JOSH GREEN, M.D. GOVERNOR

SYLVIA LUKE



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: 25:PECB/25

April 3, 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 Kemole Lane Apartments Affordable Housing Development 1026 Kemole Lane; Honolulu, Oahu Tax Map Key (1) 2-8-003:041

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.

Kemole Development LLC proposes to build the Kemole Lane Apartments Affordable Housing Development (Project) at 1026 Kemole Lane, which is located in Honolulu at the corner of Kemole Lane to the east and Young Street to the north. This Project will provide 20 affordable rental units on a 0.17-acre parcel of land zoned BMX-3.

After careful analysis outlined in the attachment, HHFDC has evaluated the Project's primary, secondary, and cumulative impacts, and concluded that it is not anticipated to have significant environmental effects.

Sincerely,

Dur C. al

Dean Minakami Executive Director

Attachment

## KEMOLE LANE APARTMENTS 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,<sup>1</sup> 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. The Project has the use of state or county lands or funds or is within Waikiki as the sole triggers for compliance with HRS 343;
  - B. The Project conforms with the existing state urban land classification;
  - C. The Project is consistent with the existing county zoning classification that allows housing; and
  - D. The Project does not require variances for shoreline setbacks or siting in an environmentally sensitive area, as stated in HAR 11-200.1-13(b)(11).

<sup>1</sup> 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 Kemole Lane Apartments Affordable Housing Project Exemption Notice April 3, 2025 Page 2

**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 administerial permits are obtained.

## **DESCRIPTION OF ACTION**

**Proposing Agency or Applicant:** Kemole Development LLC (Applicant) is located at 745 Front Street, Suite 702, Honolulu, Hawaii, 96813. The Hawaii Housing Finance and Development Corporation (HHFDC) is the approving agency of this exemption notice.

**Project Name & Address/Location:** The Kemole Lane Apartments Affordable Housing Project (Project) is located at 1026 Kemole Lane; Honolulu, HI 96826 (Project Site).

**Estimated Construction Schedule:** Construction start: January 2026 / Construction completion: January 2027

Tax Map Key (TMK) and latitude/longitude coordinates (in decimal degrees): TMK: (1) 2-8-003:041; Coordinates: 21-17-41.568N, 157-66.18W, NAD 83

#### 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
State of Hawaii	Department of Environmental Services review Air conditioning and ventilation permitting (DOH) ADA Coordination (DCAB) Chapter 6E, HRS (SHPD)

## NARRATIVE

Kemole Development LLC (Applicant) is proposing to build an affordable rental project located at 1026 Kemole Lane (Project Site) in Honolulu at the corner of Kemole Lane to the east and Young Street to the north. The Project Site has a total land area of 0.17 acres or 7,405 square feet, and is zoned as BMX-3, Community Business Mixed-Use District. The Applicant has site control as they are working in partnership with the owner of the property, Guidance Kemole LLC.

There is an existing single-family home built in 1921 and a gravel parking lot. Once the Project is ready for construction, the Applicant will demolish and remove the existing structure on the Project Site.

Kemole Lane Apartments Affordable Housing Project Exemption Notice April 3, 2025 Page 3

The Project will be a new six-story structure and will provide 20 rental units consisting of 15 twobedroom and five one-bedroom units. The Project will include 9 car parking stalls, three moped parking stalls, and a bike rack. Four units will be set aside for Family Promise of Hawaii's Permanently Supportive Housing Program.

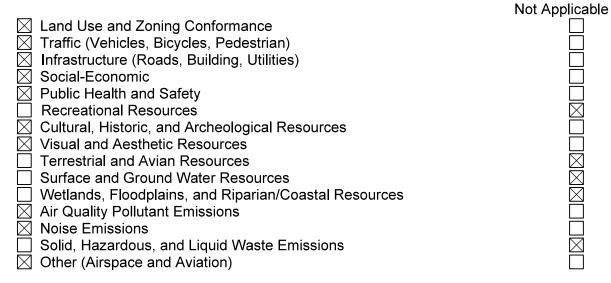
The maximum height of the tallest building will be 57 feet above ground level. The Project will include laundry facilities, a covered common recreational lanai, resident community garden space, and additional lockable storage available to tenants. A 59-kilowatt photo voltaic system will reduce utility expenses for residents as well.

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

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:



Relevant environmental analysis of the Project is provided below:

1. *Land Use and Zoning.* The Project Site is designed BMX-3, Community Business Mixed-Use District, which allows for a maximum building height of 150 feet at this location. The Project is consistent with residential use permitted within BMX-3.

Notwithstanding the current zoning, the parcel will be developed under Ordinance 19-8, extended by Bill 8 (2023) colloquially known as Bill 7, which provides for a maximum 60-

foot height. Under Bill 7, the Project qualifies for certain incentives for restricting the Project to affordable rents.

The Project Site is located in the *Extreme* Tsunami Evacuation Zone. Pursuant to HAR 11-200.1-13(b)(11), a project may be determined to have a significant effect on the environment if it is likely to have a substantial adverse effect on or is likely to suffer damage by being located in an environmentally sensitive area like a tsunami zone.

The potential tsunami impact on the Project has been mitigated by following specific codes and criteria based on occupancy and risk category:

- a. No habitable residential units are located on the ground floor, reducing the risk to life and property for an inundation zone depth of three feet as indicated on the ASCE Tsunami Design Geodatabase Map.
- b. The proposed building type is classified as Risk Category II by the International Building Code (IBC), with amendments from the State of Hawaii and the City and County of Honolulu (CCH). Section 1615 of IBC excludes Risk Category II from the requirement of tsunami impact design.
- c. The Project Site is located 325 feet from the inland run-up boundary of the Tsunami Evacuation Zone and 6,800 feet from the nearest shoreline, indicating a relatively low risk and probability of tsunami impact.
- 2. *Traffic.* Ingress and egress to the Project will be through the main driveway located on Kemole Lane. Kemole Lane is a one-way, one-lane roadway. Currently, there are on average four cars parked on the existing parcels daily. This Project would add nine total parking stalls, which is an increase of five additional vehicles that could use the roadways. The addition of five more vehicles will have a minimal impact on traffic conditions.

The neighborhood characteristic is that of a walkable community with pedestrian facilities consisting of crosswalks and pedestrian signals at signalized intersections along South King and South Beretania streets. These facilities provide direct access to the nearby transit stops and adjacent residential, commercial, retail, and office spaces.

This Project focuses on residents who would want to rent in the walkable community concept as it will contain minimal residential parking. *The City and County of Honolulu (CCH), Traffic Review Branch has reviewed and approved the Project. As such, this Project* is not anticipated to have any significant effects on traffic.

3. *Infrastructure.* The Project is serviced by existing utilities located in the immediate vicinity.

*Water:* CCH, Board of Water Supply (BWS) confirmed in a letter dated July 25, 2024, that water is available to the Project.

*Sewer:* CCH, Department of Planning and Permitting, Wastewater Branch (WWB) approved in a letter dated July 1, 2023, that there is sufficient capacity.

*Drainage:* According to the Preliminary Engineering Report, there will be a 0.01-acre increase in pervious area resulting from the Project compared to pre-existing conditions. An on-site storm drainage system consisting of swales and sidewalk culverts will convey runoff from the site toward Young Street following the existing drainage patterns. Roof runoff will be collected by the building downspouts and directed into the sidewalk culverts facing Young Street and daylight into the landscaped area before sheet flowing into Young Street. In terms of storm drainage, this results in a 0.03 cubic feet per second decrease in flow between the proposed condition and the pre-existing condition. The Project is not expected to cause any adverse impacts on surrounding properties, adjacent roadways, or CCH drainage systems.

*Electricity:* Hawaiian Electric Company (HECO) has provided a "will serve" letter dated October 5, 2021. On January 28, 2025, HECO confirmed service, assigned a project number (HECO Project No.: P-NEW-25-954460), and began its own internal planning and engineering for this Project.

*Telephone and Cable Services:* Confirmation from either Spectrum or Hawaiian Telcom is pending.

4. *Visual.* The Project is located within the Primary Urban Center in a highly urbanized area designated for high-density urban development. There is a mix of low-rise residential buildings, public facilities, and commercial uses within the Project's vicinity. The Project is on the edge of the Ala Moana district and is not located within a special district or designated place. The general vicinity is characterized by highly commercial mixed-use with South King Street to the south and South Beretania Street to the north serving as high-intensity commercial corridors with various retail establishments, restaurants, and office facilities. Parcels between these corridors are generally zoned BMX-3.

The Project does not impact the views in the Punchbowl to Diamondhead corridor which is protected in the Punchbowl Special District Design Guidelines because the Project lies outside of this corridor. Within this context, while the Project may have a visual impact compared to existing conditions, the Project is in an area where high-density urban development is planned and anticipated.

5. Cultural, Historic and Archeological Resources. The property has undergone significant previous disturbance since its initial development. The Applicant's archeological consultant prepared a Desktop Review Report for the Project Site. Based on the literature review, no archaeological historic properties were identified within the proposed Project area. The Desktop Review Report will be submitted to the State Historic Preservation Division (SHPD) for SHPD's review and determination as part of the HRS 6E process. The Applicant will implement any mitigation deemed necessary by SHPD. In the event of an unexpected discovery of archaeological or historic resources, SHPD will be notified in accordance with HAR 13-280-3.

There is an existing historic structure that is proposed to be demolished. SHPD has confirmed that the building envelope is exempted from HRS 6E review per HRS 6E-42.2 as the property is a privately owned single-family detached dwelling and is not listed in the Hawaii or National registers and is not in a historic district.

Kemole Lane Apartments Affordable Housing Project Exemption Notice April 3, 2025 Page 6

- 6. *Environmental Site Assessment.* The Applicant's environmental consultant prepared a Phase I Environmental Site Assessment (ESA) report. The Phase 1 ESA revealed no evidence of recognized environmental conditions (RECs), controlled recognized environmental conditions (CRECs), or significant data gaps in connection with the property.
- 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 planned commercial and residential developments in the area will contribute to cumulative impacts. However, the Project and other projects in the area are consistent with the CCH's *General Plan* and *Primary Urban Center Development Plan.* The overall intensification of land uses within the South King and South Beretania streets area is a goal of CCH's long-range vision for Oahu and is consistent with CCH's general development pattern goals. These plans emphasize keeping the existing urban core of Honolulu as the primary urban center of the island to keep Oahu's remaining rural areas rural. Thus, while the Project will contribute to cumulative impacts in the area, growth in this area is planned, desired, and anticipated.

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

- 1. The sole trigger for compliance with HRS 343 is the use of State funds and lands as described above.
- 2. The Project site is within the State Urban district.
- 3. The Project is zoned BMX-3 Community Business Mixed-Use District by the City and County of Honolulu (CCH). The proposed construction of 20 multifamily dwelling units is consistent with this designation.
- 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 6,800 feet from the nearest shoreline.
  - b. Is not within the Special Management Area (Exhibit 6).
  - c. It is in Flood Zone X (Exhibit 7).
  - d. Does not contain any streams or wetlands (See Exhibit 8).

Kemole Lane Apartments Affordable Housing Project Exemption Notice April 3, 2025 Page 7

e. Does not include any area designated critical habitat (See Exhibit 9).

## CONSULTATIONS

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

Agency / Organization	Name	Consultation Date
Hawaii Department of Transportation	Ed Sniffen, Director	02/18/2024
Hawaii Department of Education	Keith Hayashi, Superintendent	02/18/2024
Hawaii Department of Health	Kenny Fink, Director	02/18/2024
Office of Planning and Sustainable Development	Mary Alice Evans, Director	02/18/2024
CCH, Department of Planning and Permitting	Dawn Takeuchi-Apuna, Director	02/18/2024
CCH, Mayor's Office of Housing	Kevin Auger, Director	02/18/2024
CCH, Department of Transportation Services	J. Roger Morton, Director	02/18/2024
CCH, Department of Design and Construction	Haku Miles, Director	02/18/2024
District 5 Councilmember	Calvin Say	11/26/2024
District 5 Councilmember	Scott Nishimoto	01/12/2025
McCully-Moiliili Neighborhood Board	Board members	02/06/2025

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

- 1. Hawaii Department of Transportation. The department provided the following comments in a letter dated March 3, 2025:
  - a. 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 lightemitting 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 charging stations, ample short- and long-term bicycle parking, Energy Star-certified appliances, windows positioned to maximize cross breezes for natural cooling, LED lighting, and a 79-kW photovoltaic system designed to meet over 80% of the building's projected energy use. The Project is designed to meet Leadership in Energy and Environmental Design (LEED) Certified criteria for multifamily housing, aiming for GOLD-level certification. Additionally, the Project is situated in a walkable, mixed-use neighborhood where public transportation, grocery stores, banks, and other daily amenities are all a short distance from the Project Site.

- 2. Hawaii Department of Education. The department provided the following comments in a letter dated March 12, 2025:
  - a. DOE has determined that the Project will be served by Lunalilo Elementary, Washington Middle, and Kaimuki High School. These schools are currently operating below their design capacity.

#### Response: The Applicant acknowledges the comment.

- 3. Office of Planning and Sustainable Development (OPSD). The department provided the following comments in a letter dated March 14, 2025:
  - a. OPSD notes SHPD's determination that the existing dwelling is exempt from HRS 6E review, is not listed in the State or federal registers, and is not in a historic district. The Applicant's Phase 1 ESA revealed no evidence of recognized environmental conditions. Demolition, removal, or disposal of any materials containing asbestos or lead-based paint should be managed appropriately. Any noxious impacts to the surrounding community from demolition and construction on the site would be subject to applicable noise and fugitive dust control requirements associated with development permits for the Project.

## Response: The Applicant acknowledges the comment.

b. After reviewing the consultation materials, OPSD finds the Project meets the exemption criteria under HAR 11-200.1-15. OPSD notes that short-term impacts due to demolition and construction activities should be mitigated in compliance with applicable development permits for the Project.

Response: The Applicant acknowledges the comment.

4. Department of Health. The department provided a link to their standard comments in their email dated March 19, 2025.

Response: The Applicant acknowledges the comment.

- 5. CCH, Department of Planning and Permitting. The department provided the following comments in their letter dated March 20, 2025.
  - a. The Project Site is located in the *Extreme* Tsunami Evacuation Zone. Pursuant to HAR 11-200.1-13(b)(11), a project may be determined to have a significant effect on the environment if it is likely to have a substantial adverse effect on or is likely to suffer damage by being located in an environmentally sensitive area like a tsunami zone.

Response: The potential tsunami impact on the Project has been mitigated by following specific codes and criteria based on occupancy and risk category:

- a. No habitable residential units are located on the ground floor, reducing the risk to life and property for an inundation zone depth of three feet as indicated on the ASCE Tsunami Design Geodatabase Map.
- b. The Project Site is located 320 feet from the inland run-up boundary of the Tsunami Evacuation Zone and 6,800 feet from the nearest shoreline, indicating a relatively low risk and probability of tsunami impact.
- c. The proposed building type is classified as Risk Category II by IBC, with amendments from the State of Hawaii and the City and CCH. Section 1615 of IBC excludes Risk Category II from the requirement of tsunami impact design.
- 6. CCH, Department of Design and Construction. The department had no comments in their letter dated March 12, 2025.
- 7. CCH, Department of Transportation Services (DTS). The department provided the following comments in their letter dated March 14, 2025.
  - a. DTS stands by its April 27, 2023, memorandum to the Applicant, which requires the construction of a sidewalk along the Project's Young Street frontage.

Response: The Applicant will construct a sidewalk along Young Street.

b. The Project shall provide on-site bicycle parking to meet the requirements of Section 21-6.40, Land Use Ordinance.

Response: The Applicant will provide 12 on-site bicycle parking stalls (two temporary and 10 permanent).

c. *The Institute of Transportation Engineers Parking Generation Manual*, 6th Edition, recommends 14 vehicular parking stalls, slightly more than what the Project is proposing. While the DTS supports the reduction in parking, this makes the sidewalk improvement and bicycle parking even more important.

Response: The Applicant acknowledges the comment.

## 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. 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.

The Applicant's archaeological consultant prepared a Desktop Review Report for the Project Site. Based on the literature review, no archaeological historic properties were identified within the proposed Project area. The Desktop Review Report will be submitted to SHPD for its review and determination as part of the HRS 6E process.

There is an existing historic structure that is proposed to be demolished. SHPD has confirmed that the building envelope is exempted from HRS 6E review per HRS 6E-42.2 as the property is a privately owned single-family detached dwelling and is not listed in the Hawaii or National registers and is not in a historic district.

- 2. Curtail the range of beneficial use of the environment. The Project is consistent with the CCH's General Plan and Primary Urban Center Development Plan. The overall intensification of land uses within the South King Street and Young Street corridor area is a goal of CCH's long-range vision for Oahu and is consistent with CCH's general development pattern goals. The commitment of land resources required for the Project will not curtail the range of beneficial uses of the environment such as natural habitats, or areas of biological significance.
- 3. Conflict with the State's environmental policies or long-term goals established by law. The Project does not conflict with the policies and guidelines of HRS 343.
- 4. Have a substantial adverse effect on the economic welfare, social welfare, or cultural practices of the community and State. In the short term, construction expenditures will provide positive benefits to the local economy in the form of construction-related jobs. In the long term, the Project will provide affordable housing opportunities for Hawaii's residents.
- 5. *Have a substantial adverse effect on public health.* No identifiable adverse effects on public health or welfare are anticipated to result from the construction and operation of the Project.
- 6. *Involves adverse secondary impacts, such as population changes or effects on public facilities.* The Project is not anticipated to induce population growth in the State as the Project is primarily affordable housing that can only be rented or sold to Hawaii residents. Some redistribution of population may occur as the Project will include up to 20 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.

Kemole Lane Apartments Affordable Housing Project Exemption Notice April 3, 2025 Page 11

- 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 windblown 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.

Dur C. al

Signature of Director or Delegate

Apr 3, 2025

Date

Kemole Lane Apartments Affordable Housing Project Exemption Notice April 3, 2025 Page 12

## List of Exhibits:

- Exhibit 1 Location Map
- Exhibit 2 Site Plan
- Exhibit 3 Rendering
- Exhibit 4 State Urban District Map
- Exhibit 5 CCH Zoning Map
- Exhibit 6 Special Management Area Map
- Exhibit 7 Flood Hazard Zone Map
- Exhibit 8 Wetlands Map
- Exhibit 9 Critical Habitat Map
- Exhibit 10 Typical Consultation Packet (minus exhibits listed above)
- Exhibit 11 DOT comment letter
- Exhibit 13 DOE comment letter
- Exhibit 14 OPSD comment letter
- Exhibit 15 DOH comment letter
- Exhibit 16 DPP comment letter
- Exhibit 17 DCC comment letter
- Exhibit 18 DTS comment letter

Exhibit 1: Location Map



Exhibit 2: Site Plan

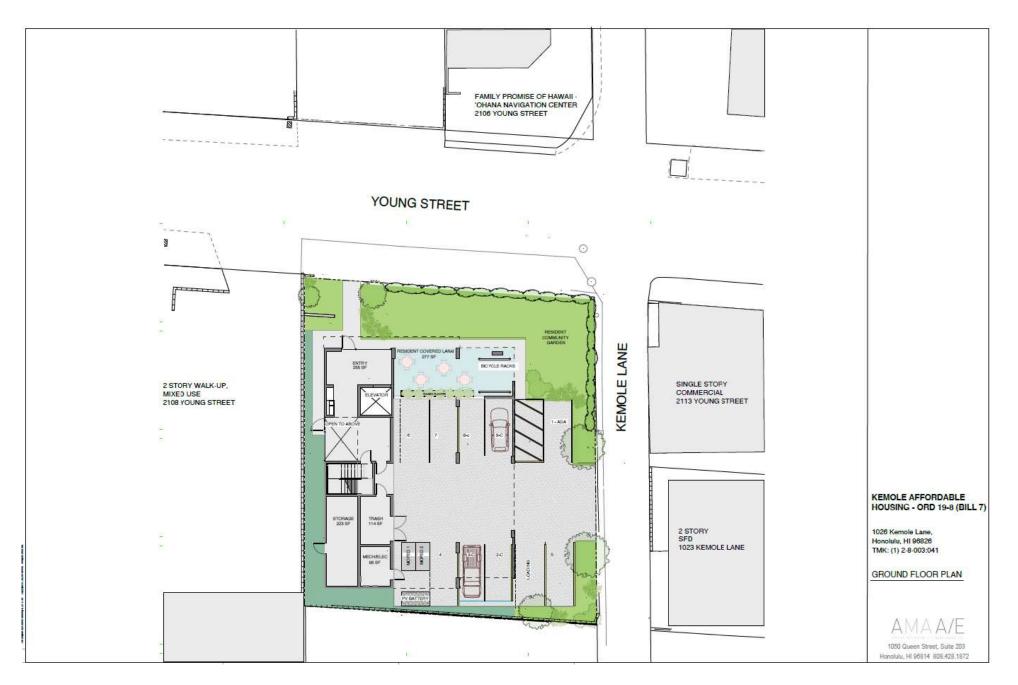


Exhibit 3: Rendering



## **Exhibit 4: State Land Use District Map**



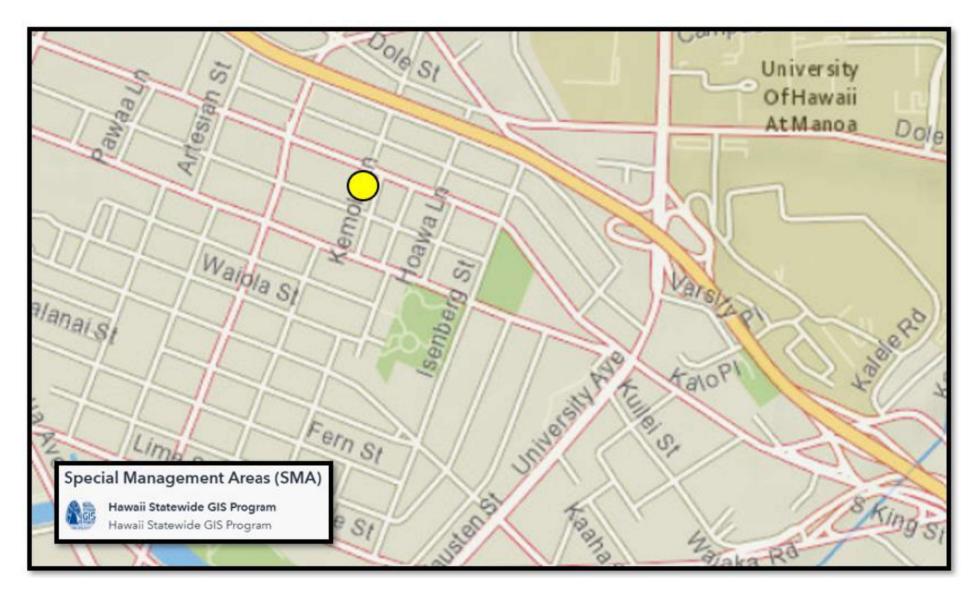
Source: Parcel and Zoning Information | City and County of Honolulu | Honolulu Land Information System



## Exhibit 5: City and County of Honolulu Zoning Map

Source: Parcel and Zoning Information | City and County of Honolulu | Honolulu Land Information System

## Exhibit 6: Special Management Area Map

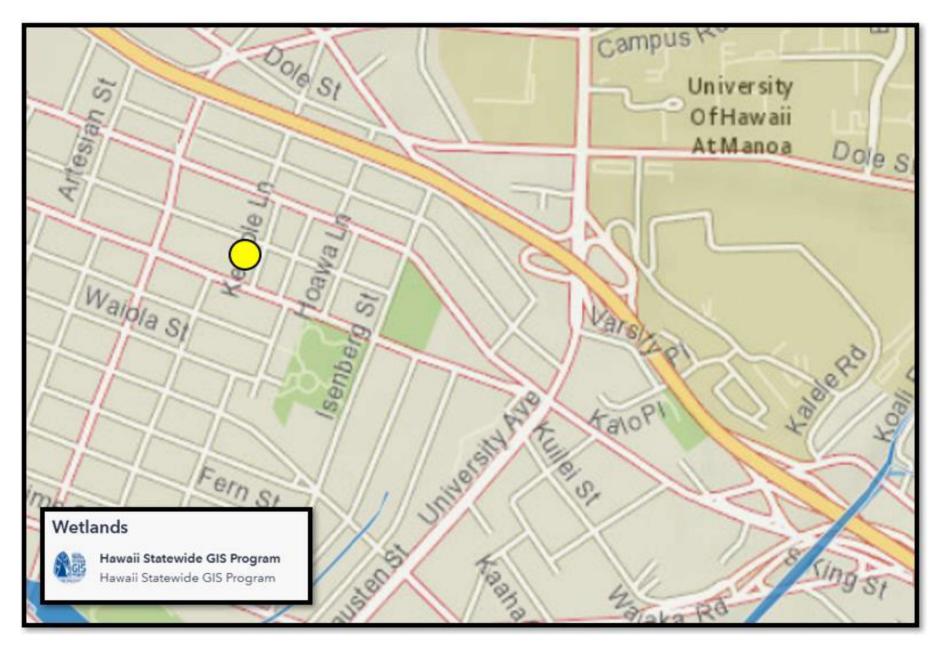


Source: Special Management Areas (SMA) | Hawaii Statewide GIS Program

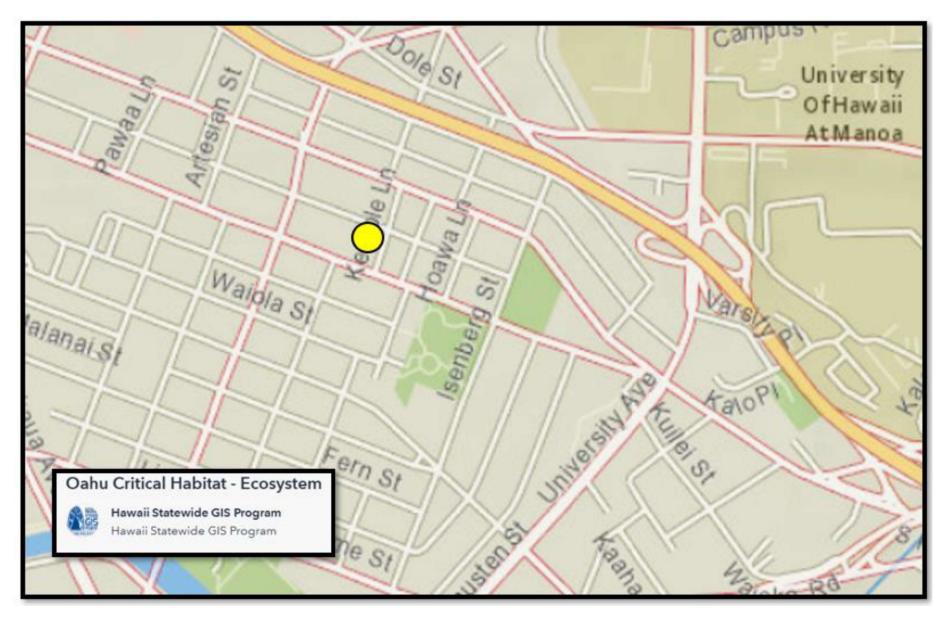
# Exhibit 7: Flood Zone Map



# **Exhibit 8: Wetlands Map**



## **Exhibit 9: Critical Habitat Map**



Source: Oahu Critical Habitat - Ecosystem | Hawaii Statewide GIS Program

## Exhibit 10

JOSH GREEN, M.D. GOVERNOR

> SYLVIA LUKE LT. GOVERNOR



DEAN MINAKAMI EXECUTIVE DIRECTOR

## STATE OF HAWAII

DEPARTMENT OF BUSINESS, ECONOMIC DEVELOPMENT, AND TOURISM HAWAII HOUSING FINANCE AND DEVELOPMENT CORPORATION 677 QUEEN STREET, SUITE 300 HONOLULU, HAWAII 96813

IN REPLY REFER TO: 25:PECB/14

February 18, 2025

FAX: (808) 587-0600

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

Dear Mr. Sniffen:

Subject: Consultation for an Environmental Assessment Exemption Kemole Lane Apartments Affordable Housing Development 1026 Kemole Lane; Honolulu, Oahu Tax Map Key (1) 2-8-003:041

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 Kemole Lane Apartments 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 March 21, 2025, to make this determination.

Kemole Development LLC (Applicant) is proposing to build an affordable rental project located at 1026 Kemole Lane (Project Site) in Honolulu at the corner of Kemole Lane to the east and Young Street to the north (See Exhibit 1). The Project Site has a total land area of 0.17 acres or 7,405 square feet, and is zoned as BMX-3, Community Business Mixed-Use District. The Applicant has site control as they are working in partnership with the owner of the property, Guidance Kemole LLC.

There is an existing single-family home built in 1921 and a gravel parking lot. Once the Project is ready for construction, the Applicant will demolish and remove the existing structure on the Project Site.

Mr. Ed Sniffen February 18, 2025 Page 2

The Project will be a new six-story structure and will provide 20 rental units consisting of 15 two-bedroom and five one-bedroom units. The Project will include 9 car parking stalls, three moped parking stalls, and a bike rack. Four units will be set aside for Family Promise of Hawaii's Permanently Supportive Housing Program.

The maximum height of the tallest building will be 57 feet above ground level. The Project will include laundry facilities, a covered common recreational lanai, resident community garden space, and additional lockable storage available to tenants. A 59-kilowatt photo voltaic system will reduce utility expenses for residents as well.

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

HHFDC believes the Project may be declared exempt from the preparation of an environmental assessment based on HHFDC's comprehensive exemption list<sup>1</sup>, 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 <u>not</u> on the Hawaii Register of Historic Places, but it was constructed in 1921 and therefore is over 50 years in age and thus is considered a historic property.

The Applicant has consulted with the Hawaii State Historic Preservation Division (SHPD) and was informed that the dwelling is exempted from HRS 6E as the property is a privately owned single-family detached dwelling and is not listed in the Hawaii or National resisters and is not in a historic district.

<sup>1</sup> As concurred in by the Environmental Advisory Council on November 1, 2022, see: <u>https://files.hawaii.gov/dbedt/erp/Agency\_Exemption\_Lists/State-Hawaii-Housing-and-Finance-Development-Corporation-2022-11-01-Exemption-List.pdf</u> Mr. Ed Sniffen February 18, 2025 Page 3

**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:** Applicable, the Project is zoned BMX-3 Community Business Mixed Use District by the City and County of Honolulu (CCH). The proposed construction of 20 multifamily dwelling units is consistent with this designation (See Exhibit 5).

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 6,800 feet from the nearest shoreline.
- b. Is not within the Special Management Area (See Exhibit 6).
- c. It is in Flood Zone X (See Exhibit 7).
- d. Does not contain any streams or wetlands (See Exhibit 8).
- e. Does not include any area designated critical habitat (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.

Mr. Ed Sniffen February 18, 2025 Page 4

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 administerial permits are obtained.

All applicable approvals and administerial 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 March 21, 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

Exhibit 11

JOSH GREEN, M.D. GOVERNOR KE KIA'ĀINA



EDWIN H. SNIFFEN DIRECTOR KA LUNA HO'OKELE

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

IN REPLY REFER TO

DIR0001393 STP 8.3896

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

March 3, 2025

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

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

THROUGH:DEAN MINAKAMI, EXECUTIVE DIRECTORHAWAII HOUSING FINANCE AND DEVELOPMENT CORPORATION

FROM: EDWIN H. SNIFFEN

SUBJECT: CONSULTATION FOR AN ENVIRONMENTAL ASSESSMENT EXEMPTION KEMOLE LANE APARTMENTS AFFORDABLE HOUSING DEVELOPMENT HONOLULU, OAHU, HAWAII TAX MAP KEY: (1) 2-8-003: 041

Thank you for your letter, dated February 18, 2025, requesting the Hawaii Department of Transportation's (HDOT) review and comments on the affordable housing project. HDOT understands Kemole Development LLC is proposing to build an affordable rental project located at 1026 Kemole Lane in Honolulu.

HDOT has the following comment:

- 1. Describe strategies to reduce carbon emissions from the project, if any. Suggestions include:
  - a. Incorporate elements that encourage and enhance the use of multiple types of transportation to reduce carbon emissions.
  - b. Implement energy-efficient technologies and practices, such as LED lighting.

c. Use sustainable, recycled, or low-emission materials in construction and manufacturing.

Please submit any subsequent land use entitlement-related requests for review or correspondence to the HDOT Land Use Intake email address, 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.

JOSH GREEN, M.D. GOVERNOR Exhibit 13



KEITH T. HAYASHI SUPERINTENDENT

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

OFFICE OF FACILITIES AND OPERATIONS

March 12, 2025

Mr. Dean Watase Interim Chief Planner Hawaii Housing Finance and Development Corporation 677 Queen Street, Suite 300 Honolulu, HI 96813

> Re: Consultation for an Environmental Assessment Exemption Kemole Lane Apartments Affordable Housing Development 1026 Kemole Lane; Honolulu, Oahu, Tax Map Key No.: (1)2-8-003:041

Dear Mr. Watase:

Thank you for your letter dated February 18, 2025. The Hawaii State Department of Education has reviewed the information provided and offers the following comment on the proposed Kemole Lane Apartments Affordable Housing Development.

Based on the proposed location, the Department has determined that the Project will be served by Lunalilo Elementary, Washington Middle, and Kaimuki High School. These schools are currently operating below their design capacity.

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

We appreciate the opportunity to comment.

Sincerely

Roy Keda Interim Public Works Manager Planning Section

RI:ctc

c: Linell Dilwilth, Complex Area Superintendent, Kaimuki-McKinley-Roosevelt Complex Area Facilities Development Branch

AN AFFIRMATIVE ACTION AND EQUAL OPPORTUNITY EMPLOYER



Coastal Zone

Management Program

## Exhibit 14

## OFFICE OF PLANNING & SUSTAINABLE DEVELOPMENT

**STATE OF HAWAI'I** 

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

> SYLVIA LUKE LT. GOVERNOR

> > DIRECTOR

MARY ALICE EVANS

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

DTS 202502191036NA TRANSMITTED VIA EMAIL

Environmental Review Program		March 14, 2025
Land Use Commission	TO:	Dean Watase, Planner Hawai'i Housing Finance and Development Corporation
Land Use Division		
Special Plans Branch	FROM:	Mary Alice Evans, Director Office of Planning and Sustainable Development
State Transit-Oriented Development	SUBJECT:	Consultation for an Environmental Assessment Exemption:
Statewide Geographic Information System		Kemole Lane Affordable Rental Housing Project 1026 Kemole Lane; Honolulu, Oʻahu Tax Map Key No. (1) 2-8-003: 041
Statewide Sustainability Branch		Office of Planning and Sustainable Development (OPSD) has reviewed

the request for consultation on an exemption from an Environmental Assessment (EA) for the Kemole Lane Affordable Rental Housing Project (Project). The Applicant, Kemole Development LLC, is proposing to build a 20-unit multi-family affordable rental housing development, targeting households earning between 30-60% of the area median income (AMI). The Project site is situated in an urbanized mixed-use neighborhood and zoned BMX-3, Community Business Mixed-Use. The Project will replace an older single-family dwelling on the 0.17-acre parcel.

Based on a review of the request and supporting materials provided by Hawai'i Housing Finance and Development Corporation (HHFDC), OPSD offers the following comments in support of an exemption from the preparation of an 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). Below are our findings:

1. **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 contain 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. Mr. Dean Watase March 14, 2025 Page 2

<u>OPSD Comments</u>: OPSD notes the State Historic Preservation Division's (SHPD) determination that the existing dwelling is exempt from HRS Chapter 6E review, is not listed in the State or federal registers, and is not in a historic district. The Applicant's Phase 1 Environmental Site Assessment revealed no evidence of recognized environmental conditions. Demolition, removal, or disposal of any materials containing asbestos or lead-based paint should be managed appropriately. Any noxious impacts to the surrounding community from demolition and construction on the site would be subject to applicable noise and fugitive dust control requirements associated with development permits for the Project.

- 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 Waikiki as the sole trigger 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 provided that allows housing;*
  - 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).

**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 administerial permits are obtained.

<u>OPSD Comments</u>. OPSD's review of the consultation materials finds that the Project meets all of the exemption criteria under Exemption Type 10. The Project's sole trigger for compliance with HRS 343 is the use of State funds. The Project site is in the Urban District and is consistent with the BMX-3 City zoning. The Project site is not situated near the shoreline or near an environmentally sensitive area.

OPSD finds that this request for consultation and the supporting materials meet the requirements for an exemption for a Part 2 Action for this Project. OPSD notes that short-term impacts due to demolition and construction activities should be mitigated in compliance with applicable development permits for the Project. Mr. Dean Watase March 14, 2025 Page 3

> The cumulative and secondary impacts of increased density through this urban redevelopment project are inevitable and unavoidable consequences of State and City urban infill and community redevelopment policies.

Thank you again for the opportunity to review and provide comments. If you have any questions, please contact Seiji Ogawa, <u>seiji.ogawa@hawaii.gov</u>, (808) 587-2898. If you wish to respond to this comment letter, please include DTS 202502191036NA in the subject line.

From:	Seto, Joanna
To:	Watase, Dean K
Cc:	CAB; cleanwaterbranch; SDWB; SHWB; doh.swpb; WWB; Young, Laura L; Oshiro, Jennah; Simmons, Gracelda M
Subject:	DBEDT/HHFDC Consultation for an EA Exemption - Kemole Lane Apartments Affordable Housing Development (Honolulu)
Date:	Wednesday, March 19, 2025 11:37:49 AM

Aloha Mr. Watase,

Hawaii Housing Finance and Development Corporation (HHFDC) is consulting with DOH to determine whether the Kemole Lane Apartments Affordable Housing Development (Project) may be exempt from the preparation of an Environmental Assessment (EA). Letter received and routed at Director's Office on February 21. Please note that the request for exemption should be sent to the Environmental Review Program of Office of Planning and Sustainable Development.

The Hazard Evaluation and Emergency Response Office contacted you directly this morning at 11:35 am.

Standard Comments for Environmental Assessments from Environmental Management Division branches are available online at <u>https://health.hawaii.gov/epo/landuse/</u>.

If your project concerns are not addressed in the Standard Comments, please contact the appropriate Environmental Health Administration branch(es) and office(s) directly using DOHEHALandUseContactList 20240827.pdf.

Mahalo! Joanna

#### Joanna L. Seto, P.E.

Administrator | Environmental Management Division Hawai'i State Department of Health | Ka 'Oihana Olakino Office: (808) 586-4305 | Mobile: (808) 292-8408

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#### Exhibit 16

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

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

RICK BLANGIARDI MAYOR *MEIA* 



March 20, 2025

DAWN TAKEUCHI APUNA DIRECTOR *PO'*O

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

REGINA MALEPEAI 2<sup>ND</sup> DEPUTY DIRECTOR HOPE PO'O KUALUA

## 2025/ELOG-326 (DC)

Mr. Dean Watase 677 Queen Street, Suite 300 Honolulu, Hawai'i 96813

Dear Mr. Dean Watase:

SUBJECT: Environmental Assessment Determination Chapter 201H, Hawai'i Revised Statutes (HRS) Kemole Lane Apartments Affordable Housing Development (Project) 1026 Kemole Lane - Honolulu Tax Map Key: 2-8-003:041

This is in response to your letter, received February 21, 2025, requesting the Department of Planning and Permitting (DPP) concur that the subject Project can be exempted from Chapter 343, HRS, the Environmental Impact Statement Law. The Hawai'i Administrative Rules (HAR) Section 11-200.1-15 enumerates exemptions for the demolition of structures and affordable housing projects that meet certain criteria. The Project site is located within the extreme tsunami evacuation zone. Therefore, the subject Project does not meet the 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 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 sole triggers for compliance with Chapter 343, HRS;
- The Project conforms to the existing State Land Use Urban classification;
- The Project is consistent with the existing county zoning classification that allows housing; and
- The Project does not require a shoreline setback variance and is not in an environmentally sensitive area, as stated in the HAR Section 11.200.1-13(b)(11).

Mr. Dean Watase March 20, 2025 Page 2

Based on the information provided, the only Chapter 343, HRS trigger is the use of State funds. The Project site is within the State Land Use Urban District and is within the BMX-3 Community Business Mixed-Use District, which allows multi-unit dwellings. The Project does not need variances for shoreline setbacks. The Project site is located in the extreme tsunami evacuation zone.

Pursuant to HAR Section 11-200.1-13(b)(11), a project may be determined to have a significant effect on the environment if it is likely to have a substantial adverse effect on or is likely to suffer damage by being located in an environmentally sensitive area such as flood plain, tsunami zone, sea level rise exposure area, beach, erosionprone area, geologically hazardous land, estuary, fresh water, or coastal waters. You have not supplied information addressing the potential effects of being located in the extreme tsunami evacuation zone. Therefore, we could not agree that the Project meets all the necessary requirements to be considered an exempt action for purposes of Chapter 343, HRS.

Should you have any other questions, please contact David Cholak, of the Zoning Regulations and Permits Branch, at (808) 768-8026 or via email at david.cholak@honolulu.gov.

Very truly yours,

Dawn Takeuchi Apuna Director

## Exhibit 17 DEPARTMENT OF DESIGN AND CONSTRUCTION KA 'OIHANA HAKULAU A ME KE KĀPILI CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 11TH FLOOR • HONOLULU, HAWAI'I 96813 PHONE: (808) 768-8480 • FAX: (808) 768-4567 • WEBSITE: <u>honolulu.gov</u>

RICK BLANGIARDI MAYOR *MEIA* 



March 12, 2025

HAKU MILLES, P.E. DIRECTOR *PO'O* 

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

#### SENT VIA EMAIL

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

Dear Mr. Watase:

Subject: Consultation for an Environmental Assessment Exemption Kemole Lane Apartments Affordable Housing Development 1026 Kemole Lane, Honolulu, O'ahu Tax Map Key: (1) 2-8-003:041

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,

& Mr. Jumm

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

HM:krn (935484)

#### Exhibit 18

# CITY AND COUNTY OF HONOLULU 7075 MAR 24 P 1: 14

711 KAPI'OLANI BOULEVARD, SUITE 1600 HONOLULU, HAWAI'I 96813

HONOLULU, HAWAI'I 96813 Phone: (808) 768-8305 • Fax: (808) 768-4730 • Website: honolulu.gov/transportation

RICK BLANGIARDI MAYOR *MEIA* 



March 14, 2025

J. ROGER MORTON DIRECTOR PO'O

他FP合码 VI

JON Y. NOUCHI DEPUTY DIRECTOR HOPE PO'O

TP3/25-936342

Dean Minakami, Executive Director State of Hawai'i Hawai'i Housing Finance and Development Corporation 677 Queen Street, Suite 300 Honolulu, Hawai'i 96813 Attn: Dean Watase, Interim Chief Planner

Dear Mr. Minakami:

SUBJECT: Consultation for an Environmental Assessment Exemption Kemole Lane Apartments Affordable Housing Development 1026 Kemole Lane; Honolulu, Oahu Tax Map Key (TMK) (1) 2-8-003:041

Thank you for the opportunity to provide written comments regarding the Consultation for an Environmental Assessment Exemption Kemole Lane Apartments Affordable Housing Development 1026 Kemole Lane; Honolulu, Oahu Tax Map Key (TMK) (1) 2-8-003:041. We have the following comments.

- 1. Pedestrian Improvements. The Department of Transportation Services (DTS) stands by its April 27, 2023, Memorandum, attached herein. The applicant shall construct a sidewalk along the project's Young Street frontage consistent with the attached, March 2024, proposed site plan.
- 2. Bicycle Parking. The project shall provide on-site bicycle parking per requirements of the Land Use Ordinance, Section 21-6.40.
- Parking. The Institute of Transportation Engineers Parking Generation Manual, 6<sup>th</sup> Edition recommends fourteen parking stalls, slightly more than the project is proposing. While the DTS supports the reduction in parking, this makes the pedestrian improvements and bicycle parking even more important.

Dean Minakami, Executive Director March 14, 2025 Page 2

Should you have any questions, please contact Bartholomew Mikitowicz, of my staff, at (808) 768-6681.

Very truly yours,

Ahuan

J. Roger Morton Director Designate

Attachments