) improvements, for the adjacent development, is currently scheduled to commence in October 2024 with an approximate completion date in the summer of 2025. The Applicant understands that a timeline for the buildout of the remainder of the large Gateway subdivision is not currently available.*

3. Hawaii Department of Education (DOE).

Comment: The Department has determined that upon the completion of Parcel A21 (Phase 1) and Parcel A28 (Phase 2), approximately 129 students will be generated. We anticipate the attendance of approximately 73 elementary, 21 middle school, and 35 high school students.

*Response: Comments acknowledged.*

4. CCH, Department of Design and Construction (DDC).

Comment: DOT has a Farrington Highway Widening project to widen a portion of Farrington Highway, between Kapolei Golf Course Road to Old Fort Weaver Road. Please consult with DOT if they have any comments on the subject request, and if the additional traffic generated by the Project will impact their roadway design capacity for future full build-out surrounding the Project area.

*Response: DOT has been consulted and is aware of this Project.*

## **DETERMINATION OF NO ADDITIONAL REVIEW**

Section 11-200.1-11, Hawaii Administrative Rules (HAR), provides that when an agency is considering whether a prior exemption, an environmental assessment (EA) with a finding of no significant impact, or an accepted environmental impact statement (EIS) satisfies Chapter 343, HRS, for a proposed action, the agency may determine that additional environmental review is not required if it meets the following three criteria:

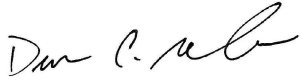
1. The proposed action was a component of, or is substantially similar to, an action that received an exemption, an EA with a finding of no significant impact, or an accepted EIS.
2. The proposed action is anticipated to have direct, indirect, and cumulative effects similar to those analyzed in a prior exemption, an EA with a finding of no significant impact, or an accepted EIS.
3. In the case of an EA with a finding of no significant impact or an accepted EIS, the proposed action was analyzed within the range of alternatives.

The Project meets the above criteria in the following ways:

1. It is substantially similar to the original concept of developing a mixed-use community as originally proposed and analyzed in the EIS. The proposed land uses are shown in the Ho'opili Conceptual Land Use Plan (Page 19 and as illustrated in Figure 2.9 in the EIS) and are deemed as "approximate land use" areas and may be adjusted as it goes through refinement through the land use review and approval processes.
2. It is anticipated to have direct, indirect, and cumulative effects similar to those analyzed in the EIS. See the discussion on environmental analysis above.
3. It is consistent with the EIS as housing was the primary subject of analysis of the EIS. As currently proposed, the Project will provide a greater amount of affordable housing

but no business / commercial space within its 12.22-acre footprint. The rest of Parcel A will be available for business / commercial opportunities should they present themselves. While the EIS alternatives section discussed alternatives based on the business / commercial use of the property, housing was an implicit alternative.

HHFDC has analyzed the Project and concludes it will have the same level of environmental impacts as disclosed in the EIS. As the approving agency for this Project, HHFDC invokes HAR 11-200.1-11, that additional environmental review is not required.



\_\_\_\_\_  
Signature of Director or Delegate

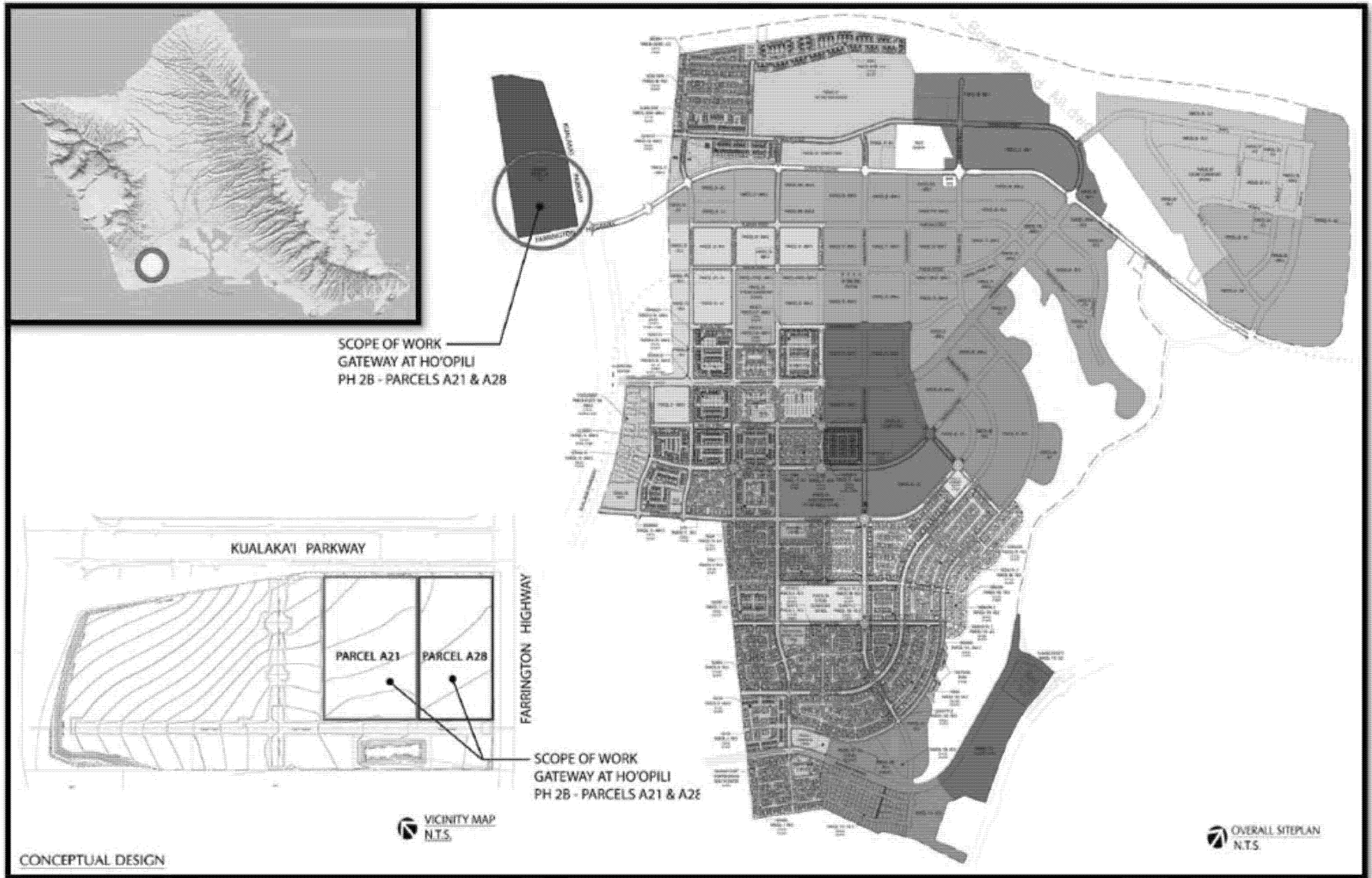
Aug 14, 2024

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Date

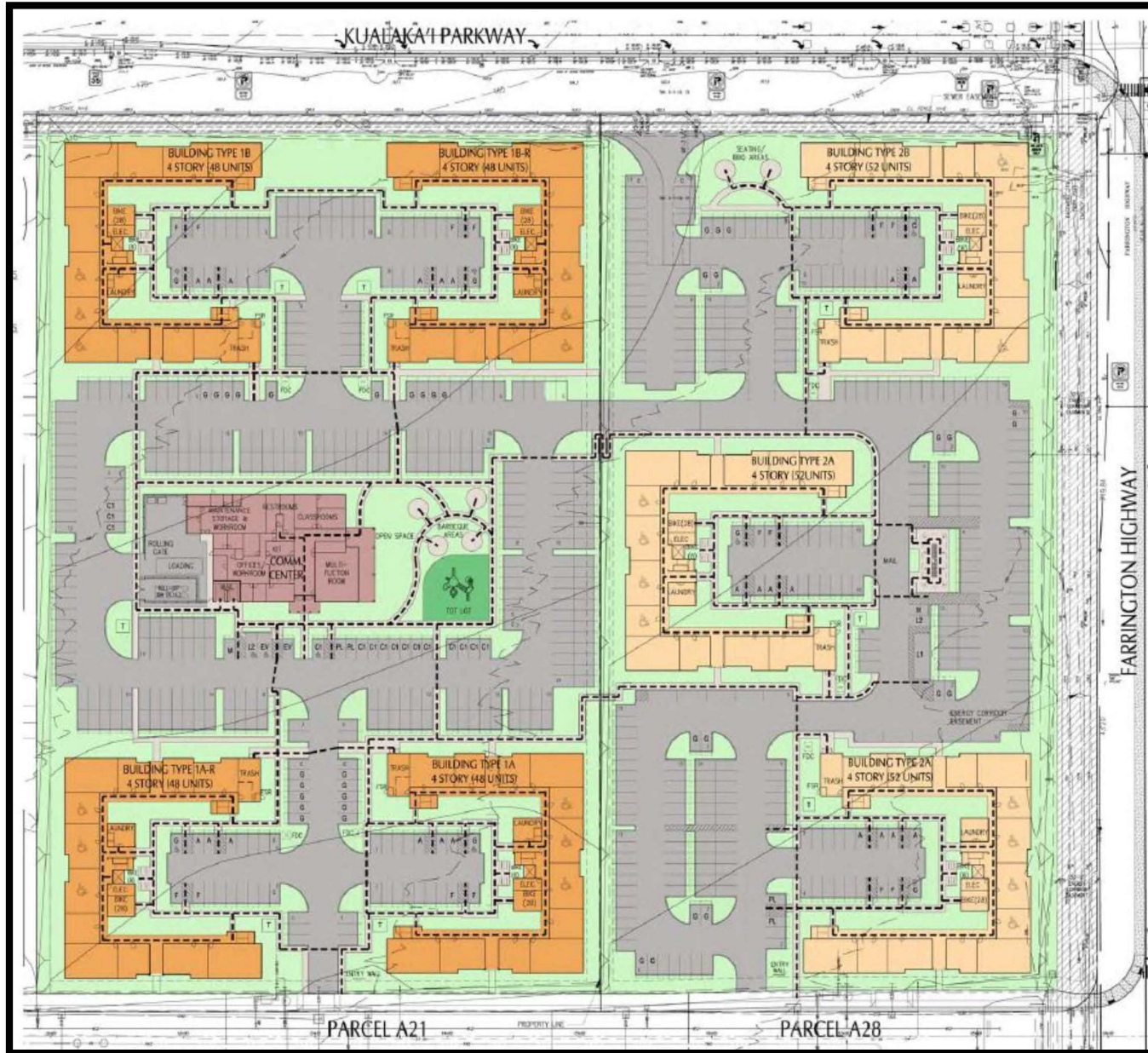
**List of Exhibits:**

- Exhibit 1 – Location Map
- Exhibit 2 – Site Plan
- Exhibit 3 – Aerial View
- Exhibit 4 – Rendering and Elevation
- Exhibit 5 – Typical Consultation Letter (excluding exhibits 1 through 4)
- Exhibit 6 – Comment letter from DOT
- Exhibit 7 – Comment letter from OPSD
- Exhibit 8 – Comment letter from DOE
- Exhibit 9 – Comment letter from DDC

# Exhibit 1: Location Map



## Exhibit 2: Site Plan



### Exhibit 3: Aerial View View Looking Makai



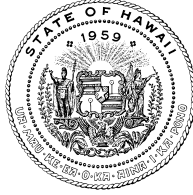
# Exhibit 4: Renderings and Elevation



# Exhibit 5 - Typical Consultation Letter

JOSH GREEN, M.D.  
GOVERNOR

SYLVIA LUKE  
LT. GOVERNOR



DEAN MINAKAMI  
EXECUTIVE DIRECTOR

## STATE OF HAWAII

DEPARTMENT OF BUSINESS, ECONOMIC DEVELOPMENT, AND TOURISM

### HAWAII HOUSING FINANCE AND DEVELOPMENT CORPORATION

677 QUEEN STREET, SUITE 300

HONOLULU, HAWAII 96813

FAX: (808) 587-0600

IN REPLY REFER TO:

24:PECB/69

July 10, 2024

Mr. Ed Sniffen, Director  
Hawaii Department of Transportation  
869 Punchbowl Street  
Honolulu, Hawaii 96813

Dear Mr. Sniffen:

Subject: Consultation to Support Notice of Determination of No Additional Environmental Review for the Gateway Rentals at Ho‘opili Project (Project) Parcels A21 and A28; East Kapolei, Oahu  
Tax Map Key (1) 9-1-018:012 (por)

The Gateway Rentals at Ho‘opili Project (Project) is a 348-unit affordable rental development located within the Ho‘opili Master Planned Community and situated mauka of the University of Hawaii – West Oahu and Tokai University campuses, and west of Kualaka‘i Parkway. The Project will be built in two phases on two parcels totaling 12.22 acres. Phase 1 will be built on Parcel A21 and will consist of 192 units and provide 373 vehicular parking stalls. Phase 1 will include four, four-story mid-rise buildings and a Community Center. Phase 2 will be built on Parcel A28 at an undetermined future date and will consist of 156 units and provide 290 vehicular parking stalls. Phase 2 will include three, four-story mid-rise buildings. The Project will include a centrally located Community Center with administrative space and a tot lot.

The Applicant commits to setting aside units based on the following income and rent restrictions listed below for a period of 75 years.

Restricted at the Area Median Income (AMI)	One-Bedroom	Two-Bedroom	Three-Bedroom
30% of the AMI	5 units	9 units	4 units
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<b>Total Number of Units</b>	<b>96 Units</b>	<b>168 Units</b>	<b>84 Units</b>



Apartment spaces will start at 542 square feet for the one-bedroom units and go up to 983 square feet for the three-bedroom units. Each mid-rise building will be serviced by a single-loaded corridor to promote natural ventilation of the units. Each unit will be constructed with attention paid to sound attenuation so that households will be less disturbed by their neighbors.

At a higher level, the master plan developer of the Ho‘opili Master Planned Community is D.R. Horton, who will convey the land at no cost to Mutual Housing Association of Hawai‘i, Inc. (Mutual Housing or Applicant), who will in turn develop affordable rental units. Mutual Housing will serve as general partner, ground lessor and developer of the Project.

### **As Originally Proposed in the EIS (2008)**

In 2008, the Land Use Commission and the Honolulu City Council approved the *Ho‘opili Final Environmental Impact Statement (EIS)*.<sup>1</sup> The EIS addressed potential impacts and provided mitigation measures for the full build-out of the Ho‘opili Master Planned Community, which consists of the development of 11,750 residential units, five schools, community centers, parks, and commercial and light industrial uses on 1,600 acres.

The EIS provided regional, location, and site maps such as flood insurance rate maps, floodway boundary maps, United States Geological Survey topographic maps, United States Department of Agriculture soil maps, and technical reports on the Project area. These included geological surveys, hydrological surveys, biological surveys, historic and cultural surveys, and traffic studies. The EIS identified and analyzed potential impacts, including but not limited to environmental and cultural impacts, impacts to traditional or customary practices, and alternatives considered. The EIS also included proposed measures for avoidance, minimization, or mitigation for limiting the potential environmental or cultural impacts.

The proposed land uses are shown in the Ho‘opili Conceptual Land Use Plan (Page 19 and as illustrated in Figure 2.9 in the EIS) and are deemed as “approximate land use” areas that were to possibly be refined through the land use review and approval processes. Since the initial publication of the EIS, the Honolulu High-Capacity Transit Corridor (HHCTC) alignment and other features within Ho‘opili has been finalized.

### **The Project, As Now Proposed (2024)**

The Project site is located within Parcel A, which is a 52-acre property identified with TMK (1) 9-1-018:012 (por). As originally envisioned and disclosed in the EIS, Parcel A was proposed to have business / commercial use. Owned by D.R. Horton, a 12.22-acre portion of Parcel A will be subdivided and conveyed to the Applicant for the construction of affordable rentals now known as the Gateway Rentals at Ho‘opili Phase 1 and Phase 2.

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<sup>1</sup> [https://files.hawaii.gov/dbedt/erp/EA\\_EIS\\_Library/2008-08-23-OA-FEIS-Acceptance-Hoopili-Vol-1.pdf](https://files.hawaii.gov/dbedt/erp/EA_EIS_Library/2008-08-23-OA-FEIS-Acceptance-Hoopili-Vol-1.pdf)

The change in use is needed for two reasons:

1. To meet the ongoing high demand for affordable rental housing in the Kapolei area as evidenced by SMS Hawai'i market study titled *Market Analysis of Affordable Housing in Leeward, O'ahu* (SMS 2018). The Study noted that demand for rentals within the affordable range for low-income households is anticipated to significantly exceed supply for the foreseeable future. The 60% of the AMI and below households generally have a greater tendency to be overcrowded or doubled up.

Other studies such as the *Hawai'i Housing Planning Study* (HHFDC 2019) identified the need for affordable rental housing units to address demand through 2025. While the methods employed by each study produce differing results, they both conclude that the need for affordable rental housing for Honolulu's low-income households is significant.

2. To repurpose underutilized allowable commercial use floor area due to softened demand.

Under the Revised Ordinances of Honolulu, the Project site is zoned B-2 Community Business District, and as such residential dwellings are not permitted in the underlying B-2. On May 13, 2024, HHFDC certified the Project as an affordable housing project under the Governor's Sixth Proclamation Relating to Affordable Housing dated April 19, 2024, suspending Chapter 46-4, Hawaii Revised Statutes, and related Revised Ordinances of Honolulu as they relate to the Project to the extent necessary to allow the construction of multifamily residential affordable housing units.

The Applicant will seek State funding and Low-Income Housing Tax Credits (LIHTC).

#### **Determination of No Additional Environmental Review**

Section 11-200.1-11, Hawaii Administrative Rules (HAR), provides that when an agency is considering whether a prior exemption, an environmental assessment (EA) with a finding of no significant impact, or an accepted environmental impact statement (EIS) satisfies Chapter 343, HRS, for a proposed action, the agency may determine that additional environmental review is not required if it meets the following three criteria:

1. The proposed action was a component of, or is substantially similar to, an action that received an exemption, an EA with a finding of no significant impact, or an accepted EIS.
2. The proposed action is anticipated to have direct, indirect, and cumulative effects similar to those analyzed in a prior exemption, an EA with a finding of no significant impact, or an accepted EIS.
3. In the case of an EA with a finding of no significant impact or an accepted EIS, the proposed action was analyzed within the range of alternatives.

Mr. Ed Sniffen  
July 10, 2024  
Page 4

The Project meets the above criteria in the following ways:

1. It is substantially similar to the original concept of developing a mixed-use community as originally proposed and analyzed in the EIS. The proposed land uses are shown in the Ho‘opili Conceptual Land Use Plan (Page 19 and as illustrated in Figure 2.9 in the EIS) and are deemed as “approximate land use” areas and may be adjusted as it goes through refinement through the land use review and approval processes.
2. It is anticipated to have direct, indirect, and cumulative effects similar to those analyzed in the EIS. See the discussion on environmental analysis above.
3. It is consistent with the EIS as housing was the primary subject of analysis of the EIS. As currently proposed, the Project will provide a greater amount of affordable housing but no business / commercial space within its 12.22-acre footprint. The rest of Parcel A will be available for business / commercial opportunities should they present itself. While the EIS alternatives section discussed alternatives based on the business / commercial use of the property, housing was an implicit alternative.

HHFDC has analyzed the Project and believes it will have the same level of environmental impacts as disclosed in the EIS. HHFDC is notifying agencies of its intent to invoke Section 11-200.1-11, HAR, but is consulting with agencies to provide a transparent process that the EIS is applicable to the Project and that additional environmental review is not required.

If you have any comments or concerns, HHFDC seeks your input by August 9, 2024, before it proceeds with this action.

If you have any questions, please have your staff contact Mr. Dean Watase, Housing Planning Manager, at 587-0639 or by email at [dean.k.watase@hawaii.gov](mailto:dean.k.watase@hawaii.gov).

Sincerely,



Chris Woodard  
Chief Planner

#### List of Exhibits

- Exhibit 1 – Location Map
- Exhibit 2 – Site Plan
- Exhibit 3 – Aerial View
- Exhibit 4 – Renderings

## GATEWAY RENTALS AT HO'OPILI PROJECT SUMMARY & IMPACT ANALYSIS

Location and Tax Map Key	Parcels A21 and A28; East Kapolei, Oahu Tax Map Key (1) 9-1-018:012
Project Site	≈ 12.22 Acres
Total Units	348 Residential Dwelling Units
Affordability	Gateway Rentals at Ho'opili (Project) will be an affordable rental housing development with nearly 100% of the units set aside as affordable. There will be a total of 348 units, which includes one manager unit. The Project will remain affordable at 60% AMI for a period of 75 years.

RESOURCE AREA	SUMMARY OF POTENTIAL IMPACTS
LAND USE & ZONING	The Project site is within the City and County of Honolulu B-2 (Business) zoning district. The Applicant requested and was granted an exemption per HRS 46-4, County Zoning, and related county code(s), to the extent necessary to allow the construction of multi-family residential affordable housing units on any lot that is zoned for commercial or mixed commercial use, subject to the approval of the county planning director.
TRAFFIC	A comprehensive Traffic Impact Assessment Report (TIAR) was completed for the overall planned community in the <i>Ho'opili Master Planned Community Final EIS</i> (EIS), conducted by Wilbur Smith Associates. The overall Project will generate significant additional vehicle trips in phases of completion, with comprehensive traffic mitigation measures implemented tied to the scheduled completion of Project increments. As a significant new commercial service area, the Project is anticipated to generate a significant number of vehicle trips. With the planned conversion of a portion of the Project to the subject affordable housing project, the expected number of daily vehicle trips and the timing of ingress and egress will change. Weekday morning and afternoon peak period traffic will be more associated with commuter and school traffic. Weekend peak periods will reflect a residential community traffic flow and less commercial traffic flow. Mitigation measures planned for the overall master planned community are anticipated to accommodate the changes in traffic flow with the Project.
INFRASTRUCTURE	<p><b>Sewer.</b> Sewer service is available to the Project site but additional capacity will be built by D.R. Horton. Sewer will be discharged through an existing 15-inch sewer lateral located at the southeast corner of the project site. Downstream of the sewer lateral, a series of sewer mains ranging from 10-inch to 24-inch convey sewage through the University of Hawaii, West Oahu property to Kualakai Parkway. At Kualakai Parkway, sewage continues south through 30-inch and 42-inch trunk lines towards the 42-inch Kapolei Interceptor located on the north side of Franklin D. Roosevelt Avenue. Within the 42-inch Kapolei Interceptor, sewage is conveyed eastward towards the Honouliuli Wastewater Treatment Plant located on the northeast border of Kalaeloa.</p> <p><b>Water.</b> Potable water service is available to the Project site but additional capacity will be built by D.R. Horton. The potable water source for domestic use will be from the East Kapolei 440-foot Water System. Potable water will be drawn from an existing 20-inch water main through an 8-inch water lateral connection with a 4-inch bypass lateral connection located to the west of the project site and south of the future Driveway B. The non-potable water source for irrigation use will be from the future East Kapolei 215-foot non-potable water system. A 4-inch non-potable water connection will be made to a future 16-inch water main located to the west of the project site and south of the future Driveway B.</p> <p><b>Drainage.</b> Drainage systems are available to the Project site but additional capacity will be built by D.R. Horton. The drainage system will connect to a future permanent drainage basin that will be built as part of the planned Gateway Development. Drainage will flow water from the building sites to an underground system with connection to the drainage system in the future Driveways A and B of the planned Gateway Development. The drainage basin will be utilized in conjunction with various on-site detention systems to reduce the runoff exiting the project site to pre-developed condition.</p> <p><b>Roadways.</b> There are no existing roadways to the Project site but D.R. Horton will construct new roads. There are plans to construct an internal roadway system for the larger lot that the Project site will tie into. In addition, a connection of the larger lot to Farrington Highway is planned as part of the Farrington Highway Widening project by the Department of Transportation, Highways Division. Direct access to the Project site will be available through the future Driveways A and B, which feeds into the subdivision off Kualakai Parkway and Farrington Highway, respectively.</p>

	<i>Electrical.</i> There is no existing electrical service to the Project site but D.R. Horton and/or Hawaiian Electric Company will construct electrical service.
ENVIRONMENTAL SITE ASSESSMENT	A Phase 1 Environmental Site Assessment (ESA) of the entire Project site found no evidence of recognized environmental conditions (RECs), controlled recognized environmental conditions (CRECs) or historical environmental conditions (HRECs). Based on the findings, the ESA recommends no further investigation.
VISUAL	The Project site is within the B-2 zoning district, and the zoning map for the area where the Project site is located allows for building heights of up to 150 feet. The proposed residential structures will be 4 stories and 57 feet high.
CULTURAL, HISTORIC & ARCHEOLOGICAL	<p>An Archaeological Inventory survey (AIS) report was completed for the overall planned community in the EIS, by Cultural Surveys Hawaii, Inc. (CSH). The survey included the Project area.</p> <p>There were no historic property findings in the AIS of the Ho‘opili area in the portion including the Project. The State Historic Preservation Division (SHPD) concurred with the findings of the AIS in their letter dated November 6, 2006 (SHPD Log No. 2006.3670).</p> <p>The AIS identified five historic properties nearly 1.5 miles from the Project site, in the vicinity of Old Fort Weaver Road. These historic properties consist of historic period agricultural features, such as water pumping stations and the plantation railway berm. The Project included mitigation measures relating to the treatment of these five historic properties under SHPD approved Preservation Plan and Archaeological Monitoring Plan.</p>
BIOLOGICAL	Faunal and botanical surveys were conducted for the EIS. The area inclusive of the Project site contained either cleared land or active corn ( <i>Zea mays</i> ) cultivation with sparse weedy species such as castor bean ( <i>Ricinus communis</i> ), lion’s ear ( <i>Leonotis nepetifolia</i> ), partridge pea ( <i>Chamaecrista nictitans</i> ), and kikania ( <i>Xanthium strumarium var. canadense</i> ). None of the plant species which occurred on the Project site were considered a threatened or endangered species or a species of concern. Mammalian surveys revealed only alien species, including house mouse ( <i>Mus musculus domesticus</i> ), dog ( <i>Canis f. familiaris</i> ), mongoose ( <i>Herpestes a. auropunctatus</i> ), horse ( <i>Equus c. caballus</i> ) and cat ( <i>Felis catus</i> ). Avian surveys recorded 24 avian species, including two indigenous migratory shorebird species, the Pacific Golden Plover ( <i>Pluvialis fulva</i> ) and Ruddy Turnstone ( <i>Arenaria interpres</i> ). The remaining 22 species were alien and included pheasants, partridges, herons, pigeons and doves, bulbuls, larks, starlings, sparrows, mockingbirds and finches. The Short-eared Owl, or Pueo ( <i>Asio flammeus sandwichensis</i> ) and the Hawaiian hoary bat ( <i>Lasiurus cinereus semotus</i> ) were not detected during the survey. The site does not contain any unique habitat. The EIS concluded that the modification of the present habitat will have no deleterious effect on mammalian or avian species currently listed as endangered or threatened, or proposed for listing under either the federal or state endangered species statutes.
NOISE	The construction of the Project will cause an incremental increase in construction-related noise, but it will be temporary and is not anticipated to be significant in the surrounding area where the predominant source of noise would be from vehicular traffic. If the noise emissions are above standards stipulated in Section 11-46, HAR (Community Noise Control), a permit will be required regulating the permissible noise levels.
AIR	The Project may have some short-term impacts on air quality in the form of fugitive dust emissions because of construction activities. Fugitive dust emissions can be controlled mostly by watering of active work areas, using wind screens, keeping adjacent paved roads clean and covering of open-bodied trucks.

# Exhibit 6 - Comment Letter from DOT

JOSH GREEN, M.D.  
GOVERNOR  
KE KIA'ĀINA



STATE OF HAWAII | KA MOKU'ĀINA 'O HAWAII  
DEPARTMENT OF TRANSPORTATION | KA 'OIHANA ALAKAU  
869 PUNCHBOWL STREET  
HONOLULU, HAWAII 96813-5097

EDWIN H. SNIFFEN  
DIRECTOR  
KA LUNA HO'OKELE

Deputy Directors  
Nā Hope Luna Ho'okele  
DREANALEE K. KALILI  
TAMMY L. LEE  
CURT T. OTAGURO  
ROBIN K. SHISHIDO

IN REPLY REFER TO:

STP 00538.24  
STP 8.3789

July 26, 2024

VIA EMAIL: dean.k.watase@hawaii.gov

TO: JAMES KUNANE TOKIOKA, DIRECTOR  
DEPARTMENT OF BUSINESS, ECONOMIC DEVELOPMENT AND  
TOURISM

THROUGH: DEAN MINAKAMI, EXECUTIVE DIRECTOR  
HAWAII HOUSING FINANCE AND DEVELOPMENT  
CORPORATION

FROM: EDWIN H. SNIFFEN   
DIRECTOR OF TRANSPORTATION

SUBJECT: CONSULTATION TO SUPPORT NOTICE OF DETERMINATION OF  
NO ADDITIONAL ENVIRONMENTAL REVIEW FOR THE  
GATEWAY RENTALS AT HOOPILI PROJECT  
EAST KAPOLEI, OAHU, HAWAII  
TAX MAP KEY: (1) 9-1-018: 012 (PORTION)

Thank you for your letter, dated July 10, 2024, requesting the Hawaii Department of Transportation's (HDOT) review and comments on the subject project. HDOT understands that the Mutual Housing Association of Hawaii, Inc. (Applicant) is proposing to build 348 affordable rental units on approximately 12.22 acres of land in 2 parcels located within the Hoopili Master Planned Community.

HDOT has the following comments:

1. The proposed site is approximately 2.75 miles from the property boundary of John Rodgers Airfield. All projects within 5 miles from Hawaii State airports are advised to read the Technical Assistance Memorandum (TAM) for guidance with development and activities that may require further review and permits. The TAM can be viewed at this link: [http://files.hawaii.gov/dbedt/op/docs/TAM-FAA-DOT-Airports\\_08-01-2016.pdf](http://files.hawaii.gov/dbedt/op/docs/TAM-FAA-DOT-Airports_08-01-2016.pdf).
2. The Federal Aviation Administration (FAA) regulation requires the submittal of FAA Form 7460-1 Notice of Proposed Construction or Alteration pursuant to the Code of Federal Regulations, Title 14, Part 77.9, if the construction or alteration is within

20,000 feet of a public use or military airport which exceeds a 100:1 surface from any point on the runway of each airport with its longest runway more than 3,200 feet. Construction equipment and staging area heights, including heights of temporary construction cranes, shall be included in the submittal. The form and criteria for submittal can be found at the following website:

<https://oeaaa.faa.gov/oeaaa/external/portal.jsp>. Please provide a copy of the FAA response to the Part 77 analysis to the HDOT Airport Planning Section.

3. Due to the proximity to the airport, the developer and future residents should be aware of potential noise from aircraft operations. There is also a potential for fumes, smoke, vibrations, odors, etc., resulting from occasional aircraft flight operations over or near the project location. These impacts may increase or decrease over time and are dependent on airport operations.
4. The HDOT requires that the proposed development does not provide landscape and vegetation that will create a wildlife attractant, which can potentially become a hazard to aircraft operations. Please review the FAA Advisory Circular 150/5200-33C, Hazardous Wildlife Attractants On Or Near Airports for guidance. If the development creates a wildlife attractant, the developer shall immediately mitigate the hazard upon notification by the HDOT and/or FAA.
5. If a solar energy photovoltaic (PV) system is going to be installed, be aware that PV systems located in or near the approach path of aircrafts can create a hazardous condition for pilots due to possible glint and glare reflected from the PV panel array. If glint or glare from the PV array creates a hazardous condition for pilots, the owner of the PV system shall be prepared to immediately mitigate the hazard upon notification by the HDOT and/or FAA.

The FAA requires a glint and glare analysis for all solar energy PV systems near airports. The [www.sandia.gov/glare](http://www.sandia.gov/glare) website has information and guidance with the preparation of a glint and glare analysis. A separate FAA Form 7460-1 will be necessary for the solar energy PV system. After the FAA determination of the Form 7460-1 glint and glare analysis, a copy shall be provided to the HDOT Airport Planning Section by the owner of the solar energy PV system.

Solar energy PV systems have also been known to emit radio frequency interference (RFI) to aviation-dedicated radio signals, thereby disrupting the reliability of air-to-ground communications. Again, the owner of the solar energy PV system shall be prepared to immediately mitigate the RFI hazard upon notification by the HDOT and/or FAA.

6. Key milestones related to the Hoopili Master Plan transportation impacts and mitigation are as follows:
  - Significant adverse regional impacts were identified in the 2008 Hoopili Final Environmental Impact Statement (EIS), accepted by the Land Use Commission (LUC) and the Honolulu City Council in 2008.
  - Condition No. 10 of the LUC Docket No. A06-771 Decision and Order describes D.R. Horton's obligations with respect to roadway improvements to mitigate the potential impacts of the project.
  - The HDOT accepted the May 30, 2014, Revised Traffic Impact Analysis Report.
  - The HDOT and D.R. Horton entered into a Memorandum of Agreement (MOA) (Attachment 2), dated March 3, 2020, documenting all commitments to mitigating the Hoopili Master Planned Community traffic impacts. Implementation of the mitigation measures are phased over time and based on development milestones (triggers).
7. The HDOT supports the development of affordable housing, however, D.R. Horton's MOA commitments for traffic mitigation for the entire Hoopili Master Plan remain in effect.
8. The HDOT concurs with Hawaii Housing Finance and Development Corporation that the proposed change in land use would not alter the significant impacts of the Hoopili Master Plan on traffic, as described in the accepted EIS. Invoking Section 11-200.1-11, Hawaii Administrative Rules, is appropriate, with respect to traffic impacts.
9. HDOT requests that the Applicant incorporate strategies to reduce carbon emissions in the project design.

Please submit any subsequent land use entitlement-related requests for review or correspondence to the HDOT Land Use Intake email address at [DOT.LandUse@hawaii.gov](mailto:DOT.LandUse@hawaii.gov).

If there are any questions, please contact Mr. Blayne Nikaido, Planner, Land Use Section of the HDOT Statewide Transportation Planning Office at (808) 831-7979 or via email at [blayne.h.nikaido@hawaii.gov](mailto:blayne.h.nikaido@hawaii.gov).

Attachment





Exhibit 7 - Comment Letter From OPSD  
**STATE OF HAWAII**  
**OFFICE OF PLANNING**  
**& SUSTAINABLE DEVELOPMENT**

**JOSH GREEN, M.D.**  
GOVERNOR

**SYLVIA LUKE**  
LT. GOVERNOR

**MARY ALICE EVANS**  
DIRECTOR

235 South Beretania Street, 6th Floor, Honolulu, Hawai'i 96813  
Mailing Address: P.O. Box 2359, Honolulu, Hawai'i 96804

Telephone: (808) 587-2846  
Fax: (808) 587-2824  
Web: <https://planning.hawaii.gov/>

Coastal Zone  
Management  
Program

Environmental Review  
Program

Land Use Commission

Land Use Division

Special Plans Branch

State Transit-Oriented  
Development

Statewide Geographic  
Information System

Statewide  
Sustainability Branch

DTS 202407120907NA  
24:PECB/71

August 5, 2024

Mr. Chris Woodard, Chief Planner  
Hawai'i Housing and Development Corporation  
677 Queen Street, Suite 300  
Honolulu, Hawai'i 96813  
Att: Mr. Dean Watase, Housing Planning Manager

Dear Mr. Chris Woodard:

**Subject:** Consultation to Support Notice of Determination of No Additional Environmental Review for the Gateway Rentals at Ho'opili Project  
Project File Number 24:PECB/71  
Parcels A21 and A28; East Kapolei, O'ahu  
Tax Map Key (1) 9-1-018:012 (por.)

The Office of Planning and Sustainable Development (OPSD) reviewed the materials submitted with your Request for Consultation to Support Notice of Determination of No Additional Environmental Review for the Gateway Rentals at Ho'opili Project (Project). The Project is a 348-unit affordable rental development located within the Ho'opili Master Planned Community. The Project will be built on two parcels totaling 12.22 acres (Project Site). The Project Site is located directly west of the Farrington Highway and Kualaka'i Parkway intersection and is within walking distance of the Keone'ae (University of Hawai'i at West O'ahu) rail station.

The buildout for the Project is anticipated to occur in two phases. Phase 1 will involve four, four-story mid-rise buildings and a centrally located Community Center with administrative space and a tot lot. Phase 1 will consist of 192 units with 373 vehicular parking stalls. Phase 2 will involve three, four-story mid-rise buildings. Phase 2 will consist of 156 units with 290 vehicular parking stalls. The rental units will be affordable for 75 years as proposed. The existing landowner of the Project Site, D.R. Horton, intends to convey the land at no cost to the Mutual Housing Association of Hawai'i, Inc. (Applicant), who will develop the Project.

The accepted 2008 Ho'opili Final Environmental Impact Statement (2008 FEIS), prepared by PBR Hawai'i, addressed the impacts of reclassifying approximately 1,553 acres from the State Land Use Agricultural District to the Urban District. A conceptual land use plan for the future urban buildout of the

Ho‘opili mixed-use community was provided as the proposed action. Business/commercial use was envisioned for the Project Site due to the site’s accessibility to the rail and adjacency to two major transportation corridors—Farrington Highway and Kualaka‘i Parkway. OPSD assumes, though, that the proposed revisions and overall Project remain in substantial compliance with the representations made to the Land Use Commission in Docket A06-771.

### **Determination of No Additional Environmental Review**

OPSD agrees with the Hawai‘i Housing and Finance Development Corporation’s (HHFDC) assessment that the three criteria provided in Section 11-200.1-11, Hawai‘i Administrative Rules, have been met and the Project should not be subject to additional environmental review. The Project is a component of or is substantially similar to the 2008 FEIS Proposed Action and is anticipated to have impacts similar to those analyzed previously. Additionally, the 2008 FEIS Proposed Action is conceptual and approximate in nature, intended for parcel-specific development plans to be refined through the land use review and approval process; and through coordination with State of Hawai‘i and City and County of Honolulu (City) officials upon determining the final rail alignment.

### **Comments on the Project**

The Project has been certified by HHFDC as an affordable housing project under the Governor’s Sixth Proclamation Relating to Affordable Housing dated April 18, 2024, suspending certain statutes and ordinances to allow the construction of multifamily residential affordable housing units. The Project will provide affordable rental housing of significance within walking distance of the Keone‘ae rail station, which will increase rail ridership and lower transportation costs for residents of the Project. It would be helpful to understand what entitlements or modifications to existing entitlements, if any, will be pursued. It is suggested that City and State agencies be given the opportunity to review the site plan and design of the Project before development plans are finalized.

OPSD would like to provide initial comments on the Project, as it is presented in the subject Request for Consultation to Support Notice of Determination of No Additional Environmental Review.

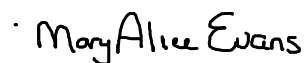
1. The site plan, displayed in Exhibit 2, would benefit from improved internal and external transportation connectivity.
  - a. The Project should provide more vehicular connections to Farrington Highway and Kualaka‘i Parkway. Considering fire and emergency safety issues, it appears the Project has only one driveway onto a public right of way. The two western driveways are contingent on the adjacent

development's site plans and construction schedule, which are not part of this current proposal.

- b. The Project is located approximately 0.38 miles from the Keone'ae rail station and is adjacent to planned mixed-use, transit-oriented development (TOD) projects. Internal pedestrian/bicycle circulation and facilities should be thoughtfully developed for the Project Site. This would involve multi-use paths and trails located primarily outside the parking lots and crosswalks at conflict points. The internal circulation networks should be connected to external networks. A parking structure would be a more efficient use of land as an alternative to surface parking and would create an environment that is not as autocentric.
2. OPSD is developing the East Kapolei Infrastructure Implementation Master Plan (EKMP), with completion expected in 2026. The EKMP will identify regional public and private infrastructure improvements required to support TOD, including the provision of affordable housing on State lands and the development of State facilities on lands near the East Kapolei rail stations. When available, we would appreciate it if HHFDC or the Applicant could share information detailing the development schedule for infrastructure improvements and final buildout. Information regarding the timing of the subdivision and buildout of the larger lot would also benefit the coordination of regional infrastructure.

Thank you for the opportunity to comment on the Notice of Determination of No Additional Environmental Review for the Gateway Rentals at Ho'opili Project. If you have any questions, please contact Brandon Soo at [brandon.a.soo@hawaii.gov](mailto:brandon.a.soo@hawaii.gov) or (808) 587-2888. If you wish to respond to this comment letter, please include DTS 202407120907NA in the subject line.

Mahalo,



Mary Alice Evans  
Director

# Exhibit 8 - Comment Letter from DOE

JOSH GREEN, M.D.  
GOVERNOR



KEITH T. HAYASHI  
SUPERINTENDENT

**STATE OF HAWAII**  
**DEPARTMENT OF EDUCATION**  
**KA 'OIHANA HO'ONA'AUAO**  
P.O. BOX 2360  
HONOLULU, HAWAII 96804

OFFICE OF FACILITIES AND OPERATIONS

August 8, 2024

Mr. Chris Woodward  
Chief Planner  
Hawaii Housing Finance and Development Corporation  
677 Queen Street, Suite 300  
Honolulu, Hawaii 96813

Re: Consultation to Support Notice of Determination of No Additional Environmental Review for the Gateway Rentals at Hoopili Project (Project), Parcels A21 and A28; East Kapolei, Oahu, Tax Map Key (1)9-1-018:012(por)

Dear Mr. Woodward:

Thank you for your letter dated July 10, 2024. The Hawaii State Department of Education (Department) has reviewed the information provided and has the following comment on the Gateway Rentals at Hoopili Project (Project).

The Department has determined that upon the completion of Parcel A21 (Phase 1) and Parcel A28 (Phase 2), approximately 129 students will be generated. We anticipate the attendance of approximately 73 elementary, 21 middle school, and 35 high school students.

Should you have any questions, please contact Cori China of the Facilities Development Branch, Planning Section, at (808) 784-5080 or via email at [cori.china@k12.hi.us](mailto:cori.china@k12.hi.us).

We appreciate the opportunity to comment.

Sincerely,

Roy Ikeda  
Interim Public Works Manager  
Planning Section

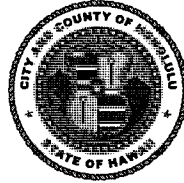
RI:ctc

c: Facilities Development Branch

Exhibit 9 - Comment Letter from DDC  
DEPARTMENT OF DESIGN AND CONSTRUCTION  
KA 'OIHANA HAKULAU A ME KE KĀPILI  
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 11TH FLOOR • HONOLULU, HAWAII 96813  
PHONE: (808) 768-8480 • FAX: (808) 768-4567 • WEBSITE: [honolulu.gov](http://honolulu.gov)

RICK BLANGIARDI  
MAYOR  
MEIA



HAKU MILLES, P.E.  
DIRECTOR  
PO'O

MARK YONAMINE, P.E.  
DEPUTY DIRECTOR  
HOPE PO'O

August 2, 2024

SENT VIA EMAIL

Mr. Chris Woodward  
[christopher.j.woodard@hawaii.gov](mailto:christopher.j.woodard@hawaii.gov)

Dear Mr. Woodward:

Subject: Consultation for Support Notice of Determination of No Additional Environmental Review for the Gateway Rentals at Ho'opili Project Parcels A21 and A28; East Kapolei, O'ahu  
Tax Map Key (1) 9-1-018:012 (por)

Thank you for the opportunity to review and comment.

Our Civil Division has comments.

The State of Hawaii, Department of Transportation (HDOT) has a Farrington Highway Widening project to widen portion of Farrington Highway, between Kapolei Golf Course Road to Old Fort Weaver Road. Please consult with HDOT if they have any comments to the subject request, and if the additional traffic generated by the proposed Gateway Rentals (348 units) development will impact their roadway design capacity for future full build out in the Kapolei-'Ewa area.

Should you have any further questions, please contact Timothy Trang, Civil Division, Chief at (808) 768-8836.

Sincerely,

A handwritten signature in black ink, appearing to read "Haku Milles". The signature is fluid and cursive.

Haku Milles, P.E., LEED AP  
Director

HM:krm (924858)