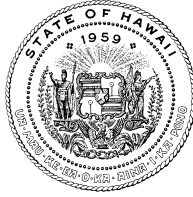


JOSH GREEN, M.D.
GOVERNOR

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/115

October 29, 2024

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

Dear Ms. Evans:

Subject: Environmental Assessment Exemption Notice
Ka Lei Momi Ka'ahumanu Homes Redevelopment Mixed-Use Project (Project)
1421 Alokele Street; Honolulu, Oahu
Tax Map Key: (1) 1-5-024:001

Pursuant to administrative rules promulgated under the authority of Section 343-6(5), Hawaii Revised Statutes; and under sections 11-200.1-15, 11-200.1-16, and 11-200.1-17, Hawaii Administrative Rules, this letter serves as notification and a request for publication that the Hawaii Housing Finance and Development Corporation (HHFDC) has declared this Project exempt from the preparation of an environmental assessment.

The Hawaii Public Housing Authority in partnership with HCDC Hawaii Development, LLC is proposing to redevelop Ka'ahumanu Homes with a new mixed-use project, which will provide up to 1,550 affordable, workforce, and market-rate homes (representing a net increase of 1,398 homes from what is currently present) and ground-level commercial/retail space.

After careful analysis as described in the attachment, HHFDC has considered primary, secondary, and cumulative impacts of the Project and has determined the Project is not anticipated to have significant impacts on the environment.

Sincerely,

Dean Minakami
Executive Director

Attachment

KA LEI MOMI KA‘AHUMANU HOMES REDEVELOPMENT MIXED-USE PROJECT ENVIRONMENTAL ASSESSMENT EXEMPTION NOTICE

Pursuant to Chapter 343, Hawaii Revised Statutes (HRS 343) and
Section 11-200.1, Hawaii Administrative Rules (HAR 11-200.1)

AGENCY OR APPLICANT ACTION

- This exempted action is an agency action as defined by HRS 343-5(b) and HAR 11-200.1-8.
- This exempted action is an applicant action as defined by HRS 343-5(e) and HAR 11-200.1-9.

EXEMPTION TYPE

The Exemption Notice for the action described below is based on HHFDC’s comprehensive exemption list,¹ which mirrors and exceeds the exemption criteria for the demolition of structures and construction of new affordable housing projects under HAR 11-200.1-15(c).

6. Demolition of structures, except those structures that are listed on the national register or Hawaii Register of Historic Places.

Part 2 Actions – Includes structures that require further consideration because of their potential impacts to the surrounding community. For example, demolition of structures that contains high levels of hazardous materials; demolition of structures that creates significant noise, fugitive dust or other adverse impacts; or demolition of structures that leads to a loss of amenities for the public.

10. New construction of affordable housing, where affordable housing is defined by the controlling law applicable for the state or county proposing agency or approving agency, that meets the following:
- A. Has the use of state or county lands or funds or is within Waikiki as the sole triggers for compliance with HRS 343;
 - B. As proposed conforms with the existing state urban land classification;
 - C. As proposed is consistent with the existing county zoning classification that allows housing; and
 - D. As proposed does not require variances for shoreline setbacks or siting in an environmentally sensitive area, as stated in HAR 11-200.1-13(b)(11).

¹ As concurred in by the Environmental Advisory Council on November 1, 2022, see: https://files.hawaii.gov/dbedt/erp/Agency_Exemption_Lists/State-Hawaii-Housing-and-Finance-Development-Corporation-2022-11-01-Exemption-List.pdf

Part 2 Actions – Development of affordable housing provided pre-assessment consultations were conducted to determine the appropriateness of preparing an exemption notice or requiring an environmental assessment.

2. Construct multi-family residential units including, but not limited to, grading; roadway and traffic systems; utility systems; dwelling units; landscaping; and ancillary facilities; provided all applicable approvals and administrative permits are obtained.

4. Allow accessory commercial activities within the development that are related to Part 2, item 2 above.

DESCRIPTION OF ACTION

Proposing Agency or Applicant: The Applicant is HCDC Hawaii Development, LLC (HCDC or the Applicant); 330 West Victoria Street Gardena, California 90248. The approving agency of this exemption notice is the Hawaii Housing Finance and Development Corporation (HHFDC).

Project Name & Address/Location: The Ka Lei Momi Ka'ahumanu Homes Redevelopment Mixed-Use Project is located at 1421 Alokele Street, Honolulu, HI 96817 (Project Site).

Estimated Construction Schedule: Construction start (Phase I): 2027 / Construction completion (Phase I): 2029.

Tax Map Key (TMK) and latitude/longitude coordinates (in decimal degrees): TMK: (1) 2-8-011:027. Coordinates: 21.326904, -157.874292

Anticipated Permits, Approvals, and Notifications:

Permitting Agency	Permit Type
City and County of Honolulu (CCH)	Demolition, grading, trenching, and building permits (DPP) Wastewater and stormwater connection permits (DPP) Certificate of Occupancy (DPP) Street usage permit (DTS) Board of Water Supply review Honolulu Fire Department plan review 201H Resolution adoption (City and County of Honolulu Council)
State of Hawaii	National Pollutant Discharge Elimination System and Noise Permit (DOH) ADA Coordination (DCAB) Chapter 6E, HRS (SHPD)
Federal	Form 7460-1 (FAA)

NARRATIVE

The Project site is a 7.37-acre parcel owned by the State of Hawaii under the jurisdiction of the Hawaii Public Housing Authority (HPHA). It is bounded by Alokele Street, Kaiwi'ula Street, McNeill Street, and Waiakamilo Road (See Exhibit 1) in the Kalihi-Pālama district of Honolulu. HPHA operates Ka'ahumanu Homes, which includes 19 buildings originally built in 1958 and last renovated in 1994. The redevelopment of Ka'ahumanu Homes is envisioned as a catalytic project with the potential to transform a state-owned land asset with aging public housing into a new, mixed-income, mixed-use, transit-oriented community designed to complement the existing community.

In partnership with HCDC, an entity controlled by Highridge Costa Development Company, HPHA is proposing to replace 152 low-income rental housing units currently comprising Ka'ahumanu Homes with a new mixed-use project. HPHA has executed a development agreement with HCDC to redevelop the property with a total of up to 1,550 affordable, workforce, and income blind² homes (representing a net increase of 1,398 homes from what is currently present) and retail and social and civic service space.

The current housing unit mix is 116 two-bedroom units and 36 three-bedroom units. When redeveloped, the housing unit mix will include studio, one-, two-, and three-bedroom units. The number of each unit type is subject to change, but the vast majority will be one- and two-bedroom units. In addition, there will be a smaller offering of studios and three-bedroom units. After the existing structures are demolished and cleared, HCDC will build six buildings ranging between 20 and 28 stories tall, which will provide up to 1,550 housing units, up to 1,780 parking stalls, and approximately 20,000 square feet of ground-level retail and social and civic service space. Outdoor amenities will include landscaped grounds, pedestrian circulation paths, large plazas, park and open space, a dog park, a tot lot, a play structure, and outdoor BBQ and picnic areas. The maximum building height is projected to be nearly 299 feet above mean sea level. See Exhibit 2A for the conceptual site plan.

HCDC commits to setting aside units based on the income and affordability restrictions listed below for 75 years.

Restricted at the Area Median Income (AMI)	Number of Units (Approximate)	Percent of Total Units (Approximate)
30% of the AMI	99	6%
50% of the AMI	99	6%
60% of the AMI	751	48%
80% of the AMI	71	5%
100% of the AMI	276	18%
Total Affordable Rental Units³	1,296	93%
For Sale(leasehold) ⁴ (>100% AMI/Market)	225	15%
For Sale (leasehold) 110% of the AMI	24	2%
For Sale (leasehold) 140% of the AMI	123	8%
For Sale (leasehold) Income Blind Units ⁵	97	6%
Total For Sale Units (leasehold)⁶	244	16%
Manager Units (2 per rental building)	10	1%
Total Number of Units	1,550	100%

² Income Blind units are available for purchase by Hawai'i residents at any income level.

³ Rental length affordability is 75 years.

⁴ For-sale leasehold condominium units sold to buyers earning 140% or less of the AMI will be subject to all HHFDC restrictions and all provisions under HRS 201H-47, 201H-49, and 201H-50 (including restrictions on the use, sale, and transfer).

⁵ Income Blind units are available for purchase by Hawai'i residents at any income level.

⁶ For-sale leasehold condominium units sold to buyers earning 140% or less of the AMI will be subject to all HHFDC restrictions and all provisions under HRS 201H-47, 201H-49, and 201H-50 (including restrictions on the use, sale, and transfer).

HCDC will seek Low-Income Housing Tax Credits to partially finance the project. In addition, HCDC will seek financing from the Rental Housing Revolving Fund, and/or other State financing programs. As such, HHFDC will be the approving agency for HRS 343 compliance because of the use of these State financing programs.

HCDC prepared a combined application to HHFDC:

- For the Project to be confirmed as a State affordable housing project under the Governor's Ninth Proclamation Relating to Affordable Housing dated October 10, 2024 (the EP), as may be succeeded by a similar emergency proclamation. Under the EP, HCDC will seek suspension from certain HRS sections; and
- To seek exemptions from certain CCH requirements under HRS 201H-38 (201H).

The 201H/EP application includes the complete list of exemptions and suspensions. Exemptions and suspensions include:

1. Exemptions from the CCH Land Use Ordinance (Chapter 21, Revised Ordinances of Honolulu) relating to mixed uses, density, height, setbacks, and other requirements.
2. Exemptions from CCH development-related fees.
3. Suspension of HRS 46-142.5, School Impact Districts; New Building Permit Requirements.
4. Suspension of HRS 46-143, Impact Fee Calculation (wastewater connection and park dedication).
5. Suspension of HRS 201H-38(a)(3), to allow the CCH Department of Planning and Permitting (DPP) Director to approve the 201H exemptions rather than the CCH Council.
6. Suspension of HRS 46-146, Time of Assessment and Collection of Impact Fees.
7. Suspension of HRS 302A-1601 to 1612, School Impact Fees.

ENVIRONMENTAL ANALYSIS

HHFDC has considered the potential effects of the Project and all related activities against the criteria checked below:

	Not Applicable
<input checked="" type="checkbox"/> Land Use and Zoning Conformance	<input type="checkbox"/>
<input checked="" type="checkbox"/> Traffic (Vehicles, Bicycles, Pedestrian)	<input type="checkbox"/>
<input checked="" type="checkbox"/> Infrastructure (Roads, Building, Utilities)	<input type="checkbox"/>
<input type="checkbox"/> Social-Economic	<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/> Public Health and Safety	<input type="checkbox"/>
<input type="checkbox"/> Recreational Resources	<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/> Cultural, Historic, and Archeological Resources	<input type="checkbox"/>
<input checked="" type="checkbox"/> Visual and Aesthetic Resources	<input type="checkbox"/>

<input type="checkbox"/>	Terrestrial and Avian Resources	<input checked="" type="checkbox"/>
<input type="checkbox"/>	Surface and Ground Water Resources	<input checked="" type="checkbox"/>
<input type="checkbox"/>	Wetlands, Floodplains, and Riparian/Coastal Resources	<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>	Air Quality Pollutant Emissions	<input type="checkbox"/>
<input checked="" type="checkbox"/>	Noise Emissions	<input type="checkbox"/>
<input type="checkbox"/>	Solid, Hazardous, and Liquid Waste Emissions	<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>	Other (Airspace and Aviation)	<input type="checkbox"/>

Relevant environmental analysis of the Project is provided below:

1. *Land Use and Zoning.* The Project site is within the CCH's A-1 (Apartment Low-Density) zoning district, which allows low-density, multi-family dwellings. As part of the 201H process, the Applicant will be seeking various exemptions from the CCH's Land Use Ordinance (Chapter 21, Revised Ordinances of Honolulu) relating to mixed uses, height, density, building area, setbacks, and other requirements.
2. *Traffic.* The Applicant's traffic engineer prepared a Transportation Impact Analysis Report (TIAR) for the Project. In summary:
 - a. The TIAR evaluated 11 intersections surrounding the Project area.
 - b. The analysis included existing conditions, future baseline conditions without the Project, and future conditions with the Project for the years 2029 and 2039.
 - c. While some intersections are expected to experience increased congestion, particularly by 2039, the TIAR notes that this is typical for urban core areas.
 - d. The Project's proximity to the future Kapālama (Niuhelewai) Skyline station and its walkable environment are expected to provide multiple travel mode options for residents.
 - e. Recommended improvements include right-in/right-out configurations for Project driveways on Waiakamilo Road, a potential traffic signal at Alokele Street and Waiakamilo Road, and implementation of Transportation Demand Management strategies to promote non-automobile travel.
3. *Infrastructure.* The Applicant's civil engineer prepared a Preliminary Engineering Report (PER) for the Project. In summary:

Water. CCH, Board of Water Supply (BWS) determined the existing water system is currently adequate to accommodate the Project. BWS noted the final decision on the availability of water will be confirmed when the building permit application is submitted for approval, pending evaluation of the water system conditions at that time on a first-come, first-served basis.

Sewer. CCH, Department of Planning and Permitting, Wastewater Branch (WWB) approved a sewer connection application (SCA) for 1,144 residential units. This is enough capacity for Phase 1 (321 units), Phase 2 (192 units), Phase 3 (293 units), and Phase 4 (349 units) of the Project. The Applicant's civil engineer has submitted an updated SCA to DPP WWB for up to 1,550 residential units and up to 20,000 square feet

of commercial/retail space. The approved SCA application for 1,550 units is pending from DPP; however, the CCH Department of Environmental Services reviewed the application and provided DPP with their approval on October 4, 2024.

Drainage. The Project will comply with the Stormwater Quality Standards adopted by CCH. Project drainage infrastructure will be designed and constructed so that the Project will not have any adverse effects on adjacent and neighboring properties. Preliminary calculations estimate the runoff after development will be 6.5 cubic-foot second/acre. No net increase in runoff because of the Project is anticipated since the site has already been developed. No offsite improvements are needed.

Electricity. Hawaiian Electric Company (HECO) issued a will-serve letter for the Project. The letter states that HECO has “determined that the existing 11.5 kV distribution circuit currently feeding the Project area has sufficient capacity to meet the projected load demand.”

Gas. Existing gas lines are available to serve the Project.

Telephone and Cable Services. Hawaiian Telecom stated it would provide access to Hawaiian Telcom’s services to the Project. Spectrum stated it would provide telephone, cable television, and internet service to the Project.

4. *Visual.* The Project is within a highly urbanized area designated for high-density urban development. It is in context with the vision and overall concept expressed in the CCH’s *Kahili Neighborhood TOD Plan* calling for “a new high-intensity mixed-use Kapālama district with residences, public facilities, jobs, and neighborhood shopping services.” It is also in context with other CCH plans and other planned high-rise developments in the area, including, Kamehameha Schools’ (KS) Kapālama Kai and HPHA’s redevelopment of Mayor Wright Homes.

Within this context, while the Project may have a visual impact compared to existing conditions, the Project is in an area where high-density urban development is planned and anticipated. However, to mitigate visual impacts, the Project design includes varying building heights, appropriate setbacks, attention to orientation and massing; balanced space between buildings; and activation of street-level views with commercial/retail and community service uses.

5. *Cultural, Historic and Archeological Resources.* The Project site has undergone significant disturbance before the initial development of housing. The Applicant’s archeological consultant prepared an archeological literature review for the site and surrounding area. The review did not identify previous archaeological historic properties within the Project site. Within 0.5 miles of the property, 21 historic properties have been identified. A single burial was also identified within 0.5 miles from the Project site. Subsurface archaeological historic properties within 0.5 miles include pre/post-Contact agricultural/wetland sediments, post-Contact incinerated trash deposits and buried post-Contact fill deposits relating to urban development infrastructure.

The Applicant’s historic architecture consultant conducted a Reconnaissance Level Survey of the Ka’ahumanu Homes buildings and property.

Both the archeological literature review and RLS will be submitted to the State Historic Preservation Division (SHPD) for their review and determination as part of the HRS 6E process.

The Applicant will implement any mitigation deemed necessary by SHPD.

6. *Environmental Site Assessment.* The Applicant's environmental consultant prepared a Phase I Environmental Site Assessment (ESA) report. The Phase 1 ESA revealed no evidence of recognized environmental conditions (RECs), controlled recognized environmental conditions (CRECs), or significant data gaps in connection with the property. However, the Phase 1 ESA recommends the following additional analyses be completed:
 - a. A file review of the property's vicinity to state and tribal hazardous waste sites (SHWS), the United States Environmental Protection Agency (EPA) superfund enterprise management system (SEMS), and EPA SEMS archived sites (SEMS-ARCHIVE) facilities with the Hawaii Department of Health (DOH) and EPA.
 - b. A quantitative Tier II invasive vapor encroachment screen (VES)/vapor intrusion risk-based screening assessment in relation to historical detrimental property use, including a former gas/oil station, contractor's yard, and machine shop.
 - c. A comprehensive asbestos survey in accordance with Title 40 Code of Federal Regulations (CFR) Part 61 Subpart M and State of Hawaii asbestos regulations.
 - d. A Lead-based Paint Inspection in accordance with HUD guidelines.
7. *Airspace and Aviation.* The Applicant's aviation consultant conducted an airport and airspace compatibility analysis. The analysis of Title 14 Code of Federal Regulations (14 CFR), Part 77 Notice Requirements determined the Project would require a formal submission to the Federal Aviation Administration (FAA) for final determination of the impacts on navigable airspace.

The Applicant and its planning consultant met with the Hawaii Department of Transportation, Airports Division (DOT-A) on September 9, 2024, for early consultation regarding building and crane heights during construction. On September 13, 2024, the Applicant's planning consultant submitted FAA Form 7640-1 to the FAA for Phase 1 and Phase 2 of the Project. Phase I of the Project will contain the highest building at nearly 299 feet above mean sea level.

The Project may cause concern from some commercial airlines operating at the Daniel K. Inouye International Airport (HNL) regarding One Engine Inoperative (OEI) procedures and departure splay paths. However, the Project is located mauka of the recently reduced Dillingham Antenna (also known as the iHeart Radio Tower) and the Project is not within the OEI flight path established starting at the end of Runway 8L (i.e., the mauka runway), and traveling eastbound between the Dillingham Antenna and Sand Island and Kapālama container terminals' gantry cranes.

FAA requires commercial airlines to develop OEI procedures to clear obstacles by 35 feet vertically or 300 feet laterally in case of engine failure on takeoff. However, FAA

does not currently have OEI requirements or consider OEI paths in airspace determinations.

The Applicant will comply with all FAA and DOT-A requirements and required mitigation measures.

8. *Noise.* 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 HAR 11-46 (Community Noise Control), a permit will be required to regulate the permissible noise levels.

The Project is within the 55 to 65 dB Day-Night Average Sound Levels (DNL) Airport Noise Contours for HNL (See Exhibit 9). The United States Department of Housing and Urban Development (HUD) defines noise-impacted areas as those that exceed the 65 dB DNL and requires noise attenuation features for new construction in areas at or above the 65 dB DNL. Since the Ka'ahumanu Homes property is in an area below the 65 dB DNL, noise attenuation features are not required for the Project.

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 active work areas, using windscreens, keeping adjacent paved roads clean, and covering open-bodied trucks.
10. *Cumulative Impacts.* The Project, along with other planned mixed-use projects in the area such as KS' Kapālama Kai and HPHA's redevelopment of Mayor Wright Homes, will contribute to cumulative impacts. However, the Project and other projects in the area are consistent with the CCH's *General Plan, Primary Urban Center Development Plan, and Kalihi Neighborhood TOD Plan*. The overall intensification of land uses within the Kalihi-Kapālama-area is a major goal of CCH's long-range vision for O'ahu and is consistent with CCH's general development pattern goals. These plans emphasize keeping the existing urban core of Honolulu as the primary urban center of the island, with a secondary center in 'Ewa, to keep Oahu's remaining rural areas rural. Thus, while the Project will contribute to cumulative impacts in the area, growth in this area is planned, desired, and anticipated.

In addition, the Project meets the four criteria under the Type 10 exemption in the following manner:

1. The sole trigger for compliance with HRS 343 is the use of State funds and lands as described above.
2. The Project site is within the State Urban district. See Exhibit 3.
3. The Project site is within CCH's A-1 (Apartment Low-Density) zoning district (See Exhibit 4) which allows low-density, multi-family dwellings. As part of the EP Application, the Applicant seeks various exemptions from the CCH's Land Use Ordinance (Chapter 21, Revised Ordinances of Honolulu) relating to density, height, building area, setbacks, and other requirements; however, a change in zoning from the A-1 zoning district is not needed.

4. The Project does not require variances for shoreline setbacks and is not in an environmentally sensitive area (as defined under HAR 11-200.1-13 (b) (11)). The Project site:
 - a. Is approximately 1.76 miles from the nearest shoreline (See Exhibit 1).
 - b. It is in Flood Zone X (See Exhibit 5).
 - c. Does not contain any streams or wetlands (See Exhibit 6).
 - d. Does not include any area designated critical habitat (See Exhibit 7).
 - e. Is not within the Special Management Area (See Exhibit 8).

CONSULTATIONS

The following parties were consulted as part of the public outreach and exemption processes.

Agency / Organization	Name	Consultation Date
Kalihi-Palama Neighborhood Board	Various	07/17/2024
Ka'ahumanu Resident Meeting	Residents	07/23/2024
Adjacent District Representative	Tyler Dos Santos-Tam	08/12/2024
District Representative	CM Radiant Cordero	08/12/2024
City and County of Honolulu Mayor's Office	Various	08/13/2024
Legislature	Senator Glenn Wakai	08/15/2024
K'ahumanu Town Hall	Various	08/15/2024
Kalihi-Palama Neighborhood Board	Various	08/21/2024
Hawaii Department of Transportation, Airports	Various	09/09/2024
Hawaii Department of Transportation	Ed Sniffen, Director	09/24/2024
Hawaii Department of Education	Keith Hayashi, Superintendent	09/24/2024
Hawaii Department of Health	Kenny Fink, Director	09/24/2024
Office of Planning and Sustainable Development	Mary Alice Evans, Director	09/24/2024
CCH, Department of Planning and Permitting	Dawn Takeuchi-Apuna, Director	09/24/2024
CCH, Mayor's Office of Housing	Denise Iseri-Matsubara, Director	09/24/2024
CCH, Department of Transportation Services	J. Roger Morton, Director	09/24/2024
CCH, Department of Design and Construction	Haku Miles, Director	09/24/2024
Airlines Committee of Hawaii	Brendan Baker & Mark Berg	09/24/2024
Hawaii Airlines Liaison Office	Rod Aoki	09/24/2024

The following comments were received during the HRS 343 comment period. Responses are provided in italics.

1. Hawaii Department of Transportation. The department provided the following comments:
 - a. Comment: The proposed Project is approximately 1.75 miles from the property boundary of HNL. 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.

Response: The Applicant has reviewed the TAM 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 HNL operations.

- b. Comment: The Project Site is approximately 10,780 feet from the end of Runway 26R at HNL. FAA regulation requires the submittal of FAA Form 7460-1 Notice of Proposed Construction or Alteration pursuant to 14 CFR, 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. Please provide a copy of the FAA response to the analysis to the DOT-A Planning Section.

Response: On September 13, 2024, the Applicant's consultant submitted FAA Form 7460-1 to the FAA for Phase 1 and Phase 2 of the Project. Phase 1 of the Project will contain the highest building at nearly 299 feet above mean sea level. The Applicant will provide a copy of the determination to DOT-A Planning Section.

- c. Comment: 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 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: Project plans currently do not include PV systems; however, with six phases over an approximately 10-year build out period, the Applicant may include PV systems in some Project locations in the future. In designing any future PV system Applicant's design team will specify non-glint and non-glare solar panels, follow FAA guidance, prepare a glint and glare analysis, and file FAA Form 7460-1 for proposed PV systems. 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.

- d. Comment: The Project Site is within the 55-65 Day Night Average Sound Level (DNL) noise contours on the HNL 2008 Noise Exposure Map. DOT recommends that noise reduction measures be incorporated into the building's design to achieve interior noise levels of 45 DNL or less per the State of Hawaii Land Use Compatibility Guidelines.

Response: The Applicant acknowledges the Project Site is within the 55 to 65 dB Day-Night Average Sound Levels (DNL) Airport Noise Contours for HNL. The United States Department of Housing and Urban Development defines noise-impacted areas as those that exceed the 65 dB DNL and requires noise attenuation features for new construction in areas at or above the 65 dB DNL.

The Applicant understands that HDOT recommends that noise reduction measures be incorporated into residential building design to achieve interior noise levels of 45 DNL or less per the State of Hawaii Land Use Compatibility Guidelines. Noise reduction measures include: concrete tunnel form construction of high-rise residential buildings; closable windows with double-pane glass; and air conditioning.

- e. Comment: 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.

- f. Comment: Given the Project Site is within the urban core and *Kalihi Transit-Oriented Development Plan* area, with proximity to rail stations and limitations of older neighborhoods on road widening and right-of-way acquisitions, DOT concurs with the TIAR's recommendations of the following:
- i. The promotion of Transportation Demand Management and its strategies as discussed in Section 9.2.
 - ii. As mentioned in Section 9.3, Roadway Network Improvements, DOT concurs that an updated TIAR be completed at the midpoint of six phases of development to collect future data and reassess traffic conditions with actual rail ridership data. DOT recommends that an updated TIAR be submitted to both the DOT and CCH for review and acceptance after the completion of Phases 1, 2, and 4 and before the completion of the project buildout.

Response: Comment acknowledged.

- g. Comment: Describe strategies to reduce carbon emissions from the Project, if any. Suggestions include:
 - i. Incorporate elements that encourage and enhance the use of multiple types of transportation to reduce carbon emissions.
 - ii. Implement energy-efficient technologies and practices, such as LED lighting.
 - iii. Sustainable materials: Using sustainable, recycled, or low-emission materials in construction and manufacturing.

Response: The Applicant will make efforts to reduce carbon emissions by providing electric vehicle stalls, ample short-term and long-term bicycle parking, Energy Star certified appliances, and LED lighting. Project will be designed to meet Leadership in Energy and Environmental Design (LEED) Certified criteria for multifamily housing to the extent possible; however, at this stage in the design process, it is not known which specific LEED criteria will be achieved.

2. Hawaii Department of Education. The department commented that residential units within an established school impact district must pay fees before obtaining a county building permit.

Response: The Project meets the definition of a "State affordable housing project" under the Governor's Ninth Proclamation Relating to Affordable Housing dated October 10, 2024 (EP). Pursuant to the EP: "State affordable housing projects or county affordable housing projects may proceed under this Proclamation." The EP suspends certain State laws for State affordable housing projects, including HRS 46-142.5, School Impact Districts; New Building Permit Requirements and HRS 302A-1601 to 1612, School Impact Fees. Therefore, the Project is not subject to school impact fees.

3. Hawaii Department of Health, Solid and Hazardous Waste Branch. The department provided standard comments. The Applicant acknowledges receipt of the comments.
4. Office of Planning and Sustainable Development. The office concurred that this Project qualifies for an exemption from the preparation of an EA.
5. CCH, Department of Planning and Permitting. The department concurred that this Project qualifies for an exemption from the preparation of an EA.
6. CCH, Department of Design and Construction. The department had no comments.

MITIGATION

The Applicant will comply with all permit conditions required to mitigate construction-related impacts. No other mitigation is necessary.

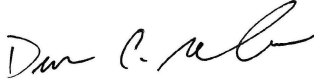
EXEMPTION DECLARATION

Potential impacts of the Project have been evaluated in accordance with the significance criteria of HAR 11-200.1-13 and a discussion of the Project's conformance to the criteria is presented below:

1. *Irrevocably commit a natural, cultural, or historic resource.* There are no known threatened or endangered species or critical habitats on the Project site. Currently, there are no known cultural, archaeological, or historic resources of significance on the Project site. The archeological literature review and RLS will be submitted to the State Historic Preservation Division (SHPD) for their review and determination as part of the HRS 6E process. The Applicant will implement any mitigation deemed necessary by SHPD. In the event of unexpected discovery of archaeological or historic resources, SHPD will be notified pursuant to HAR 13-280-3.
2. *Curtail the range of beneficial use of the environment.* The Project is in a highly urbanized area. It will be similar in nature to other projects planned for the area (such as KS' Kapālama Kai and HPHA's redevelopment of Mayor Wright Homes) and is consistent with the CCH's *General Plan, Primary Urban Center Development Plan, and Kalihi Neighborhood TOD Plan*. The overall intensification of land uses within the Kalihi-Kapālama-area is a major goal of CCH's long-range vision for Oahu and is consistent with CCH's general development pattern goals. The commitment of land resources required for the Project will not curtail the range of beneficial uses of the environment such as natural habitats, or areas of biological significance.
3. *Conflict with the State's environmental policies or long-term goals established by law.* The Project does not conflict with the policies and guidelines of HRS 343.
4. *Have a substantial adverse effect on the economic welfare, social welfare, or cultural practices of the community and State.* In the short term, construction expenditures will provide positive benefits to the local economy in the form of construction-related jobs. In the long term, the Project will provide affordable housing opportunities for Hawaii's residents.
5. *Have a substantial adverse effect on public health.* No identifiable adverse effects on public health or welfare are anticipated to result from the construction and operation of the Project.
6. *Involves adverse secondary impacts, such as population changes or effects on public facilities.* The Project is not anticipated to induce population growth in the State as the Project is primarily affordable housing that can only be rented or sold to Hawaii residents. Some redistribution of population may occur as the Project will include up to 1,398 more units than are currently on the site. Thus, some Hawaii residents from outside the immediate Project area may choose to relocate to the Project. On a County-level and Statewide basis, substantial impacts on public facilities are not anticipated to result from the construction and operation of the Project as households that relocate to the Project from other parts of the County or the State would require similar public facilities. Thus, public facility funds from other areas could be allocated to public facilities serving the Project area.

7. *Involves a substantial degradation of environmental quality.* The Project is not anticipated to substantially degrade environmental quality. Best Management Practices (BMPs) and appropriate erosion control measures will be utilized during the construction period.
8. *Be individually limited but cumulatively have substantial adverse effect upon the environment or involves a commitment for larger actions.* The Project is limited to the development of the mixed-use redevelopment, with primarily affordable housing. There are no commitments for further action beyond the scope presented within this EA Exemption Notice.
9. *Have a substantial adverse effect on rare, threatened, or endangered species, or its habitat.* The Project site is not located near critical habitats and will be adjacent to existing residential and commercial developments of a similar nature once the area is fully developed. The Project is not anticipated to substantially affect rare, threatened, or endangered species, or their habitat.
10. *Have a substantial adverse effect on air or water quality or ambient noise levels.* Construction activities will result in short-term air quality and noise impacts from the operation of construction equipment. Dust control measures, such as regular watering and sprinkling, and installation of dust screens will be implemented to minimize wind-blown emissions. Construction noise impacts will be mitigated through compliance HAR 11-46. No long-term significant impacts on air or water quality, or noise levels within the Project site are anticipated because of the Project.
11. *Have a substantial adverse effect on or likely to suffer damage by being located in an environmentally sensitive area such as a flood plain, tsunami zone, sea level rise exposure area, beach, erosion-prone area, geologically hazardous land, estuary, fresh water, or coastal waters.* No significant impacts are anticipated as the Project site is not located within an environmentally sensitive area.
12. *Have a substantial adverse effect on scenic vistas and view planes, during day or night, identified in county or state plans or studies.* The Project will not result in significant impacts to view planes. While the Project may have a visual impact compared to existing conditions, the Project is in an area where high-density urban development is planned and anticipated. The Project supports the CCH's *Kahili Neighborhood TOD Plan* vision for "a new high-intensity mixed-use Kapālama district with residences, public facilities, jobs, and neighborhood shopping services." It is also in context with other CCH plans and other planned high-rise developments in the area, including, KS' Kapālama Kai and HPHA's redevelopment of Mayor Wright Homes.
13. *Requires substantial energy consumption or emit substantial greenhouse gases.* The Project will not require more energy than used for comparable projects.

HHFDC has considered primary, secondary, and cumulative impacts of the Project and has determined the Project is not anticipated to have significant impacts on the environment. HHFDC as the approving agency for this Project has declared this Project is exempt from the preparation of an environmental assessment.



Signature of Director or Delegate

Oct 30, 2024

Date

List of Exhibits:

- Exhibit 1 – Site Plan and Location Map
- Exhibit 2 – Renderings
- Exhibit 3 – State District Map
- Exhibit 4 – City and County Zoning Map
- Exhibit 5 – National Flood Hazard Map
- Exhibit 6 – Wetlands Inventory Map
- Exhibit 7 – Critical Habitat Map
- Exhibit 8 – Special Management Area Map
- Exhibit 9 – Airport Noise Contours
- Exhibit 10 – Typical Consultation Packet (minus exhibits listed above)
- Exhibit 11 – DOT comment letter
- Exhibit 12 – DOE comment letter
- Exhibit 13 – DOH comment letter
- Exhibit 14 – OPSD comment letter
- Exhibit 15 – DPP comment letter
- Exhibit 16 – DDC comment letter

KA LEI MOMI KA‘AHUMANU HOMES REDEVELOPMENT PROJECT SUMMARY & IMPACT ANALYSIS

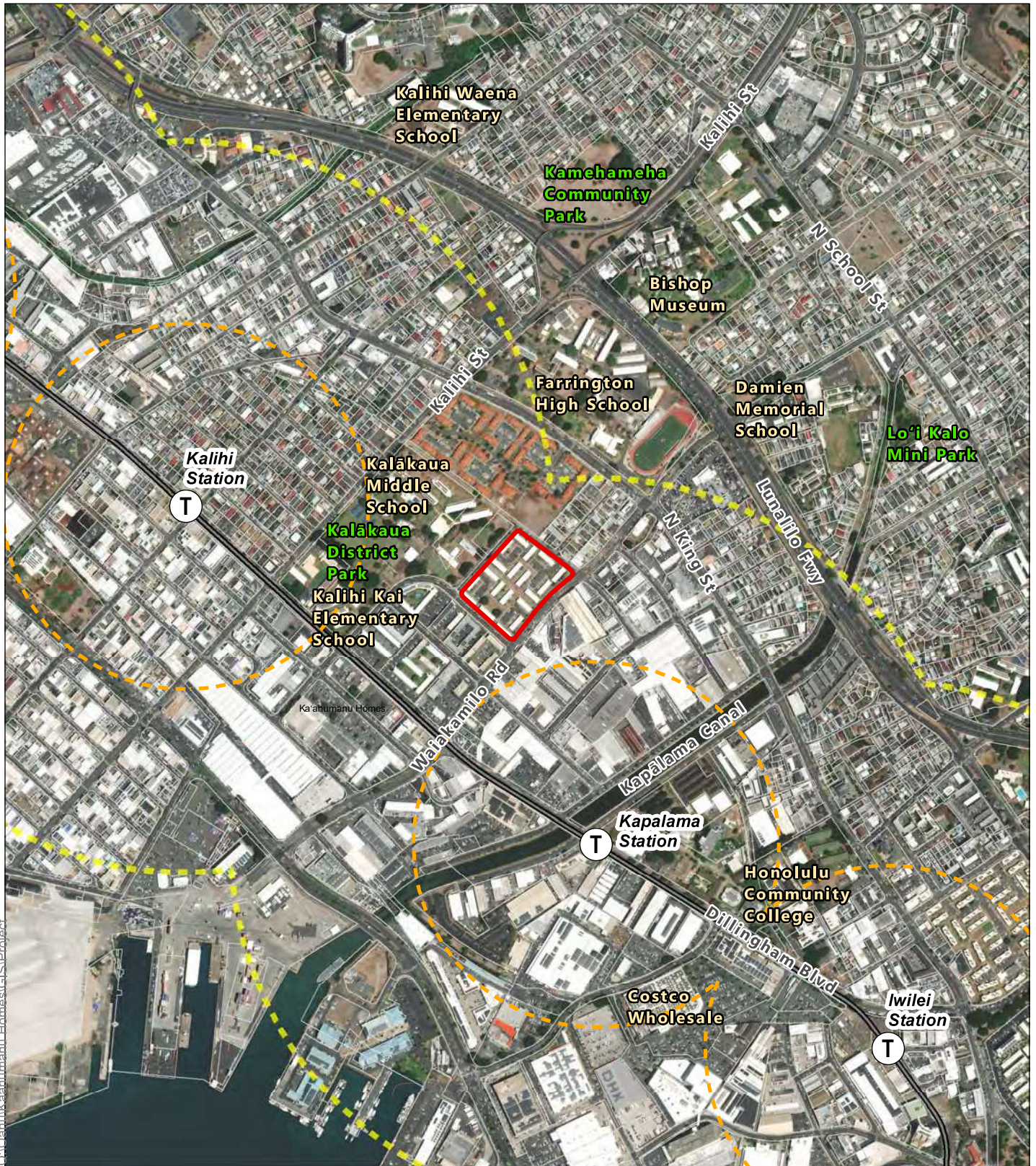
(revised October 23, 2024)

Location and Tax Map Key	1421 Alokele Street, Honolulu, Oahu. Tax Map Key: (1) 1-5-024:001.
Project Site	≈ 7.37 acres
Total Units	1,550
Affordability	<p>The Ka Lei Momi Ka‘ahumanu Homes Redevelopment Project (Project) will be a mixed-use project (Project) with approximately:</p> <ul style="list-style-type: none"> • 61% affordable rental apartments targeting residents earning 60% or below of the area median income (AMI).¹ • 22% affordable rental apartments targeting residents earning between 80% and 100% of the AMI.¹ • 16% for-sale leasehold condominium units sold at prices affordable to residents earning 100% or greater of the AMI.² • 1% manager’s units (2 per affordable rental building; 10 total units). <p>¹ Rental length affordability is 75 years. ² For-sale leasehold condominium units sold to buyers earning 140% or less of the AMI will be subject to all HHFDC restrictions and all provisions under HRS 201H-47, 201H-49, 201H-50, HRS (including restrictions on the use, sale, and transfer).</p>
Parking	1,780 parking stalls (approximate; based on a target ratio of 1.04 parking stalls per unit)
Stories/Heights	Six buildings ranging from 20 to 28 stories up to with the highest building at nearly 299 feet high above mean sea level (MSL).
Requested Exemptions	<p>As part of the HRS 201H/Emergency Proclamation (201H/EP) Application, the Applicant will seek exemptions from the certain City and County of Honolulu (CCH) requirements under HRS 201H and suspensions of State laws (HRS) under the EP. The lists of exemptions and suspensions are included in the 201H/EP application. Exemptions and suspensions include:</p> <ol style="list-style-type: none"> 1. Exemptions from the CCH Land Use Ordinance (Chapter 21, Revised Ordinances of Honolulu) relating to mixed uses, density, height, setbacks, and other requirements. 2. Exemptions from CCH developed-related fees. 3. Suspension of HRS 46-142.5, School Impact Districts; New Building Permit Requirements. 4. Suspension of HRS 46-143, Impact Fee Calculation (wastewater connection and park dedication). 5. Suspension of HRS 46-146, Time of Assessment and Collection of Impact Fees. 6. Suspension of HRS 201H-38(a)(3), to allow the DPP Director to approve the 201H exemptions rather than the CCH Council. 7. Suspension of HRS 302A-1601 to 1612, School Impact Fees.

RESOURCE AREA	SUMMARY OF POTENTIAL IMPACTS
LAND USE & ZONING	The Project site is within the CCH’s A-1 (Apartment Low-Density) zoning district, which allows low-density, multi-family dwellings. As part of the 201H/EP Application, the Applicant is seeking various exemptions from the CCH’s Land Use Ordinance (Chapter 21, Revised Ordinances of Honolulu) relating to mixed uses, height, density, building area, setbacks, and other requirements.
TRAFFIC	<p>Access to the property is from seven driveways:</p> <ul style="list-style-type: none"> • Two driveways each on Waiakamilo Road, Alokele Street, and McNeil Street. • One driveway on Kaiwi‘ula Street. <p>The Applicant’s traffic engineer prepared a Transportation Impact Analysis Report (TIAR) for the Project. The TIAR is included as an exhibit of the 201H/EP Application.</p> <p>In summary:</p> <ul style="list-style-type: none"> • The TIAR evaluated 11 intersections surrounding the Project area. • The analysis included existing conditions, future baseline conditions without the Project, and future conditions with the Project for the years 2029 and 2039. • While some intersections are expected to experience increased congestion, particularly by 2039, the TIAR notes that this is typical for urban core areas. • The Project’s proximity to the future Kapālama (Niuhelewai) Skyline station and its walkable environment are expected to provide multiple travel mode options for residents.

	<ul style="list-style-type: none"> Recommended improvements include right-in/right-out configurations for Project driveways on Waiakamilo Road, a potential traffic signal at Alokele Street and Waiakamilo Road, and implementation of Transportation Demand Management strategies to promote non-automobile travel.
INFRASTRUCTURE	<p>The Applicant's civil engineer prepared a Preliminary Engineering Report (PER) for the Project. The PER is included as an exhibit of the 201H/EP Application.</p> <p><i>Water:</i> CCH, Board of Water (BWS) supply determined the existing water system is currently adequate to accommodate the Project. BWS noted the final decision on availability of water will be confirmed when the building permit application is submitted for approval, pending evaluation of the water system conditions at that time on a first-come, first-served basis.</p> <p><i>Sewer:</i> CCH, Department of Planning and Permitting, Wastewater Branch (WWB) approved a sewer connection application (SCA) for 1,144 residential units. This is enough capacity for Phase 1 (321 units), Phase 2 (192 units), Phase 3 (293 units), and Phase 4 (349 units) of the Project. The Applicant's civil engineer has submitted an updated SCA to DPP WWB for up to 1,550 residential units and up to 20,000 square feet of commercial/retail space. The approved SCA application for 1,550 residential units is pending from DPP; however, CCH Department of Environmental Services reviewed the application and provided DPP with their approval on October 4, 2024.</p> <p><i>Drainage:</i> The Project will comply with the Stormwater Quality Standards adopted by CCH. Project drainage infrastructure will be designed and constructed so that the Project will not have any adverse effects on adjacent and neighboring properties. Preliminary calculations estimate the runoff after development will be 6.5 cubic-feet second/acre. No net increase in runoff because of the Project is anticipated since the site has already been developed. No offsite improvements are needed.</p> <p><i>Electricity:</i> Hawaiian Electric Company (HECO) issued a will-serve letter for the Project. The letter states that HECO has "determined that the existing 11.5 kV distribution circuit currently feeding the Project area has sufficient capacity to meet the projected load demand."</p> <p><i>Gas:</i> Existing gas lines are available to serve the Project.</p> <p><i>Telephone and Cable Services:</i> Hawaiian Telecom stated they would provide access to Hawaiian Telecom's services to the Project. Spectrum stated they would provide telephone, cable television, and internet service to the Project.</p>
PHASE 1 ENVIRONMENTAL SITE ASSESSMENT	<p>The Applicant's environmental consultant prepared a Phase I Environmental Site Assessment (ESA) report dated October 15, 2024. The Phase 1 ESA revealed no evidence of recognized environmental conditions (RECs), controlled recognized environmental conditions (CRECs), or significant data gaps in connection with the property. However, the Phase 1 ESA recommends the following additional analyses be completed:</p> <ul style="list-style-type: none"> A file review of the property's vicinity to state and tribal hazardous waste sites (SHWS), United States Environmental Protection Agency (EPA) superfund enterprise management system (SEMS), and EPA SEMS archived sites (SEMS-ARCHIVE) facilities with the Hawaii Department of Health (DOH) and EPA. A quantitative Tier II invasive vapor encroachment screen (VES)/vapor intrusion risk-based screening assessment in relation to historical detrimental property use, including a former gas/oil station, contractor's yard, and machine shop. A comprehensive asbestos survey in accordance with Title 40 Code of Federal Regulations (CFR) Part 61 Subpart M and State of Hawaii asbestos regulations. A Lead-based Paint Inspection in accordance with HUD guidelines.
VISUAL	<p>The Project is within a highly urbanized area designated for high-density urban development. It is in context with the vision and overall concept expressed in the CCH's <i>Kahili Neighborhood TOD Plan</i> calling for "a new high-intensity mixed-use Kapālama district with residences, public facilities, jobs, and neighborhood shopping services." It is also in context with other CCH plans and other planned high-rise developments in the area, including, Kamehameha Schools' (KS) Kapālama Kai and the Hawaii Public Housing Authority's (HPHA) redevelopment of Mayor Wright Homes.</p> <p>Within this context, while the Project may have a visual impact compared to existing conditions, the Project is in an area where high-density urban development is planned and anticipated. However, to mitigate visual impacts, the Project design includes varying building heights, appropriate setbacks, attention to orientation and massing; balanced space between buildings; and activation of street-level views with commercial/retail and community service uses.</p>
AIRSPACE AND AVIATION	<p>The Applicant's aviation consultant conducted an airport and airspace compatibility analysis. The analysis of 14 CFR Part 77 Notice Requirements determined the Project would require a formal submission to the Federal Aviation Administration (FAA) for final determination of the impacts on navigable airspace.</p> <p>The Applicant and its planning consultant met with the Hawaii Department of Transportation, Airports Division (DOT-A) on September 9, 2024, for early consultation regarding building and crane heights during construction.</p> <p>On September 13, 2024, the Applicant's planning consultant submitted FAA Form 7640-1 to the FAA for Phase 1 and Phase 2 of the Project. Phase I of the Project will contain the highest building at nearly 299 feet above MSL.</p> <p>The Project may cause concern from some commercial airlines operating at the Daniel K. Inouye International Airport (HNL) regarding One Engine Inoperative (OEI) procedures and departure splay paths. However, the Project is located</p>

	<p>mauka of the recently reduced Dillingham Antenna (also known as the iHeart Radio Tower) and the Project is not within the OEI flight path established starting at the end of Runway 8L (i.e., the mauka runway), and traveling eastbound between the Dillingham Antenna and Sand Island and Kapalama container terminals' gantry cranes.</p> <p>The FAA requires commercial airlines to develop OEI procedures to clear obstacles by 35 feet vertically or 300 feet laterally in case of engine failure on takeoff. However, the FAA does not currently have OEI requirements or consider OEI paths in airspace determinations.</p> <p>The Applicant will comply with all FAA and DOT-A requirements and required mitigation measures.</p>
CULTURAL, HISTORIC & ARCHEOLOGICAL	<p>The Project site has undergone significant disturbance before the initial development of housing. The Applicant's archeological consultant prepared an archeological literature review for the site and surrounding area. The review did not identify previous archaeological historic properties within the Project site. Within 0.5 miles of property, 21 historic properties have been identified. A single burial was also identified within 0.5 miles from the Project site. Subsurface archaeological historic properties within 0.5 miles include pre/post-Contact agricultural/wetland sediments, post-Contact incinerated trash deposits and buried post-Contact fill deposits relating to urban development infrastructure.</p> <p>The Applicant's historic architecture consultant conducted a Reconnaissance Level Survey of the Ka'ahumanu Homes buildings and property.</p> <p>Both the archeological literature review and RLS will be submitted to the State Historic Preservation Division (SHPD) for SHPD's review and determination as part of the HRS 6E process.</p> <p>The Applicant will implement any mitigation deemed necessary by SHPD.</p>
NOISE	<p>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 HAR 11-46 (Community Noise Control), a permit will be required to regulate the permissible noise levels.</p> <p>The Ka'ahumanu Homes property is within the 55 to 65 dB Day-Night Average Sound Levels (DNL) Airport Noise Contours for HNL (See Exhibit 9). The United States Department of Housing and Urban Development (HUD) defines noise-impacted areas as those that exceed the 65 dB DNL and requires noise attenuation features for new construction in areas at or above the 65 dB DNL. Since the Ka'ahumanu Homes property is in an area below the 65 dB DNL, noise attenuation features are not required for the Project.</p>
AIR	<p>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 active work areas, using windscreens, keeping adjacent paved roads clean, and covering open-bodied trucks.</p>
CUMULATIVE IMPACTS	<p>The Project, along with other planned mixed-use projects in the area such as KS' Kapālama Kai and HPHA's redevelopment of Mayor Wright Homes, will contribute to cumulative impacts. However, the Project and other projects in the area are consistent with the CCH's <i>General Plan, Primary Urban Center Development Plan, and Kalihi Neighborhood TOD Plan</i>. The overall intensification of land uses within the Kalihi-Kapālama-area is a major goal of CCH's long-range vision for O'ahu and is consistent with CCH's general development pattern goals. These plans emphasize keeping the existing urban core of Honolulu as the primary urban center of the island, with a secondary center in 'Ewa, to keep Oahu's remaining rural areas rural. Thus, while the Project will contribute to cumulative impacts in the area, growth in this area is planned, desired, and anticipated.</p>



Q:\Oahu\Kaahumanu Homes\GIS\Project

DATE: 8/16/2024

LEGEND

- Ka'ahumanu Homes
- TMK
- T HART Transit Station
- 0.25-Mile TOD Walk Radius
- 0.5-Mile TOD Walk Radius



**Exhibit 1
Location and Surrounding Uses**

Ka'ahumanu Homes

HCDC Hawaii Development, LLC Island of O'ahu

North Linear Scale (feet)

0 500 1000

Source: City & County of Honolulu 2024, DOT,2022, ESRI Online Basemap
 Disclaimer: This graphic has been prepared for general planning purposes only and should not be used for boundary interpretations or other spatial analysis.






KEY	
	1 STORY COMMERCIAL / RESIDENTIAL LOBBY
	PARKING GARAGE
	RESIDENTIAL TOWER

Exhibit 2A
Ka'ahumanu Homes Redevelopment
Master Site Plan with Phasing

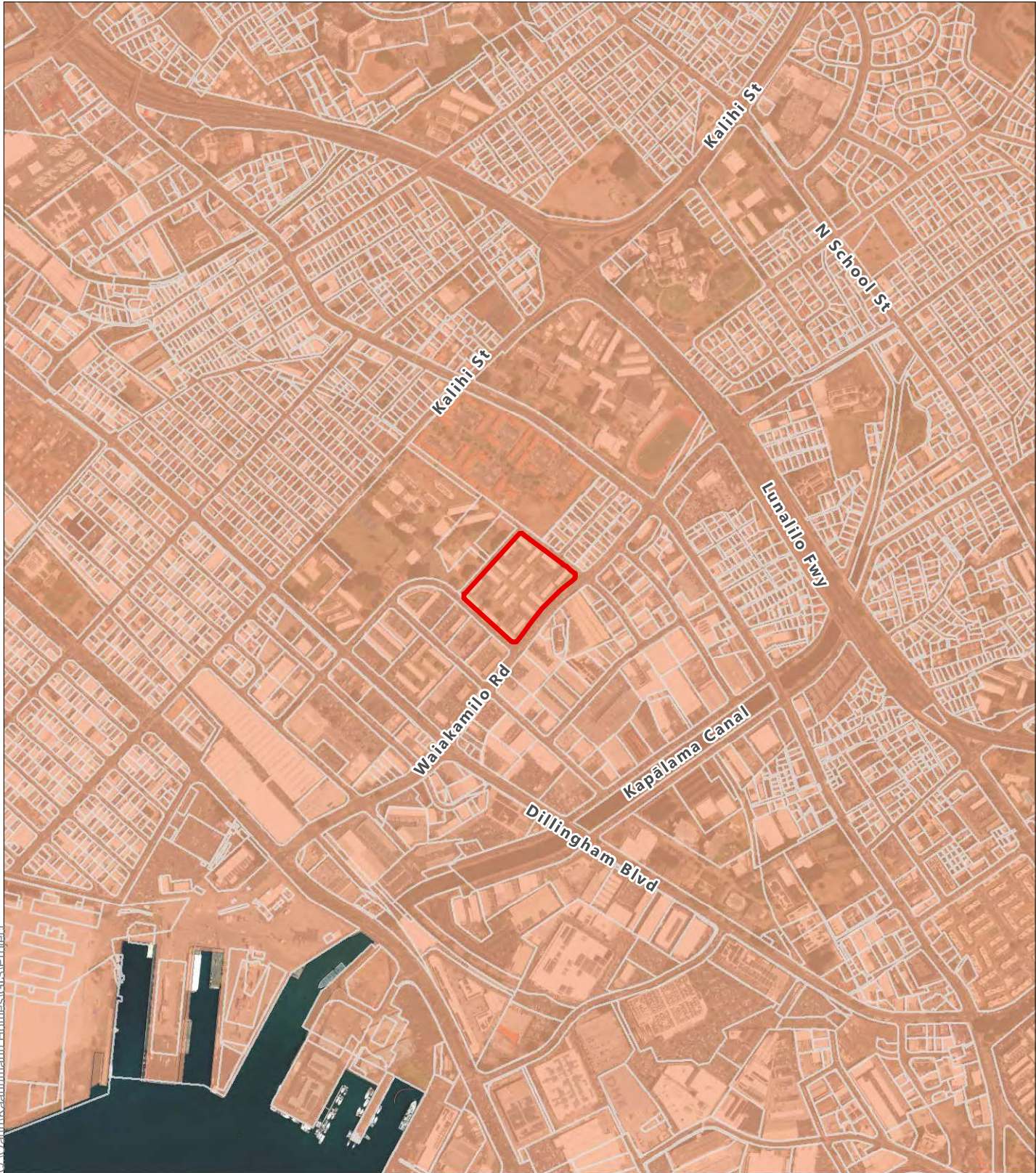


Makai view from Waiakamilo Road.



Mauka view from Skyline guideway.

**Exhibit 2B
Ka‘ahumanu Homes Redevelopment
Renderings**



O:\Oahu\Kaahumanu Homes\GIS\Project

DATE: 5/10/2024

LEGEND

- Project Area
- TMK

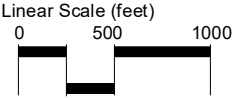
State Land Use Districts

- Urban

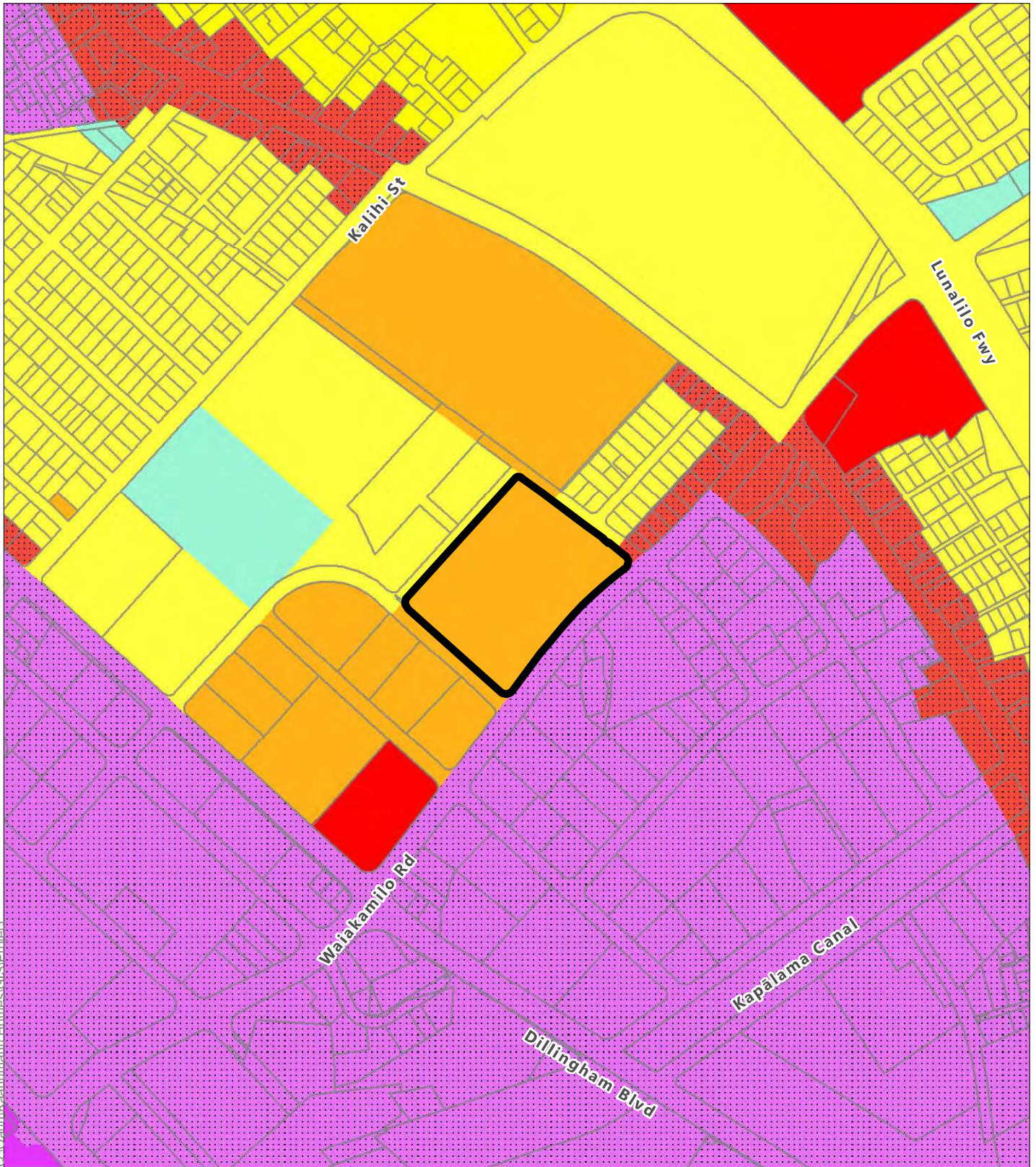
**Exhibit 3
State Land Use Districts**

Ka'ahumanu Homes

HCDC Hawaii Development, LLC Island of O'ahu













Source: City & County of Honolulu 2024, State Land Use Commission, 2020. ESRI Online Basemap
 Disclaimer: This graphic has been prepared for general planning purposes only and should not be used for boundary interpretations or other spatial analysis.



O:\Oahu\Kaahumanu Homes\GIS\Project

DATE: 5/10/2024

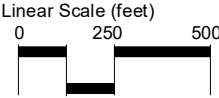
LEGEND

- | | | |
|--|---|---|
|  Project Area | Zoning |  B-2 |
|  TMK |  P-2 |  BMX-3 |
| |  R-3.5 |  I-3 |
| |  R-5 |  IMX-1 |
| |  A-1 | |

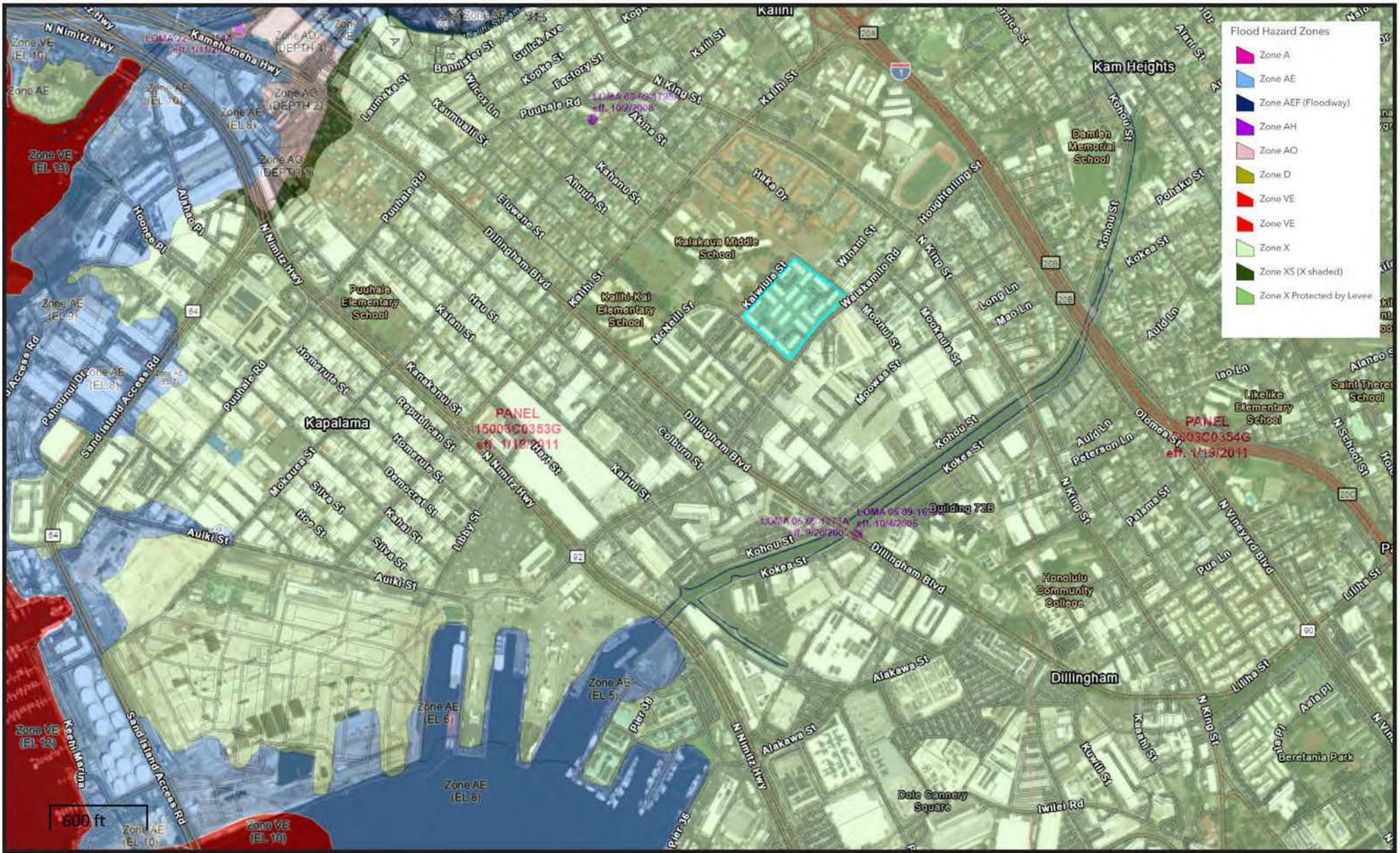
**Exhibit 4
Zoning**

Ka'ahumanu Homes

HCDC Hawaii Development, LLC Island of O'ahu



Source: City & County of Honolulu 2023 & 2024.
Disclaimer: This graphic has been prepared for general planning purposes only and should not be used for boundary interpretations or other spatial analysis.



Flood Hazard Map

Title: **Exhibit 5**

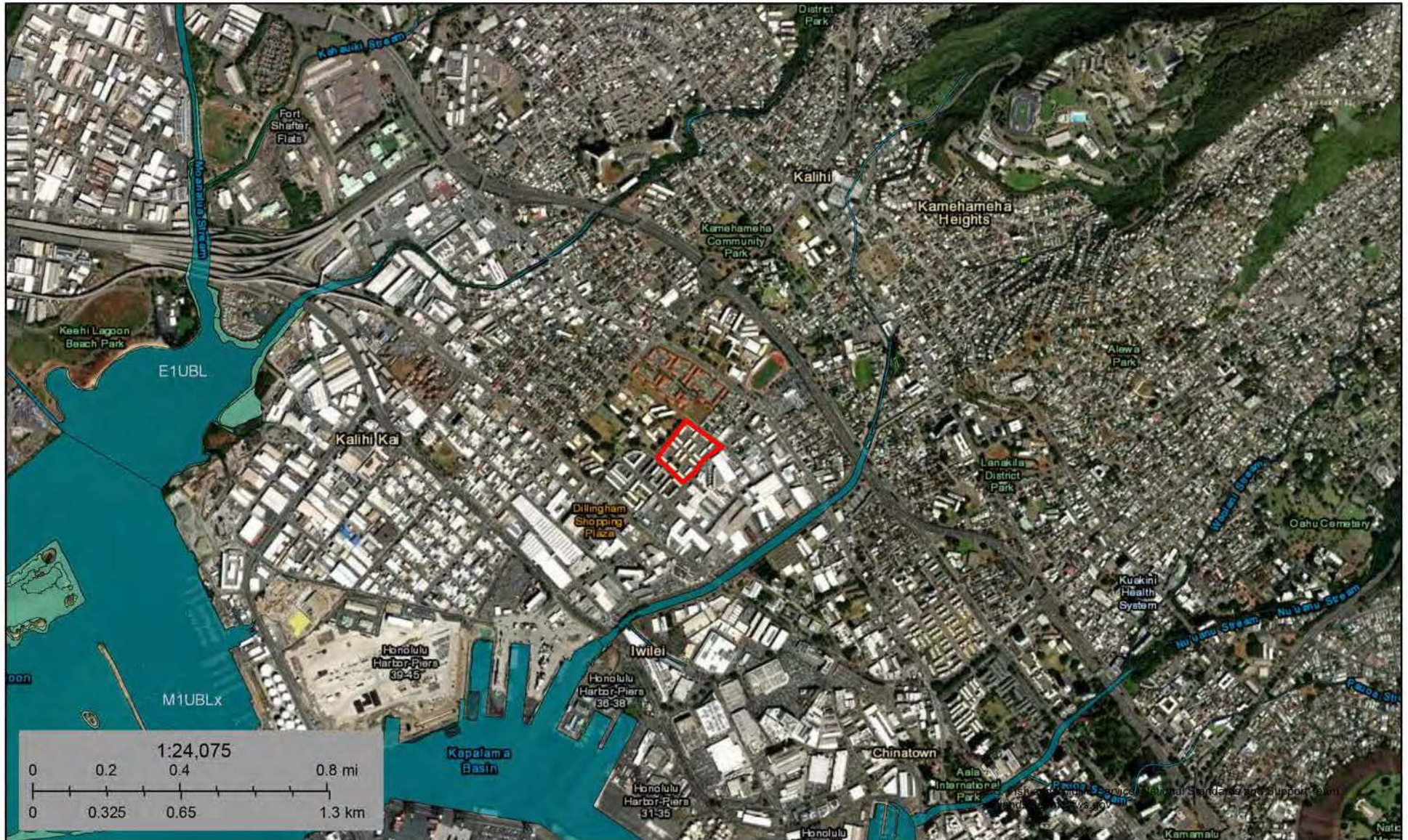
Notes:

Map generated on 05/09/2024



[Map Legend](#)

Disclaimer: The Hawaii Department of Land and Natural Resources (DLNR) assumes no responsibility arising from the use, accuracy, completeness, and timeliness of any information contained in this report. Viewers/Users are responsible for verifying the accuracy of the information and agree to indemnify the DLNR, its officers, and employees from any liability which may arise from its use of its data or information.

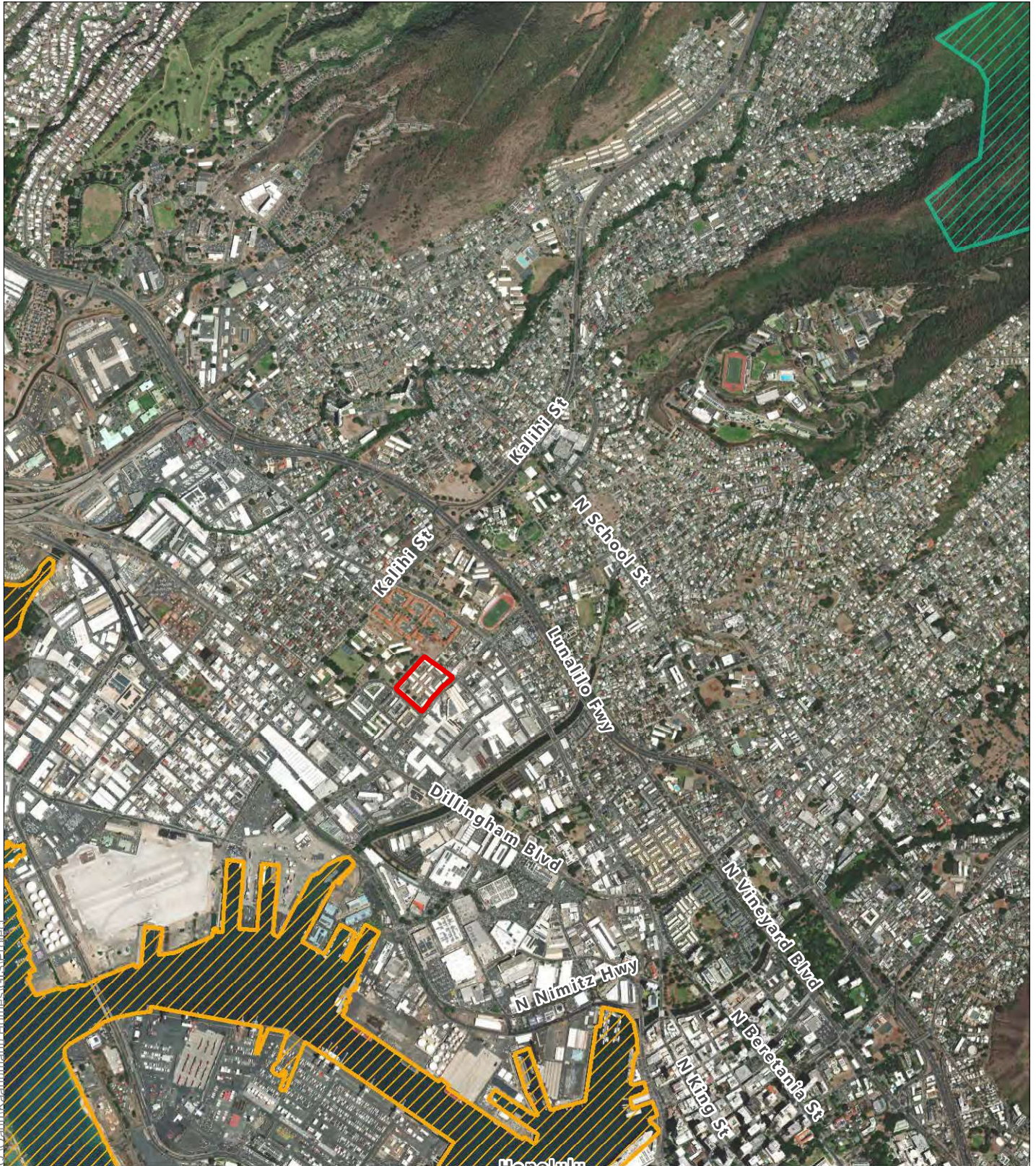


May 10, 2024

Wetlands




- | | | | | | |
|---|--------------------------------|---|-----------------------------------|---|----------|
|  | Estuarine and Marine Deepwater |  | Freshwater Emergent Wetland |  | Lake |
|  | Estuarine and Marine Wetland |  | Freshwater Forested/Shrub Wetland |  | Other |
| | |  | Freshwater Pond |  | Riverine |

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.



DATE: 5/14/2024

LEGEND

-  Project Area
-  USFWS Critical Habitat
-  NOAA Hawaiian Monk Seal Critical Habitat


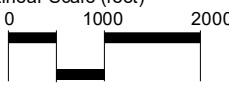

**Exhibit 7
Critical Habitat**

Ka'ahumanu Homes

HCDC Hawaii Development, LLC Island of O'ahu

North Linear Scale (feet)

0 1000 2000

Source: City & County of Honolulu 2024, USFWS, 2023 NOAA, 2022. ESRI Online Basemap
 Disclaimer: This graphic has been prepared for general planning purposes only and should not be used for boundary interpretations or other spatial analysis.



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DATE: 5/10/2024

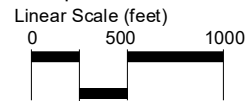
LEGEND

- Project Area
- TMK
- Special Management Area

**Exhibit 8
Special Management Area**

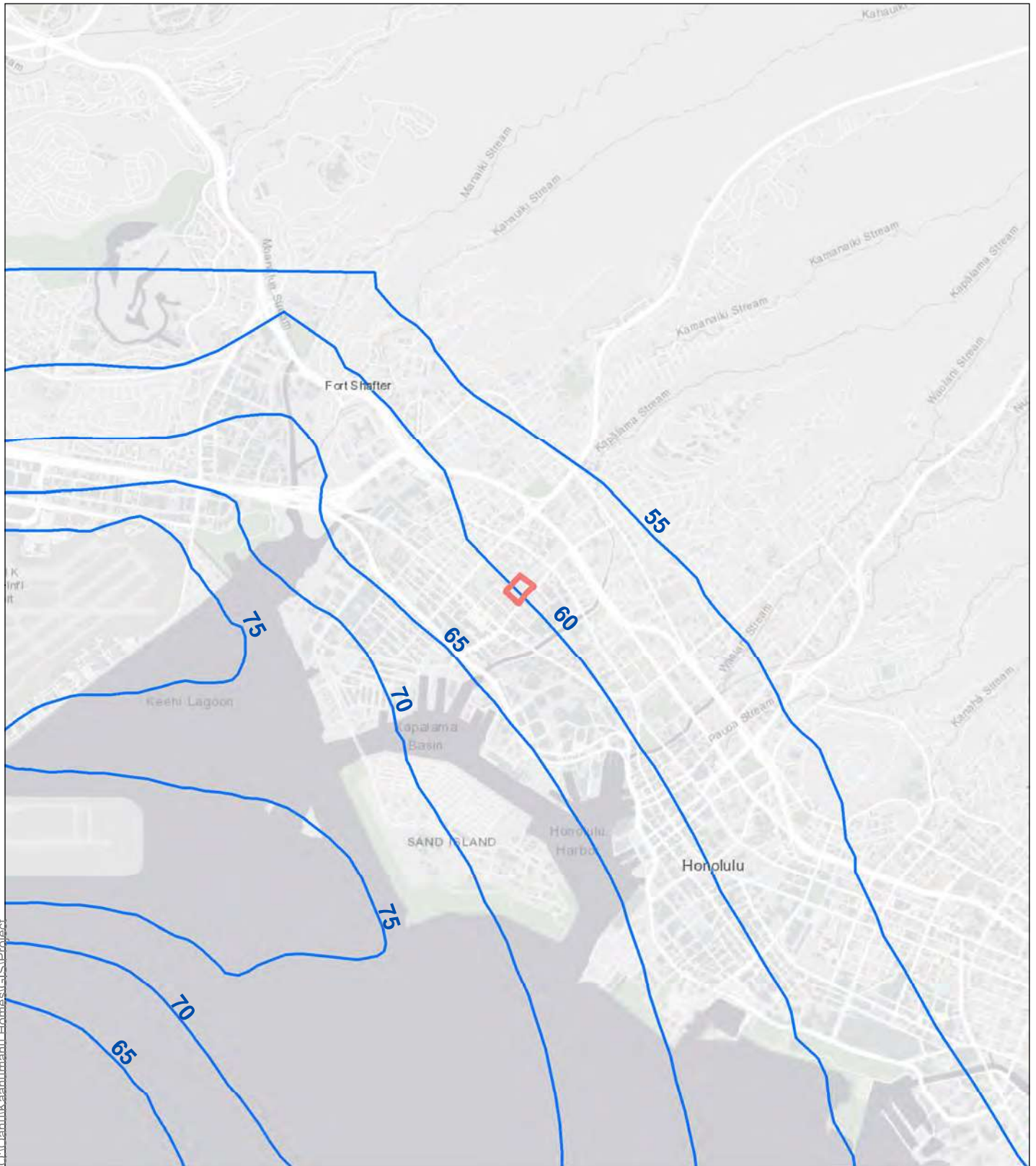
Ka'ahumanu Homes

HCDC Hawaii Development, LLC Island of O'ahu



Source: City & County of Honolulu 2021 & 2024.



Disclaimer: This graphic has been prepared for general planning purposes only and should not be used for boundary interpretations or other spatial analysis.



C:\Oahu\Kaahumanu Homes\GIS\Project

DATE: 9/17/2024

LEGEND

-  Project Area
-  Airport Noise Contours (DNL)


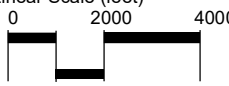

**Exhibit 9:
Airport Noise**

Ka'ahumanu Homes

HCDC Hawaii Development, LLC Island of O'ahu

North Linear Scale (feet)

0 2000 4000

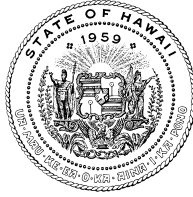




Source: City & County of Honolulu. State Department of Transportation, Airports Division, 2008. ESRI Basemap.
 Disclaimer: This graphic has been prepared for general planning purposes only and should not be used for boundary interpretations or other spatial analysis.

EXHIBIT 10

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/104

September 23, 2024

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

Dear Mr. Sniffen:

Subject: Consultation for an Environmental Assessment Exemption
Ka Lei Momi Ka'ahumanu Homes Redevelopment Mixed-Use Project
1421 Alokele Street; Honolulu, Oahu
Tax Map Key: (1) 1-5-024:001

In accordance with the State guidelines for preparing environmental review documents, the Hawaii Housing Finance and Development Corporation (HHFDC) is consulting with entities having jurisdiction or expertise to determine whether the Ka Lei Momi Ka'ahumanu Homes Redevelopment (Project) may be exempt from the preparation of an Environmental Assessment (EA) pursuant to the administrative rules promulgated under the authority of Chapter 343-6(5), Hawaii Revised Statutes (HRS); and under Sections 11-200.1-15, 11-200.1-16, and 11-200.1-17, Hawaii Administrative Rules (HAR). HHFDC seeks your input on the subject Project by October 23, 2024, to make this determination.

The Project site is a 7.37-acre parcel owned by the State of Hawaii and is under the jurisdiction of the Hawaii Public Housing Authority (HPHA). It is bounded by Alokele, Kaiwi'ula, and McNeill streets, and Waiakamilo Road (See Exhibit 1) in the Kalihi-Pālama district of Honolulu. HPHA operates Ka'ahumanu Homes, which includes 19 buildings originally built in 1958 and last renovated in 1994. The redevelopment of Ka'ahumanu Homes is envisioned as a catalytic project with the potential to transform a state-owned land asset improved with obsolete public housing into a new, mixed-income, mixed-use, transit-oriented development designed to complement the existing community.

In partnership with HCDC Hawaii Development, LLC (HCDC or the Applicant), an entity controlled by Highridge Costa Development Company, HPHA is proposing to replace 152 low-income rental housing units currently comprising Ka’ahumanu Homes with a new mixed-use project. HPHA has executed a development agreement with HCDC to redevelop the property with a total of up to 1,550 affordable, workforce, and market-rate homes (representing a net increase of 1,398 homes from what is currently present) and retail space.

The current housing unit mix is 116 two-bedroom units and 36 three-bedroom units. When redeveloped, the housing unit mix will include studio, one-, two-, and three-bedroom units. The number of each unit type has not been finalized yet, but the vast majority will be one- and two-bedroom units. After the existing structures are demolished and cleared, HCDC will build six buildings ranging between 20 stories and up to 28 stories, which will provide up to 1,550 housing units, up to 1,730 parking stalls, and approximately 20,000 square feet of ground-level retail and community services space. Outdoor amenities will include landscaped grounds, pedestrian circulation paths, large plazas, park and open space, a dog park, a tot lot, a play structure, and outdoor BBQ and picnic areas. The maximum building height is projected to be nearly 300 feet above mean sea level. See Exhibit 2A for the conceptual site plan.

HCDC commits to setting aside units based on the following income and affordability restrictions listed below for 75 years.

Restricted at the Area Median Income (AMI)	Number of Units (Approximate)	Percent of Total Units (Approximate)
30% of the AMI	99 units	6%
50% of the AMI	99 units	6%
60% of the AMI	751 units	48%
80% of the AMI	71	5%
100% of the AMI	276	18%
Total Affordable Rental Units¹	1,296	93%
For Sale(leasehold) ² (>100% AMI/Market)	225	15%
For Sale (leasehold) 110% of the AMI	24	2%
For Sale (leasehold) 140% of the AMI	123	8%
For Sale (leasehold) Income Blind Units ³	97	6%
Total For Sale Units (leasehold)⁴	244	16%
Manager Units (2 per rental building)	10 units	1%
Total Number of Units	1,550 Units	100%

¹ Rental length affordability is 75 years.

² For-sale leasehold condominium units sold to buyers earning 140% or less of the AMI will be subject to all HHFDC restrictions and all provisions under HRS 201H-47, 201H-49, and 201H-50 (including restrictions on the use, sale, and transfer).

³ Income Blind units are available for purchase by Hawai’i residents at any income level.

⁴ For-sale leasehold condominium units sold to buyers earning 140% or less of the AMI will be subject to all HHFDC restrictions and all provisions under HRS 201H-47, 201H-49, and 201H-50 (including restrictions on the use, sale, and transfer).

HCDC will seek Low-Income Housing Tax Credits to partially finance the project. In addition, HCDC will seek financing from the Rental Housing Revolving Fund, and/or other State financing programs. As such, HHFDC will be the approving agency for HRS 343 compliance because of the use of these State financing programs.

HCDC is preparing an application to HHFDC for the Project to be approved as a certified affordable housing project under the Governor's Eighth Proclamation Relating to Affordable Housing dated August 15, 2024 (the EP), as may be succeeded by a similar emergency proclamation.

HCDC will seek exemptions from certain City and County of Honolulu (CCH) requirements relating to zoning such as mixed uses, density, height, and setbacks, and relating to development fees. HCDC will also seek exemptions from certain HRS sections, as suspended under the EP, such as exemptions relating to State Department of Education School Impact Fees and general excise taxes. See Project Summary for a list of exemptions.

HCDC has hosted meetings with residents, conducted a Town Hall meeting, and made a presentation to the Kalihi-Pālama Neighborhood Board to solicit public input, understand any concerns, and answer questions.

HHFDC believes the Project may be declared exempt from the preparation of an environmental assessment based on HHFDC's comprehensive exemption list⁵, which mirrors and exceeds the exemption criteria for the demolition of structures and affordable housing projects under HAR 11-200.1-15(c).

EXEMPTION TYPE 6: *Demolition of structures, except those structures that are listed on the national register or Hawaii Register of Historic Places.*

Part 2 Actions – *Includes structures that require further consideration because of their potential impacts to the surrounding community. For example, demolition of structures that contains high levels of hazardous materials; demolition of structures that creates significant noise, fugitive dust or other adverse impacts; or demolition of structures that leads to a loss of amenities for the public.*

Analysis: There are 19 existing buildings that will be demolished and removed to prepare the site for construction. The buildings were constructed in 1958 and therefore the Project is over 50 years in age and thus is considered historic property. The Applicant will submit to

⁵ As concurred in by the Environmental Advisory Council on November 1, 2022, see: https://files.hawaii.gov/dbedt/erp/Agency_Exemption_Lists/State-Hawaii-Housing-and-Finance-Development-Corporation-2022-11-01-Exemption-List.pdf

the Hawaii State Historic Preservation Division for HRS 6E review of the structures to ensure no significant historic properties are affected.

For all tenants displaced during construction, HCDC will be responsible for coordinating placement into temporary or permanent housing. Those tenants will continue to pay the same or similar rents throughout the duration of the offsite relocation. All residents in good standing will have the first right of refusal to return to the newly constructed units. HCDC will comply with all applicable federal relocation requirements. All relocation efforts will be subject to the approval of the United States Department of Housing and Urban Development.

EXEMPTION TYPE 10: *New construction of affordable housing, where affordable housing is defined by the controlling law applicable for the state or county proposing agency or approving agency, that meets the following:*

- A. *Has the use of state or county lands or funds or is within Waikiki as the sole triggers for compliance with HRS 343;*

Analysis: Applicable, the sole trigger for compliance with HRS 343, which is the use of State lands and funds as described above.

- B. *As proposed conforms with the existing state urban land classification;*

Analysis: Applicable, the Project site is within the State Urban district (See Exhibit 3).

- C. *As proposed is consistent with the existing county zoning classification provided that allows housing;*

Analysis: Applicable, the Project site is within CCH's A-1 (Apartment Low-Density) zoning district (See Exhibit 4) which allows low-density, multi-family dwellings. As part of the EP Application, the Applicant will be seeking various exemptions from the CCH's Land Use Ordinance (Chapter 21, Revised Ordinances of Honolulu) relating to density, height, building area, setbacks, and other requirements; however, a change in zoning from the A-1 zoning district is not needed.

- D. *As proposed does not require variances for shoreline setbacks or siting in an environmentally sensitive area, as stated in HAR 11-200.11-13(b)(11).*

Analysis: Applicable, the Project does not require variances for shoreline setbacks and is not in an environmentally sensitive area (as defined under HAR 11-200.1-13 (b) (11)). The Project site:

- a. Is approximately 1.76 miles from the nearest shoreline (See Exhibit 1).

- b. It is in Flood Zone X (See Exhibit 5).
- c. Does not contain any streams or wetlands (See Exhibit 6).
- d. Does not include any area designated critical habitat (See Exhibit 7).
- e. Is not within the Special Management Area (See Exhibit 8).

Part 2 Actions – *Development of affordable housing provided pre-assessment consultations were conducted to determine the appropriateness of preparing an exemption notice or requiring an environmental assessment.*

- 2. *Construct multi-family residential units including, but not limited to, grading; roadway and traffic systems; utility systems; dwelling units; landscaping; and ancillary facilities; provided all applicable approvals and administrative permits are obtained.*
- 4. *Allow accessory commercial activities within the development that are related to Part 2, item 2 above.*

Analysis: The Project is a mixed-use multi-family affordable housing development with up to 20,000 square feet of commercial/retail space on the ground floor.

All applicable approvals and administrative permits will be obtained, including grading, roadway and traffic systems, utility systems, dwelling units, landscaping, and ancillary facilities.

Attached is a Project summary and impact analysis, which provides additional details.

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.

Sincerely,



Chris Woodard
Chief Planner

Attachment

EXHIBIT 11

JOSH GREEN, M.D.
GOVERNOR
KE KIA'ĀINA



EDWIN H. SNIFFEN
DIRECTOR
KA LUNA HO'ŌKELE

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

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

IN REPLY REFER TO


DIR 0000942
STP 8.3844

October 23, 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 FOR AN ENVIRONMENTAL ASSESSMENT
EXEMPTION
KA LEI MOMI KAAHUMANU HOMES REDEVELOPMENT
MIXED-USE PROJECT
HONOLULU, OAHU, HAWAII
TAX MAP KEY: (1) 1-5-024: 001

Thank you for your letter, dated September 23, 2024, requesting the Hawaii Department of Transportation's (HDOT) review and comments on the subject project. HDOT understands that the Hawaii Public Housing Authority is proposing replacing 152 low-income rental housing units, currently known as Kaahumanu Homes, with a new mixed-use project.

HDOT has the following comments:

1. The proposed development project is approximately 1.75 miles from the property boundary of Daniel K. Inouye International Airport (HNL). 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.
2. The project site is approximately 10,780 feet from the end of Runway 26R at HNL. 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 project's proximity to HNL, the applicant and future users should be aware of potential single-event 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. These incidences may increase or decrease over time and are dependent on airport operations.
4. 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 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.

5. The project site is within the 55-65 Day Night Average Sound Level (DNL) noise contours on the HNL 2008 Noise Exposure Map (see attached). The HDOT recommends that noise reduction measures be incorporated into the building's design to achieve interior noise levels of 45 DNL or less per the State of Hawaii Land Use Compatibility Guidelines (see attached).
6. The proposed development project shall 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's landscaping creates a wildlife attractant, the developer shall immediately mitigate the hazard upon notification by the HDOT and/or FAA.

7. Given the site is within the city's urban core and the Kalihi Transit-Oriented Development Plan area, with proximity to rail stations and limitations of older neighborhoods on road widening and right-of-way acquisitions, we concur with the Traffic Impact Analysis Report's (TIAR) recommendations of the following:
 - a. The promotion of Transportation Demand Management and its strategies as discussed in Section 9.2.
 - b. As mentioned in Section 9.3, Roadway Network Improvements, we concur that an updated TIAR be completed at the midpoint of six phases of development to collect future data and reassess traffic conditions with actual rail ridership data. We recommend that an updated TIAR be submitted to both the HDOT and the County for review and acceptance after the completion of Phases 1, 2, and 4 and prior to the completion of the project buildout.

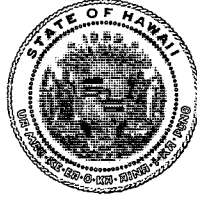
8. Describe strategies to reduce carbon emissions from the project, if any. Suggestions include:
 - a. Incorporate elements that encourage and enhance the use of multiple types of transportation to reduce carbon emissions.
 - b. Implement energy-efficient technologies and practices, such as LED lighting.
 - c. Use sustainable, recycled, or low-emission materials in construction and manufacturing.

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.

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.

Attachments

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

October 22, 2024

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

Re: Consultation for an Environmental Assessment Exemption
Ka Lei Momi Kaahumanu Homes Redevelopment Mixed-Use Project
1421 Alokele Street, Honolulu, Oahu, Tax Map Key No.: (1)1-5-024:001

Dear Mr. Woodard:

Thank you for your letter dated September 23, 2024. The Hawaii State Department of Education has reviewed the information provided and has the following comment for the Ka Lei Momi Kaahumanu Homes Redevelopment Mixed Use Project (Project).

Pursuant to Act 245 from the 2007 Hawaii State Legislature, proposed residential units within an established school impact fee district must pay fees before obtaining a county building permit. Beginning on October 1, 2018, residential developments within the Kalihi to Ala Moana corridor became subject to school impact fees.

Pursuant to Section 7 of Act 72 (2020), the Hawaii School Facilities Authority (SFA) currently manages the day-to-day operations of the School Impact Fee Program. The Project developer is encouraged to meet with the SFA to discuss the applicability of ACT 245 (2007) and the required Education Contribution Agreement for the project.

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.

We appreciate the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Roy Ikeda".

Roy Ikeda
Interim Public Works Manager
Planning Section

RI:ctc

c: Facilities Development Branch

Solid and Hazardous Waste Branch Standard Comments

October 11, 2024

The Solid and Hazardous Waste Branch administers programs in the areas of:

- 1) Management of hazardous waste;
- 2) Management of solid waste; and
- 3) Regulation of underground storage tanks.

Our general comments on projects are below. For further information about these programs, please contact the Solid and Hazardous Waste Branch at (808) 586-4226. All chapters of the Hawaii Revised Statutes (HRS) are at <https://www.capitol.hawaii.gov/hrscurrent/>.

Hazardous Waste Program

- The state regulations for hazardous waste and used oil are in chapters 11-260.1 to 11-279.1, Hawaii Administrative Rules (HAR) [<https://health.hawaii.gov/shwb/hazwaste/hwrules/>]. These rules apply to the identification, handling, transportation, storage and disposal of regulated hazardous waste and used oil. Generators, transporters and treatment, storage, and disposal facilities of hazardous waste and used oil must adhere to these requirements. Violations are subject to penalties under chapter 342J, HRS.

Solid Waste Section

- The Solid Waste Section (SWS) enforces laws and regulations contained in chapters 342H and 342I, HRS, and chapter 11-58.1, HAR, “Solid Waste Management Control” [<http://health.hawaii.gov/shwb/solid-waste/>].
- The purpose of the rules is to establish minimum standards governing the design, construction, installation, operation, and maintenance of solid waste disposal, recycling, reclamation and transfer systems.
- All facilities that accept solid wastes are required to obtain a solid waste management permit from the SWS. Examples of the types of facilities governed by these regulations include landfills, transfer stations and convenience centers, recycling facilities, composting facilities, and salvage facilities. Medical waste, infectious waste, and foreign waste treatment facilities are also included.
- Generators of solid waste are required to ensure that their wastes are properly delivered to permitted solid waste management facilities. Managers of construction and demolition projects should require their waste contractors to submit disposal receipts and invoices to ensure proper disposal of wastes.

Solid and Hazardous Waste Branch Standard Comments

Office of Solid Waste Management

- The Office of Solid Waste Management (OSWM) administers statewide integrated solid waste management planning activities, which apply to the counties, as well as various recycling programs, e.g. the Glass Advance Disposal Fee (ADF) and Deposit Beverage Container (DBC) Programs. Management of the DBC Program is conducted pursuant to chapter 342G, HRS, which contains compliance and enforcement provisions, and chapter 11-282, HAR, “Deposit Beverage Recycling” [<http://health.hawaii.gov/hi5/rules-regulations-additional-links/>]. OSWM is also responsible for limited enforcement and compliance of solid waste management facilities that operate primarily as certified DBC redemption centers pursuant to chapter 342H, HRS, and chapter 11-58.1, HAR, “Solid Waste Management Control” [<http://health.hawaii.gov/shwb/solid-waste/>]. Authority for the integrated solid waste management planning and ADF programs is contained in chapter 342G, HRS.
- Glass Advance Disposal Fee Program: Businesses that import glass containers into Hawaii are required to register with the Department of Health and pay a 1.5 cent per container fee. Fee revenue is distributed to the counties for the operation of glass recycling programs.
- Deposit Beverage Container Program: Business that manufacture or import deposit beverage containers into Hawaii are required to register with the Department of Health and pay the five cent deposit and one cent container fee on each deposit container. Deposits and fees are deposited into a special fund and are used to reimburse DBC redemption center refunds paid to consumers; and to pay handling fees to redemption/recycling companies to process and recycle collected deposit beverage containers; and to pay program administrative costs.
- The Department of Health reimburses and pays an associated handling fee for the redemption of deposit beverage containers (DBC). These transactions are conducted only with certified redemption centers. Certification requires obtaining a solid waste management permit from the SWS (which addresses environmental issues) and a certification from the DBC program (which standardizes the redemption process).
- Chapter 342G, HRS, encourages the reduction of waste generation, reuse of discarded materials, and the recycling of solid waste. Businesses, property managers and developers, and government entities are highly encouraged to develop solid waste management plans to ensure proper handling of wastes and divert recyclables from being landfilled.
- Solid waste management plans seek to maximize waste diversion and minimize disposal. Such plans should include designated areas to promote the collection of reusable and recyclable materials.

Solid and Hazardous Waste Branch Standard Comments

Underground Storage Tank Program

- The state's underground storage tank (UST) regulations, found in chapter 11-280.1, HAR [<http://health.hawaii.gov/shwb/underground-storage-tanks/>], include specific requirements that UST owners and operators must meet when installing, operating, and permanently closing their UST systems and addressing releases from USTs. Violations are subject to penalties under chapter 11-280.1, HAR, and chapter 342L, HRS.
- A permit is required prior to the installation and operation of a UST. Any new UST system that will be installed must have secondary containment with interstitial monitoring. Refer to subchapters 2, 3, 4, and 12 of chapter 11-280.1, HAR. The installation permit expires 1 year from the date of issuance. The operation permit expires 5 years from the date of issuance.
- §11-280.1-50, HAR, requires owners and operators of USTs or tank systems to notify DOH within twenty-four (24) hours and follow the procedures in §11-280.1-52, HAR, if any of the following occur, with specific exceptions found in the rules:
 - 1) The discovery by any person of evidence of regulated substances which may have been released at the UST site or in the surrounding area (such as the presence of free product or vapors in soils, basements, sewer and utility lines, or nearby surface water);
 - 2) Unusual UST system operating conditions observed or experienced (such as the erratic behavior of product dispensing equipment, the sudden loss of product from the UST, or an unexplained presence of water in the tank); or
 - 3) Monitoring results from a release detection method required under §§11-280.1-41 or 11-280.1-42 indicate a release may have occurred.
- For release response actions, responsible parties and their consultants and contractors should not only follow the applicable regulations, but also the Department of Health Hazard Evaluation Emergency (HEER) Office Technical Guidance Manual, HEER Environmental Action Level (EAL) guidance, and other guidance documents on the DOH HEER Office website [<https://health.hawaii.gov/heer/>], including those pertaining to Multi-Increment Sampling of soil, low flow groundwater sampling, soil vapor sampling, and Environmental Hazard Evaluations (EHE)/Environmental Hazard Management Plans (EHMP).



EXHIBIT 14

Consultation for an EA Exemption; Ka Lei Momi Kaahumanu Homes Redevelopment Mixed-Use Project; TMK: (1) 1-5-024:001

From DBEDT State Planning <dbedt.stateplanning@hawaii.gov>

Date Wed 10/2/2024 3:18 PM

To Woodard, Christopher <christopher.j.woodard@hawaii.gov>; Watase, Dean K <dean.k.watase@hawaii.gov>

Cc Balassiano, Katia <katia.balassiano@hawaii.gov>

Sending on behalf of Katia Balassiano, Planning Program Administrator, Office of Planning & Sustainable Development

Aloha,

Thank you for the opportunity to provide input on the Kaahumanu Homes Project. The Office of Planning and Sustainable Development concurs; the Project appears to qualify for an exemption from the preparation of an Environmental Assessment pursuant to Chapter 343-6(5) HRS and various sections of the Administrative Rules.

Mahalo,

Katia Balassiano

katia.balassiano@hawaii.gov

(808) 587-2885

[OPSD website](#) | [geospatial data portal](#) | [subscribe to OPSD newsletter](#)



**STATE OF HAWAII
OFFICE OF PLANNING & SUSTAINABLE DEVELOPMENT**

Leiopapa A Kamehameha
235 South Beretania Street, 6th Floor · Honolulu, Hawai'i · 96813
PO Box 2359 · Honolulu, Hawai'i · 96804-2359
Phone (808) 587-2846 · Fax (808) 587-2824

DEPARTMENT OF PLANNING AND PERMITTING
KA 'OIHANA HO'OLĀLĀ A ME NĀ PALAPALA 'AE
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 7TH FLOOR • HONOLULU, HAWAII 96813
PHONE: (808) 768-8000 • FAX: (808) 768-6041 • WEBSITE: honolulu.gov/dpp

RICK BLANGIARDI
MAYOR
MEIA



DAWN TAKEUCHI APUNA
DIRECTOR
PO'O

BRYAN GALLAGHER, P.E.
DEPUTY DIRECTOR
HOPE PO'O

REGINA MALEPEAI
2ND DEPUTY DIRECTOR
HOPE PO'O KUALUA

October 16, 2024

2024/ELOG-1869 (JD)

Mr. Chris Woodard
State of Hawaii
Department of Business, Economic Development, and Tourism
Hawaii Housing Finance and Development Corporation
677 Queen Street, Suite 300
Honolulu, Hawaii 96813

RECEIVED
HAWAII HOUSING FINANCE
DEVELOPMENT CORP
2024 OCT 18 P 12:58

Dear Mr. Woodard:

SUBJECT: 24:PECB/104
Consultation for an Environmental Assessment
Ka Lei Momi Kaahumanu Homes Redevelopment Mixed-Use Project
1421 Alokele Street – Kalihi-Palama
Tax Map Key: 1-5-024: 001

This is in response to your letter, received September 27, 2024, requesting consultation on whether the subject Project may be exempt from the preparation of an Environmental Assessment (EA). We agree that the Project may be exempt from the preparation of an EA pursuant to the criteria listed in Hawaii Administrative Rules (HAR) Section 11-200.1-15(c)(10).

The 7.37-acre parcel is owned by the State and is under the jurisdiction of the Hawaii Public Housing Authority (HPHA). The existing site is developed with 19 buildings consisting of 152 multi-family dwelling units known as Kaahumanu Homes. We understand that the HPHA is proposing to redevelop the existing site with a new mixed-use affordable housing Project.

The proposed Project will use State land and funds and is therefore subject to the requirements of Hawaii Revised Statutes (HRS) Chapter 343. Pursuant to HAR Section 11-200.1-15(c)(10), new construction of affordable housing is an exempt action provided that it complies with applicable affordable housing regulations of the State or County, and it meets the following criteria:

Mr. Chris Woodard
October 16, 2024
Page 2

- The use of State or County lands or funds, or development within Waikiki are the only HRS Chapter 343 triggers;
- The Project conforms with the State Land Use Urban classification;
- The Project is located within a County zoning District that allows for housing; and,
- The Project does not require a Shoreline Setback Variance and is not an environmentally sensitive area, pursuant to HAR Section 11-200.1-13(b)(11).

Based on the information provided, the proposed redevelopment will meet the above criteria. Therefore, we concur with your determination that the Project may be declared exempt from the preparation of an EA.

Should you have any questions, please contact Jordan Dildy, of our Urban Design Branch, at (808) 768-8027 or via email at jdildy@honolulu.gov.

Very truly yours,

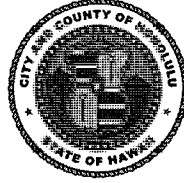

For Dawn Takeuchi Apuna
Director

EXHIBIT 16

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

RICK BLANGIARDI
MAYOR
MEIA



HAKU MILLES, P.E.
DIRECTOR
PO'O

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

October 10, 2024

SENT VIA EMAIL

Mr. Dean Watase
dean.k.watase@hawaii.gov

Dear Mr. Watase:

Subject: Consultation for an Environmental Assessment Exemption
Ka Lei Momi Ka'ahumanu Homes Redevelopment Mixed-Use Project
1421 Alokele Street; Honolulu, O'ahu
Tax Map Key: (1) 1-5-024:001

Thank you for the opportunity to review and comment. The Department of Design and Construction has no comments to offer at this time.

Should you have any questions, please contact me at (808) 768-8480.

Sincerely,

A handwritten signature in black ink, appearing to read "H. Milles".

Haku Milles, P.E., LEED AP
Director

HM:cf (928685)