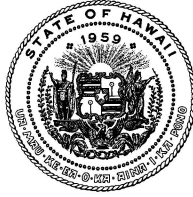


JOSH GREEN, M.D.
GOVERNOR

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:
25:PECB/56

September 9, 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
Kuhio Park Terrace Low-Rises and Kuhio Homes Redevelopment (Project)
Tax Map Key: 1-3-039: 003, 006, and 008 (multiple addresses)

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.

In partnership with KPLR Phase 1 LP (the Applicant and an entity of Highridge Costa Development Company), the Hawaii Public Housing Authority plans to demolish Kuhio Park Terrace Low-Rises and Kuhio Homes, totaling 174 units, and replace them with up to 650 new affordable rental units. Situated on a 22-acre public housing site, the redevelopment will include eight buildings of various heights: four-, six-, and eight-story mid-rise structures, along with a 16-story tower. Unit layouts will range from one- to five-bedroom apartments to serve different household sizes.

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,

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

Dean Minakami
Executive Director

Attachment

KUHIO PARK TERRACE LOW-RISES AND KUHIO HOMES REDEVELOPMENT 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. 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).

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: KPLR Phase 1 LP (Applicant) is located at 330 West Victoria Street; Gardena, CA 90248. The Hawaii Housing Finance and Development Corporation (HHFDC) is the approving agency of this exemption notice.

Project Name & Address/Location: Kuhio Park Terrace Low-Rises and Kuhio Homes Redevelopment Project (Project) is located at 1140 Ahonui, 1141 Ahonui, and 1472 Linapuni streets; Kalihi Ahupuaa; Honolulu, HI 96819 (Project Site).

Estimated Construction Schedule: Construction start: October 2025 / Construction completion: June 2028

Tax Map Key (TMK) and latitude/longitude coordinates (in decimal degrees): TMK: 1-3-039: 003, 006, and 008; Coordinates: 21-20-20.492N, 157-52-36.062W, NAD 83

Anticipated Permits, Approvals, and Notifications:

Permitting Agency	Permit Type
City and County of Honolulu (CCH)	Demolition, grading, trenching, and building permits (DPP) Construction dewatering permit (DPP) Foundation and structure permits (DPP) Wastewater and stormwater connection permits (DPP) Site Development Division approval (DPP) Surface runoff from construction activities entering into City's storm sewer system (DPP) Storm Water Quality Fee (DPP) Construction Plan Review (DTS, DDC) Street usage permit (DTS) Water Availability Approval and Construction Plan Review (BWS) Honolulu Fire Department review Certificate of Occupancy (DPP)
State of Hawaii	NPDES Permit Notice of Intent (NOI) Forms C, F, and G (DOH) Community noise permit (DOH) Air conditioning and ventilation permit (DOH) Phase II ESA review (DOH) ADA Coordination (DCAB) Pre-Building Permit Review (solar water heating compliance) (DBEDT) Chapter 6E, HRS review (SHPD)

NARRATIVE

In partnership with KPLR Phase 1 LP (an entity of Highridge Costa Development Company and the Applicant), HPHA proposes to demolish Kuhio Park Terrace Low-Rises and Kuhio Homes (a total of 174 units) and replace them with up to 585 new affordable residential rental units and

approximately 65 market-rate residential rental units. The redevelopment will include eight buildings of different heights: four-, six-, and eight-story mid-rise structures, along with one 16-story tower. Unit layouts will vary from one-bedroom to five-bedroom apartments to serve various household sizes.

The new residential buildings will be arranged around a continuous green space that features connected courtyards with native fruit trees and communal amenities such as a shared imu, community gardens, a community Round House, and Wash Houses serving as shared laundry facilities and community gathering areas. Construction will occur in three separate phases.

The table below shows the units to be provided. The Applicant commits to setting aside affordable units for 60 years.

Affordable Units		
Restricted at:	Number of units	Percent of total units
30% of the AMI	65 units	10%
60% of the AMI	520 units	80%
Total Affordable Units:	585 units	90%
Market Rate Units		
Total Market Rate Units (including 2 for on-site managers):	65	10%
Total Units		
Total Units:	650 units	100%

The Applicant will seek Low-Income Housing Tax Credits (LIHTC) to partially finance the Project. In addition, 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.

The City and County of Honolulu (CCH) Council granted exemptions from certain CCH requirements relating to zoning (i.e., density, height, and setbacks) and development fees for the Project with the adoption of CCH City Council Resolution 22-240, CD-1.

ENVIRONMENTAL ANALYSIS

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

	Not Applicable
☒ Land Use and Zoning Conformance	☐
☒ Traffic (Vehicles, Bicycles, Pedestrian)	☐
☒ Infrastructure (Roads, Building, Utilities)	☐
☒ Social-Economic	☐
☒ Public Health and Safety	☐
☐ Recreational Resources	☒
☒ Cultural, Historic, and Archeological Resources	☐
☒ Visual and Aesthetic Resources	☐
☐ Terrestrial and Avian Resources	☒
☐ Surface and Ground Water Resources	☒
☐ Wetlands, Floodplains, and Riparian/Coastal Resources	☒

- ☒ Air Quality Pollutant Emissions
☒ Noise Emissions
☐ Solid, Hazardous, and Liquid Waste Emissions
☐ Other

☐
☐
☒
☐

Relevant environmental analysis of the Project is provided below:

1. *Land Use and Zoning.* The Project Site is within CCH A-2 Medium Density Apartment zoning district, which allows medium density, multi-family dwellings. As part of the 201H Application, KPLR Phase 1 LP (the Applicant) received various exemptions from the CCH's Land Use Ordinance (Chapter 21, Revised Ordinances of Honolulu) relating to heights, density, building area, setbacks, and other requirements.
2. *Traffic.* Access to the Kuhio Park Terrace Low-Rises and Kuhio Homes is through two entry points connected by Linapuni Street, the main internal road serving the Kuhio Park Complex:
 - North Access: Connects to North School Street at a signalized intersection (North School Street/Linapuni Street/Hauiki Street).
 - South Access: Connects to Kamehameha IV Road at an unsignalized intersection (Kamehameha IV Road/Rose Street/Linapuni Street).

Linapuni Street serves as the primary circulation route connecting these external access points and providing internal traffic flow throughout the Kuhio Park Complex. As part of the redevelopment, Linapuni Street improvements will include selective roadway widening, additional parking areas, and enhanced pedestrian crosswalks.

A Transportation Impact Analysis Report (TIAR) prepared for the Project analyzed traffic impacts and provided the following summary:

- The TIAR evaluated 4 key intersections surrounding the Project area.
- The analysis included existing 2022 conditions and projected 2028 conditions both with and without the Project.
- The Project is projected to generate approximately 144 vehicles per hour during AM peak and 177 vehicles per hour during PM peak.
- All analyzed intersections are expected to operate at acceptable levels of service (LOS C or better) with the additional traffic from the redevelopment.

Key Recommendations:

- **Vehicular Access:** Maintain the current two access points and keep Ahonui Street closure between Kuhio Park and the adjacent development to avoid increasing traffic at unsignalized intersections.
- **Pedestrian Improvements:** Enhance raised crosswalks along Linapuni Street and coordinate with CCH's Safe Routes to School project on Kamehameha IV Road.

- **Transit Enhancements:** Explore rerouting existing bus routes through Kuhio Park by removing guard houses to provide better transit service to residents.
 - **Transportation Demand Management:** Provide bus passes to residents, enhance pedestrian/bicycle facilities, and implement parking management strategies (reducing parking ratio from 1.99 to 0.82 spaces per unit to encourage alternative transportation modes).
3. *Infrastructure.* The Applicant's consultant prepared a Preliminary Engineering Report (PER) for the Project.

Water: CCH, Board of Water Supply (BWS) provided a letter (dated June 3, 2022) stating that the existing water system is currently adequate to accommodate the Project. BWS noted the final decision on availability of water will be confirmed when the building permit application is submitted for approval, pending evaluation of the water system conditions at that time on a first-come, first-served basis.

Sewer: CCH, Department of Planning and Permitting, Wastewater Branch (WWB) approved a sewer connection application (SCA) for 650 residential units with an expiration date of February 9, 2024. The approval of the SCA (2024/SCA-0122) indicates that there is sufficient wastewater capacity for the Project.

Drainage: The Project will comply with the Stormwater Quality Standards and Storm Drainage Standards adopted by CCH. Project drainage infrastructure will be designed and constructed so that the Project will not have any adverse effects on adjacent and neighboring properties. The Project involves improvements to stormwater management. Therefore, no adverse impacts on drainage are anticipated. The Project Site will be graded to provide positive drainage directed away from the buildings. All drainage will be retained on site and no offsite drainage infrastructure drainage improvements are needed.

Electricity: Hawaiian Electric Company (HECO) provided a letter (dated February 21, 2022) stating that the existing distribution circuits along Ahonui and Linapuni streets could potentially serve the redevelopment project. HECO indicated that the existing circuits may need to be upgraded depending on the ultimate size of the Project load. HECO did not have sufficient information to make a final determination.

Telephone and Cable Services: Hawaiian Telcom and Charter (Spectrum) have indicated that they have the existing infrastructure that will accommodate the Project. A new underground service will need to be installed to feed the new buildings.

4. *Visual.* Public views toward the Project site are available from Linapuni Street at the North School Street intersection, Linapuni Street at the Kamehameha IV Road, and Ahonui Street at Hulali Place intersection.

While the existing open space surrounding the existing 174 multi-family units can be characterized as "disconnected", the Project will consolidate open spaces into larger, more usable open spaces, through the replacement of double-loaded and taller

buildings. Exhibit 3 is the Conceptual Master Plan showing playgrounds, sports courts, and other open spaces.

5. *Cultural, Historic, and Archeological Resources.*

Archaeological: The State Historic Preservation Division (SHPD) accepted an Archaeological Inventory Survey (AIS) and an Archaeological Monitoring Plan (AMP) prepared for the Project. Archaeological Survey Findings:

- Subsurface testing of 15 trenches found no evidence of archaeological deposits or features.
- Stratigraphy showed modern fill layers from existing construction over natural subsoils from 1960s grading.
- Two culturally significant *pōhaku* (stones) were identified as SIHP 50-80-14-09422, located outside the Project area but with a spiritual pathway extending through it.
- The stones were evaluated as significant under multiple criteria and eligible for the National Register.

Mitigation Requirements:

- Project determined to have “Effect, with proposed mitigation commitments”.
- Required mitigation includes on-site archaeological monitoring and preparation of a Traditional Cultural Property study.

Historic: The Project will require the phased demolition and removal of 33 buildings considered historic. Reconnaissance Level Survey (RLS) documents were completed to evaluate their historic integrity and significance. The evaluations determined that demolishing the Project will have an adverse effect on historically significant structures. Under Section 106 of the National Historic Preservation Act, federally funded projects that impact historic properties must develop mitigation measures. To mitigate adverse effects, the Hawaii Public Housing Authority (HPHA), the State Historic Preservation Officer (SHPO), the Applicant, and consulting parties executed a Memorandum of Agreement, in which they agreed to six key mitigation requirements:

- Historic Documentation (completed): Create Historic American Buildings Survey (HABS) documentation for the 33 buildings being demolished - Final documentation was submitted to and approved by the National Park Service on June 3, 2024, with copies provided to all required repositories.
- Historic Context Study (in progress): Prepare a Historic Context Study of Kalihi *Ahupuaa* focusing on Chief Palena and the Kalua O Palena stone - Anticipated to be developed and released in Q1 2026.

- Preservation Fund (established): Create a \$15,000 Preservation Fund for future Kalihi *Ahupuaa* preservation activities - Fund established; consulting parties will receive periodic reminders about available funding.
- Cultural Integration (pending): Incorporate Hawaiian and Kalihi *Ahupuaa* cultural elements into the Project – the Project has not yet reached this design stage.
- Annual Reporting (current): Provide annual progress reports – The applicant prepared the first annual progress report and submitted it to SHPO and all consulting parties.
- Archaeological Monitoring (approved): Conduct archaeological monitoring during construction – a Final Archaeological Monitoring Plan was submitted to and approved by SHPD.

Cultural: The Applicant's archaeological consultant conducted an ethnographic study to identify cultural resources and community perspectives on the Project. The study identified two culturally significant *pōhaku* (sacred stones) – male and female boulders with a spiritual alignment running between them. The area has a rich cultural history with fishponds, archaeological sites, and potential for *iwi kūpuna* (ancestral remains). Interviews were conducted with knowledgeable community members who expressed concerns about protecting cultural resources and the Project's impact on the existing neighborhood. Recommendations from the ethnographic study include:

- Bless the area before construction.
 - Conduct additional cultural research and community outreach.
 - Fully document and protect the two *pōhaku* with SIHP numbers.
 - Provide archaeological and cultural monitors during construction.
 - Install vibration monitoring and bracing for the male *pōhaku* during construction.
 - Design buildings to respect the spiritual alignment between the stones.
 - Follow proper protocols if *iwi kūpuna* are discovered.
 - Develop educational programs and install interpretive signage about the area's cultural significance.
6. *Environmental Site Assessment.* The Applicant's environmental consultant prepared a Phase I Environmental Site Assessment (ESA) report dated March 16, 2022. The ESA revealed no evidence of recognized environmental conditions (RECs), but identified 1 controlled recognized environmental condition (CREC) and 3 business environmental risks (BERs) in connection with the property.

Controlled Recognized Environmental Condition. Onsite Soil Impacts from Lead and Pesticides – Soil beneath building foundations is contaminated with lead, dieldrin, and endrin pesticides. The Hawaii Department of Health (DOH) issued a "No Further Action

with Institutional Controls Determination" letter in 2013, and the property is managed under Environmental Hazard Management Plans (EHMPs).

Business Environmental Risks:

- Suspect Polychlorinated Biphenyls (PCB) Transformers – There are three HECO transformers in a locked vault with unknown PCB content.
- Suspect Asbestos-Containing Materials (ACM) – Present in buildings constructed prior to 1980.
- Suspect Lead-Based Paint (LBP) – Present in apartment buildings constructed prior to 1977.

Key Recommendations:

- For future construction/renovation involving soil excavation, develop a work plan with DOH approval and a construction EHMP.
- Prior to renovation/demolition activities, sample and analyze suspect ACM and LBP materials.

Contact HECO to decommission and test transformers if impacted during future activities. Implement proper management protocols for hazardous materials in accordance with applicable regulations.

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 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 will contribute to cumulative impacts. However, the Project is consistent with the CCH's *General Plan* and *Primary Urban Center Development Plan* (2025). The *Primary Urban Center Development Plan* designates the Project Site as "Town Neighborhood – High" (a dense residential neighborhood environment that supports high-rise buildings but is made up of a wide variety of other large multi-unit building types, and is located within walking distance to high-intensity and transit-rich mixed-use areas) and "Near-Town Neighborhood" (a dense residential neighborhood with well-connected street networks located adjacent to mixed-use areas). The overall intensification of land uses within the area is a major 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, with a secondary center in Ewa, to keep Oahu's remaining rural areas rural. Thus, while the Project will

contribute to cumulative impacts in the area, growth in this area is planned, desired, and anticipated.

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

1. The sole trigger for compliance with HRS 343 is the use of State funds and lands as described above.
2. The Project site is within the State Urban district.
3. The Project Site is zoned A-2 Medium Density Apartment District by the City and County of Honolulu (CCH). Housing and multifamily dwellings are permitted in the A-2 zone. The construction of 650 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 1.05 miles from the nearest shoreline and not within the Special Management Area.
 - b. Is in Flood Zone X.
 - c. Does not contain any streams or wetlands, nor any designated critical habitat.
 - d. Is not within the Tsunami Evacuation Zone.

CONSULTATIONS

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

Agency/Community Outreach	Name	Consultation Date
Choice Neighborhoods Initiative (CNI) Planning Grant process.	Conducted extensive community outreach and engagement that resulted in a CNI Final Transformation Plan and the Master Development Agreement. This early community outreach and engagement formed the basis for the current project.	2013-2014
Open House Workshops #1 and #2 to Reintroduce Refreshed Master Plan	Residents of Kuhio Park Towers and Low-Rises	06/08/2022
Open House Workshop #3 to Reintroduce Refreshed Master Plan	Residents of Kuhio Park Towers and Low-Rises; community stakeholders, community leaders, and the greater public	06/09/2022
Kalihi-Palama Neighborhood Board No. 15	Ken Farm, Chair	05/18/2022 08/17/2022 03/15/2023
Hawaii Department of Transportation (DOT)	Ed Sniffen, Director	08/04/2025
Hawaii Department of Education (DOE)	Keith Hayashi, Superintendent	08/04/2025
Hawaii Department of Health (DOH)	Kenny Fink, Director	08/04/2025
Office of Planning and Sustainable Development (OPSD)	Mary Alice Evans, Director	08/04/2025

CCH, Department of Planning and Permitting (DPP)	Dawn Takeuchi-Apuna, Director	08/04/2025
CCH, Department of Housing and Land Management	Kevin Auger, Director	08/04/2025
CCH, Department of Transportation Services (DTS)	J. Roger Morton, Director	08/04/2025
CCH, Department of Design and Construction (DDC)	Haku Miles, Director	08/04/2025

The following comments were received during the HRS 343 comment period. Copies of comment letters received are available upon request.

Agency	Comment	Response
DOT	DOT, in their letter dated September 5, 2025, offered the following comments: 1. The Project is located 1.25 miles from HNL. All projects within 5 miles of state airports are advised to review the <i>Technical Assistance Memorandum</i> (TAM). 2. FAA regulations require the submission of FAA Form 7460-1 if the Project is within 20,000 feet of a commercial or military airport. 3. The applicant and future residents should be aware of potential single-event noise, fumes, smoke, vibrations, odors, etc., from flight operations. 4. If a photovoltaic (PV) system is to be installed, FAA requires a glint and glare analysis on PVs near the State airports, and the Applicant shall mitigate the radio frequency interference (RFI) upon notification by DOT and/or FAA. 5. The Project is bounded by CCH roadways, and it appears they will not impact DOT Highways facilities. 6. The Project has two primary access points: Linapuni Street, which connects to Kamehameha Road, and North School Street, both of which are CCH roadways. 7. DOT reviewed the TIAR and noted that it did not include any regional impact analyses related to the nearby State Highways facilities. Its conclusion regarding the access points is reasonable, and the project does not seem to significantly impact state facilities. 8. DOT continues to promote the expansion of safe bicycle and pedestrian routes on State Highways facilities. 9. Describe strategies to reduce carbon emissions, such as incorporating multi-modal transportation options, implementing energy-efficient technologies, and using sustainable materials in construction.	The Applicant has the following responses: 1. The Applicant has reviewed the TAM and development will be undertaken in a manner to avoid airport operations. 2. The Applicant will submit a 7460-1. 3. Comment acknowledged. 4. The Project currently does not include a PV system; however, if a PV system is added in the future, the Applicant will specify non-glint and non-glare panels, submit a 7460, and if the PV produces a hazardous RFI condition, it will take immediate action to mitigate the situation. 5. Comment acknowledged. 6. Comment acknowledged. 7. Comments acknowledged. 8. Comment acknowledged. 9. The Applicant will make efforts to reduce carbon emissions and design the Project to meet Leadership in Energy and Environmental Design (LEED) certification.
DOE	DOE, in their letter dated September 5, 2025, had no comments except to note that the Project may have potential impacts on public school capacity. DOE requests early consultation to discuss Project phases, specific school impacts, and possible mitigation measures.	Comment acknowledged.
OPSD	OPSD, in their letter dated September 2, 2025, supports exempting the Project from preparing an Environmental Assessment based on the use of 6 and 10 exemption types.	Comment acknowledged.
DPP	DPP, in their letter dated September 4, 2025, agrees that it meets all the requirements to be considered an exempt action for purposes of HRS 343.	Comment acknowledged.
DDC	DDC, in their letter dated August 28, 2025, had no comments.	Comment acknowledged.

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 State Historic Preservation Division accepted the AIS and AMP for the Project.
2. *Curtail the range of beneficial use of the environment.* The Project is in a highly urbanized area and is consistent with the CCH's *General Plan* and *Primary Urban Center Development Plan* (2025). The *Primary Urban Center Development Plan* designates the Project Site as "Town Neighborhood – High" (a dense residential neighborhood environment that supports high-rise buildings but is made up of a wide variety of other large multi-unit building types, and is located within walking distance to high-intensity and transit-rich mixed-use areas) and "Near-Town Neighborhood" (a dense residential neighborhood with well-connected street networks located adjacent to mixed-use areas). 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. The overall intensification of land uses within the area is a major 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, with a secondary center in Ewa, to keep Oahu's remaining rural areas rural.
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 650 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 with 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. Public views toward the Project Site are available from Linapuni Street at the North School Street intersection, Linapuni Street at the Kamehameha IV Road, and Ahonui Street at Hulali Place intersection. While the existing open space surrounding the existing 174 multi-family units can be characterized as “disconnected”, the Project will consolidate open spaces into larger, more usable open spaces, through the replacement of double-loaded and taller buildings. Moreover, the Project will not affect any of the Significant Public Views (neither Corridor Views nor Panoramic Views) as designated on Figures 2.4 and 2.5 of the Primary Urban Center Development Plan (2025).

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.

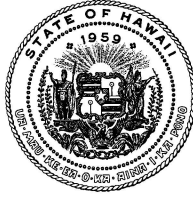
 _____ Signature of Director or Delegate	<u>09/15/2025</u> _____ Date
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Attachment: Typical Consultation Packet with the listed exhibits below:

- Exhibit 1 – Regional Location Map
- Exhibit 2 – Aerial Map
- Exhibit 3 – Conceptual Site Plan
- Exhibit 4 – Significant Panoramic View
- Exhibit 5 – State Urban District Map
- Exhibit 6 – CCH Zoning Map
- Exhibit 7 – Flood Hazard Assessment Map
- Exhibit 8 – Tsunami Evacuation Zones Map
- Exhibit 9 – Sea Level Rise Exposure Areas Map
- Exhibit 10 – National Wetlands Map
- Exhibit 11 – Critical Habitat Map
- Exhibit 12 – Special Management Area Map

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:

25:PECB/35

August 4, 2025

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
Kuhio Park Terrace Low-Rises and Kuhio Homes Redevelopment
1140 Ahonui Street, 1141 Ahohui Street, and 1472 Linapuni Street
Kalihi Ahupuaa; Honolulu, Oahu
Tax Map Key: 1-3-039: 003, 006, and 008

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 if the Kuhio Park Terrace Low-Rises and Kuhio Homes Redevelopment (Project) may be exempt from the preparation of an Environmental Assessment (EA) pursuant to the administrative rules promulgated under the authority of Chapter 343-6(5), Hawaii Revised Statutes (HRS); and under Sections 11-200.1-15, 11-200.1-16, and 11-200.1-17, Hawaii Administrative Rules (HAR). HHFDC seeks your input on the subject Project by September 5, 2025, to make this determination.

Kuhio Park Complex Overview

The Kuhio Park Complex is a 22-acre public housing development located on the south side of the intersection of Kamehameha IV Road and School Street, bounded by Kalihi Stream to the south. Linapuni and Ahonui streets bisect the property. See Exhibit 1 (Regional Location) and Exhibit 2 (Aerial Map).

The complex consists of multiple housing types and community facilities constructed across several decades:

- Housing Components:
 - Kūhiō Homes (21 single and two-story multi-unit residential structures, built in 1953)
 - Kuhio Park Terrace Low-Rises (twelve single- and two-story buildings, built in 1962)
 - Towers at Kuhio Park (Tower A and Tower B, built in 1962)
- Community Facilities:
 - Community Meeting Hall (built in 1962)
 - Former Park Facilities Building, now used as a Church (built in 1962)
 - Kamehaikana Resource Center and affiliated pavilion (built in 2001)
 - Linapuni Elementary School

The State of Hawaii owns the property and the Hawaii Public Housing Authority (HPHA) operates the rental housing. Additional residential development of various ages surrounds the complex.

Project Area and Scope

The Project involves redevelopment of Kuhio Park Terrace Low-Rises and Kuhio Homes, which are on approximately 9.78 acres of the larger 22-acre complex, and comprise three Tax Map Key (TMK) parcels: 1-3-039:003, 1-3-039:006, and 1-3-039:008 (Project Area) (see Exhibit 2). Kuhio Park Terrace Low-Rises and Kuhio Homes contain a total of 174 units.

Areas NOT included in the Project:

- TMK parcels 1-3-039:007, 1-3-039:009, and 1-3-039:010 (containing the Towers at Kuhio Park, Community Meeting Hall, Kamehaikana Resource Center, and Church)
- TMK parcel 1-3-039:005 (containing Linapuni Elementary School)

Proposed Redevelopment (Project)

In partnership with KPLR Phase 1 LP (an entity of Highridge Costa Development Company and the Applicant), HPHA proposes to demolish Kuhio Park Terrace Low-Rises and Kuhio Homes (174 units total) and replace them with up to 585 new affordable residential rental units and approximately 65 market-rate residential rental units. The redevelopment will feature eight buildings of varying heights, including four-, six-, and eight-story mid-rise structures, as well as a 16-story tower. Unit configurations will range from one-bedroom to five-bedroom apartments, accommodating diverse household sizes.

The new residential buildings will be organized around a continuous green belt featuring connected courtyards with native fruit-bearing trees and communal amenities including a shared imu, community gardens, a community Round House, and Wash Houses that serve as both shared laundry facilities and community gathering spaces. Construction will proceed through three distinct phases. Exhibit 3 is the Conceptual Master Plan showing the three phases. Exhibit 4 shows a panoramic view of the Project from Punchbowl Crater.

Table 1 shows the units to be provided. The Applicant reserves the right to modify the allocation of units per Area Median Income (AMI) levels in the phases of development.

Table 1: Proposed Affordable and Market Rate Units

Affordable Units		
Restricted at:	Number of units	Percent of total units
30% of the AMI	65 units	10%
60% of the AMI	520 units	80%
Total Affordable Units:	585 units	90%
Market Rate Units		
Total Market Rate Units (including 2 for on-site managers):	65	10%
Total Units		
Total Units:	650 units	100%

The Applicant will seek Low-Income Housing Tax Credits (LIHTC) to partially finance the Project. In addition, 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.

The City and County of Honolulu (CCH) Council granted exemptions from certain CCH requirements relating to zoning (i.e., density, height, and setbacks) and development fees for the Project with the adoption of CCH City Council Resolution 22-240, CD-1. A summary of the exemptions is provided in the Project Summary and Impacts Analysis Matrix.

HPHA's previous development partner, The Michaels Organization (Kuhio Park 2, LLC), hosted meetings with residents, conducted a Town Hall meeting, and made presentations to the Kalihi-Pālana Neighborhood Board to solicit public input, understand any concerns, and answer questions regarding the Project.

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 for the provision of 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.

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 – 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 Project will require the phased demolition and removal of 33 buildings. These structures, built in 1953 and 1962, are considered historic. To evaluate their historic integrity and significance, Reconnaissance Level Survey (RLS) documents were completed for the buildings proposed for demolition and those within the “Area of Potential Effect” (APE). This documentation enables informed assessment of the Project's impact on historic structures within the APE, which encompasses the Project Site (TMK parcels: 1-3-039:003, 1-3-039:006, and 1-3-039:008) and adjacent parcels (TMK parcels: 1-3-039:005, 1-3-039:007, 1-3-039:009, and 1-3-039:010).

The evaluation determined that demolishing Kuhio Homes and Kuhio Park Terrace Low-Rises will have an adverse effect on historically significant structures. To mitigate this impact, documentation prepared according to Historic American Buildings Survey (HABS) standards was submitted to and approved by the National Park Service on June 3, 2024. Final copies were subsequently submitted to the State Historic Preservation Officer (SHPO) in both archival hard copy and digital format through the Hawaii Cultural Resource Information System (HICRIS). This documentation fulfills the first condition of a Memorandum of Agreement (MOA) signed in December 2023 between HPHA; SHPO; and Kuhio Park 2, LLC.

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

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

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

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

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

Analysis: Applicable, the Project Site is within the State Urban district (See Exhibit 5).

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

Analysis: Applicable, the Project Site is within CCH's A-2 (Apartment Medium-Density) zoning district (See Exhibit 6), which allows medium-density, multi-family dwellings.

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

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

- a. Is approximately 1.05 miles from the nearest shoreline (See Exhibit 1).
- b. It is in Flood Zone X (See Exhibit 7).
- c. Is not within a Tsunami Evacuation Zone (See Exhibit 8).
- d. Is not within a Sea Level Rise Exposure Area (See Exhibit 9).
- e. Does not contain any streams or wetlands (See Exhibit 10).
- f. Does not include any area designated critical habitat (See Exhibit 11).
- g. Is not within the Special Management Area (See Exhibit 12).

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.*

Analysis: The Project is a multi-family affordable housing development.

Mr. Ed Sniffen
August 4, 2025
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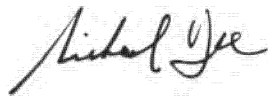
The following studies were completed to support the analysis and will be made available upon request. Attached is a Project Summary and Impact Analysis Matrix, which summarizes the findings from the various studies.

1. Transportation Impact Assessment Report.
2. Phase I Environmental Site Assessment.
3. Preliminary Engineering Report.
4. BWS Water Availability Letter
5. Sewer Connection Approval
6. Archaeological Inventory Study.
7. Visual Impact Analysis.
8. Preliminary Geotechnical Study

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

Please email any comments to Mr. Dean Watase, Housing Planning Manager, at dean.k.watase@hawaii.gov by September 5, 2025.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Yee", written over a faint dotted grid background.

Michael Yee
Chief Planner

Attachment

KUHIO PARK TERRACE LOW-RISES AND KUHIO HOMES REDEVELOPMENT PROJECT

SUMMARY & IMPACT ANALYSIS

Location and Tax Map Key	1140 Ahonui Street 1141, Ahohui St, and 1472 Linapuni Street; Honolulu, Hawaii Tax Map Key: 1-3-039:003, 1-3-039:006, and 1-3-039:008 (Project Site)
Project Site	≈ 9.78 acres
Total Units	650 residential units
Affordability	The Kuhio Park Terrace Low-Rises and Kuhio Homes Redevelopment (Project) will be a multi-family affordable housing project with approximately: • 10% affordable rental apartments targeting residents earning a maximum of 30% of the area median income (AMI).¹ • 80% affordable rental apartments targeting residents earning a maximum of 60% of the AMI.¹ • 10% market rate units (including 2 for on-site managers). ¹ Rental length affordability is a minimum of 60 years.
Parking	<i>Automobile Parking:</i> Approximately 533 spaces for a parking ratio of .8 parking spaces/unit. (202 off-street parking spaces, 177 on-street parking spaces, and 154 shared spaces for after-hours resident parking). Off-street parking spaces will be provided in PV carports wherever appropriate. Four EV-ready spaces will be provided if economically feasible. <i>Bicycle Parking:</i> Approximately 65 short-term bike racks will be provided throughout the master plan area. Approximately 325 long-term storage spaces will be provided in bike storage rooms (proposed in the Wash Houses).
Stories/Heights	8 buildings of varying heights: 4-, 6-, and 8-story mid-rise buildings and one 16-story building.
Exemptions Granted	As part of the Hawaii Revised Statutes (HRS) 201H process, the Honolulu City Council adopted Resolution 22-240, CD1, which grants certain exemptions from City and County of Honolulu (CCH) requirements, including: • Land Use Ordinance (Chapter 21, Revised Ordinances of Honolulu) exemptions: ○ A building height increase from 150 feet to 175 feet for one building. ○ Density increase to allow a floor area ratio of 2.0 instead of 1.9. ○ Reduced yard setbacks allowing portions of sidewalks and parking within required setbacks. ○ Reduced landscaping requirements for yards and parking areas. ○ Joint development of multiple zoning lots without conditional use permits. ○ Modified loading space dimensions (nine 19' x 8.2' spaces instead of standard requirements). • Development-related fee exemptions: ○ Application fees: grading permits, building permit reviews, special inspections, conditional use permits, subdivision permits, storm water reviews. ○ Infrastructure charges: exemption from wastewater system facility charges for affordable units. ○ Water fees: deferral of water system facility charges. ○ Fire Department review fees. ○ Park dedication: exemption from park dedication requirements for affordable units.

RESOURCE AREA	SUMMARY OF POTENTIAL IMPACTS
LAND USE & ZONING	The Project Site is within CCH A-2 Medium Density Apartment zoning district, which allows medium density, multi-family dwellings. As part of the 201H Application, the Project received various exemptions from the CCH's Land Use Ordinance (Chapter 21, Revised Ordinances of Honolulu) relating to heights, density, building area, setbacks, and other requirements.

TRAFFIC	Access to the Kuhio Park Terrace Low-Rises and Kuhio Homes is through two entry points connected by Linapuni Street, the main internal road serving the Kuhio Park Complex: • North Access: Connects to North School Street at a signalized intersection (North School Street/Linapuni Street/Hauiki Street). • South Access: Connects to Kamehameha IV Road at an unsignalized intersection (Kamehameha IV Road/Rose Street/Linapuni Street). Linapuni Street serves as the primary circulation route connecting these external access points and providing internal traffic flow throughout the Kuhio Park Complex. As part of the redevelopment, Linapuni Street improvements will include selective roadway widening, additional parking areas, and enhanced pedestrian crosswalks. A Transportation Impact Assessment Report (TIAR) prepared for the Project analyzed traffic impacts. The following summary summarizes the TIAR and its recommendations. TIAR Summary: • The TIAR evaluated 4 key intersections surrounding the Project area. • The analysis included existing 2022 conditions and projected 2028 conditions both with and without the pProject. • The Project is projected to generate approximately 144 vehicles per hour during AM peak and 177 vehicles per hour during PM peak. • All analyzed intersections are expected to operate at acceptable levels of service (LOS C or better) with the additional traffic from the redevelopment. Key Recommendations: • Vehicular Access: Maintain the current two access points and keep Ahonui Street closure between Kuhio Park and adjacent development to avoid increasing traffic at unsignalized intersections. • Pedestrian Improvements: Enhance raised crosswalks along Linapuni Street and coordinate with CCH's Safe Routes to School project on Kamehameha IV Road. • Transit Enhancements: Explore rerouting existing bus routes through Kuhio Park by removing guard houses to provide better transit service to residents. • Transportation Demand Management: Provide bus passes to residents, enhance pedestrian/bicycle facilities, and implement parking management strategies (reducing parking ratio from 1.99 to 0.82 spaces per unit to encourage alternative transportation modes).
INFRASTRUCTURE	The Applicant's civil engineer prepared a Preliminary Engineering Report (PER) for the Project. <i>Water:</i> CCH, Board of Water Supply (BWS) provided a letter (dated June 3, 2022) stating that the existing water system is currently adequate to accommodate the Project. BWS noted the final decision on availability of water will be confirmed when the building permit application is submitted for approval, pending evaluation of the water system conditions at that time on a first-come, first-served basis. <i>Sewer:</i> CCH, Department of Planning and Permitting, Wastewater Branch (WWB) approved a sewer connection application (SCA) for 650 residential units with an expiration date of February 9, 2024. The approval of the SCA (2024/SCA-0122) indicates that there is sufficient wastewater capacity for the Project. <i>Drainage:</i> The Project will comply with the Stormwater Quality Standards and Storm Drainage Standards adopted by CCH. Project drainage infrastructure will be designed and constructed so that the Project will not have any adverse effects on adjacent and neighboring properties. The Project involves improvements to stormwater management. Therefore, no adverse impacts on drainage are anticipated. The Project Site will be graded to provide positive drainage directed away from the buildings. All drainage will be retained on site and no offsite drainage infrastructure drainage improvements are needed. <i>Electricity:</i> Hawaiian Electric Company (HECO) provided a letter (dated February 21, 2022) stating that the existing distribution circuits along Ahonui and Linapuni streets could potentially serve the redevelopment project. HECO indicated that the existing circuits may need to be upgraded depending on the ultimate size of the Project load. HECO did not have sufficient information to make a final determination. <i>Telephone and Cable Services:</i> Hawaiian Telcom and Charter (Spectrum) have indicated that they have the existing infrastructure that will accommodate the Project. A new underground service will need to be installed to feed the new buildings.
PHASE 1 ENVIRONMENTAL SITE ASSESSMENT	The Applicant's environmental consultant prepared a Phase I Environmental Site Assessment (ESA) report dated March 16, 2022. The Phase I ESA revealed no evidence of recognized environmental conditions (RECs) but identified 1 controlled recognized environmental condition (CREC) and 3 business environmental risks (BERs) in connection with the property. • Controlled Recognized Environmental Condition: ○ Onsite Soil Impacts from Lead and Pesticides - Soil beneath building foundations is contaminated with lead, dieldrin, and endrin pesticides. The Hawaii Department of Health (DOH) issued a "No Further Action with

	Institutional Controls Determination" letter in 2013, and the property is managed under Environmental Hazard Management Plans (EHMPs). • Business Environmental Risks: ○ Suspect Polychlorinated Biphenyls (PCB) Transformers – There are three HECO transformers in a locked vault with unknown PCB content. ○ Suspect Asbestos-Containing Materials (ACM) – Present in buildings constructed prior to 1980. ○ Suspect Lead-Based Paint (LBP) – Present in apartment buildings constructed prior to 1977. Key Recommendations: • For future construction/renovation involving soil excavation, develop a work plan with DOH approval and a construction EHMP. • Prior to renovation/demolition activities, sample and analyze suspect ACM and LBP materials. • Contact HECO to decommission and test transformers if impacted during future activities Implement proper management protocols for hazardous materials in accordance with applicable regulations.
VISUAL	Public views toward the Project site are available from Linapuni Street at the North School Street intersection, Linapuni Street at the Kamehameha IV Road, and Ahonui Street at Hulali Place intersection. Exhibit 4 shows a panoramic view of the Project from Punchbowl Crater. While the existing open space surrounding the existing 174 multi-family units can be characterized as “disconnected”, the Project will consolidate open spaces into larger, more usable open spaces, through the replacement of double-loaded and taller buildings. Exhibit 3 is the Conceptual Master Plan showing playgrounds, sports courts, and other open spaces.
ARCHAEOLOGICAL, HISTORIC, & CULTURAL	<i>Archaeological:</i> The State Historic Preservation Division (SHPD) accepted an Archaeological Inventory Survey (AIS) and an Archaeological Monitoring Plan (AMP) prepared for the Project. Archaeological Survey Findings: • Subsurface testing of 15 trenches found no evidence of archaeological deposits or features. • Stratigraphy showed modern fill layers from existing construction over natural subsoils from 1960s grading. • Two culturally significant <i>pōhaku</i> (stones) were identified as SIHP 50-80-14-09422, located outside the Project area but with a spiritual pathway extending through it. • The stones were evaluated as significant under multiple criteria and eligible for the National Register. Mitigation Requirements: • Project determined to have “Effect, with proposed mitigation commitments”. • Required mitigation includes on-site archaeological monitoring and preparation of a Traditional Cultural Property study. <i>Historic:</i> The Project will require the phased demolition and removal of 33 buildings considered historic. Reconnaissance Level Survey (RLS) documents were completed to evaluate their historic integrity and significance. The evaluations determined that demolishing the Project will have an adverse effect on historically significant structures. Under Section 106 of the National Historic Preservation Act, federally funded projects that impact historic properties must develop mitigation measures. To mitigate adverse effects, the Hawaii Public Housing Authority (HPHA), the State Historic Preservation Officer (SHPO), the Applicant, and consulting parties executed a Memorandum of Agreement, in which they agreed to six key mitigation requirements: • Historic Documentation (completed): Create Historic American Buildings Survey (HABS) documentation for the 33 buildings being demolished - Final documentation was submitted to and approved by the National Park Service on June 3, 2024, with copies provided to all required repositories. • Historic Context Study (in progress): Prepare a Historic Context Study of Kalihi Ahupua'a focusing on Chief Palena and the Kalua O Palena stone - Anticipated to be developed and released in Q1 2026. • Preservation Fund (established): Create a \$15,000 Preservation Fund for future Kalihi Ahupua'a preservation activities - Fund established; consulting parties will receive periodic reminders about available funding. • Cultural Integration (pending): Incorporate Hawaiian and Kalihi Ahupua'a cultural elements into the Project – the Project has not yet reached this design stage. • Annual Reporting (current): Provide annual progress reports – The applicant prepared the first annual progress report and submitted it to SHPO and all consulting parties. • Archaeological Monitoring (approved): Conduct archaeological monitoring during construction – a Final Archaeological Monitoring Plan was submitted to and approved by SHPD. <i>Cultural:</i> The Applicant's archaeological consultant conducted an ethnographic study to identify cultural resources and community perspectives on the Project. The study identified two culturally significant <i>pōhaku</i> (sacred stones) – male and female boulders with a spiritual alignment running between them. The area has a rich cultural history with fishponds, archaeological sites, and potential for <i>iwi kūpuna</i> (ancestral remains). Interviews were conducted with knowledgeable community members who expressed concerns about protecting cultural resources and the Project's impact on the existing neighborhood. Recommendations from the ethnographic study include:

	• Bless the area before construction. • Conduct additional cultural research and community outreach. • Fully document and protect the two <i>pōhaku</i> with SIHP numbers. • Provide archaeological and cultural monitors during construction. • Install vibration monitoring and bracing for the male <i>pōhaku</i> during construction. • Design buildings to respect the spiritual alignment between the stones. • Follow proper protocols if <i>iwi kūpuna</i> are discovered. • Develop educational programs and install interpretive signage about the area's cultural significance.
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.
CUMULATIVE IMPACTS	The Project will contribute to cumulative impacts. However, the Project is consistent with the CCH's <i>General Plan</i> and <i>Primary Urban Center Development Plan</i> (2025). The <i>Primary Urban Center Development Plan</i> designates the Project Site as "Town Neighborhood – High" (a dense residential neighborhood environment that supports high-rise buildings but is made up of a wide variety of other large multi-unit building types, and is located within walking distance to high-intensity and transit-rich mixed-use areas) and "Near-Town Neighborhood" (a dense residential neighborhood with well-connected street networks located adjacent to mixed-use areas). The overall intensification of land uses within the area is a major 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, with a secondary center in Ewa, to keep Oahu's remaining rural areas rural. Thus, while the Project will contribute to cumulative impacts in the area, growth in this area is planned, desired, and anticipated.



DATE: 7/18/2025

LEGEND

 Project TMK Parcels



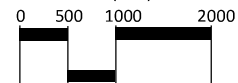
Exhibit 1: Regional Location

KŪHIŌ PARK TERRACE LOW-RISES AND KŪHIŌ HOMES REDEVELOPMENT

KPLR Phase 1 LP

North

Linear Scale (feet)



Island of O'ahu



Source: City & County of Honolulu, 2025. ESRI Online Basemap.

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



LEGEND

- Project TMK Parcels
- Kuhio Park Complex
- TMK Boundaries

1. Kuhio Homes
2. Kuhio Park Terrace Low-Rises
3. Towers at Kuhio Park (Tower A)
4. Towers at Kuhio Park (Tower B)
5. Community Meeting Hall
6. Kamehaikana Resource Center
7. Church Building
8. Linapuni Elementary School

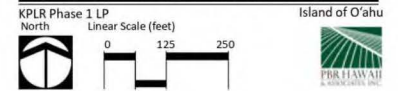
Source: City & County of Honolulu, 2025. Google Earth, 2025.

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

DATE: 7/24/2025

**Exhibit 2:
Aerial Map**

**KUHIO PARK TERRACE LOW-RISES
AND KUHIO HOMES REDEVELOPMENT**



CONCEPTUAL SITE PLAN



MASTER PLAN

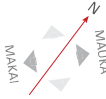
BLDG 1	103 UNITS
BLDG 2	59 UNITS
BLDG 3	71 UNITS
BLDG 4	71 UNITS
BLDG 5	250 UNITS
BLDG 6	38 UNITS
BLDG 7	29 UNITS
BLDG 8	29 UNITS

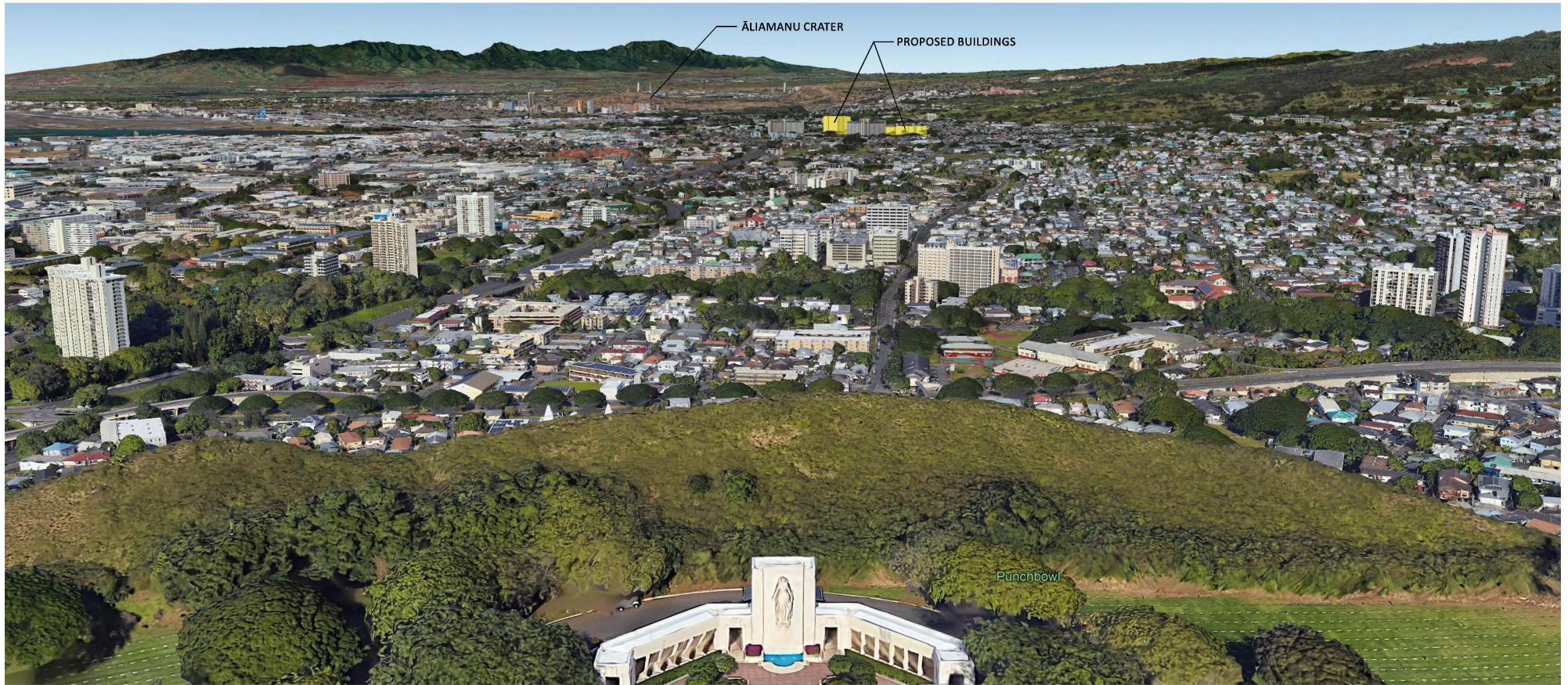
TOTAL 650 UNITS

PHASE 1

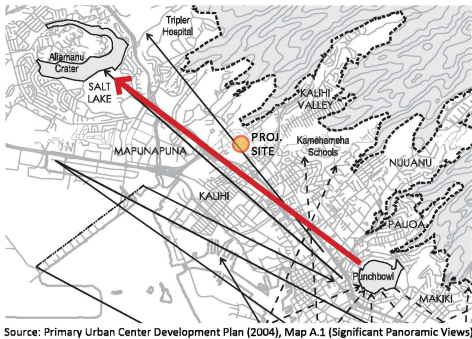
46	STUDIOS
82	1-BEDROOMS
104	2-BEDROOMS
43	3-BEDROOMS
29	4-BEDROOMS
304	TOTAL UNITS
AMI:	30-60%

KUHIO PARK LOW-RISES AND HOMES REDEVELOPMENT





VIEW FROM PUNCHBOWL (PŪOWAINA) CRATER TOWARD ĀLIAMANU CRATER



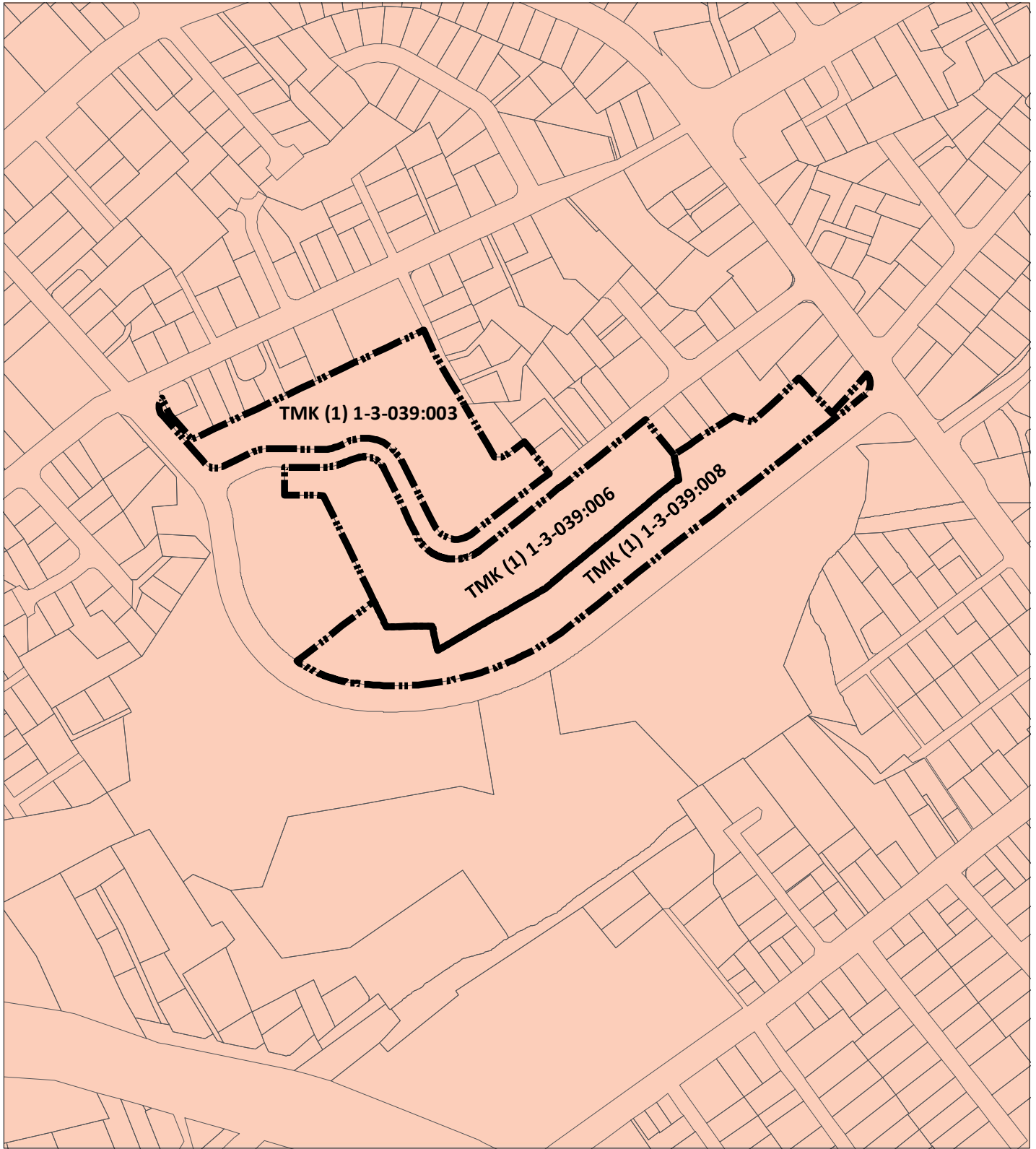
Source: Primary Urban Center Development Plan (2004), Map A.1 (Significant Panoramic Views)

LOW RISE DEVELOPMENT PLAN | KUHIO PARK | KALIHI | MAY 2022

Exhibit 4: SIGNIFICANT PANORAMIC VIEW

lowney
arch

Michaels



DATE: 7/24/2025

LEGEND

-  Project TMK Parcels
-  Tax Map Key Parcels
-  Urban

Exhibit 5: State Land Use District

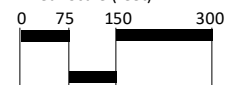
KUHIO PARK TERRACE LOW-RISES AND KUHIO HOMES REDEVELOPMENT

KPLR Phase 1 LP

O'ahu

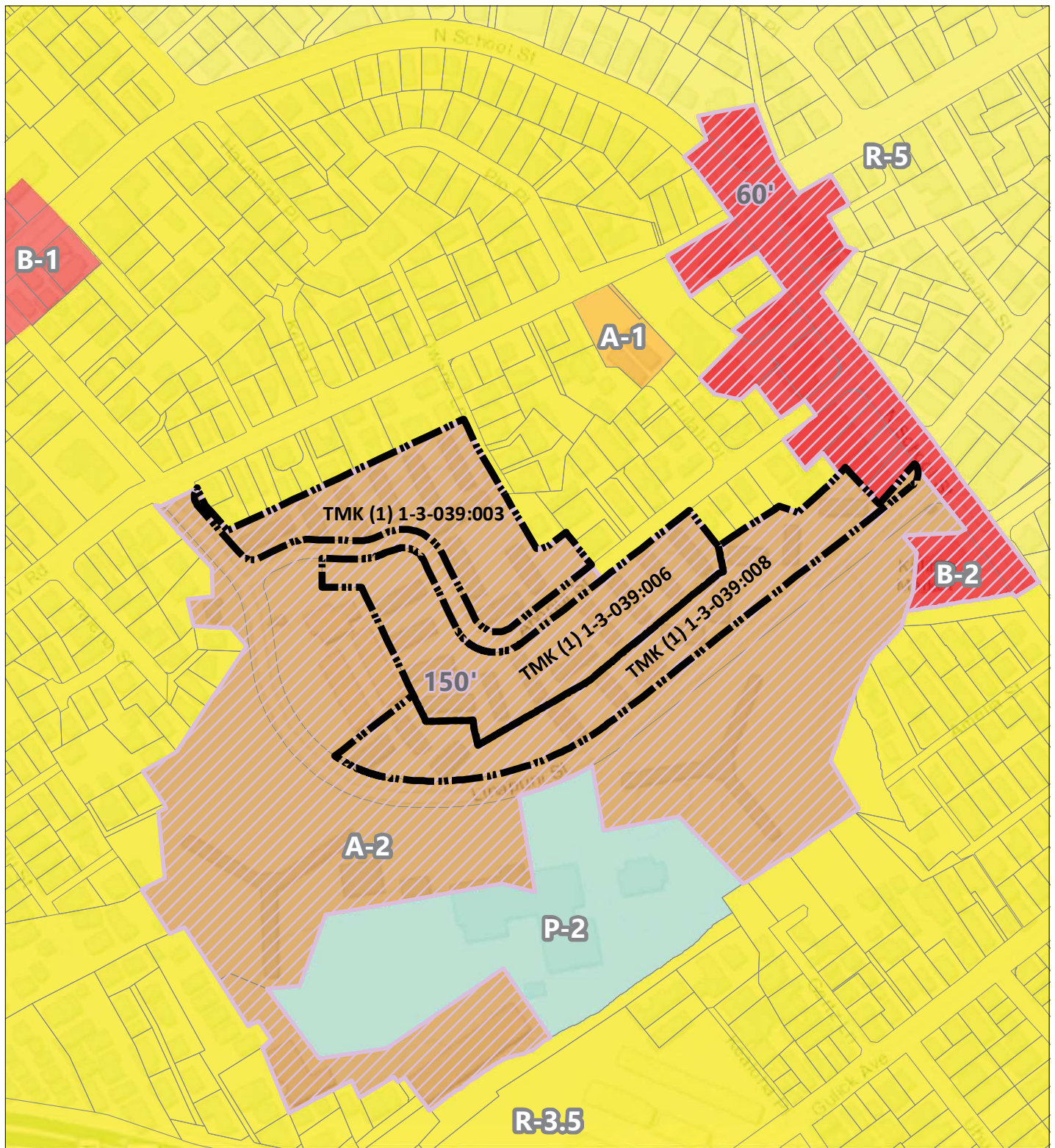
North

Linear Scale (feet)



Source: City and County of Honolulu, 2019; State Land Use Commission, 2020

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



DATE: 7/24/2025

LEGEND

	Project TMK Parcels		P-2
	Tax Map Key Parcels		R-5
	Zoning Map Height Limits		R-3.5
			A-1
			A-2
			B-1
			B-2

Exhibit 6: City and County Zoning District Map with Height Limits

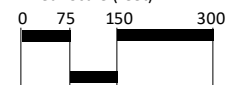
KUHIO PARK TERRACE LOW-RISES AND KUHIO HOMES REDEVELOPMENT

KPLR Phase 1 LP

North



Linear Scale (feet)

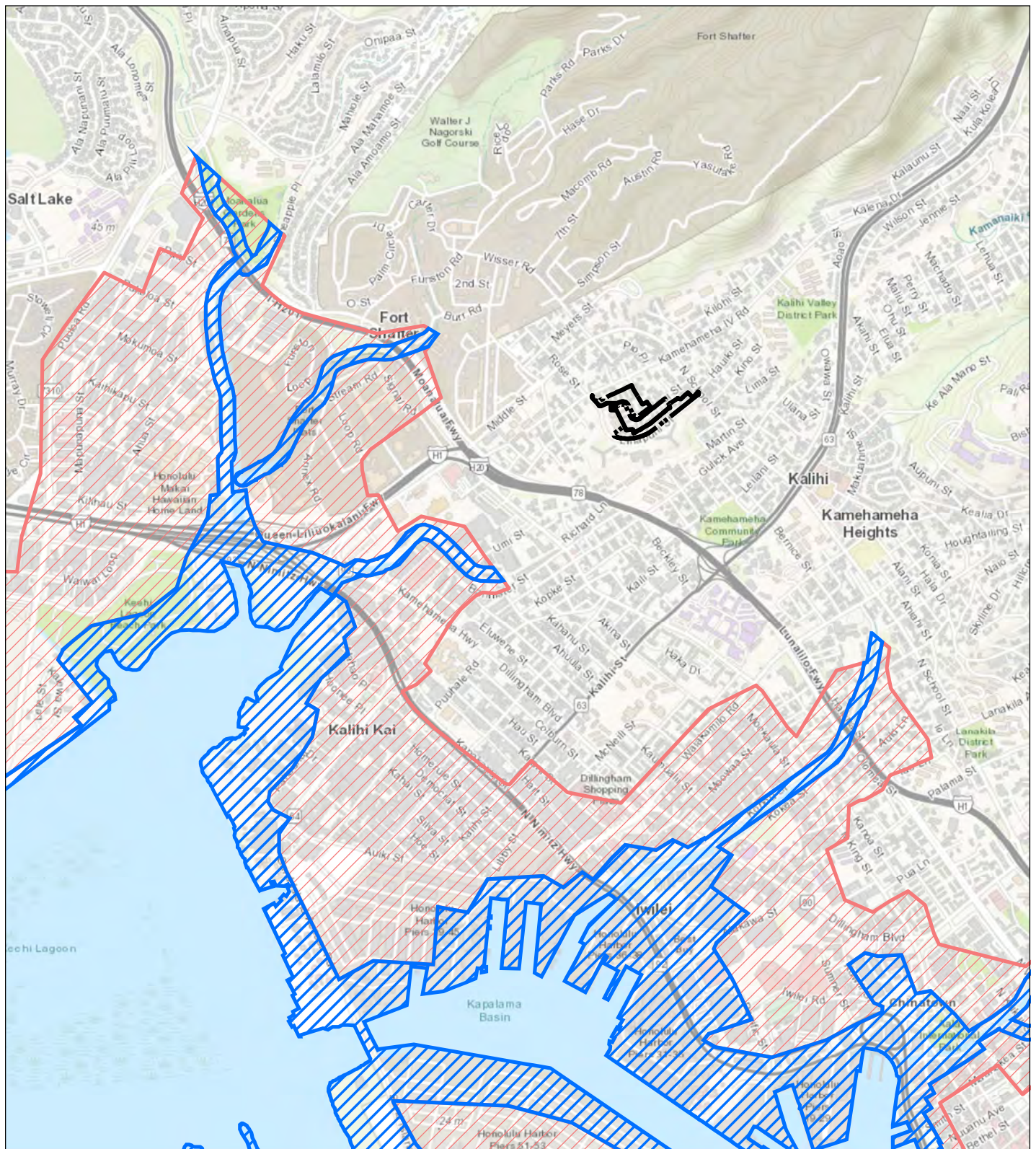


O'ahu



Source: City and County of Honolulu, 2019 & 2021. ESRI Online Basemap.

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



DATE: 6/23/2022

LEGEND

-  Project TMK Parcels
-  Tsunami Evacuation Zone
-  Extreme Tsunami Evacuation Zone

Exhibit 8: Tsunami Evacuation Zones

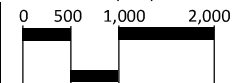
KŪHIŌ PARK TERRACE LOW-RISES AND KŪHIŌ HOMES REDEVELOPMENT

KPLR Phase 1 LP

North



Linear Scale (feet)

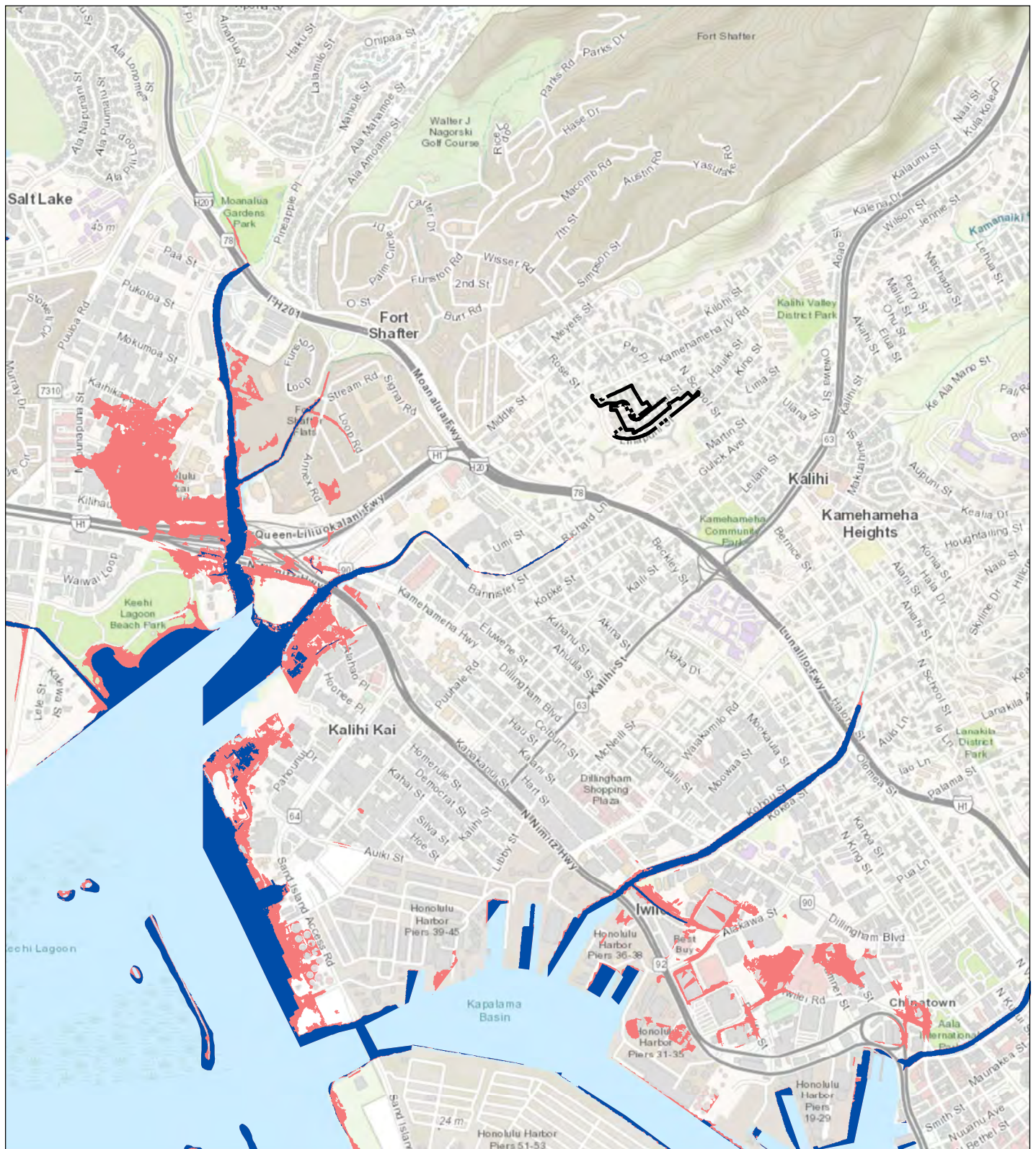


Island of O'ahu



Source: City and County of Honolulu, 2010 & 2022. ESRI Online Basemap.

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



DATE: 6/23/2022

LEGEND

-  Project TMK Parcels
-  0.5-ft Sea Level Rise Exposure Area
-  3.2-ft Sea Level Rise Exposure Area

Exhibit 9: Sea Level Rise Exposure Areas

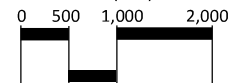
KŪHIŌ PARK TERRACE LOW-RISES AND KŪHIŌ HOMES REDEVELOPMENT

KPLR Phase 1 LP

North



Linear Scale (feet)



Island of O'ahu





U.S. Fish and Wildlife Service

National Wetlands Inventory

Exhibit 10:

USFWS National Wetlands Inventory



August 2, 2022

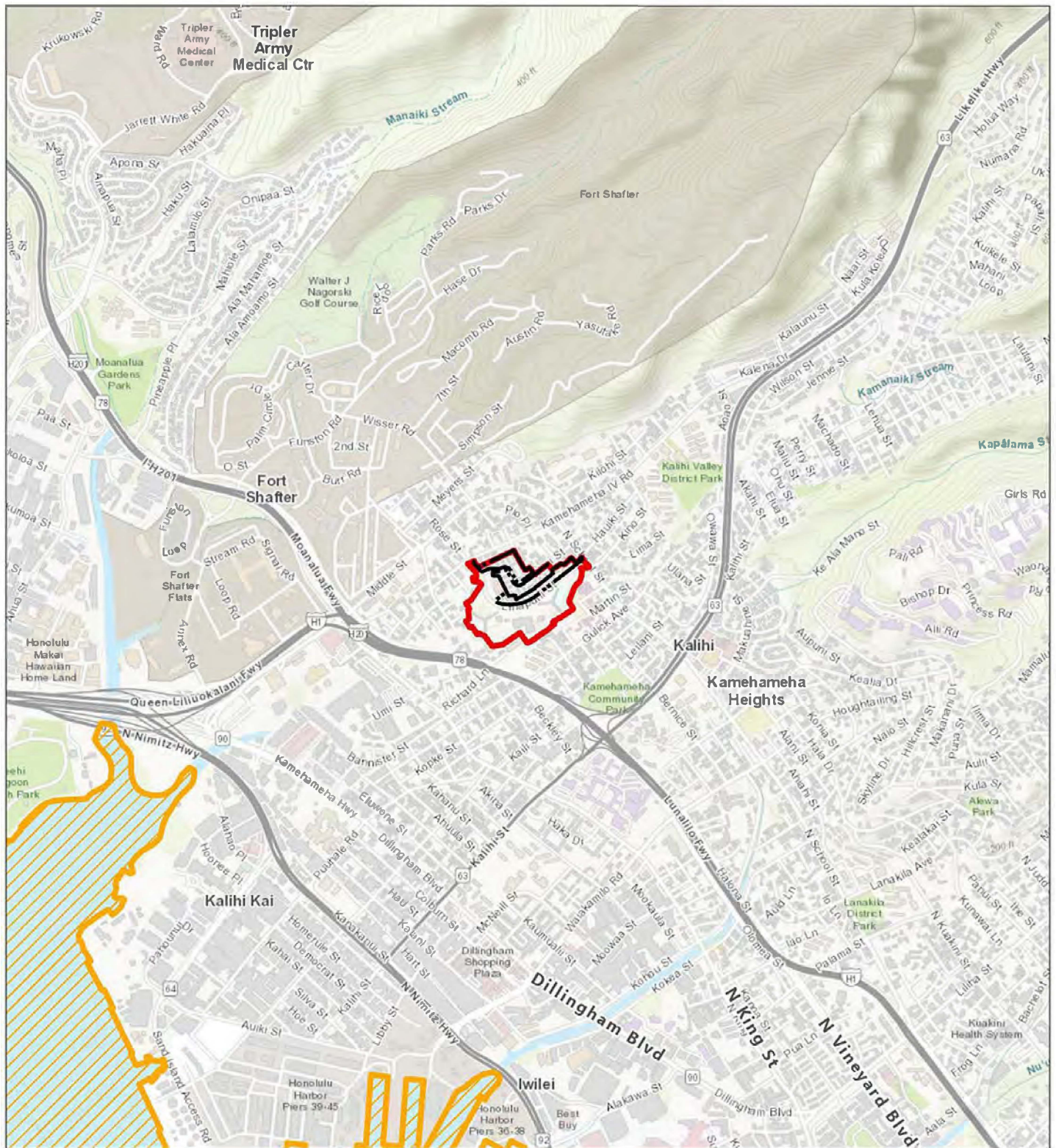
Wetlands

- Estuarine and Marine Deepwater
- Estuarine and Marine Wetland

- Freshwater Emergent Wetland
- Freshwater Forested/Shrub Wetland
- Freshwater Pond

- Lake
- Other
- Riverine

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



DATE: 7/24/2025

LEGEND

-  Project TMK Parcels
-  Kuhio Park Complex
-  NOAA Hawaiian Monk Seal Critical Habitat

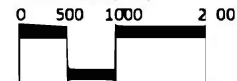
Exhibit 11: Critical Habitats

KUHIO PARK TERRACE LOW-RISES AND KUHIO HOMES REDEVELOPMENT

KPLR Phase 1 LP

North

Linear Scale (feet)



Island of O'ahu



Source: City & County of Honolulu, 2025. NOAA, 2022. ESRI Online Basemap.

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



DATE: 8/1/2022

LEGEND



Project TMK Parcels



Tax Map Key Parcels



Special Management Area

Exhibit 12: Special Management Area

KŪHIŌ PARK TERRACE LOW-RISES AND KŪHIŌ HOMES REDEVELOPMENT

KPLR Phase 1 LP

North



Linear Scale (feet)



Island of O'ahu



Source: City & County of Honolulu, 2018.

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