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DEAN MINAKAMI
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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:
25:PECB/13

February 13, 2025

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
Kaiaulu O Kalaeloa Affordable Rental Housing Development
91-1309 Franklin D. Roosevelt Avenue; Kalaeloa, Oahu
Tax Map Key (1) 9-1-013:079

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.

Ikaika Ohana is proposing to build the Kaiaulu O Kalaeloa Affordable Rental Housing Development, which will provide 260 affordable rental or affordable for-sale units on 3.39 acres of land zoned T4 Urban Center under the Hawaii Community Development Authority jurisdiction.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Dean C. Minakami".

Dean Minakami
Executive Director

Attachment

KAIAULU O KALAELOA AFFORDABLE HOUSING 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.

DESCRIPTION OF ACTION

Proposing Agency or Applicant: The Applicant is Ikaika Ohana (Applicant); 2000 East Fourth Street, Suite 220; Santa Ana, California 92705. The approving agency of this exemption notice is the Hawaii Housing Finance and Development Corporation (HHFDC).

Project Name & Address/Location: The Kaialulu O Kalaeloa Affordable Housing Project (Project) is located at 91-1309 Franklin D. Roosevelt Avenue; Kalaeloa, HI 96707 (Project Site).

Estimated Construction Schedule: Construction start: March 2027 / Construction completion: March 2028

Tax Map Key (TMK) and latitude/longitude coordinates (in decimal degrees): TMK: (1) 9-1-013:079; Coordinates: 21-19-18.82N NAD 83, 158-04-32.51W

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)

NARRATIVE

The Applicant is proposing to build an affordable rental housing in Kalaeloa at the corner of Franklin D. Roosevelt Avenue to the north and Franklin Street to the west (See Exhibits 1 and 2 for location maps). The Applicant has executed an option to purchase agreement with the landowner, which has a total land area of 3.39 acres or 147,668 square feet (Project Site). The Project Site is located within the Hawaii Community Development Authority (HCDA), Kalaeloa Community Development District (KCDD). HCDA designates the Project Site as T4 Urban Center.

There is a vacant two-story, former school building with a parking lot that was built in 1957. Once the parcel is cleared and ready for construction, the Applicant will demolish and remove the structure on the Project Site.

The proposed Project would provide 260 units, which will be affordable rental or for-sale units, as described further below. Under the affordable rental scenario, seven units will be available for onsite managers, maintenance, and social services staff. In addition, the Project will include 365 parking stalls, two spaces for loading/unloading activities, and a parking area for bicycles and mopeds. The number of parking stalls is subject to change; however, minimum parking requirements will be met. Project amenities include two lobby areas with mailrooms, a community center, and laundry facilities. See Exhibit 3, Site Plan.

The Project will be constructed all at once, or will be phased. If phased, Phase 1 will consist of a seven-story building with 190 parking stalls, which includes 168 stalls for residential use. Phase 2 will consist of a nine-story building with 175 parking stalls, which includes 158 stalls for residential use. The maximum height of the tallest building is 90 feet above ground level. It is noted that the final breakdown of unit types (i.e., one, two, or three bedrooms) may be adjusted based on demand at the time of construction.

	One Bedroom Units	Two Bedroom Units	Three Bedroom Units	Total Units
Phase 1	30	51	53	134
Phase 2	31	46	49	126
Total Units	61	97	102	260

The funding source is uncertain and for flexibility, the Applicant has proposed the Project to be built under one of three funding scenarios as described below. In the first two scenarios, the Project will be an affordable rental apartment project. In the third funding scenario, the Project will be an affordable for-sale condominium development. The three scenarios are:

1. An affordable Low-Income Housing Tax Credit (LIHTC) rental apartment project targeting residents earning 60% or below of the area median income (AMI). Under this scenario, the Project would be financed using a combination of LIHTC and RHRF. The Applicant commits to setting aside affordable units for 65 years. Income averaging would allow the Project units to be leased to a mix of units with different income designations, so long as the average income/rent for the Project is 60% or less of the AMI. For example, a property could have 25 units at 80% of the AMI, 25 units at 40% of the AMI, and the rest at 60% of the AMI.
2. An affordable “missing middle,” rental apartment project targeting residents earning between 100% and 120% of the AMI. The “missing middle,” are asset-limited, income-constrained, employed (ALICE) families. These are families that have incomes above 60% of the AMI but still cannot afford the rent. The Applicant proposes that 80% to 100% of the units may be leased to individuals or families earning anywhere from 30% to up to 120% of the AMI to meet the needs of the “missing middle” segment of the population. Under this scenario, the Project would be financed using a combination of LIHTC and RHRF Tier II Program. The Applicant commits to setting aside affordable units for 65 years.
3. An affordable for-sale condominium project with between 80% to 100% of the units to be sold at affordable prices to residents earning up to 120% of the AMI. The balance of the units would be sold at market prices. Under this scenario, the Project would be financed using HHFDC’s Dwelling Unit Revolving Fund (DURF).

The Applicant will seek exemptions from certain conditions relating to planning, zoning, construction standards for subdivisions, development, and improvement of land, and the construction of dwelling units thereon – see Project Summary for a list of exemptions.

The Applicant will seek financing from the Rental Housing Revolving Fund, Hula Mae Multi-Family tax-exempt bonds, Dwelling Unit 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.

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 land use and zoning regulating authority for the KCDD is HCDA. The Project site is located within the KCDD T4 Urban Center Zone (medium-density mixed-use). The T4 is characterized by a mix of retail, office, residential, and civic buildings. The T4 designation allows for residential development with a maximum height of 75 feet above ground level and a maximum density of 40 units per acre. As an affordable housing development, the Project is consistent with the mixed-use, urban center designation.
2. *Traffic.* Franklin D. Roosevelt Avenue is a two-lane roadway. Vehicular access to both phases will be provided via a driveway off Franklin D. Roosevelt Avenue. Potential access may be provided via Franklin Street, which is a private roadway.

The Applicant’s traffic engineer prepared a Traffic Impact Assessment Report. At full build-out, the Project is expected to generate a total of 1,076 net new daily vehicle trips, including 88 net new vehicle trips during the AM peak hour and 40 net new vehicle trips during the PM peak hour. Based on typical City and County of Honolulu, Department of Planning and Permitting, Traffic Review Branch (TRB) requirements, the analysis determined that the Project will not have a significant impact at any of the study

intersections through completion in 2028. As such, no vehicle capacity improvements were recommended. Site access, parking, and circulation were deemed to be adequate. It was noted that future bicycle improvements are expected with the buildout of the *Kalaeloa Master Plan* and include a multi-use path on the north side of Roosevelt Avenue per the *Oahu Bike Plan*, and protected bike lanes on Saratoga Avenue.

3. *Infrastructure.* Coordination has taken place with utility companies to determine service to the Project Site. The will-serve letters have been obtained from Kalaeloa Water Company for water and sewer service. Hawaiian Electric (HECO) has also provided a will-serve letter for electrical service. The Applicant will work with HECO on identifying offsite improvements to connect the property to the HECO system.

Additionally, a Preliminary Engineering Report with a drainage plan and a Geotechnical report is being prepared for the Project. The Project site is part of the *Kalaeloa Drainage Master Plan 2023 Addendum*, which requires that all stormwater runoff and runoff from adjacent public streets be retained. Improvements in the form of retention basins or alternative low-impact development methods are proposed to accommodate runoff. In addition, on-site drywalls are recommended to contain additional runoff to replace existing drywells that do not conform to City and County of Honolulu standards.

4. *Visual.* The visual character of the community surrounding the Project Site is a mixture of two-story single-family residences, three-story multifamily apartment buildings, and open spaces. The property is located within the T-4 of the HCDA zoning, which allows for building heights of up to 75 feet in this area. An exemption for building height will be requested through the 201H process. The proposed residential towers will reach a maximum height of 90 feet above ground level, which will be visible from the surrounding community. While the current condition of the Project Site does not serve as a visual resource and does not significantly affect any view corridor, the Project will alter both street level and skyline views. This impact is an unavoidable impact of urban development. Nevertheless, it is noted that context-sensitive design is proposed with careful attention placed in regards to transitions between the multi-story buildings and surrounding uses.
5. *Cultural, Historic and Archeological Resources.* An archaeological consultant prepared an Archaeological Literature Review and Field Inspection (LRFI) for the Property, which was submitted by HCDA to SHPD for review and determination as part of HRS 6E process. The Applicant's historic architecture consultant also prepared a Reconnaissance Level Survey (RLS) of the Property. Upon review by the SHPD, an Archaeological Inventory Survey (AIS) was requested. The Applicant's archaeological consultant will prepare an AIS and submit it for review by SHPD. The Applicant will implement any further mitigation deemed necessary by SHPD.
6. *Environmental Site Assessment.* The Applicant's environmental consultant prepared a Phase 1 Environmental Site Assessment (ESA) of the Project Site. It found no evidence of recognized environmental conditions (REC). However, due to the age of the existing and former structures, it is possible that pesticides were used for termite and pest control. Pesticide Best Management Practices, including on-site management and redevelopment disposal are recommended as mitigation. In addition, previous investigations identified a black mastic coating on a brown vinyl floor tile and two types of brown vinyl floor tiles that are considered Asbestos Containing Materials (ACM).

Another ACM identified through a Hazardous Materials Survey testing included the drywall on the second floor. Paint containing lead was also identified throughout the existing structure. Hazardous materials abatement will be conducted prior to demolition of the building.

7. **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.
8. **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.
9. **Cumulative Impacts.** The Project, along with other proposed developments in the area, is not anticipated to result in significant secondary and cumulative impacts.

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 4.
3. The Project Site is within the KCDD T4 Urban Center Zone (medium-density mixed-use). As part of the 201H Application, the Applicant is requesting various exemptions from HCDA's KCDD relating to density, height, park dedication, and other requirements.
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 8,500 feet from the nearest shoreline (See Exhibit 5).
 - b. It is in Flood Zone D (See Exhibit 6).
 - c. Does not contain any streams or wetlands (See Exhibit 7).
 - d. Does not include any area designated critical habitat (See Exhibit 8).
 - e. Is not within the Special Management Area (See Exhibit 9).

CONSULTATIONS

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

Agency / Organization	Name	Consultation Date
City and County of Honolulu	Mayor Rick Blangiardi	11/14/2022
Kalaeloa Stakeholders Group	Stakeholders Group	04/13/2023
Kapolei/Makakilo/Honokai Hale Neighborhood Board	Board	10/25/2023
Kalaeloa Rental Homes (Neighbors)	Greystar (Property Manager)	11/20/2023
Hawaii Department of Transportation	Ed Sniffen, Director	12/04/2024
Hawaii Community Development Authority	Craig Nakamoto, Executive Director	12/04/2024
Hawaii Department of Education	Keith Hayashi, Superintendent	12/04/2024
Hawaii Department of Health	Kenny Fink, Director	12/04/2024
Office of Planning and Sustainable Development	Mary Alice Evans, Director	12/04/2024
CCH, Department of Planning and Permitting	Dawn Takeuchi-Apuna, Director	12/04/2024
CCH, Mayor's Office of Housing	Kevin Auger, Director	12/04/2024
CCH, Department of Transportation Services	J. Roger Morton, Director	12/04/2024
CCH, Department of Design and Construction	Haku Miles, Director	12/04/2024
Hawaii Community Development Authority	Board members	12/04/2024

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

1. **Hawaii Department of Transportation.** The department had the following comments:

- a. The Project is approximately 0.43 miles from the property boundary of the Kalaeloa Airport (JRF). All projects within 5 miles from 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. The Project Site is approximately 4,530 feet from the end of Runway 11 at JRF. Federal Aviation Administration (FAA) regulation requires the submittal of FAA Form 7460-1 Notice of Proposed Construction or Alteration pursuant to the Code of Federal Regulations, Title 14, Part 77.9, if the construction or alteration is within 20,000 feet of a public use 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 Part 77 analysis to the DOT Airports Planning Section.

Response: The Applicant will submit the FAA Form 7460-1 to FAA and provide a copy of the determination to DOT Airports Planning Section.

- c. **Due to the Project's proximity to JRF, the Applicant and future residents should be aware of potential single-event noise from aircraft operations. There is also potential for fumes, smoke, vibrations, odors, etc., resulting from occasional aircraft flight operations over or near the Project. These incidences may increase or decrease over time and are dependent on airport operations.**

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

- d. **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 the pilot 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.**

FAA requires a glint and glare analysis for all solar energy PV systems near airports. 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, the Applicant may include PV systems in the future. In designing any future PV system, the **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.*

- e. **The 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 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. DOT encourages 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 light-emitting diode lighting.
 - iii. Use 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. The 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 Community Development Authority. The authority had the following comments:

- a. The Exemption narrative should be clear that the developer has requested exemptions and expedited review under HRS 201H-38. There is no mention of the 201H process until the analysis of visual impacts in the attached Project Summary and Impact Analysis table.

Response: This comment is acknowledged.

- b. With regards to Exemption Type 6, except those structures that are listed on the National or Hawaii Register of Historic Places, it should be noted that Building 55 has been identified as Eligible for listing on the National Register of Historic Places under Criterion C. HCDA is not aware that the Chapter 6E, HRS consultation for the project scope to demolish Building 55 has been concluded with the State Historic Preservation Division (SHPD). The Covenants that are **attached to the Property's deed (Parcel 4)** specify that SHPD must be consulted and concur on the findings of a professionally qualified historical architect as to **the building's eligibility status and as appropriate, mitigation measures in writing**, in accordance with HRS 6E and 205.

In addition, SHPD must provide its concurrence with the **Project's AIS and Archaeological Monitoring Plan** in writing. The outcome of the consultation with SHPD may have a direct bearing on the applicability of Exemption Type 6. Please refer to Attachment 1: Historic Covenants Quitclaim Deed: Section D. Historic Covenants (Parcels 3, 4, 8, 9A, 9B, 10, 15 and 16), Articles 1, 2, & 3 and Exhibit "O".

Response: An Archaeological Literature Review and Field Inspection was prepared in March 2020 by TCP Hawaii, LLC. No historic properties were identified other than the existing abandoned Navy building and the entire site has been razed and graded from previous development. An Evaluation of Significance assessment and Historic Covenant Review was conducted for the abandoned building and submitted for SHPD review. The AIS has been initiated and the Project will comply with any further SHPD recommendations. SHPD concurrence will be obtained prior to demolition and construction.

- c. Will the addition of 260 new residential units adversely impact public services, such as schools, fire, and police?

Response: The proposed project is within existing service areas for schools, fire, police, and other government, medical, commercial, and recreational services. In addition, agencies such as DOE, DOT, and DOH have also been consulted regarding the project. The HCDA Kalaeloa Draft Master Plan, released in August 2024, includes the project parcel and identifies public services needs for the region. The draft Master Plan notes that the Honolulu Fire Department has identified a need for a new fire station in Kalaeloa and notes that "standard development procedures will ensure that a suitable location and facility are provided as Kalaeloa grows in the future". A potential new elementary school and/or middle school may also be needed as the region grows. The Applicant will continue coordinating with HCDA on project plans to ensure adequate public services are provided.

- d. Please clarify a seeming discrepancy in courtyards as a design element. The rationale for Item #11 includes the statement that the Applicant will provide an active streetscape that would provide pedestrian amenities such as tree-lined walking paths and intermittent courtyards along Roosevelt Avenue. However, the exemption requested in Item #12 states that courtyards are not proposed.

Response: To clarify, courtyards are not proposed, but Roosevelt Avenue will include frontage improvements inclusive of benches, trees, and walkways.

- e. Pursuant to the "expedited review" process under HRS 201H-38, the Applicant shall hold community meetings prior to its determination whether an EA/EIA is required. If the project has been presented to the Makakilo-Kapolei Neighborhood Board and/or other interested parties, please incorporate community feedback in the exemption narrative.

Response: The Project has been presented to the Makakilo/Kapolei/Honokai Hale Neighborhood Board, the HCDA Kalaeloa Stakeholders Group, and the HCDA Board. The stakeholder groups have been generally supportive of the project and affordable housing. Comments from stakeholders are listed below.

- ***The Project should include ADA units.***
- ***Vertical landscaping can be used to soften visual impacts to neighboring single-family homes.***

- *Proposed buildings should be resilient to hurricane damage and flooding.*
 - *Sustainability features should be incorporated into the design and the design should honor the area and land.*
 - *The Applicant should coordinate with community partners regarding potential tenants that can provide services.*
 - *Trees can be a good source of shade since the area can get hot. Native plants were encouraged.*
 - *Appropriate mitigation should be used to ensure hazardous materials from the proposed demolition of the U.S. Navy building do not impact the community.*
3. The Department of Health, Environmental Health Administration, Environmental Management Division and Environmental Health Services Division provide standard comments on the EPO Land Use Planning Review webpage at <https://health.hawaii.gov/epo/landuse/>.
- a. Please see the individual links on the webpage for the Clean Air Branch, Clean Water Branch, Indoor and Radiological Health Branch, Safe Drinking Water Branch, and Wastewater Branch standard comments.

Response: The link to the DOH standard comments have been shared with the Applicant for Project implementation, as applicable.

4. Office of Planning and Sustainable Development (OPSD). The department had the following comments:
- a. The request states that the existing structure is not on the Hawaii Register of Historic Places, but due to the structure's age, citing Part 2 Actions, the Applicant has initiated consultation with the Hawaii State Historic Preservation Division (SHPD) to ensure the structure is properly evaluated. OPSD supports this consultation. OPSD further notes that the HHFDC Project Summary and Impact Analysis states that prior environmental site assessment investigations indicate that asbestos-containing materials and lead-based paint were identified in the structure. Therefore, under Part 2 Actions, the Applicant must ensure that hazardous material removal and disposal are conducted in accordance with any applicable State Department of Health or industry standards.
- Response: OPSD's concurrence with consultation with SHPD is acknowledged. For the building demolition, the Applicant will ensure hazardous materials are properly disposed of in accordance with DOH and regulatory standards.*
- b. OPSD notes that the Project meets all of the above criteria for consideration pursuant to Exemption Type 10, as documented in the HHFDC request. The use of State funds is the sole trigger for compliance with HRS Chapter 343. The project is within the State Urban District. The project is consistent with the T5

Urban Center Zone land use designation in HCDA July 2024 Draft Kalaeloa Master Plan, which would control the use or development of the parcel. The T5 Urban Center Zone includes a diverse mix of uses with the highest allowable density and height, containing a mix of retail, office buildings, civic uses, and residential. The Project is not located near the shoreline and is not in a natural hazard zone or an environmentally sensitive area. HHFDC has identified the project as a Part 2 Action under Exemption Type 10, which would exempt affordable housing provided that pre-assessment consultations were conducted to determine the appropriateness of preparing an exemption notice or requiring an environmental assessment.

The Project Summary and Impact Analysis states that a TIAR, a PER with a drainage plan, and a geotechnical report, as well as other studies, have been or are being prepared for the Project. These project-related studies and reports, by their nature, should document and discuss the range of Project impacts as well as recommended mitigation measures the Applicant plans to incorporate into the Project. Making these reports available to relevant agencies and the public before any decision-making on development and permit approvals would be consistent with the requirement for consultation and the request for an HRS 343 exemption for the proposed project.

Finally, OPSD notes that cumulative and secondary impacts are inevitable and unavoidable for projects that support the buildout of planned development in adopted State or county long-range land use plans. In this instance, it is reasonable to assume that those project impacts that can be mitigated will be addressed through best practices and other measures incorporated or conditions placed on project development and operation by approving entities.

Response: The aforementioned comments are acknowledged. It is noted that the HCDA Kalaeloa District Rules currently in effect designate the Project site as T4 Urban Center, which is characterized by a mix of retail, office, residential, and civic buildings. Civic spaces include urban parks, plazas, and squares. It is further noted that consulted agencies will also have the opportunity to review the 201H application prepared for the Project, which will include technical studies.

5. CCH, Department of Planning and Permitting. The department concurs this Project is eligible for an EA exemption.
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.

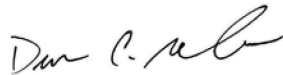
EXEMPTION DECLARATION

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 LRFI has been submitted to SHPD for their review and determination as part of the HRS 6E process. Per request by SHPD, the Applicant will prepare an AIS for the Project. 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 located within the Community Growth Boundary for Ewa and Central Oahu in the CCH's *Ewa Development Plan* and is consistent with the long-range vision for Ewa as the secondary urban center, and is consistent with the Kalaeloa Master Plan's general development pattern goals for higher density housing with mixed uses. In addition, the Project site has been previously developed. 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 260 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 an affordable housing project. 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 within an area designated for urban use and will include visually-appealing design features.
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

Feb 14, 2025

Date

List of Exhibits:

Exhibit 1 – Regional Map

Exhibit 2 – Project Location Map

Exhibit 3 – Site Plan

Exhibit 4 – State Urban District Map

Exhibit 5 – Sea Level Rise Exposure Map

Exhibit 6 – Flood Hazard Zone Map

Exhibit 7 – Streams and Wetlands Map

Exhibit 8 – Critical Habitat Map

Exhibit 9 – Special Management Area Map

Exhibit 10 – Typical Consultation Packet (minus exhibits listed above)

Exhibit 11 – DOT comment letter

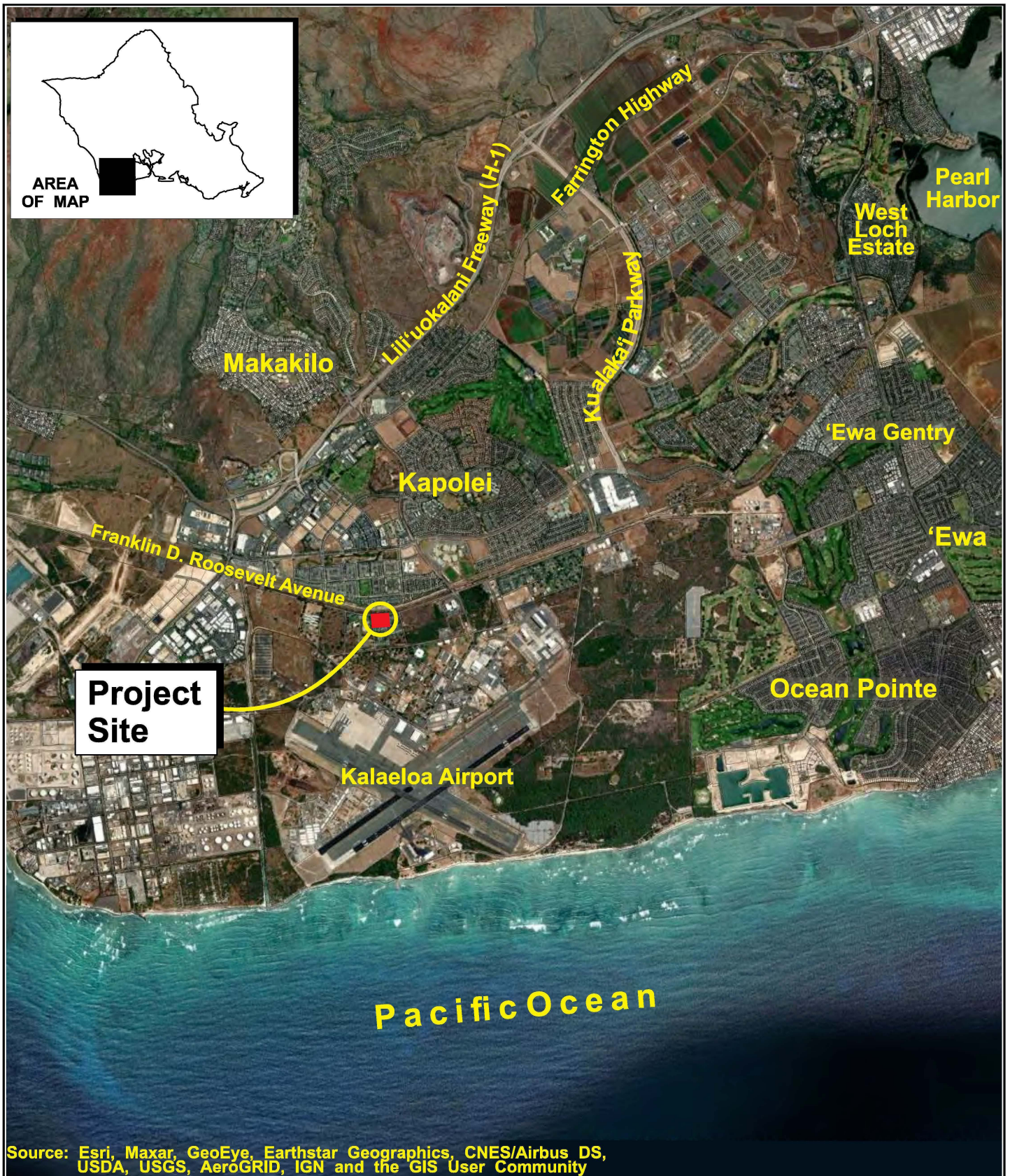
Exhibit 12 – HCDA comment letter

Exhibit 13 – DOH comment letter

Exhibit 14 – OPSD comment letter

Exhibit 15 – DPP comment letter

Exhibit 16 – DCC comment letter



Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN and the GIS User Community

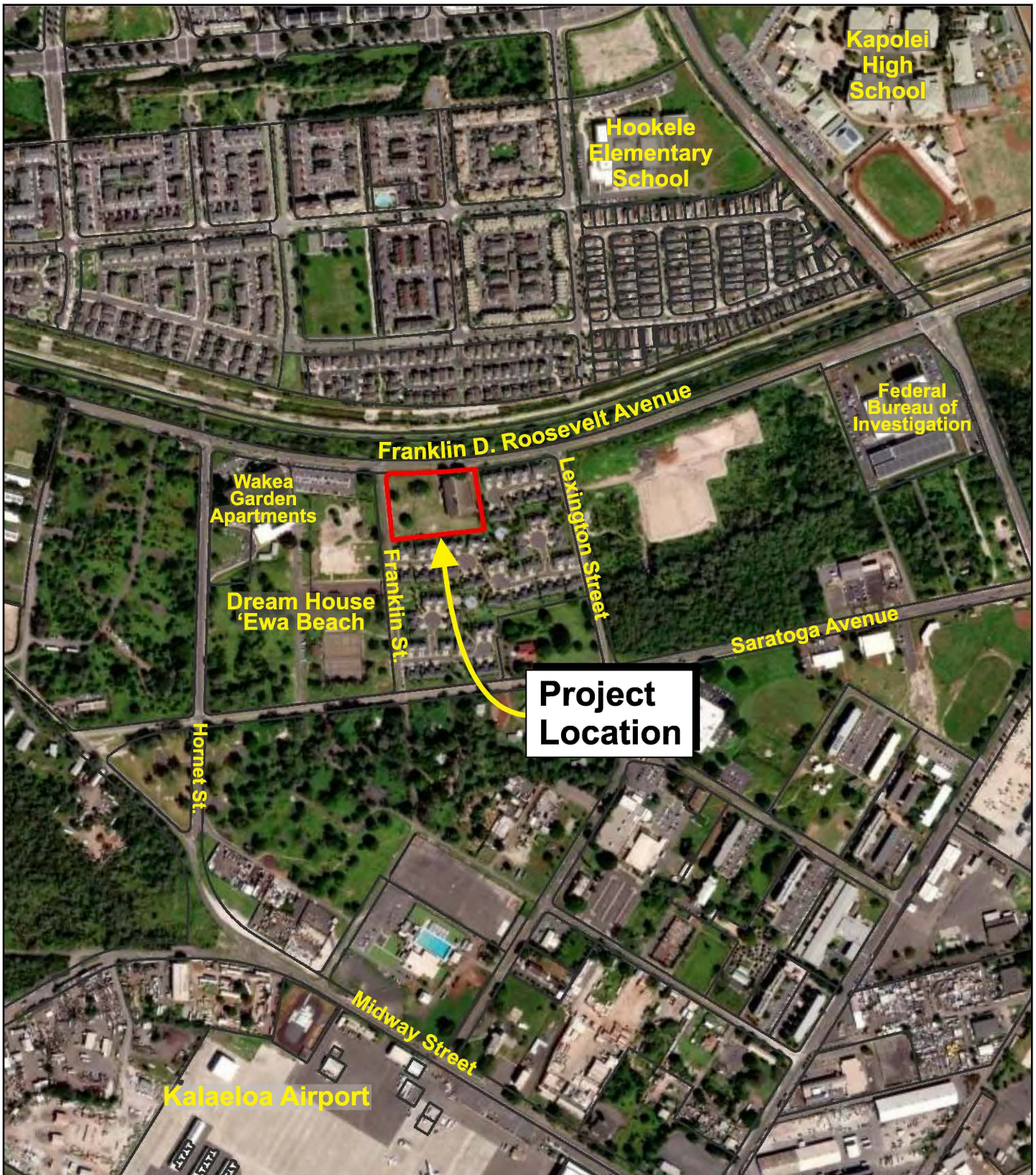
Exhibit 1 Proposed Kaiulu O Kalaeloa Affordable Housing Development Project

Regional Location Map



Prepared for: Ikaika Ohana

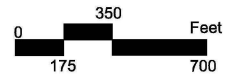




Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, the GIS User Community, and City and County of Honolulu Department of Planning and Permitting

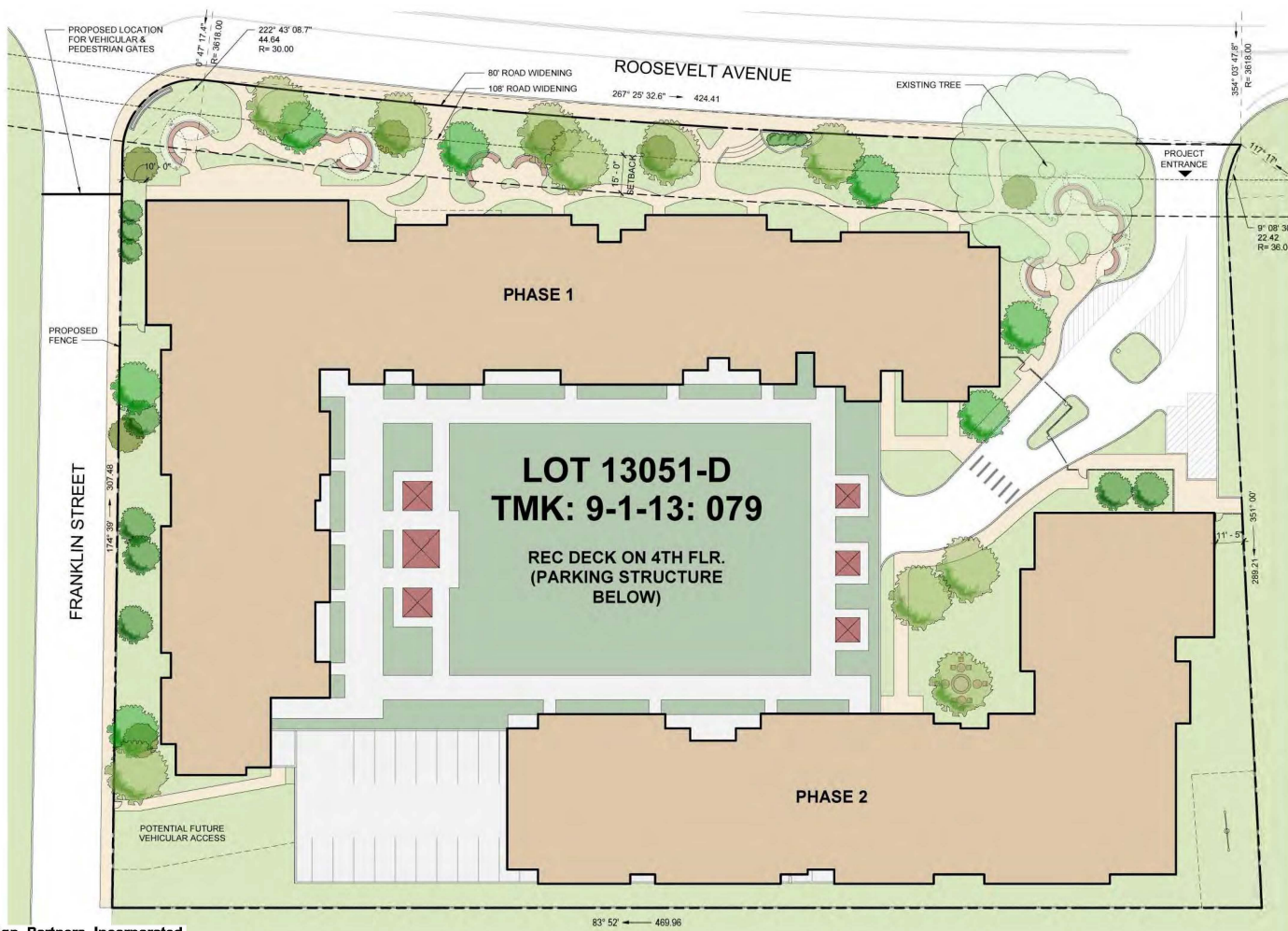
Exhibit 2 Proposed Kaiaulu O Kalaeloa Affordable Housing Development Project

Project Location Map



Prepared for: Ikaika Ohana





PROJECT INFORMATION

PARCEL 4
 TMK: 9-1-13:079
 LOT AREA: 147,668 SF (3.39 ACRES)

ZONING DESIGNATION
 KALAELOA COMMUNITY DEVELOPMENT DISTRICT
 T-4 URBAN CENTER

PROPOSED CONSTRUCTION TYPE IB

MAXIMUM DENSITY	ALLOWED	PROVIDED
40 UNITS/ACRE MAX 135 UNITS		80 UNITS/ACRE MAX 260 UNITS
SETBACK	REQUIRED/ALLOWED	PROVIDED
FRONT YARD: SIDE YARD: REAR YARD:	5'-0" TO 15'-0" 0'-0" 0'-0"	15'-0" MINIMUM 10'-0" MINIMUM 10'-0" MINIMUM
MAXIMUM HEIGHT	REQUIRED/ALLOWED	PROVIDED
	75'-0" MAXIMUM	95'-0" MAXIMUM

PROJECT SUMMARY:

UNIT MIX	PHASE 1 (7-STORY BLDG.)	PHASE 2 (8-STORY BLDG.)	TOTAL
1BR UNITS:	30 UNITS	31 UNITS	61 UNITS
2BR UNITS:	51 UNITS	46 UNITS	97 UNITS
3BR UNITS:	53 UNITS	49 UNITS	102 UNITS
TOTAL UNITS:	134 UNITS	126 UNITS	260 UNITS

PARKING SUMMARY	PHASE 1	PHASE 2	TOTAL
REQUIRED PARKING			
RESIDENTIAL UNITS (1.25/UNIT)	168	158	326
OFFICE (1/450SF)	9	1	10
COMMUNITY ROOM (0.9/300 SF)	13	16	29
TOTAL REQUIRED	190	175	365
TOTAL STALLS PROVIDED	190	175	365
<small>*NUMBER OF PROVIDED STALLS MAY BE SUBJECT TO CHANGE BUT WILL MEET OR EXCEED PROJECT MINIMUM PARKING REQUIREMENTS.</small>			
LOADING STALLS REQUIRED/PROVIDED			2

ACCESSIBILITY SUMMARY	PHASE 1	PHASE 2	TOTAL
REQUIRED UNITS	7	7	14
ADA MOBILITY ACCESSIBLE (5%)			
ADA COMMUNICATION ACCESSIBLE (2%)	3	3	6
ACCESSIBLE PARKING			
RESIDENTIAL UNITS	7	7	14
ADAPTABLE STALLS (2%)	3	3	6
GUEST	2	1	3
TOTAL REQUIRED	12	11	23
TOTAL ACCESSIBLE STALLS PROVIDED	12	12	24

Source: Design Partners Incorporated

Exhibit 3

Proposed Kaiāulu O Kalaeloa Affordable Housing Development Project
 Site Plan

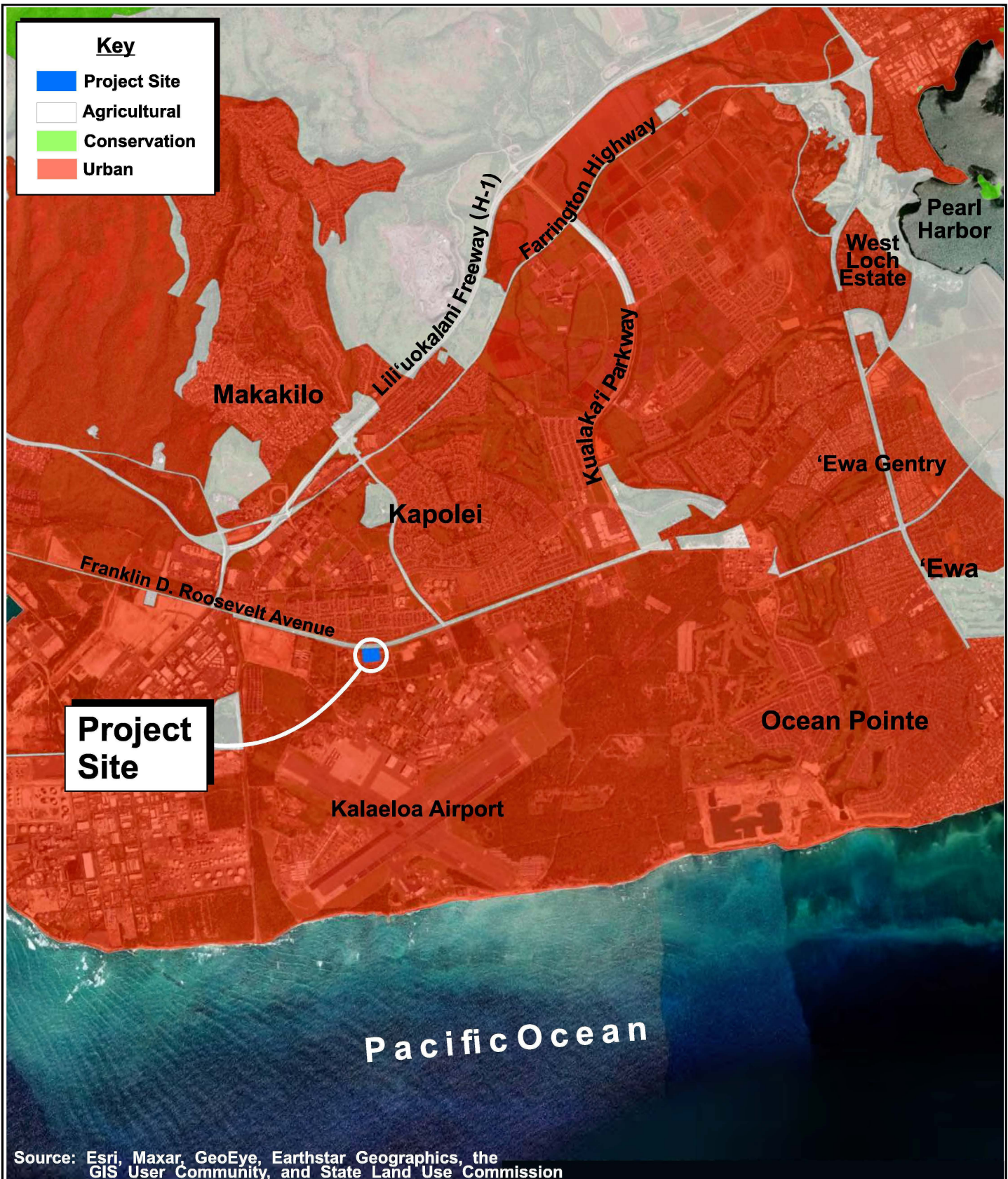
NOT TO SCALE



Prepared for: Ikaika Ohana



Ikaika/Kalaeloa 2011H/Applications/Figures/SitePlan.EAE



Source: Esri, Maxar, GeoEye, Earthstar Geographics, the GIS User Community, and State Land Use Commission

Exhibit 4 Proposed Kaiaulu O Kalaeloa Affordable Housing Development Project

State Land Use Designation

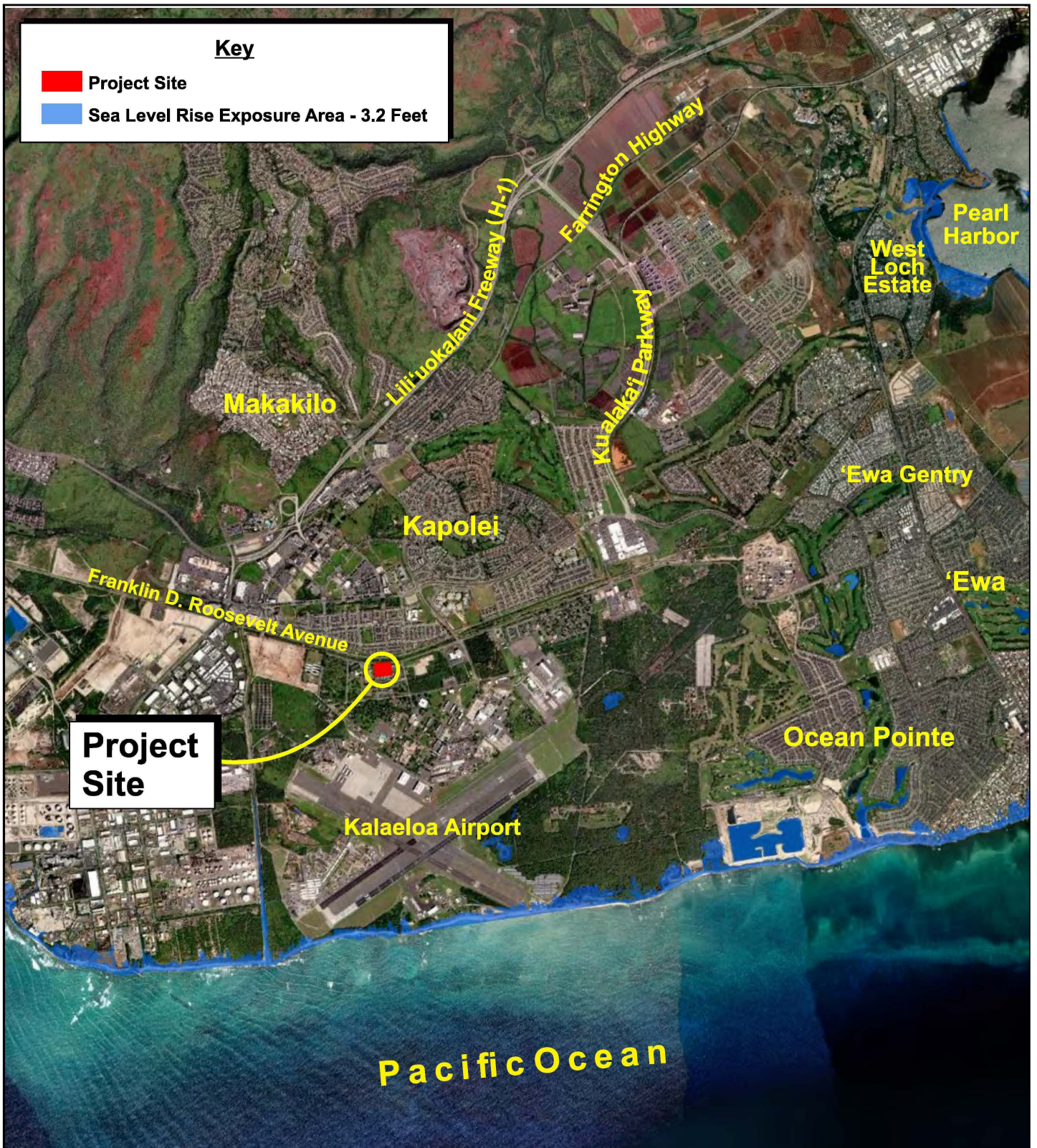


Prepared for: Ikaika Ohana



Key

-  Project Site
-  Sea Level Rise Exposure Area - 3.2 Feet



Source: Esri, Maxar, GeoEye, Earthstar Geographics, the GIS User Community, and The Pacific Islands Ocean Observing System (PaciOOS)

Exhibit 5 Proposed Kaiaulu O Kalaeloa Affordable Housing Development Project

3.2 Ft. Sea Level Rise Exposure Area



Prepared for: Ikaika Ohana



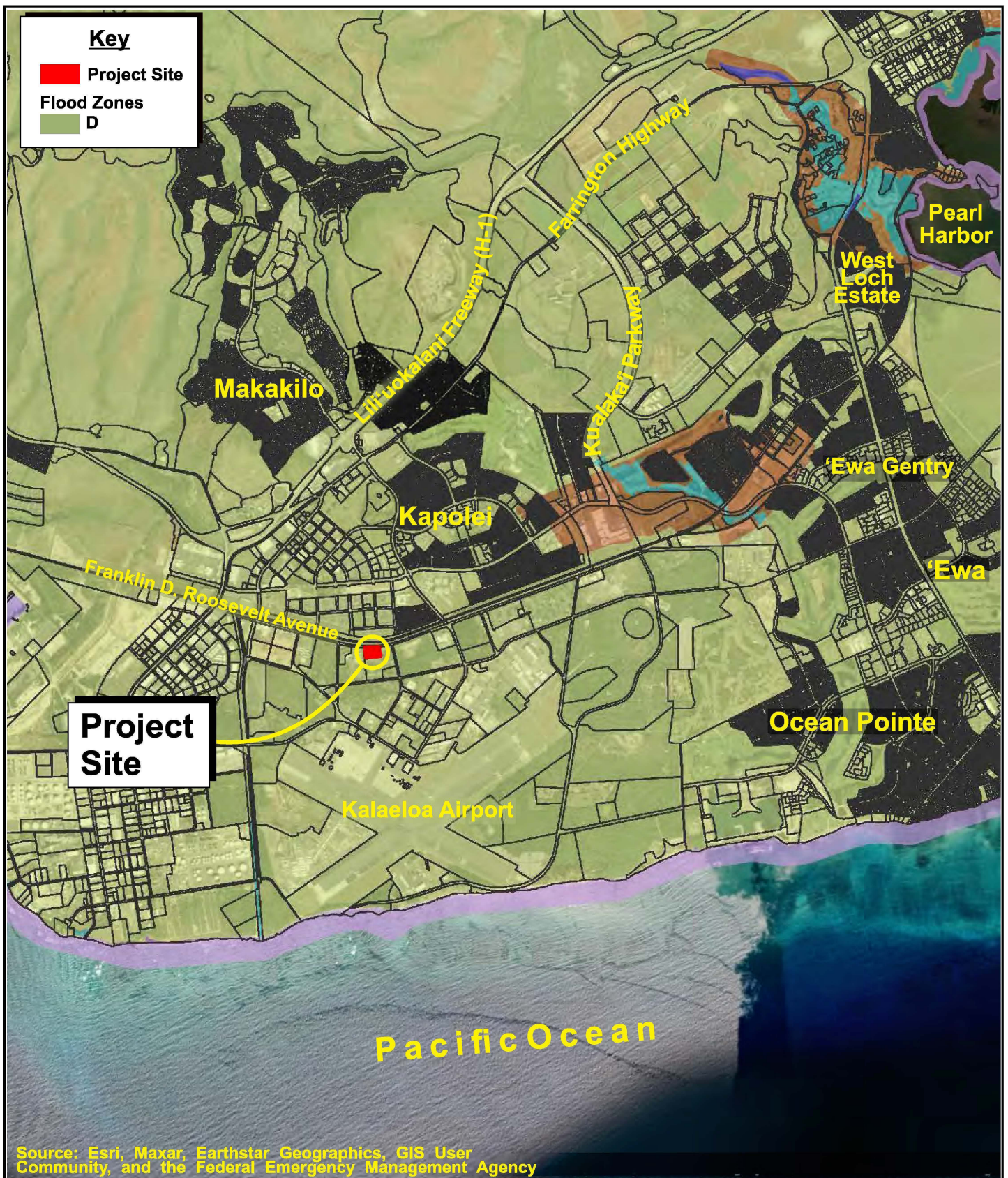


Exhibit 6 Proposed Kaiulu O Kalaeloa Affordable Housing Development Project Flood Hazard Zone Map



Prepared for: Ikaika Ohana



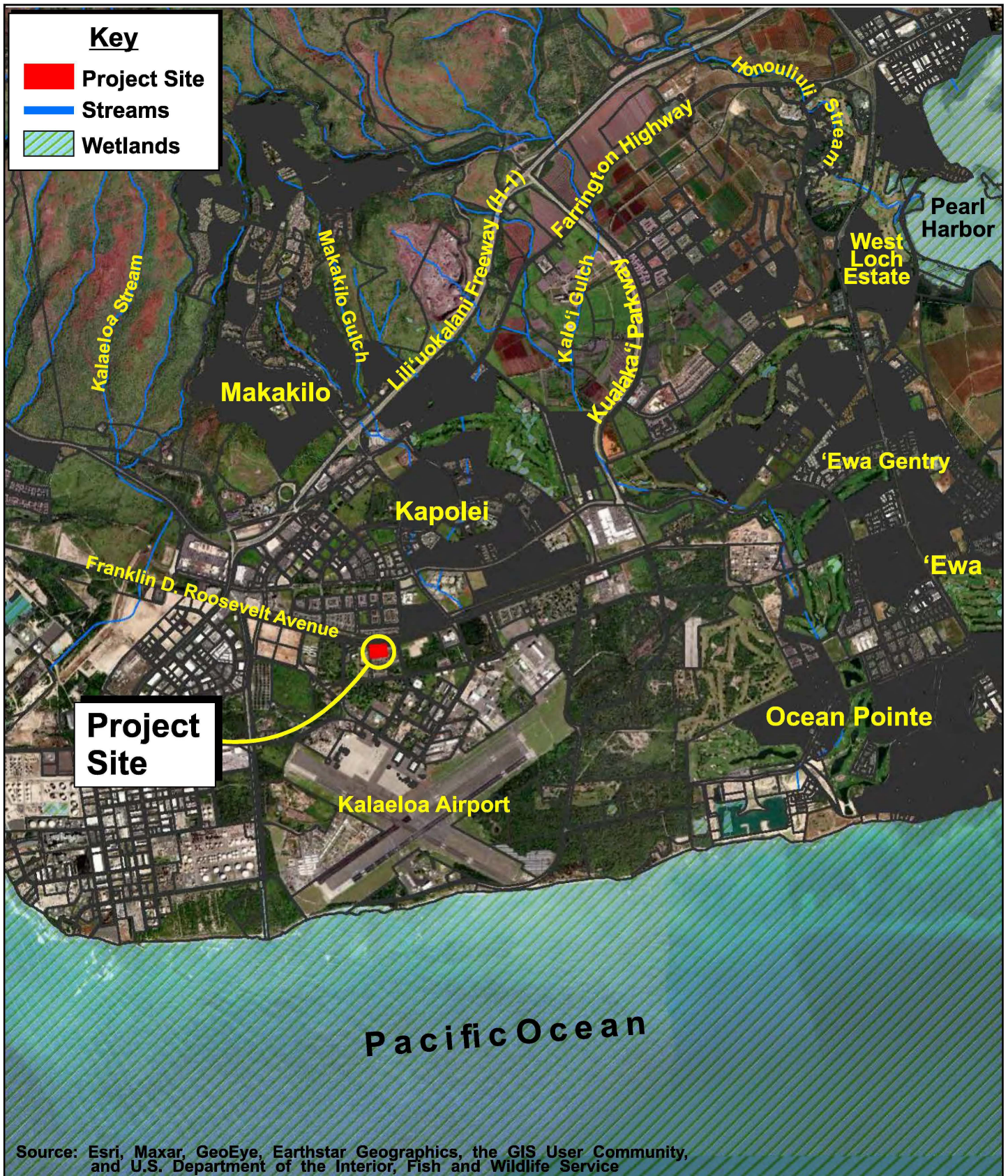
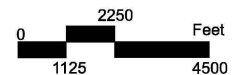


Exhibit 7 Proposed Kaiāulu O Kalaeloa Affordable Housing Development Project

Streams and Wetlands Map



Prepared for: Ikaika Ohana



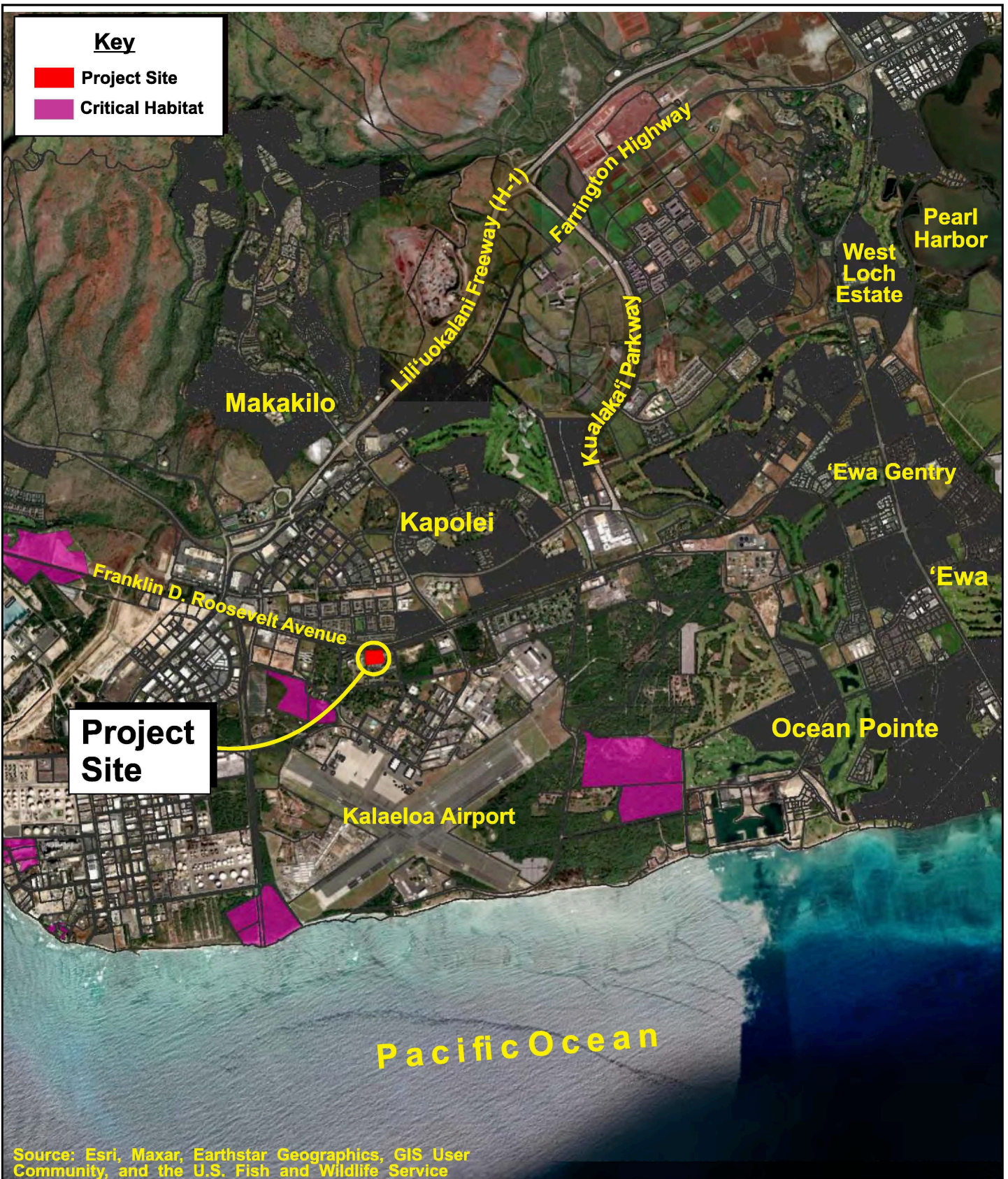


Exhibit 8 Proposed Kaiaulu O Kalaeloa Affordable Housing Development Project Critical Habitat

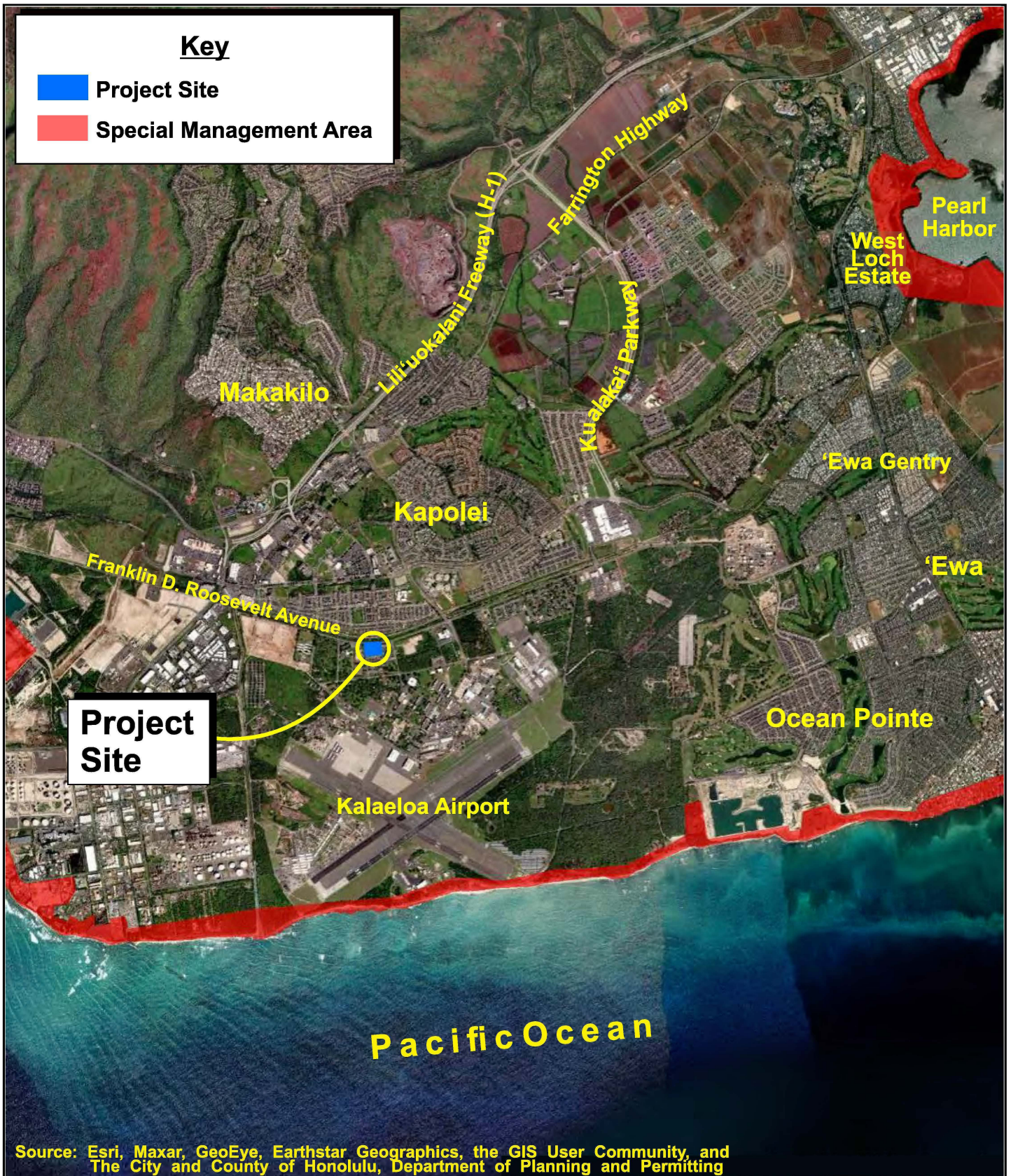


Prepared for: Ikaika Ohana



Key

-  Project Site
-  Special Management Area



Source: Esri, Maxar, GeoEye, Earthstar Geographics, the GIS User Community, and The City and County of Honolulu, Department of Planning and Permitting

Exhibit 9 Proposed Kaiaulu O Kalaeloa Affordable Housing Development Project

Special Management Area Map

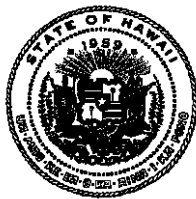


Prepared for: Ikaika Ohana



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/128

December 4, 2024

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

Dear Mr. Sniffen:

**Subject: Consultation for an Environmental Assessment Exemption
Kaiaulu O Kalaeloa Affordable Rental Housing Development
91-1309 Franklin D. Roosevelt Avenue; Kalaeloa, Oahu
Tax Map Key (1) 9-1-013:079**

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 Kaiaulu O Kalaeloa Rental Affordable Housing Development (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 January 8, 2025, to make this determination.

Ikaika Ohana (Applicant) is proposing to build an affordable rental project in Kalaeloa at the corner of Franklin D. Roosevelt Avenue to the north and Franklin Street to the west (See Exhibits 1 and 2 for location maps). The Applicant has executed an option to purchase agreement with the landowner, which has a total land area of 3.39 acres or 147,668 square feet (Project Site). The Project Site is located within the Hawaii Community Development Authority (HCDA), Kalaeloa Community Development District (KCDD). HCDA designates the Project Site as T4 Urban Center.

There is a vacant two-story, former school building with a parking lot that was built in 1957. Once the parcel is cleared and ready for construction, the Applicant will demolish and remove the structure on the Project Site.

The proposed Project would provide 260 units, which will be affordable rental or for-sale units, as described further below. Under the affordable rental scenario, seven units will be available for onsite managers, maintenance, and social services staff. In addition, the Project will include 365 parking stalls, two spaces for loading/unloading activities, and a parking area for bicycles and mopeds. Project amenities include two lobby areas with mailrooms, a community center, and laundry facilities. See Exhibit 3, Site Plan.

The Project will be constructed all at once, or will be phased. If phased, Phase 1 will consist of a seven-story building with 190 parking stalls, which includes 168 stalls for residential use. Phase 2 will consist of a nine-story building with 175 parking stalls, which includes 158 stalls for residential use. The maximum height of the tallest building is 90 feet above ground level. It is noted that the final breakdown of unit types (i.e., one, two, or three bedrooms) may be adjusted based on demand at the time of construction.

	One Bedroom Units	Two Bedroom Units	Three Bedroom Units	Total Units
Phase 1	30	51	53	134
Phase 2	31	46	49	126
Total Units	61	97	102	260

The funding source is uncertain and for flexibility, the Applicant has proposed the Project to be built under one of three funding scenarios as described below. In the first two scenarios, the Project will be an affordable rental apartment project. In the third funding scenario, the Project will be a for-sale condominium development. The three scenarios are:

1. An affordable Low-Income Housing Tax Credit (LIHTC) rental apartment project targeting residents earning 60% or below of the area median income (AMI). Under this scenario, the Project would be financed using a combination of LIHTC and RHRF. The Applicant commits to setting aside affordable units for 65 years. Income averaging would allow the Project units to be leased to a mix of units with different income designations, so long as the average income/rent for the Project is 60% or less of the AMI. For example, a property could have 25 units at 80% of the AMI, 25 units at 40% of the AMI, and the rest at 60% of the AMI.
2. An affordable “missing middle,” rental apartment project targeting residents earning between 100% and 120% of the AMI. The “missing middle,” are asset-limited, income-constrained, employed (ALICE) families. These are families that have incomes above 60% of the AMI but still cannot afford the rent. The Applicant proposes that 80% to 100% of the units may be leased to individuals or families earning anywhere from 30% to

up to 120% of the AMI to meet the needs of the “missing middle” segment of the population. Under this scenario, the Project would be financed using a combination of LIHTC and RHRF Tier II Program. The Applicant commits to setting aside affordable units for 65 years.

3. An affordable for-sale condominium project with between 80% to 100% of the units to be sold at affordable prices to residents earning up to 120% of the AMI. The balance of the units would be sold at market prices. Under this scenario, the Project would be financed using HHFDC’s Dwelling Unit Revolving Fund (DURF).

The Applicant will seek exemptions from certain conditions relating to planning, zoning, construction standards for subdivisions, development, and improvement of land, and the construction of dwelling units thereon – see Project Summary for a list of exemptions.

The Applicant will seek financing from the Rental Housing Revolving Fund, Hula Mae Multi-Family tax-exempt bonds, Dwelling Unit 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.

HHFDC believes the Project may be declared exempt from the preparation of an environmental assessment based on HHFDC’s comprehensive exemption list¹, 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: The existing structure on the parcel is not on the Hawaii Register of Historic Places, but it was constructed in 1957 and therefore is over 50 years in age and thus is considered a historic property.

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

The Applicant has initiated consultation with the Hawaii State Historic Preservation Division (SHPD) pursuant HRS 6E to ensure the structure is properly evaluated. All mitigation measures, as recommended by SHPD, will be followed.

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 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 4).

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

Analysis: The land use and zoning regulating authority for the KCDD is HCDA. The Project site is located within the KCDD T4 Urban Center Zone (medium-density mixed-use). The T4 is characterized by a mix of retail, office, residential, and civic buildings. The T4 designation allows for residential development with a maximum height of 75 feet above ground level and a maximum density of 40 units per acre. As an affordable housing development, the Project is consistent with the mixed-use, urban center designation.

- 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 8,500 feet from the nearest shoreline (See Exhibit 5).
- b. It is in Flood Zone D (See Exhibit 6).
- c. Does not contain any streams or wetlands (See Exhibit 7).

Mr. Ed Sniffen
December 4, 2024
Page 5

- d. Does not include any area designated critical habitat (See Exhibit 8).
- e. Is not within the Special Management Area (See Exhibit 9).

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.*

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.

Please email any comments you may have to dean.k.watase@hawaii.gov by January 8, 2025.

If you have any questions, please contact me at the email listed above or at (808) 587-0639.

Sincerely,

Dean Watase

Dean Watase
Interim Chief Planner

Attachment

KAIKOLA O KALAELOA AFFORDABLE RENTAL HOUSING PROJECT PROJECT SUMMARY AND IMPACT ANALYSIS

LOCATION AND TAX MAP KEY	91-1309 Franklin D. Roosevelt Avenue; Kalaeloa, Hawaii. TMK (1) 9-1-013:079
PROJECT SITE	≈ 147,668 square feet (≈ 3.39 acres)
TOTAL UNITS AND PARKING	Total of 260 units and 365 parking stalls, 2 open spaces for unloading and unloading activities, and bicycle parking. Phase 1: 134 units and 190 parking stalls. Phase 2: 126 units and 175 parking stalls.
AFFORDABILITY	The funding source is uncertain and for flexibility, the Applicant has proposed the Project to be built under one of three funding scenarios as described below. In the first two scenarios, the Project will be an affordable rental apartment project. In the third funding scenario, the Project will be a for-sale condominium development. The three scenarios are: <ol style="list-style-type: none"> 1. An affordable Low-Income Housing Tax Credit (LIHTC) rental apartment project targeting residents earning 60% or below of the area median income (AMI). Income averaging would allow the Project units to be leased to a mix of units with different income designations, so long as the average income/rent for the Project is 60% or less of the AMI. The Applicant commits to setting aside affordable units for 65 years. 2. An affordable “missing middle,” rental apartment project targeting residents earning between 100% and 120% of the AMI. Ikaika Ohana proposes that 80% to 100% of the units may be leased to individuals or families earning anywhere from 30% and up to 120% of the AMI in order to meet the needs of the “missing middle”. The Applicant commits to setting aside affordable units for 65 years. 3. An affordable for-sale condominium project with between 80% to 100% of the units to be sold at affordable prices to residents earning up to 120% of the AMI. The balance of the units would be sold at market prices.
STORIES / HEIGHT	Phase 1: 7 stories at 70 feet above ground level. Phase 2: 9 stories at 90 feet above ground level.
REQUESTED EXEMPTIONS	See Exemption List Attachment.

RESOURCE AREA	IMPACT ANALYSIS
LAND USE & ZONING	The Project site is located within the Hawaii Community Development Authority (HCDA), Kalaeloa Community Development District. HCDA designates the Project site as T4 Urban Center, which allows for residential use with a maximum building height of 75 feet above ground level and a maximum density of 40 units per acre.
TRAFFIC	Franklin D. Roosevelt Avenue is a two-lane roadway. Vehicular access to both phases will be provided via a driveway off Franklin D. Roosevelt Avenue. Potential access may be provided via Franklin Street, which is a private roadway. The Applicant’s traffic engineer prepared a Traffic Impact Assessment Report. At full build-out, the Project is expected to generate a total of 1,076 net new daily vehicle trips, including 88 net new vehicle trips during the AM peak hour and 40 net new vehicle trips during the PM peak hour. Based on typical City and County of Honolulu, Department of Planning and Permitting, Traffic Review Branch (TRB) requirements, the analysis determined that the Project will not have a significant impact at any of the study intersections through completion in 2028. As such, no vehicle capacity improvements were recommended. Site access, parking, and circulation were deemed to be adequate. It was noted that future bicycle improvements are expected with the buildout of the <i>Kalaeloa Master Plan</i> and include a multi-use path on the north side of Roosevelt Avenue per the <i>Oahu Bike Plan</i> , and protected bike lanes on Saratoga Avenue.
INFRASTRUCTURE	Coordination has taken place with utility companies to determine service to the Project Site. The will-serve letters have been obtained from Kalaeloa Water Company for water and sewer service. Hawaiian Electric (HECO) has also provided a will-serve letter for electrical service. The Applicant will work with HECO on identifying offsite improvements to connect the property to the HECO system. Additionally, a Preliminary Engineering Report with a drainage plan and a Geotechnical report is being prepared for the Project. The Project site is part of the <i>Kalaeloa Drainage Master Plan 2023 Addendum</i> , which requires that all stormwater runoff and runoff from adjacent public streets be retained. Improvements in the form of retention basins or alternative low-impact development methods are proposed to accommodate runoff. In addition, on-site drywalls are recommended to contain additional runoff to replace existing drywells that do not conform to City and County of Honolulu standards.

ENVIRONMENTAL SITE ASSESSMENT	The Applicant's environmental consultant prepared a Phase 1 Environmental Site Assessment (ESA) of the Project Site. It found no evidence of recognized environmental conditions (REC). However, due to the age of the existing and former structures, it is possible that pesticides were used for termite and pest control. Pesticide Best Management Practices, including on-site management and redevelopment disposal are recommended as mitigation. In addition, previous investigations identified a black mastic coating on a brown vinyl floor tile and two types of brown vinyl floor tiles that are considered Asbestos Containing Materials (ACM). Another ACM identified through a Hazardous Materials Survey testing included the drywall on the second floor. Paint containing lead was also identified throughout the existing structure. Hazardous materials abatement will be conducted prior to demolition of the building.
CULTURAL, HISTORIC & ARCHEOLOGICAL	An archaeological consultant prepared an Archaeological Literature Review and Field Inspection (LRFI) for the Property, which was submitted by HCDA to SHPD for review and determination as part of HRS 6E process. The Applicant's historic architecture consultant also prepared a Reconnaissance Level Survey (RLS) of the Property. Upon review by the SHPD, an Archaeological Inventory Survey (AIS) was requested. The Applicant's archaeological consultant will prepare an AIS and submit it for review by SHPD. The Applicant will implement any further mitigation deemed necessary by SHPD.
VISUAL	The visual character of the community surrounding the Project Site is a mixture of two-story single-family residences, three-story multifamily apartment buildings, and open spaces. The property is located within the T-4 of the HCDA zoning, which allows for building heights of up to 75 feet in this area. An exemption for building height will be requested through the 201H process. The proposed residential towers will reach a maximum height of 90 feet above ground level, which will be visible from the surrounding community. While the current condition of the Project Site does not serve as a visual resource and does not significantly affect any view corridor, the Project will alter both street level and skyline views. This impact is an unavoidable impact of urban development. Nevertheless, it is noted that context-sensitive design is proposed with careful attention placed in regards to transitions between the multi-story buildings and surrounding uses.
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.
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.
SECONDARY AND CUMULATIVE IMPACTS	The Project, along with other proposed developments in the area, is not anticipated to result in significant secondary and cumulative impacts.

Kaiaulu O Kalaeloa

Development Standard or Requirement	Code Section	Requested Exemption	Rationale	Estimated Valuation
City and County of Honolulu Standards				
1 Park Dedication	ROH Section 22-7, "Parks and Playgrounds" Park Dedication Rules and Regulations of the City and County of Honolulu – Section 8 (b)"	An exemption from Park Dedication requirements for affordable dwelling units as allowed by ROH Section 22-7.3(j).	The proposed project will provide on-site amenities for residents, including gathering areas at ground level, an outdoor recreational space above the parking garage and internal community spaces.	N/A - exemption allowed by ROH 22-7.3(j).
2 Plan Review Fees	ROH Section 18-6.1, "Plan Review Fees"	Exemption from plan review fees.	The exemption will provide cost savings and advance the affordability objectives of the project.	\$50,000.00
3 Building Permit Fees	ROH Section 18-6.2, "Building Permit Fees"	Exemption from building permit fees (including demolition, building, foundation, plumbing, electrical, fire sprinkler, etc.)	The exemption will provide cost savings and advance the affordability objectives of the project.	\$654,422.00
4 National Pollutant Discharge Elimination System (NPDES) Permit	ROH Section 43-11.22 "Discharge of effluent other than stormwater runoff"	Exemption from NPDES Permit Fee	The exemption will provide cost savings and advance the affordability objectives of the project.	\$500.00
5 Fire Department Plan Review Fees	ROH Section 20-1.1(3), "Amending Section 1.12.8 Fire Plans Review Fee"	Exemption from Fire Plan Review fee.	The exemption will provide cost savings and advance the affordability objectives of the project.	\$50,000.00
6 Grading and Grubbing	ROH Section 14-14.4, "Permit Fees"	Exemption grading stockpiling, trenching, grubbing, de-watering and NPDES permit fees.	The exemption will provide cost savings and advance the affordability objectives of the project.	\$1,220.00 Permit Fee plus \$38,400.00 Bond Fee
7 Erosion Control and Sediment Plan (ESCP)	ROH Section 18A-1.6(d), "Erosion and Sediment Control Plans"	Exemption from Sediment Control Plan Review fee.	The exemption will provide cost savings and advance the affordability objectives of the project.	\$250.00
8 Trenching	ROH Section 14-17.1, "Permit required—Application—Insurance—Bond—Permit fee"	Exemption from trenching, repair and service permit fees.	The exemption will provide cost savings and advance the affordability objectives of the project.	\$3,175.00
9 Subdivision Street Standards	Honolulu Subdivision Rules and Regulations: Appendix A - Page 3 of the Subdivision Street Standards	Exemption from the requirement to establish a 108 ft. ROW along Franklin D. Roosevelt Avenue. An 80 ft. ROW is proposed instead.	The reduced ROW allows additional land area for affordable residential units to be developed and roadway frontage improvements.	N/A
Kaiauloa Community Development District Rules (Chapter 15-215, Hawai'i Administrative Rules)				
10 Large Lot Development - Thoroughfare Network	15-215-62 (c)(1-6)	Exemption from the requirement for large lots to provide a thoroughfare network.	The project is bordered by an existing residential community with no provisions for connectivity to the subject property. As such, potential thoroughfare connections within the site would have nowhere to connect to. Pedestrian improvements within the subject property will be provided for residents. However, the property will be maintained as a private secured property and as such, connections through the property for non-residents would not be appropriate. Regardless, the project proposes an active streetscape that aims to promote connectivity to surrounding areas.	N/A
11 Large Lot Development - New Buildings - Mid-Block Crossing	15-215-62 (d)(4)	Exemption from providing a mid-block crossing at least every 300 feet.	Compliance with this section would require a potential mid-block crossing off of Roosevelt Avenue. However, this crossing would need to pass through a parking structure or disrupt the ability to provide a landscaped recreation deck. In-lieu of a mid-block crossing, the Applicant will provide an active street scape that would provide pedestrian amenities such as tree-lined walking paths and intermittent courtyards along Roosevelt Avenue.	N/A
12 Large Lot Development - New Buildings - Courtyard Dimensions	15-215-62 (d)(5)	Exemption from courtyard minimum dimensions of 40 feet deep and 35 feet deep. Courtyards are not proposed.	Because an exemption from the mid-block crossing requirement is requested, an exemption from this requirement is also requested as this provision would be inapplicable.	N/A
13 Large Lot Development - New Buildings - Mid-Block Crossing/Courtyard	15-215-62 (d)(6)	Exemption from the requirement that mid-block pedestrian passageway or courtyard not abut an alley.	Because an exemption from the mid-block crossing and courtyard is requested, an exemption from this requirement is also requested as this provision would be inapplicable.	N/A
14 Large Lot Development - New Buildings - Alley	15-215-62 (d)(7)	Exemption from the requirement that an alley of at least 26 feet be provided at the edge of the lot adjacent to other lots.	Rear and side setbacks at a minimum of 10 feet will be provided along adjacent lots. Collectively, the setback between the buildings on each side of the property line will provide for sufficient light, room, and air to neighboring lots.	N/A
15 Architectural Standards	§15-215-43 (f)(3)(A)	Exemption from burying the utilities and service elements underground	The exemption will provide cost savings and advance the affordability objectives of the project.	N/A

Development Standard or Requirement	Code Section	Requested Exemption	Rationale	Estimated Valuation
16 Frontage Type	Figure 1.6 Frontage Types	Exemptions from conformance with the permitted frontage type standards for the T-4 Urban Center Zone set forth in Figure 1.6.	The T-4 zone does not allow residential type frontages such as the Common Yard and Porch and Fence. The majority of the ground floor uses of the project will be residential which would be more appropriate with one of the residential frontage types. In addition, the specific requirements of the frontage types may not be strictly adhered to. For example, the porch and fence frontage type requires a minimum of an 8' deep porch, however this project is proposing a 6' deep porch. Also, the porch will not be raised with steps since the porches need to be on an accessible route. The exemption to strict compliance for frontage types will allow for flexibility and modifications to frontage types to complement the various spaces on the first floor.	N/A
17 Density	Figure 1.3 Development Standards Summary	The HCDA designates the project site as "T-4 Urban Center Zone," which allows for 40 dwelling units per acre. An exemption is requested to increase the project density to 80 dwelling units per acre.	This exemption would allow Applicant to increase the number of affordable housing units available at the project building at greater densities also reduces per unit costs by allocating fixed costs across more units.	N/A
18 Building Setbacks (if applicable)	Figure 1.3 Development Standards Summary	The "T-4 Urban Center Zone" has 5'-15' foot front yard building setbacks. Exemption to allow building within property setbacks / height transition setbacks.	Buildings will generally comply with required setbacks. Buildings above the maximum allowable height are anticipated to have the maximum setback.	N/A
19 Height	Figure 1.3 Development Standards Summary	Exemption to increase the maximum height limit from 75' to 95'.	This exemption would allow the Applicant to increase the number of affordable housing units available at the project.	N/A
20 Lei Building - Open Space Requirement	Figure BT.9 D.2 & D.3 Lei Building	Exemption from the minimum 30' dimension of any open space. The minimum dimension of open space provided is 43% total open space with 22.3 % at grade level.	The project exceeds the minimum open space requirement. Although there will be sufficient open space both on grade and at the recreation deck level, some spaces may not be able to be a minimum dimension of 30'. However, these spaces are generally located along the street frontages and provide effective open spaces that are usable and will feel spacious.	N/A
21 Lei Building - Ratio of Each Story Allowed	Figure BT.9 Table BT.9-1 Lei Building	Exemption from having the Ratio of Each Story Allowed above the 4th floor to be 100%.	If the building needs to meet this requirement, the building would need to be stepped. This would require a need to add additional stairwells, making the building less efficient and increasing the overall cost of the project. Complying with this requirement may also reduce the amount of affordable housing units provided.	N/A
22 Width of curb cut and setback from adjacent property	15-215-47 (c) (2)	Exemption from minimum setback of the driveway of 22' from adjacent property.	There is an existing driveway to the property off of Franklin D. Roosevelt Avenue that is less than 22' from the adjacent property. An exemption for a minimum 22' driveway setback is also being requested for a proposed future secondary entrance location off of Franklin Street to maximize site efficiency and increase the number of affordable units that may be provided.	N/A
23 Loading Stall Height	15-215-47 (l) (4)	Exemption from the minimum 14' height clearance. Height clearance of 10' feet may be provided.	Loading stalls are currently proposed to be located outside of the parking structure. In the event that loading stalls need to be in the parking structure, the 14' height clearance for the loading stall may be hard to achieve without having to raise the building height. Factors that may affect this are the structural beams, mechanical and electrical pipes and conduits that will be running in the ceiling of the parking structure.	N/A
23 Fences	15-215-43 (c)	Development standards note that fences should be up to six feet for any rear or side yard and three feet for portions of a front yard or a side yard that faces a throughfare.	An exemption is requested to allow fences up to 6' in height along the frontages of Roosevelt Avenue and Franklin Street to support the proposed implementation of vehicular and pedestrian gates to secure the property and the privately owned Franklin Street section between Roosevelt Avenue and Saratoga Avenue.	N/A
24 Dedication of Public Facilities	15-215-64	Exemption from dedication of public facilities, land or in-lieu fee payments.	The proposed project will provide onsite amenities for residents, including gathering areas at ground level, an outdoor recreational space above the parking garage and internal community space.	N/A
25 Future Amended Kalaeloa Community Development District Rules	Chapter 15-215, as may be amended (Any applicable codes sections that are changed from the Kalaeloa Community Development District Rules at the time of filing of this application.)	Exemptions from conformance to potential amendments to the Kalaeloa Community Development District Rules that are inconsistent with the design and exemptions requested as part of this 201-H application.	The HCDA is in the process of proposing potential amendments to the Kalaeloa Community Development District Rules. The current plans and requested exemptions reference the existing Kalaeloa Community Development District Rules. Having to make revisions to the plans and related applications or approvals will require additional time and expenses that would not advance the affordability objectives of the project.	N/A
State of Hawaii Review Standards				
26 Underground Injection Control (UIC) Permit Application	Department of Health Administrative Rules, Title 11, Chapter 23	Exemption from UIC Application filing fee	The exemption will provide cost savings and advance the affordability objectives of the project.	\$100.00
27 Disability and Communication Access Board's (DCAB) Review	Hawaii Revised Statutes, HRS Section 103-50	Exemption from DCAB Review fee	The exemption will provide cost savings and advance the affordability objectives of the project.	\$3,000.00

JOSH GREEN, M.D.
GOVERNOR
KE KIA'ĀINA



EDWIN H. SNIFFEN
DIRECTOR
KA LUNA HO'ŌKELE

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

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

IN REPLY REFER TO


DIR0001150
STP 8.3879

January 8, 2025

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
KAIAPULU O KALAELOA AFFORDABLE RENTAL HOUSING
DEVELOPMENT
KALAELOA, OAHU, HAWAII
TAX MAP KEY: (1) 9-1-013: 079

Thank you for your letter, dated December 4, 2024, requesting the Hawaii Department of Transportation's (HDOT) review and comments on the subject project. HDOT understands Ikaika Ohana is proposing to construct a new 260-unit affordable rental or for-sale development on an approximately 3.39-acre parcel in Kalaeloa, Oahu.

HDOT has the following comments:

1. The proposed residential project is approximately 0.43 miles from the property boundary of the Kalealoa Airport (JRF). All projects within 5 miles from Hawaii State airports are advised to read the Technical Assistance Memorandum (TAM) for guidance with development and activities that may require further review and permits. The TAM can be viewed at this link: http://files.hawaii.gov/dbedt/op/docs/TAM-FAA-DOT-Airports_08-01-2016.pdf.
2. The project site is approximately 4,530 feet from the end of Runway 11 at JRF. Federal Aviation Administration (FAA) regulation requires the submittal of FAA Form 7460-1 Notice of Proposed Construction or Alteration pursuant to the Code of Federal Regulations, Title 14, Part 77.9, if the construction or alteration is within 20,000 feet of a public use 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 JRF, the applicant and future residents should be aware of potential single-event noise from aircraft operations. There is also potential for fumes, smoke, vibrations, odors, etc., resulting from occasional aircraft flight operations over or near the project. 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 <http://www.sandia.gov/glare> website has information and guidance with the preparation of a glint and glare analysis. A separate FAA Form 7460-1 will be necessary for the solar energy PV system. After the FAA determination of the Form 7460-1 glint and glare analysis, a copy shall be provided to the HDOT Airport Planning Section by the owner of the solar energy PV system.

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

5. The proposed 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.
6. HDOT encourages 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 light-emitting diode 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.



**HAWAII COMMUNITY
DEVELOPMENT AUTHORITY**

547 Queen Street, Honolulu, Hawaii 96813
Telephone: (808) 594-0300 Fax: (808) 587-0299
Web site: <http://dbedt.hawaii.gov/hcda/>

JOSH GREEN, M. D.
GOVERNOR

SYLVIA LUKE
LT. GOVERNOR

STERLING HIGA
CHAIRPERSON

CRAIG K. NAKAMOTO
EXECUTIVE DIRECTOR

Ref. No.: KAK 24-016

January 3, 2025

Sent Via Electronic Mail to: dean.k.watase@hawaii.gov

Hawai'i Housing Finance Development Corporation
677 Queen Street, Suite 300
Honolulu, Hawai'i 96813

Re: **Kaiāulu** O Kalaeloa Affordable Rental Housing Development
Exemption for an Environmental Assessment
91-1309 Roosevelt Avenue - TMK Parcel: (1) 9-1-013: 079
Honouliuli Ahupua'a, Ewa District

Dear Mr. Watase:

The Hawai'i Community Development Authority ("HCDA") is providing the following comments regarding consideration of exempting the Kaiāulu O Kalaeloa Affordable Rental Housing Development Project ("Project") from the preparation of an environmental assessment.

1. The Exemption narrative should be clear that the developer has requested exemptions and expedited review under Chapter § 201H-38, **Hawai'i Revised Statutes ("HRS")**. **There is no mention of the § 201H process until the analysis of visual impacts in the attached Project Summary and Impact Analysis table.**
2. With regards to Exemption Type 6: Demolition of structures, except those structures that are listed on the National or Hawaii Register of Historic Places, it should be noted that Building 55 has been identified as Eligible for listing on the National Register of Historic Places under Criterion C. HCDA is not aware that the Chapter 6E, HRS consultation for the project scope to demolish Building 55 has been concluded with the State Historic Preservation Division ("**SHPD**"). The Covenants that are attached to the Property's deed (Parcel 4) specifies that SHPD must be consulted and concur on the findings of a professionally qualified historical architect as to the building's eligibility status and as appropriate, mitigation measures in writing, in accordance with Chapters 6E and 205, HRS.

In addition, SHPD must provide its concurrence with the project's AIS and Archaeological Monitoring Plan in writing. The outcome of the consultation with SHPD may have a direct bearing on the applicability of Exemption Type 6. Please refer to Attachment 1: Historic Covenants Quitclaim Deed: Section D. Historic Covenants (**Parcels 3, 4, 8, 9A, 9B, 10, 15 and 16**), **Articles 1, 2, & 3 and Exhibit "O"**.

3. Will the addition of 260 new residential units adversely impact public services, such as schools, fire, and police?

4. Please clarify a seeming discrepancy in courtyards as a design element. The rationale for Item #11 includes the statement that the Applicant will provide an active streetscape that would provide pedestrian amenities such as tree-lined walking paths and intermittent courtyards along Roosevelt Avenue. However, the exemption requested in Item #12 states that courtyards are not proposed.
5. Pursuant to the **“expedited review”** process under § 201H-38, **Hawai‘i Revised Statutes (“HRS”), the Developer shall hold community meetings prior to its determination** whether an EA/EIA is required. If the project has been presented to the Makakilo-Kapolei Neighborhood Board and/or other interested parties, please incorporate community feedback in the Exemption narrative.

Should you have any questions regarding this matter, please contact Charlene K. Oka, of our Planning and Development Section, at (808) 594-0318 or by email to charlene.k.oka@hawaii.gov.

Sincerely,

Craig K. Nakamoto

Craig K. Nakamoto
Executive Director

- Attachment 1: Historic Covenants Quitclaim Deed: Section D. Historic Covenants (Parcels 3, 4, **8, 9A, 9B, 10, 15 and 16**), **Articles 1, 2, & 3 and Exhibit “O”**.
- Attachment 2: SHPD’s response letter dated March 5, 2024 to HCDA’s review request dated June 16, 2023.

**ATTACHMENT 1: Historic Cov
3, 4, 8, 9A, 9B, 10, 15, and 16), Articles 1, 2, & 3 and Exhibit "O"**

environmental laws concerning the sampling, handling, storage, transportation, treatment and/or disposal of any hazardous materials on the property.

The GRANTEE is hereby informed and does acknowledge that one UST, J1, was previously identified as being located on Parcel 15 near Building 1883. There is no information available about this tank, and its location is not shown on as-built drawings for Building 1883. If the UST is found on Parcel 15, the GRANTEE shall be responsible for conducting maintenance and addressing any releases from the existing UST on the property. All UST closures and removals shall be conducted in accordance with federal, state and local laws.

Radiological Materials

The GRANTEE is hereby informed and does acknowledge that exit signs and smoke detectors containing tritium, which is a low-level radioactive source, may be present in buildings on Parcels 3, 4, 8, 9A, 9B, 10, 15 and 16.

The GRANTEE is hereby informed and does acknowledge that due to damage to the buildings, exit signs and smoke detectors may have been damaged.

The GRANTEE shall be responsible for identifying the exit signs and smoke detectors containing tritium. If the GRANTEE identifies any exit signs and smoke detectors containing tritium, the GRANTEE shall be responsible for maintenance, removal, and disposal of tritium-containing exit signs and smoke detectors in accordance with all appropriate federal, state and local laws.

The GRANTEE is hereby notified and does acknowledge that a detailed assessment for radon was performed in 1997 and 1998 on Parcel 10. During the assessment, one room in Building 152 (Receiving Office of the former Commissary) had a radon concentration of 6.8 pCi/L. An unsealed grease sump (inactive) was suspected to be the cause of the elevated radon. Subsequently, the grease sump pipe openings were sealed with hydraulic cement and the grease sump cover was sealed with a generous bead of polyurethane. Post-mitigation radon test results were less than 4 pCi/L (action level for radon). Therefore, no further action was recommended unless renovations are performed within the former Receiving Office in Building 152. Should there be any renovations within the former Receiving Office (including, but not limited to, disturbance of the sealed grease sump), the GRANTEE shall be responsible for the testing and, if necessary, mitigation of radon levels to ensure the safety of its occupants. The GRANTEE shall, at its own expense, at all times comply with all federal, state, and local environmental laws concerning radon levels on the property.

D. Historic Covenants (Parcels 3, 4, 8, 9A, 9B, 10, 15 and 16)

GRANTEE hereby covenants on behalf of itself, its successors, and assigns, and every successor in interest to the Property hereby conveyed, to protect and maintain the historic property described in Exhibit O, which is hereinafter referred to as the "Historic Property", in a manner described in this section. Grantee and its successors and assigns hereby agree to the following:

1. The GRANTEE agrees that any proposed action affecting said Historic Property will be administered in accordance with applicable Hawaii State law, rules and regulations, for example, Hawaii Revised Statutes, Chapter 6E and 205. This includes, but is not limited to, inadvertent discovery procedures outlined in Hawaii Revised Statutes Chapter 6E.
2. The GRANTEE shall consult with the SHPO and all interested parties requesting status as an interested party and concurred to by the SHPO prior to taking any proposed action on the Property that results in an effect to the significance of the Historic Property, as defined under applicable Hawaii State law, rules and regulations, for example Hawaii Administrative Rules Title 13, Chapter 284.
3. The GRANTEE shall provide the SHPO the opportunity to review and provide written concurrence that the proposed action will not have an effect to the Historic Property. The GRANTEE shall take reasonable measures to secure the Historic Property against vandalism and deterioration from human disturbances or exposure to natural elements due to neglect.
4. Commitments for preservation, rehabilitation, reconstruction, alteration, new construction, demolition, and restoration, shall be consistent with the Secretary of the Interior's Standards for Treatment of Historic Properties.
5. Nothing herein shall be construed to prevent the ordinary maintenance or repair of any feature in or on the Historic Property that does not involve a change in the design, material, or outer appearance or change in the characteristics which qualify the Historic Property for entry onto the Hawaii register of historic places or the National Register of Historic Places. Nothing herein shall be construed to prevent other mitigation commitments concurred to by the SHPO, including but not limited to, architectural recordation, archeological data recovery, historical data recovery, and ethnographic documentation.
6. The GRANTEE shall allow the SHPO access at all reasonable times and upon reasonable advanced notice to GRANTEE to inspect said Historic Property in order to ascertain whether the GRANTEE is complying with the conditions of these historic preservation covenants.
7. The failure by the SHPO to exercise any right or remedy granted under this covenant shall not have the effect of waiving or limiting the exercise by the SHPO of any other right or remedy or the use of such right or remedy at any other time.
8. To the extent provided under applicable Hawaii State law, in the event of a violation of this covenant, and in addition to any remedy provided by law, the SHPO may, following reasonable notice to the GRANTEE, institute any action to enjoin said violation or to require the restoration of said Historic Property to the condition prior to said violation.
9. This covenant shall be binding on the GRANTEE, as well as its successors and assigns, in perpetuity. The restrictions, stipulations, and covenants contained herein shall be inserted by the

GRANTEE, its successors, and its assigns, verbatim or by express reference, in any deed or other legal instrument by which such party divests itself of either the fee simple title or any lesser estate in said Historic Property or the Property or access thereto.

10. This covenant shall be a binding servitude upon the Property that includes the Historic Property and access thereto and shall be deemed to run with the land.

E. Electric-Utility Reservations

1. **On-Parcel Electric-Utility Areas.** GRANTOR hereby reserves from the foregoing conveyance those certain existing electrical transformers (excluding transformer pads, buildings and fencing), poles, wire lines, guy wires, anchors and/or underground wire lines, ducts, manholes, and such other appliances and equipment located within the Property, up to the appropriate electrical metering point of each building located on the Property, as said "metering point" is defined in the Hawaiian Electric Company, Inc. (HECO) "Electric Service Installation Manual" effective on the date of this conveyance and regardless of whether or not those meters have actually been installed; TOGETHER WITH perpetual easements and rights-of-way over, across, under, and through the areas on the Property on which such items are located as of the date of this Deed ("**On-Parcel Electric-Utility Areas**") for the operation, maintenance, repair, replacement, and/or removal of the said existing electric facilities located on the Property. GRANTOR reserves the right to unilaterally relinquish said perpetual easements.

2. **Facilities Serving Other Properties.** GRANTOR hereby reserves from the foregoing conveyance those certain electrical transformers (excluding transformer pads, buildings and fencing), poles, wire lines, guy wires, anchors and/or underground wire lines, ducts, manholes, and other appliances and equipment located within the Property that are utilized to provide electrical service for lots other than the Property, the locations of which are shown on HECO Drawings attached to this Deed as Exhibits I through M, all on file at HECO's office at 900 Richards Street, Honolulu, Hawaii 96813, and identified as "Easements for Existing Electrical Facilities" (all of the above electrical facilities are hereinafter referred to collectively as "**Other-Property Electric-Utility Facilities**"); TOGETHER WITH perpetual easements over, across, under, and through the areas on the Property on which the Other-Property Electric-Utility Facilities are located as of the date of this Deed ("**Other-Property Electric-Utility Facilities Areas**"), for the operation, maintenance, repair, replacement, and/or removal of said Other-Property Electric-Utility Facilities located on the Property; and further reserving to the GRANTOR, the rights to transfer such reserved easements to any governmental agency, or to any public, quasi-public or private utility services company, upon notice to, but without requirements for joinder or consent of GRANTEE or any person holding under or through GRANTEE.

Exhibit 0 Historic Buildings

'Parcel	Fae. No.	Fae.Name	Historic Name	Year	¹ NR'EligibilityCriteria
3	//.	BOQ-Mess	BOQ	1958	Eligible/ Crit. A & C as Cold War-era officer housing in a pared-down and utilitarian International-style design
3	<u>943</u>	Pool Bath House	Pool Dressing Room - Pavilion	1959	Eligible/ Crit. C as an example of Hawaiian Regionalism on a military base
4		Chapel Center/ FSC	Enlisted Men's Barracks	1957	Eligible/ Crit. C as an example of a pared down and utilitarian International-style design
8	2	Chapel	Chapel	1953	Eligible/ Crit. C as an example of the military's reuse of buildings in the Post War period, and as what is likely the only standard-plan Army chapel on a Hawaii Navy installation
9	.m	Operational Storage	Ready Magazine	1944	Eligible/ Crit. C as a distinctive type of ready magazine that is representative of the World War II period
10	<u>152</u>	Commissary	Warehouse	1943	Eligible/ Crit. C as a distinctive form incorporating World War II-era Quonset huts
15	<u>476</u>	Storage Facility	General Stores Bldg. 8D	1942	Eligible/ Crit. A & C as an example of the change in military storage practices on Oahu directly following the December 7, 1941 attack, and as a World War II wood storehouse, of which relatively few remain
15	<u>477</u>	Club Facility	Engine Stores Bldg. SF	1942	Eligible/ Crit. A & C as an example of the change in military storage practices on Oahu directly following the December 7, 1941 attack, and as a World War II wood storehouse, of which relatively few remain
16	.IIS	CPWAdmin	Radio Transmitter Building	1942	Eligible/ Crit. A & C for its association with the development of Navy radio communications at NASBP, and as a distinctive World War II radio communications building type

ATTACHMENT 2: SHPD's Response letter dated March 5, 2024 to HCDA's Review request dated June 16, 2023

JOSH GREEN, M.D.
GOVERNOR | KE KAA'AINA

SYLVIA LUKE
LIEUTENANT GOVERNOR | KA HOPE KAA'AINA



STATE OF HAWAII | KA MOKU'ĀINA 'O HAWAII'
DEPARTMENT OF LAND AND NATURAL RESOURCES
KA 'OIHANA KUMUWAIWAI 'ĀINA

STATE HISTORIC PRESERVATION DIVISION
KAKUHIHEWA BUILDING
601 KAMOKILA BLVD, STE 555
KAPOLEI, HAWAII 96707

March 5, 2024

Craig Nakamoto, Executive Director
State of Hawai'i
Department of Business, Economic Development & Tourism
Hawaii Community Development Authority
547 Queen Street
Honolulu, Hawaii 96813
Email: dbedt.hcda.contact@hawaii.gov

IN REPLY REFER TO:
Project No.: 2023PR00818
Doc. No.: 2403AM01
Archaeology, Architecture

Dear Craig Nakamoto:

**SUBJECT: Chapter 6E-8 Historic Preservation Review –
State of Hawai'i Department of Business, Economic Development & Tourism
Hawai'i Community Development Authority
Kaiaulu O Kalaeloa Affordable Housing Project
Request for Concurrence with a Project Effect Determination
Honouliuli Ahupua'a, 'Ewa District, Island of O'ahu
TMK: (1) 9-1-013:079**

This letter provides the State Historic Preservation Division's (SHPD's) review of the State of Hawai'i Department of Business, Economic Development & Tourism, Hawai'i Community Development Authority's (HCDA's) request for concurrence with a project effect determination for the Kaiaulu O Kalaeloa Affordable Housing Project. SHPD received the current submission on August 31, which included an archaeological literature review and field inspection (LRFI) report (Monahan, March 2020), an architectural historic context report (MASON, October 2015), and a letter from HCDA requesting SHPD's concurrence with a project effect determination of "effect, with proposed mitigation commitments."

The HCDA and Ikaika Ohana proposes the public/private Kaiaulu O Kalaeloa Affordable Housing Project within a 3.39-acre project area. The project will include the construction of 262 residential units with a parking lot, a community room, and laundry facilities. Additionally, the project will include the demolition of an existing "Chapel Center/FSC" historic building (Facility No. 55, ca. 1955) that occurs within the project area.

TCP Hawaii, LLC conducted an archaeological field inspection and produced an archaeological LRFI report (Monahan, March 2020). The field inspection included a pedestrian survey of the project area with transects spaced 20 meters apart. TCP Hawaii, LLC indicates the project area includes historic architecture associated with the former Barbers Point Naval Air Station. Additionally, they indicated that there is a moderate possibility that subsurface historic properties such as filled-in pit caves ("sink holes") are buried under fill in the project area.

A search of SHPD records indicates an archaeological inventory survey (AIS) has not been conducted within the current project area. However, several archaeological investigations have occurred within the former Barbers Point Naval Air Station and identified several significant historic properties in the area including Haun (1991), Landrum and Schilz (1993), and Tuggle and Tomonari-Tuggle (1994/1997). Additionally, Mason Architects previously conducted a historic context study which included the current project area. During the study Mason identified the "Chapel Center/FSC" historic building and evaluated it under Section 110 NHPA Eligibility Criteria as eligible for

listing in the National Register of Historic Places (NHPA) under Criterion C, and as retaining integrity of location, design, materials, workmanship, and association (MASON, October 2015).

At this time, SHPD has insufficient information to make an effect determination regarding the potential for the proposed project to impact subsurface historic properties. Prior to the initiation of the project, **SHPD requests the following:**

1. **An archaeological inventory survey (AIS) with a subsurface testing component be completed.** The AIS shall be conducted by a qualified archaeologist in order to adequately identify and document any archaeological historic properties that may be present, to assess their significance, to determine the potential impacts of this project on any identified archaeological historic properties, and to identify and ensure appropriate mitigation is implemented, if needed. The AIS shall meet the requirements of HAR §13-276-4.
2. **An architectural reconnaissance level survey (RLS) report** be completed by a Secretary of Interior (SOI) qualified architect, architectural historian, or historic architect per HAR §13-275-5(b)(5)(C). The RLS report shall also include an assessment of site integrity and site significance of the architectural historic properties within the project area in accordance with HAR §13-275-6.

SHPD requests that the HCDA and the archaeological firm consult with our office regarding an appropriate testing strategy prior to initiation of the AIS.

SHPD looks forward to receiving an RLS report and an AIS report, along with their associated filing review fees. Please submit these documents to our office to HICRIS Project No. 2023PR00818 using the Project Supplement option.

SHPD shall notify the HCDA when the RLS report and the AIS report and any required mitigation plans are accepted, and the project initiation process may continue.

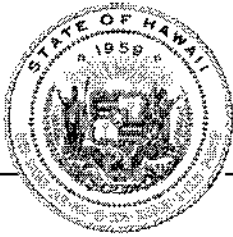
Please contact Mary Kodama, Historic Architect, at mary.kodama@hawaii.gov, for any concerns regarding architectural resources within the project area, and contact Susan A. Lebo, Archaeology Branch Chief, at Susan.A.Lebo@hawaii.gov, for any matters regarding archaeological resources or in this letter.

Aloha,

Alan Downer

Alan S. Downer, PhD
Administrator, State Historic Preservation Division
Deputy State Historic Preservation Officer

cc: Polly Tice, Mason Architects, pt@masonarch.com
Emily Murai, Munekiyo Hiraga, emily@munekiyohiraga.com
Mike Dega, SCS, mike@scshawaii.com
Janet Meinke-Lau, HCDA, janet.meinke-lau@hawaii.gov
Thomas Fischer, Ikaika Ohana, tfischer@ikaikaohana.org
Douglas Bigley, Ikaika Ohana, dbigley@ikaikaohana.org



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

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GOVERNOR

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DTS 202412050850NA
TRANSMITTED VIA EMAIL

Coastal Zone
Management
Program

January 8, 2025

Environmental Review
Program

Land Use Commission

Dean Watase, Interim Chief Planner
Hawai'i Housing Finance and Development Corporation
677 Queen Street, Suite 300
Honolulu, Hawai'i 96813

Land Use Division

Special Plans Branch

State Transit-Oriented
Development

Dear Mr. Watase:

Statewide Geographic
Information System

**Subject: Request for an Environmental Assessment Exemption for
Kaiāulu O Kalaeloa Affordable Rental Housing Development
91-1309 Franklin D. Roosevelt Avenue, Kalaeloa, O'ahu
Tax Map Key No. (1) 9-1-013: 079**

Statewide
Sustainability Program

The Office of Planning and Sustainable Development (OPSD) has reviewed the Request for an Exemption from an Environmental Assessment for the Kaiāulu O Kalaeloa Affordable Housing project. Ikaika Ohana, the Project Applicant, is proposing to build an affordable rental or for-sale housing project with 260 units on a 3.39-acre site within the Hawai'i Community Development Authority's (HCDA) Kalaeloa Community Development District. The housing units will be priced to serve households earning from 30% to 120% of the area median income, depending on the project's funding.

Based on a review of the request and supporting materials, OPSD provides the following comments on the Hawai'i Housing Finance and Development Corporation's (HHFDC) analysis of how the project meets the criteria in Hawai'i Revised Statutes (HRS) Section 343-6(5) and Hawai'i Administrative Rules (HAR) Sections 11-200.1-15, 11-200.1-16, and 11-200.1-17 for an exemption from the preparation of an Environmental Assessment (EA). Our assessment of the General Exemption Types and action types cited for the exemption request is as follows.

- 1. Exemption Type 6:** Demolition of structures, except those structures that are listed on the National Register or Hawai'i Register of Historic Places.

OPSD Comments. The request states that the existing structure is not on the Hawai'i Register of Historic Places, but due to the structure's age, citing Part 2 Actions, the Applicant has initiated consultation with the Hawai'i State Historic Preservation Division (SHPD) to ensure the

structure is properly evaluated. OPSD supports this consultation. OPSD further notes that the HHFDC Project Summary and Impact Analysis states that prior environmental site assessment investigations indicate that asbestos-containing materials and lead-based paint were identified in the structure. Therefore, under Part 2 Actions, the Applicant must ensure that hazardous material removal and disposal are conducted in accordance with any applicable State Department of Health or industry standards.

- 2. 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 Waikīkī as the sole trigger for compliance with HRS Chapter 343;
 - B. As proposed conforms with the existing State urban land classification;
 - C. As proposed is consistent with the existing county zoning classification provided that it allows housing; and
 - D. As proposed does not require variances for shoreline setbacks or siting in an environmentally sensitive area, as stated in HAR 11-200.11-13(b)(11).

OPSD Comments. OPSD notes that the project meets all of the above criteria for consideration pursuant to Exemption Type 10, as documented in the HHFDC request. The use of State funds is the sole trigger for compliance with HRS Chapter 343. The project is within the State Urban District. The project is consistent with the parcel's T5 Urban Center Zone land use designation in HCDA's July 2024 Draft Kalaeloa Master Plan, which would control use or development of the parcel. The T5 Urban Center Zone includes a diverse mix of uses with the highest allowable density and height, containing a mix of retail, office buildings, civic uses, and residential. The project is not located near the shoreline and is not in a natural hazard zone or an environmentally sensitive area.

HHFDC has identified the project as a Part 2 Action under Exemption Type 10, which would exempt affordable housing provided that pre-assessment consultations were conducted to determine the appropriateness of preparing an exemption notice or requiring an environmental assessment.

The Project Summary and Impact Analysis states that a Traffic Impact Assessment Report, a Preliminary Engineering Report with a drainage plan and a geotechnical report, as well as other studies, have been or are being prepared for the project. These project-related studies and reports, by their nature, should document and discuss the range of project impacts as well as recommended

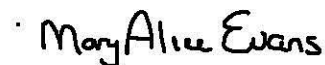
Mr. Dean Watase
January 8, 2025
Page 3

mitigation measures the Applicant plans to incorporate into the project. Making these reports available to relevant agencies and the public prior to any decision-making on development and permit approvals would be consistent with the requirement for consultation and the request for an HRS Chapter 343 exemption for the proposed project.

Finally, OPSD notes that cumulative and secondary impacts are inevitable and unavoidable for projects that support the buildout of planned development in adopted State or county long-range land use plans. In this instance, it is reasonable to assume that those project impacts that can be mitigated will be addressed through best practices and other measures incorporated or conditions placed on project development and operation by approving entities.

Thank you for the opportunity to review and provide comments. If you have any questions, please contact Seiji Ogawa, seiji.ogawa@hawaii.gov, (808) 587-2898, or Ruby Edwards, Land Use Division, ruby.m.edwards@hawaii.gov, (808) 587-2817. If you wish to respond to this comment letter, please include DTS 202412050850NA in the subject line.

Mahalo,



Mary Alice Evans
Director

From: Seto, Joanna <joanna.seto@doh.hawaii.gov>
Sent: Wednesday, January 8, 2025 11:00 AM
To: Watase, Dean K <dean.k.watase@hawaii.gov>
Cc: Cab <Cab.General@doh.hawaii.gov>; cleanwaterbranch <cleanwaterbranch@doh.hawaii.gov>; DOH.SDWB <DOH.sdwb@doh.hawaii.gov>; wwbb <DOH.wwbb@doh.hawaii.gov>; Racoma, Robin <robin.mulleitner@doh.hawaii.gov>; Kurano, Matthew <matthew.kurano@doh.hawaii.gov>
Subject: HHFDC Kaialua O Kalaeloa Affordable Rental Housing Development - Consult EA Exemption

Aloha and Happy New Year Dean,

The Department of Health, Environmental Health Administration, Environmental Management Division and Environmental Health Services Division provides standard comments on the EPO Land Use Planning Review webpage at:

<https://health.hawaii.gov/epo/landuse/>

Please see the individual links on the webpage for the Clean Air Branch, Clean Water Branch, Indoor and Radiological Health Branch, Safe Drinking Water Branch and Wastewater Branch standard comments.

- PDF page 8 refers to the infrastructure (water and sewer by Kalaeloa Water Company).
- PDF page 9 refers to air.
- PDF pages 14-15 are front and back of an 11x17 sheet – Lot Area is 3.39 acres.

Mahalo!

Joanna

Joanna L. Seto, P.E.

Administrator | Environmental Management Division

Hawai'i State Department of Health | Ka 'Oihana Olakino

Hale Ola | 2827 Waimano Home Road, Room 234 | Pearl City, HI 96782-1487

Office: (808) 586-4305 | Mobile: (808) 292-8408

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

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

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MEJA



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PO'O

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

REGINA MALEPEAI
2ND DEPUTY DIRECTOR
HOPE PO'O KUALUA

December 20, 2024

2024/ELOG-2478 (MAK)

Mr. Dean Watase
Hawai'i Housing Finance and Development Corporation
677 Queen Street, Suite 300
Honolulu, Hawai'i 96813

Dear Mr. Watase:

SUBJECT: Environmental Assessment Determination
Kaiaulu O Kalaeloa Affordable Rental Housing Development
91-1309 Franklin D. Roosevelt Avenue - Kalaeloa
Tax Map Key 9-1-013; 079

2024 DEC 30 P 1:50
HAWAII HOUSING FINANCE
DEVELOPMENT CORP

This is in response to your letter, received December 10, 2024, requesting Department of Planning and Permitting (DPP) concurrence that the subject Project can be exempted from Chapter 343, Hawai'i Revised Statutes (HRS), the Environmental Impact Statement Law. The Hawai'i Administrative Rules (HAR) Section 11-200.1, enumerate an exemption for affordable housing projects if the Project meets certain criteria. We concur that the subject Project meets necessary criteria to be exempted from Chapter 343, HRS.

Pursuant to Section 11-200.1-15(c)(10), HAR, 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:

- The use of State or County lands or funds, or development within Waikīkī are the only 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 in an environmentally sensitive area, pursuant to HAR Section 11-200.1-13(b)(11).

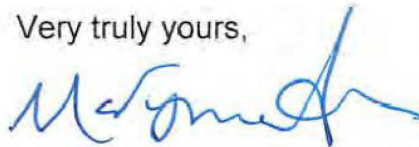
Mr. Dean Watase
December 20, 2024
Page 2

Based on the information provided, the only Chapter 343, HRS, trigger is the use of State funds. Our records show the site is within the State Land Use Urban classification and is within the F-1 Military and Federal Preservation District, which is not subject to zoning requirements of the City and County of Honolulu. According to your letter, the Project site is under the jurisdiction of the Hawaiian Community Development Authority (HCDA). Therefore, we defer to HCDA as to whether the Project is located in a zoning district that allows housing. Additionally, in accordance with Section 11-200.1-13(b)(11), HAR, the site is not located within environmentally sensitive area because it is not a shoreline lot, not affected by 3.2 feet of sea level rise, not within a flood hazard area, not a beach or an erosion-prone area, and not within the tsunami evacuation zone.

Therefore, provided that the Project complies with the applicable affordable housing regulations of the State or County, we agree that it meets all the necessary requirements to be considered an exempt action for purposes of Chapter 343, HRS.

Should you have any questions, please contact Michael Kat, of our Zoning Regulations and Permits Branch, at (808) 768-8013 or via email at michael.kat@honolulu.gov.

Very truly yours,



FOR

Dawn Takeuchi Apuna
Director

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) 768-4587 • WEBSITE: honolulu.gov

RICK BLANGIARDI
MAYOR
MEIA



HAKU MILLES, P.E.
DIRECTOR
PO'O

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

January 2, 2025

SENT VIA EMAIL

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

Dear Mr. Watase:

Subject: Consultation for an Environmental Assessment Exemption
Kaiaulu O Kalaeloa Affordable Rental Housing Development
91-1309 Franklin D. Roosevelt Avenue, Kalaeloa, O'ahu
Tax Map Key (1) 9-1-013:079

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,


Haku Milles, P.E., LEED AP
Director Designate

HM:karn (931860)