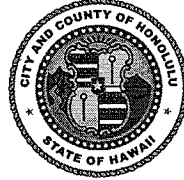


DEPARTMENT OF PLANNING AND PERMITTING  
KA 'OIHANA HO'OLĀLĀ A ME NĀ PALAPALA 'AE  
CITY AND COUNTY OF HONOLULU

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March 16, 2026

2021/ED-16(SF)

Ms. Mary Alice Evans  
Director  
Office of Planning and Sustainable Development  
Environmental Review Program  
State of Hawai'i  
235 South Beretania Street, Room 702  
Honolulu, Hawai'i 96813

Dear Ms. Evans:

SUBJECT: Revised Ordinances of Honolulu (ROH) Chapter 25  
Final Environmental Assessment (EA)  
Project: Shin New Commercial Building (Project)  
Owner: Kyung Chul Shin and Soon Ae Shin  
Applicant/Agent: Planning Solutions, Inc. (Jim Hayes and Makena White)  
Location: 87-1818 Farrington Highway – Nānākuli  
Tax Map Key: 8-7-035: 005  
Determination: Finding of No Significant Impact (FONSI)

We have reviewed the Final EA for the subject Project, which was received on January 20, 2025. Based on the requirements of ROH Chapter 25, we have determined that preparation of an Environmental Impact Statement is not required, and hereby issue a FONSI.


With this letter, the Department of Planning and Permitting transmits the Final EA and FONSI for the Shin New Commercial Building Project, located at 87-1818 Farrington Highway in Nānākuli, Oahu, for publication in the March 23, 2026, edition of *The Environmental Notice*. The Final EA includes copies of public comments received and the corresponding responses from the Applicant that were received during the 30-day public comment period on the Draft EA and Anticipated FONSI.

Ms. Mary Alice Evans  
March 16, 2026  
Page 2

Due to issues with Americans with Disabilities Act portable document format (pdf) compliance for the Project's technical studies and additional attachments to the Final EA, we have uploaded only an electronic copy of the Final EA and FONSI to your online submittal site. The conclusions and findings from the Project's technical studies and additional attachments are well represented throughout the Final EA.

Should you have any questions, please contact Shelby Frangk, of our Land Use Approval Branch, at (808) 768-8019 or via email at [shelby.frangk@honolulu.gov](mailto:shelby.frangk@honolulu.gov).

Very truly yours,

A handwritten signature in black ink, appearing to read 'Dawn', with a stylized flourish extending to the right.

Dawn Takeuchi Apuna  
Director

**NON-CHAPTER 343 DOCUMENT  
PUBLICATION FORM  
ENVIRONMENTAL REVIEW PROGRAM**

**Project Name:** New Commercial Building

**Applicable Law:** Revised Ordinances of Honolulu (ROH) Chapter 25

**Type of Document:** Final Environmental Assessment (FEA) and Finding of No Significant Impact (FONSI)

**Island:** Oahu

**District:** Waianae

**TMK:** (1) 8-7-035: 005

**Permits Required:** SMA Major Permit; HRS Chapter 6E Review; Building Permit; Trenching Permit

**Applicant or Proposing Agency: See Below**  
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808-550-4538

**Status:** Final (see above FEA and FONSI under "Type of Document")

**Project Summary:**

(Summarize proposed action and purpose/need in less than 200 words in the space below):

Applicants Kyung Chul Shin and Soon Ae Shin are proposing a new two-story commercial building on a vacant lot within the B-1 Neighborhood Business District in Nanakuli. The lot is across Farrington Highway from the beach. The building will be L-shaped in configuration surrounding an open parking lot. Two open stairways will connect the ground and second floors. The development requires approval of a Special Management Area Use Permit from the Honolulu City Council.

---

**FINAL ENVIRONMENTAL ASSESSMENT &  
FINDING OF NO SIGNIFICANT IMPACT  
NEW COMMERCIAL BUILDING  
87-1818 FARRINGTON HIGHWAY**

Substantive changes between the Draft Environmental Assessment and this Final Environmental Assessment are indicated as ~~strike throughs~~ and double underlines.

**PREPARED FOR:**  
**Roy K. Yamamoto Architect, AIA, Inc.**  
**And**  
**Soon Ae Shin**

**PREPARED BY:**



**P L A N N I N G  
S O L U T I O N S**

**JANUARY 2026**

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**LIST OF ACRONYMS**

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AFONSI	Anticipated Finding of No Significant Impact
AMP	Archaeological Monitoring Plan
BMP	Best Management Practice
CCH	City and County of Honolulu
cfs	Cubic Feet Per Second
CIA	Cultural Impact Assessment
CMU	Concrete Masonry Unit
CRM	Concrete Reinforced Masonry
CTMP	Construction Traffic Management Plan
CZM	Coastal Zone Management
DEA	Draft Environmental Assessment
DLNR	Department of Land and Natural Resources
DPP	Department of Planning and Permitting
EA	Environmental Assessment
EIS	Environmental Impact Statement
FAD	Fish Aggregating Devices
FEA	Final Environmental Assessment
FEMA	Federal Emergency Management Agency
FONSI	Finding of No Significant Impact
HAR	Hawai‘i Administrative Rules
HCC	Honolulu City Council
HDOH	State of Hawai‘i, Department of Health
HDOT	State of Hawai‘i Department of Transportation
HRS	Hawai‘i Revised Statutes
IBC	International Building Code
IPCC	Intergovernmental Panel on Climate Change
ITE	Institute of Transportation Engineers
LUO	Land Use Ordinance
MSL	Mean Sea Level
NOAA	National Oceanographic and Atmospheric Agency
OISC	O‘ahu Invasive Species Committee
OR&L	O‘ahu Railway and Land Company
PSI	Planning Solutions, Inc.
ROH	Revised Ordinances of Honolulu
SHPD	State Historic Preservation Division
SIHP	State Inventory of Historic Places
SLR	Sea Level Rise
SLR-XA	Sea Level Rise Exposure Area

SMA	Special Management Area
TMK	Tax Map Key
TA	Traffic Assessment
UBC	Uniform Building Code
USGS	U.S. Geological Survey
WSCP	Wai‘anae Sustainable Communities Plan

## 1.0 INTRODUCTION

### 1.1 Purpose and Need

The purpose of the Proposed Action is to develop the subject parcel in a manner consistent with its B-1 Neighborhood Business zoning designation and other applicable land use rules and regulations, including the Land Use Ordinance (LUO) and Shoreline Setback Ordinance. The project is needed so that one or more businesses can be established on Tax Map Key (TMK) No. (1) 8-7-035:005, which is currently vacant and undeveloped. The project is located at 87-1818 Farrington Highway in Nānākuli, O‘ahu, Hawai‘i (Figure 1-1).

### 1.2 Environmental Assessment Trigger

The project does not meet any of the triggers requiring preparation of an Environmental Assessment (EA) pursuant to Hawai‘i Revised Statutes (HRS) Chapter 343. Therefore, HRS Chapter 343 does not apply. However, the subject parcel is located entirely within the City and County of Honolulu’s (CCH) Special Management Area (SMA) (Figure 1-1), the proposed structure meets the definition of “development” in Revised Ordinances of Honolulu (ROH) Section 25-1.3, and the estimated value of the proposed development is greater than \$750,000. Therefore, an SMA Major permit is required, and, pursuant to ROH Chapter 25, an EA is a required component of a complete SMA Major Permit application involving development other than one-family and two-family detached dwellings.

This EA is intended to satisfy the ROH Chapter 25 requirement. It has been prepared in accordance with ROH Chapter 25 and meets the content and process requirements of HRS Chapter 343 and its implementing regulations contained in Hawai‘i Administrative Rules (HAR) Title 11, Chapter 200.1.

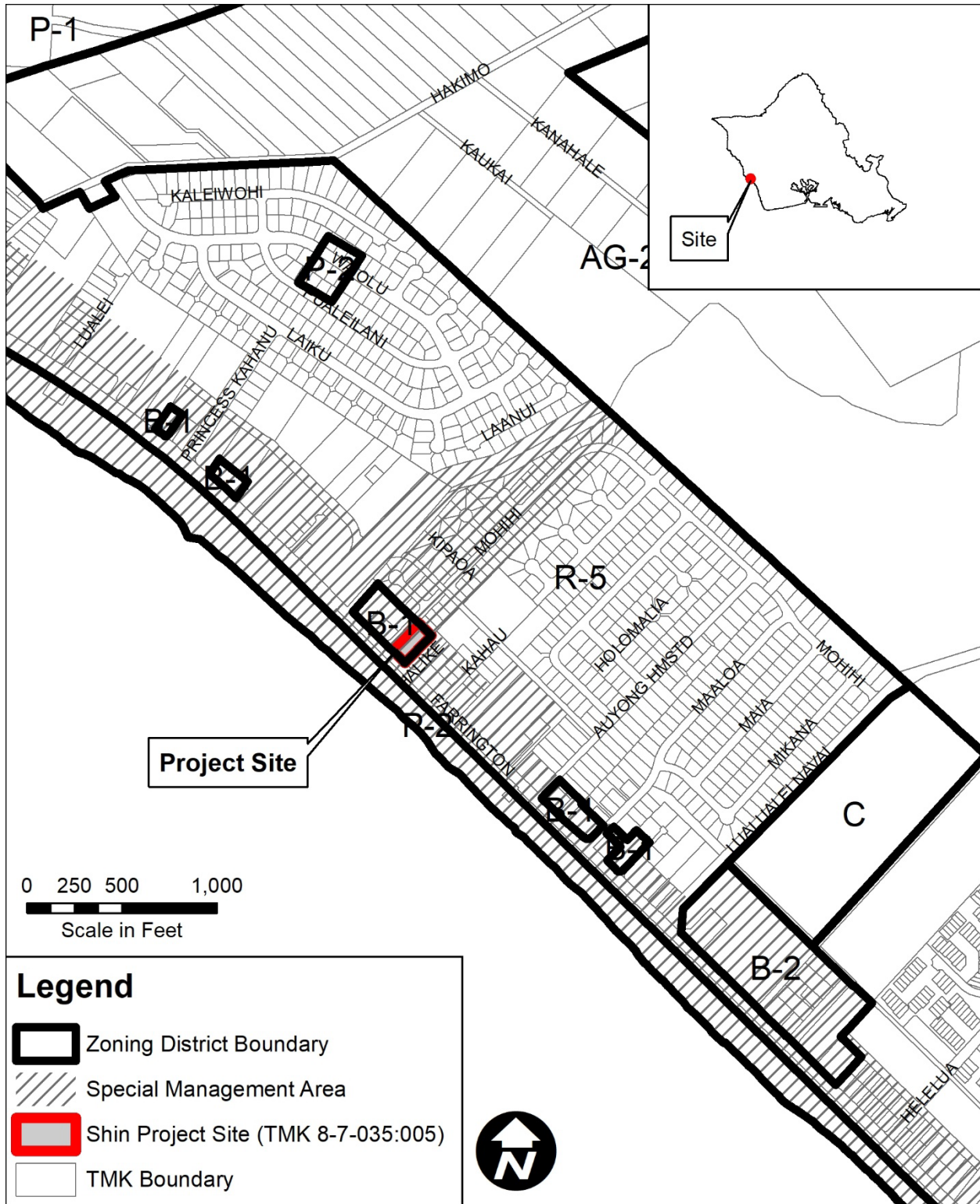
### 1.3 Early Consultation

Pursuant to HAR § 11-200.1-18(a), the applicant has sought to:

*“conduct early consultation seeking, at the earliest practicable time, the advice and input of the county agency responsible for implementing the county’s general plan for each county in which the Proposed Action is to occur, and consult with other agencies having jurisdiction or expertise as well as those citizen groups and individuals that the proposing agency or approving agency reasonably believes may be affected.”*

On behalf of the Applicant, on July 3, 2020, Hawaii Planning, LLC sent letters regarding the proposed action to the agencies identified in Table 1-1. All responses received were carefully considered during preparation of this EA.

Figure 1-1: Location, Zoning, and SMA Map



Source: Planning Solutions, Inc.

**Table 1-1: Early Consultation Letters**

Level	Department	Division	Response
Federal	U.S. Fish & Wildlife Service	--	Yes
State of Hawai'i	Department of Health (DOH)	--	No
State of Hawai'i	DOH	Environmental Planning Office	No
State of Hawai'i	DOH	Office of Environmental Quality Control	No
State of Hawai'i	DOH	Wastewater Branch	No
State of Hawai'i	Department of Land and Natural Resources (DLNR)	Land Division	No
State of Hawai'i	DLNR	State Historic Preservation Division	No
State of Hawai'i	DLNR	Office of Conservation and Coastal Lands	No
State of Hawai'i	Department of Transportation	--	Yes
State of Hawai'i	Office of Planning and Sustainable Development	--	Yes
CCH	Board of Water Supply	--	Yes
CCH	Department of Facility Maintenance	--	Yes
CCH	Department of Planning and Permitting	--	Yes
CCH	Honolulu Fire Department	--	Yes
CCH	Honolulu Police Department	--	Yes
CCH	Office of Climate Change, Sustainability and Resiliency	--	Yes
CCH	Nānākuli-Mā'ili Neighborhood Board No. 36	--	Yes

#### 1.4 Environmental Assessment Process

The EA has been prepared as an applicant action with the Department of Planning and Permitting (DPP) acting as the approving agency. The Draft EA was published in the Office of Planning and Sustainable Development, Environmental Review Program's bi-monthly bulletin, *The Environmental Notice* on October 23, 2021, which initiated a 30-day public review and comment period. After the 30-day public review period was complete, all substantive comments were considered, addressed as needed in this Final EA (FEA), and provided with a written response. The FEA reflects revisions based upon any relevant information received during the public review period. DPP will issue a Finding of No Significant Impact (FONSI) with its acceptance of the FEA.

## 1.5 Permits and Approvals

The permits and approvals required to construct the proposed development are identified in Table 1-2.

**Table 1-2: Permits and Approvals**

Permit	Issuing Authority
ROH § 25 Environmental Review	Department of Planning and Permitting
HRS Chapter 6E-42 Review	State Historic Preservation Division
Special Management Area, Major	City and County of Honolulu, County Council
Trenching Permit	Department of Planning and Permitting
Building Permit	Department of Planning and Permitting

## 2.0 PROPOSED PROJECT AND ALTERNATIVES

The proposed project involves constructing a new, two-story commercial building on a vacant lot at 87-818 Farrington Highway in Nānākuli. The building will be L-shaped in configuration surrounding an open parking lot. Two open stairs, one at the mauka and one at the makai end, will connect the ground and second floors. The proposed development is designed to be consistent with the parcel’s B-1 Neighborhood Business zoning (Figure 1-1) and other applicable land use rules and regulations, including the LUO and Shoreline Setback Ordinance. The commercial building will be developed in a similar style and manner consistent with other commercial properties in the rural community commercial center of Nānākuli.

### 2.1 Project Site Description

The subject parcel (TMK 8-7-035:005) is in the SMA (Figure 1-1) but is not a shoreline lot. The recorded owners of the parcels are Kyung Chul Shin and Soon Ae Shin with an address of 99-045 Hokio Place, Aiea, Hawai‘i, 96701. The parcel is accessed via a driveway off Mōhihi Street. Recent site conditions are illustrated on Figure 2-1 and Figure 2-2. Characteristics of the subject parcel are summarized below in Table 2-1.

**Table 2-1: Characteristics of the Project Parcels**

Lot Area and Zone	19,737 square feet/0.4531-acre SLU Urban District; B-1 Neighborhood Business
Easements	None
Lot Shape	Rectangular
Topography	The site is essentially flat, with a ground elevation ranging from roughly 8.5 to 9.4 feet above mean sea level (+msl).
Current Development	The lot is vacant except for a chain-link perimeter fence and a concrete reinforced masonry (CRM) wall along the western boundary of the parcel.
Surrounding Uses	To the northeast and southeast there are single-family dwellings in the R-5 Residential zone. To the southwest is Farrington Highway, with the beach and Pacific Ocean beyond. To the northwest is Mōhihi Street.
Nearest Bodies of Water	The Pacific Ocean, immediately to the southwest across Farrington Highway, is designated as an estuarine and marine wetland.
Certified Shoreline Survey	The shoreline is roughly 135 feet to the southwest of the project parcel, across Farrington Highway. A shoreline certification is not required.
Soil Classifications	Coral outcrop (CR), with a 3 to 20 percent slope.
Vegetation	The site is a vacant lot covered by low weedy types of grasses and other scrub vegetation.
Flood Zone	Flood Zone D; unstudied area where flood hazards are undetermined, but flooding is possible (Figure 3-4).
Erosion Rate	-0.17 feet per year
Tsunami	Tsunami Evacuation Zone

**Figure 2-1: Aerial Photograph (2025) of Recent Site Conditions**



Source: Google Earth; satellite photo dated March 2025.

**Figure 2-2: Ground-Level Photographs of Existing Site Conditions**

a. View facing south of the project site from Mōhihi Street near its intersection with Farrington Highway.



b. View facing south looking over the project site with adjacent dwellings beyond.



c. View facing southeast from the project site with adjacent dwellings in background.



b. View facing east from the project site with adjacent dwellings in background.



Source: Hawaii Planning, LLC (2021).

## 2.2 Project Description

The large-scale elements of the project, such as the building and parking area geometry, are unlikely to change as the design progresses from the concept presented in this section. Other elements, such as the internal floor plan, may be modified somewhat as the design progresses. Modifications to the project as the design progresses will not change the fact that the project is consistent with applicable plans, policies, or controls, nor will the modifications cause a change in the impact assessment in Chapter 3.0.

### 2.2.1 Description of Activities and Development Proposed

Generally, the proposed project will advance through the following stages once all necessary permits and approvals are obtained:

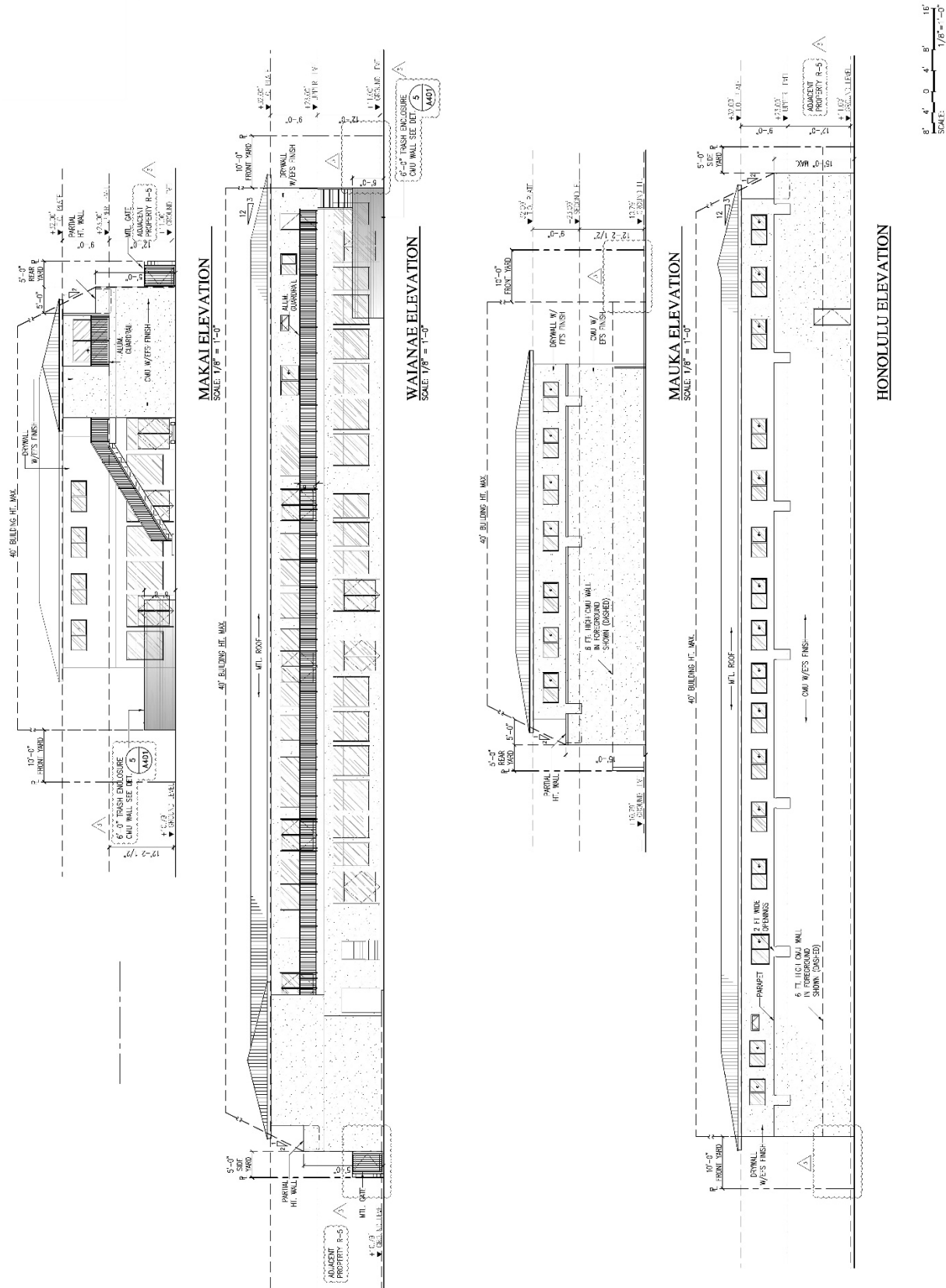
- Establish temporary Best Management Practices (BMPs).
- Demolish and remove minor existing developments (e.g., chain-link fence, CRM wall, etc.).
- Construct developments:
  - *Ground floor.* The ground floor of the two-story commercial building will have 6 loft spaces, plus a women's and men's bathroom.
  - *Upper floor.* The upper floor will have 5 loft spaces along with a residential caretaker's unit with two bathrooms.
  - *Parking area.* The parking area will have 21 parking stalls and 1 loading space. It will be accessible via a driveway off Mōhihi Street.
- Establish retention/infiltration trench and landscape exposed areas prior to removing temporary BMPs.

All proposed project development will be confined to the project parcel (TMK No. 8-7-035:005). No development is proposed in the shoreline setback area. All developments will conform to applicable regulations and standards. The BMPs and proposed development are discussed in the sections below. Once construction activities have been completed, the development will be used as a rural commercial development. Figure 2-3, Figure 2-4, and Figure 2-5 illustrate the project plans.





Figure 2-5: Conceptual Elevation



Source: Roy K. Yamamoto Architect (2025)

### *Construction Best Management Practices*

Temporary BMPs will be implemented throughout the entire construction process from mobilization to site stabilization. The BMPs will be employed to manage fugitive dust, storm water runoff, solid waste, and address other topics.

Physical BMPs will be established prior to ground-disturbing activities and will include the use of silt fences and/or silt socks to manage storm water runoff and a stabilized construction site ingress and egress. The plans submitted to obtain building permits will detail the erosion and sediment control BMPs.

Throughout the construction period administrative BMPs will be implemented, including:

- Conduct construction activities in compliance with (i) Honolulu's *Rules Relating Storm Drainage Standards*, (ii) ROH Chapter 14 regarding Public Works Infrastructure Requirements, (iii) HAR § 11-54 *Water Quality Standards*, and (iv) HAR § 11-55 *Water Pollution Controls*. Typical measures will include establishing and maintaining appropriate construction BMPs until the parcel has been stabilized, appropriately stockpiling materials on-site to prevent runoff, limiting the total area of exposed earth, and establishing landscaping as early as possible on disturbed areas.
- Materials will be delivered in phases, as needed, as the construction progresses so that all construction staging can and will occur on-site.
- All work will be carried out during standard work hours: Monday through Friday (excluding holidays) from 7 a.m. to 6 p.m. and Saturday from 9 a.m. to 6 p.m. and comply with all applicable provisions of HAR § 11-46 *Community Noise Control*. No work will be conducted between sunset and sunrise that would require exterior lighting. If any powered impact tools need to be used (e.g., jackhammer), they will be used after 9 a.m. to reduce potential impacts.
- Maintaining all construction equipment in proper tune according to manufacturer's specifications and further minimize noise by properly maintaining mufflers and other noise-attenuating equipment.
- Fueling all off-road vehicles and equipment, including but not limited to backhoes, tractors, generator sets, and compressors, in a designated location with sufficient spill response equipment and materials.
- Providing notifications periodically to nearby residents.
- Coordinating worker travel and parking to manage the number of vehicle trips and to conduct parking either on-site or in appropriate nearby areas.
- Reusing excavated material on-site to fill trenches or grade the site to the extent possible.

### *Proposed Developments*

The proposed development will conform to all applicable regulations and standards. For example, the structure will be: (i) outside of all yards and setbacks, including the shoreline setback, (ii) lower

than the applicable height limit of 40 feet, and (iii) not exceed the allowable floor area ratio (Table 3-4).

As shown on Figure 2-3, Figure 2-4, and Figure 2-5, the development consists of a two-story commercial building and appurtenances. Important aspects of the design include:

- *First floor.* A first floor with 6 lofts, a women's restroom, men's restroom, an electrical room, and custodian closet. The first floor will have a floor elevation of 10 feet and a floor area of 5,748 square feet.
- *Second floor.* The second floor will consist of 5 lofts. In addition, the caretaker's unit will include a living/dining area, kitchen, master bedroom and master bathroom, one additional bedroom, and a second bathroom. The second floor will have a floor area of 4,726 square feet with the caretaker unit being roughly 800 square feet.
- *Parking lot and walkways.* The L-shaped building will surround an open, ground-level parking lot accessed via a driveway off Mōhihi Street. The parking lot will have 21 parking stalls including 2 handicapped stalls, plus a loading space, and short-term and long-term bicycle parking. Two open stairs, one at the mauka and one at the makai end of the building, will connect the ground and second floors. Access will be provided via a 5-foot-wide walkway fronting the lofts on the ground floor, and a 4-foot-wide walkway on the second floor.
- *Lighting.* All lighting for the Project will be designed to minimize environmental impacts and to be compatible with the surrounding residential neighborhood. Fixtures will be low in height, fully shielded, and directed downward to prevent glare and light spill onto adjacent properties. Color temperatures will be limited to warm, low-Kelvin lighting ( $\leq 4000\text{K}$ ) to reduce skyglow and potential impacts on wildlife. Lighting levels will be kept at the minimum necessary for safety, and automatic timers or controls will be used to ensure that lights operate only during required evening hours.
- *Boundary wall and gates.* A 6-foot perimeter concrete masonry unit (CMU) wall will be placed on the northeast and southeast parcel boundaries. A CMU wall will also form the trash enclosure and bicycle parking on the makai side of the parcel.
- *Bicycle parking and trash enclosure.* Five short-term and one long-term bicycle parking stalls will be located on the makai side of the parcel. Adjacent to the bicycle parking will be a trash enclosure.
- *Landscaping.* Landscaping will generally be drought and salt-tolerant and be naturally hardy or endemic to the shoreline area. A sprinkler system will be installed to provide irrigation for the landscaping; the irrigation system will be designed in a manner that prevents water from traversing the property line.
- *Utility Connections.* See Section 2.2.3 regarding utilities. Utilities will be connected to the development using aboveground and/or underground connections. A new Hawaiian Electric pad mounted transformer will be located along Mōhihi Street. A new duct line will run from the existing utility pole on Farrington Highway to the transformer.

The proposed construction can be accomplished with standard construction equipment; no novel equipment or techniques are required to complete the project. Limited excavations will be necessary for building foundation elements and utility trenches (e.g., water, sewer, and irrigation). To the extent possible, excavated material will be reused on-site to fill trenches or used to generate level ground for the parking areas and other portions of the parcels.

### 2.2.2 Foundations, Excavations, and Fill

The site is generally level; the topography will be modified to accommodate the proposed development. Earthwork, fills, and foundations will generally consist of the following:

- Infiltration trench. Excavation of the 170-foot-long, 5-foot-wide, and 5.5-foot-deep infiltration trench along the Mōhihi Street side of the property and around the Farrington Highway corner. This will result in roughly 173 cubic yards of excavation. The infiltration trench will be backfilled with clean drain rock grade A #2 course wrapped in Mirafi 140N or equal filter fabric. Accounting for the 24-inch-diameter perforated pipe, roughly 153 cubic yards of drain rock will be imported and used as backfill.
- Driveway and parking lot. Various depths of excavation, generally not exceeding half a foot, will be required prior to construction in the building area, resulting in roughly 100 cubic yards of excavation. The driveway and parking lot will consist of a 6-inch-thick layer of base course (structural fill) with a 2-inch-thick layer of asphaltic concrete. This will result in the importation of roughly 160 cubic yards of structural fill.
- Building. Various depths of excavation, generally not exceeding one foot, will be required prior to construction in the building area, resulting in roughly 220 cubic yards of excavation. The building will have a 6-inch-thick, reinforced, concrete slab-on-grade foundation over a 10-mil vapor barrier and 4-inches of cushion/structural fill. Spread footings will be along the perimeter of the building and some interior walls. The volume of structural fill necessary is roughly 85 cubic yards.
- Utility trenches. Trenches will be dug for water service connection, sewer service connection, and electrical conduit for parking lot lighting. These trenches will typically be 3 to 4 feet deep and 2 feet wide. Cushion/structural fill will be used to backfill around the utility. Minor amounts of structural fill will be imported for this purpose.

In total, there will be approximately 500 cubic yards of excavation, roughly 153 cubic yards of drain rock imported, and approximately 250 cubic yards of structural fill imported. Excess native soil will be disposed of properly off site by the contractor.

### 2.2.3 Utilities Requirements

The proposed development will require potable water, electricity, communication, sewer, and solid waste services. These services are all present in the area and readily available, as follows:

- Hawaiian Electric power is available via underground ductlines and overhead lines in the project area. A new Hawaiian Electric pad mounted transformer will be located along Mōhihi Street to provide electricity for the proposed project. A new ductline will run from the existing utility pole on Farrington Highway to the transformer.

- Hawaiian Telcom and/or Spectrum communication is available from underground and overhead lines in the project area.
- The Board of Water Supply has a water line under Farrington Highway, and the project site will be served by the Nānākuli 242 Reservoir.
- The existing municipal sewer system serving the project area includes several gravity lines along Farrington Highway. There is an existing 6" waste line below grade at Mōhihi Street. Wastewater collected by these lines is conveyed to the Wai‘anae Wastewater Treatment Plant for treatment and disposal through an ocean outfall.
- The proposed commercial development will rely on a private refuse collection company. Solid waste from residential and commercial properties within the project area not recycled or diverted to the waste-to-energy plant, will be disposed of at the Waimānalo Gulch Sanitary Landfill. Construction waste will be disposed of at the Nānākuli Landfill, also known as Lualualei Landfill, located on Lualualei Naval Road.

#### 2.2.4 Site Drainage

A drainage study prepared by Hida, Okamoto, and Associates, Inc. was used to inform this section. The existing site is level and overgrown with grass. Storm water currently surface flows towards Mōhihi Street and to Farrington Highway, to an existing catch basin at the intersection.

The estimated pre-development stormwater runoff is estimated to be 0.92 cubic feet per second (cfs). Once developed as proposed, stormwater runoff is expected to increase to 2.31 cfs, for an increase of 1.39 cfs. The on-site stormwater will be directed to a new stormwater retention system consisting of a 170-foot long by 5-foot wide by 5.5-foot-deep gravel infiltration trench with a 24-inch diameter HDPE perforated pipe located within the planter areas along the Mōhihi Street frontage and curb return frontage at the Mōhihi/Farrington Highway corner of the site.

The storm water retention system is designed to retain runoff from a 10-year, 1-hour storm (the design storm) so there will be no increase in off-site storm water flows during a design storm. The retention system will collect, retain, and filter all design storm runoff within the planter areas prior to stormwater flowing off site.

During larger storms, such as 50-year or 100-year events, storm water generated on-site may exceed the capacity of the retention system. During these larger storms, storm water runoff will continue to be directed to on-site landscaped areas and the retention system. Storm water exceeding the capacity of on-site infiltration and retention will flow to the storm drain at the southern corner of the Mōhihi Street/Farrington Highway intersection. According to information available from the CCH, a 24-inch-diameter pipe extends from that storm drain to Ulehawa Stream channel.

#### 2.2.5 Project Schedule and Value

It is anticipated, once all necessary permits have been obtained, it will take roughly 1.5 years to build the proposed development.

The total value of the proposed development is estimated to be roughly \$2,500,000.

## **2.3 Alternatives**

### 2.3.1 Framework for Consideration of Alternatives

Title 11, Chapter 200.1, HAR contains the State of Hawai‘i, Department of Health (HDOH) environmental review rules. HAR, § 11-200.1-9 deals with applicant actions such as the proposed project. It requires that, for actions not exempt, the applicant must consider the environmental factors and available alternatives and disclose those in an EA or Environmental Impact Statement (EIS). HAR § 11-200.1-18 establishes the process for the preparation and content of an EA. Among the requirements listed, HAR § 11-200.1-18(d)(7) requires the identification and analysis of impacts of alternatives considered during project planning.

In accordance with those requirements, the Applicant has considered several alternatives before determining that the Proposed Action and project described above is its preferred alternative. The process consisted of formally defining the purpose and need for the project (Section 1.1), identifying other ways in which those objectives might be achieved (i.e., alternatives, including those specifically recommended by HRS, Chapter 343 and HAR § 11-200.1), and evaluating each alternative with respect to the project’s objectives. Possibilities considered included the “No Action Alternative,” alternative locations, alternative configurations for the project, alternative scales for the proposed project, and alternative timing (i.e., delayed action).

### 2.3.2 Alternatives for Detailed Consideration

The Applicant has concluded that the only alternatives that merit detailed consideration in this EA are:

- The Proposed Action Alternative. This alternative is described previously in this chapter (Section 1.2 and Section 2.2). The Applicant has concluded that constructing and occupying facilities at the project parcel on its present timeline will enable it to best meet its purpose and need, as described in Section 1.1. Thus, the Proposed Action represents its preferred alternative.
- The No Action Alternative. Under the No Action Alternative, existing conditions on the project parcel would not change. No attempts would be made to construct a commercial building, and the property would remain as vacant, unused land. The No Action alternative would preclude any of the short or long-term impacts described in this EA. While the No Action Alternative does not meet the project’s purpose and need as defined in Section 1.1, it is considered here pursuant to the recommendations of HRS, Chapter 343 and HAR § 11-200.1, and to provide a baseline for comparison and contrast with the action alternative (i.e., the Proposed Action).

Only these two alternatives are analyzed in Chapter 3.0.

### 2.3.3 Alternatives Considered but Rejected

The following subsections briefly describe the other alternatives considered and the factors that were used to decide they should be excluded from detailed consideration.

### *Alternative Scale*

In considering the needs of the project, the Applicant considered constructing a commercial building at the same location, but with an alternative scale. The scale could be larger or smaller than the project outlined in Section 2.2. The subject site could host fewer/smaller or more/larger commercial spaces. Having evaluated the larger scale possibility, it was determined it would present planning and design challenges and run the risk of exceeding demand for commercial space in the area. A smaller scale development was determined to be less attractive because it would not provide sufficient return on investment. Therefore, the Applicant eliminated these scale alternatives from further consideration.

### *Delayed Action Alternative*

As noted previously, HAR § 11-200.1 recommends the consideration of a variety of alternatives, including those of a substantially different nature than the Proposed Action, to include alternative timing (i.e., delayed action). The Applicant's Proposed Action is for the sole purpose of developing a commercial building at 87-1818 Farrington Highway, meeting the purpose and need identified in Section 1.1. As such, a delayed action alternative would address neither the Applicant's purpose nor needs. Further, prolonging development of the commercial building would offer no countervailing advantages. For these reasons, the Applicant has determined that a delayed action alternative is not a viable option and eliminated it from further consideration in this EA.

### *Alternative Location*

HAR § 11-200.1 also recommends the consideration of alternative locations for a proposed action. Effectively, the choice of sites was made when the Applicant acquired the parcel, which is zoned for the proposed use. The Applicant believes the parcel possesses all the characteristics which make it a desirable location for the proposed project, and that other available sites did not possess the same combination of characteristics which make the current location ideal for the proposed use. Owning the parcel, which possesses the appropriate underlying zoning, and other characteristics, the Applicant can see no advantage to further investigating alternative locations. Although the proposed site is identified by the Wai'anāe Development Plan Land Use Map as "Rural Residential," the City and County Zoning designation is B-1 Neighborhood Business, indicating the CCH's desire to see the site used for businesses serving and supporting the surrounding community. The proposed project is consistent with this zoning. For these reasons, the Applicant has determined that an alternative location is not a reasonable option and eliminated it from further consideration in this EA.

### 3.0 EXISTING ENVIRONMENT, PROJECT EFFECTS, AND SMA/CZM CONSISTENCY

This chapter describes the potential environmental effects of the Proposed Action as described in Chapter 2.0. The discussion in Sections 3.1 through 3.103.9 address the development proposed on the parcel. This chapter is organized by SMA/CZM resource category (e.g., recreational resources, historic and cultural resources, etc.). The discussion under each topic includes: (i) an overview of existing conditions on the project site; (ii) the applicable ROH Chapter 25 SMA and HRS Chapter 205A CZM objectives, policies, and guidelines; (iii) the potential environmental impacts that may occur as a result of implementation of one of the alternatives considered in this EA; and, where appropriate, (iv) any measures that will be employed to avoid, minimize, or mitigate potential adverse effects.

The scale of the discussion is commensurate with the potential for impacts. Where appropriate, the larger environmental context (e.g., Leeward O‘ahu) is discussed, and in other cases the focus is narrower (e.g., the project site). The discussion of impacts also distinguishes between short-term impacts (i.e., those occurring when construction equipment and personnel are actively implementing demolition and construction processes) and those that may result over the long-term because of the project.

Table 3-1 provides an overview of the resources and SMA/CZM topics discussed in this chapter. The three right columns provide a quick reference regarding the impact or consistency assessment.

**Table 3-1: Summary of Impact Assessment**

SMA/CZM Resource	Less Than Significant with Measures	Less than Significant Impact	No Impact/ Is Consistent
<b>A. Recreational Resources (Section 3.1)</b>			
Access to Beaches, Coastal Dunes, Recreational Areas, and Natural Reserves		X	
Preserves Recreation Areas and Wildlife Preserves			X
<b>B. Historic and Cultural Resources (Section 3.2)</b>			
Historic Archaeological Resources	X (Section 3.2.5)		
Historic Architectural Resources			X
Cultural Resources			X
<b>C. Scenic and Open Space Resources (Section 3.3)</b>			
Coastal Scenic and Open Space			X
Alterations to Landforms/Vegetation			X
Scenic or Recreational Amenities			X
<b>D. Coastal Ecosystems (Section 3.4)</b>			
Critical Habitat			X
Protected Flora			X
Protected Fauna	X (Section 3.4.4)		
Invasive Species	X (Section 3.4.4)		
Solid and Liquid Waste Treatment			X

SMA/CZM Resource	Less Than Significant with Measures	Less than Significant Impact	No Impact/ Is Consistent
<b>E. Economic Uses (Section 3.5)</b>			
Facilities and Development Important to State's Economy			X
Consistent with Minimizing Exposure to Coastal Hazards			Consistent
Consistent with Minimizing Adverse Social, Visual, and Environmental Impacts			Consistent
<b>F. Coastal Hazards (Section 3.6)</b>			
Reduces Risks of Coastal Hazards on Life and Property			X
Designed to Minimize Impacts From:			
Landslides			X
Erosion			X
Sea Level Rise			X
Siltation			X
Failure in Event of Earthquake	X (Section 3.6.4)		
Flood / Storm Surge / Tsunami	X (Section 3.6.4)		
<b>G. Managing Development (Section 3.7)</b>			
Consistent with HRS Chapter 205A CZM			Consistent
Consistent with HRS Chapter 205 Agricultural Lands			Consistent
Compliant with HRS Chapter 6E Historic Preservation			Consistent
Consistent with O'ahu General Plan			Consistent
Consistent with North Shore Sustainable Communities Plan			Consistent
Consistent with ROH Chapter 21 Land Use Ordinance			Consistent
Consistent with ROH Chapter 26 Shoreline Setback Ordinance			Consistent
Consistent with ROH Chapter 25 Special Management Area Ordinance			Consistent
Consistent with Provided Opportunity for Public Input			Consistent
<b>H. Beach and Coastal Dune Protection (Section 3.8)</b>			
Beaches and Coastal Dunes			X
Natural Shoreline Processes			X
Loss Due to Erosion			X
<b>I. Marine and Coastal Resources (Section 3.9)</b>			
Water Resources (surface and ground)			X
Scenic and Recreational Amenities			X
Wetlands (Section 3.4)			X
<b>J. Cumulative Impact or Significant Effect and Compelling Public Interest (Section 3.10)</b>			
Cumulative Impact or Significant Effect			X
Public Health, Safety, or Compelling Public Interest			X

### 3.1 Recreational Resources

#### 3.1.1 Existing Conditions

The proposed project site is not a public recreational resource. The nearest public recreational resources are:

- *Parks*. The proposed project is in the CCH Department of Parks and Recreation's District III, which encompasses 49 of its parks on the Leeward side of O'ahu from Waipahū to Mākaha. These include: (i) beach parks, (ii) community parks, (iii) regional parks, (iv) senior centers, and (v) community centers. The District III administrative office is located at 94-230 Paiwa Street in Waipahū. The nearest CCH park to the project parcel is Ulehawa Beach Park approximately 400 feet to the northwest.
- *Shoreline Access*. The parcel is not a shoreline lot and is located on the mauka side of Farrington Highway. The shoreline is roughly 130 feet from the parcel. The closest public shoreline access point is immediately across the highway from the project site.
- *Marine-based Recreational Resources*. According to the *Atlas of Natural Hazards in the Hawaiian Coastal Zone* (2002), the coastline fronting Nānākuli and the project site is a combination of rocky coastline and narrow beaches with fringing reef. Ulehawa Beach Park and the Pacific Ocean, directly across Farrington Highway from the project site, provide public recreation opportunities, including surfing, boating, paddling, fishing, snorkeling, swimming, sunning, and oceanside relaxation.
- *Lateral Shoreline Movement*. The shoreline in the vicinity of the project, including Ulehawa Beach Park, is wide enough to allow for both recreational activity (e.g., sunning and relaxation) and lateral movement along the shoreline for extended distances in both directions. It is very typical to see people moving laterally along the shoreline in the area and there are no unnatural impediments to doing so. The project site is not a shoreline parcel, and the proposed commercial development will not interact with lateral shoreline movement in any way.

#### 3.1.2 SMA and CZM Objectives, Policies, and Guidelines

Development within the SMA should provide coastal recreational opportunities to the public. Adequate access, by dedication or other means, to beaches, coastal dunes, recreation areas, and natural reserves must be provided to the extent consistent with sound conservation principles. Adequate and properly located public recreation areas and wildlife preserves must be preserved. The Council shall seek to minimize, where reasonable: 1) Any development which would reduce the size of any beach or other areas usable for public recreation; and 2) Any development which would reduce or impose restrictions upon public access to tidal and submerged lands, beaches, portions of rivers and streams within the SMA, and the mean high tide line where there is no beach.

The recreational objective of the CZM program is to provide coastal recreational opportunities accessible to the public. Its policies are to:

- A) Improve coordination and funding of coastal recreational planning and management; and

B) Provide adequate, accessible, and diverse recreational opportunities in the coastal zone management area by:

- i) Protecting coastal resources uniquely suited for recreational activities that cannot be provided in other areas;
- ii) Requiring restoration of coastal resources that have significant recreational value, including but not limited to coral reefs, surfing sites, fishponds, sand beaches, and coastal dunes, when these resources will be unavoidably damaged by development; or requiring monetary compensation to the State for recreation when restoration is not feasible or desirable;
- iii) Providing and managing adequate public access, consistent with conservation of natural resources, to and along shorelines with recreational value;
- iv) Providing an adequate supply of shoreline parks and other recreational facilities suitable for public recreation;
- v) Ensuring public recreational uses of county, state, and federally owned or controlled shoreline lands and waters having recreational value consistent with public safety standards and conservation of natural resources;
- vi) Adopting water quality standards and regulating point and nonpoint sources of pollution to protect, and where feasible, restore the recreational value of coastal waters;
- vii) Developing new shoreline recreational opportunities, where appropriate, such as artificial lagoons, artificial beaches, and artificial reefs for surfing and fishing; and
- viii) Encouraging reasonable dedication of shoreline areas with recreational value for public use as part of discretionary approvals or permits by the land use commission, board of land and natural resources, and county authorities; and crediting such dedication against the requirements of section 46-6.

### 3.1.3 Potential Impacts and SMA/CZM Consistency

The proposed development will have no effect on coastal access or recreational resources. The parcel is not a shoreline lot, is mauka of Farrington Highway, and is roughly 130 feet from the shoreline. There is no public shoreline access on or across the proposed project. All development will take place entirely within TMK No. 8-7-035:005, which is a privately owned commercial parcel.

The proposed development will not result in any impact to public open spaces or recreational opportunities. No development is proposed in the shoreline setback area. No development or activity is proposed within the State's Conservation Land Use District. Therefore, the proposed project is unlikely to have any adverse impact on publicly accessible recreational resources and is consistent with the SMA/CZM objectives, policies, and guidelines presented in Section 3.1.2.

### 3.1.4 Avoidance, Minimization, or Mitigation Measures

No adverse effects to recreational resources are anticipated. The Applicant will implement the following measures to further reduce the potential for adverse effects:

- Construction staging will occur on the project parcel.
- The irrigation system will be designed and operated in a manner that does not allow irrigation water to leave the site.

## 3.2 **Historic and Cultural Resources**

### 3.2.1 Existing Conditions

The Applicant has worked with Keala Pono Archaeological Consulting, LLC to assess the potential for impacts to cultural, historic, or archaeological resources. The resulting cultural report, Ka Pa'a Kai Analysis for the Proposed Two-Story Commercial Building Project at 87-1818 Farrington Highway, Lualualei Ahupua'a, Wai'anae District, Island of O'ahu, TMK: (1) 8-7-035:005 (Keala Pono, 2025a) and the archaeological report, Archaeological Literature Review and Field Inspection for 87-1818 Farrington Highway, Lualualei Ahupua'a, Wai'anae District, Island of O'ahu, TMK: (1) 8-7-035:005 (Keala Pono, 2025b) form the basis for the information and analysis in this section.

The archaeological report (Keala Pono, 2025b) indicates that no historic resources have been identified within the project site. The field visit identified two possible surface features of indeterminate age: an uneven but smooth pavement, likely a former sidewalk, southwest of the lot entrance along Mōhihi Street; and a fragment of waterworn concrete and basalt aggregate near the northern corner of the project area, northeast of the concrete slab.

#### *Historic Context*

Wai'anae was home to ruling chiefs at different times in O'ahu's history. The district of Wai'anae is a dry leeward coastal area with only four minor streams that reach the sea. Despite the challenging conditions for agriculture, sweet potato fields and coconut trees were common in the dry lowland area before Western contact (Handy et al. 1972:468). It does have especially rich deep-sea fishing just offshore and beyond Ka'ena Point. Given these conditions, this coast was likely never the most heavily populated area of the island before Western contact.

Place names often reflect traditional views and uses of an area, thus providing important contextual information. Wai'anae literally translates to 'mullet water,' which refers to the abundant fishing in the area. Wai translates specifically to "fresh water of any kind, stream or river" while 'anae refers to mullet. Wai'anae may have been named for an inland lake called Pūhā where a mo'o named Pūhā-wai (water hollow) was said to have lived. Pūhā-wai was noted for stealing a woman's husband who was later returned by the wind god Makani-ke-oe.

Lualualei is a word composed of Lualua, which translates to "relaxed or let down," and lei, which translates to "beloved one or wreath." One possible meaning of the name is "flexible wreath." The more likely translation is "beloved one spared," which was the name given to a child born to a man who had been spared by the king.

Kapuhawaii is a sacred spring located on military lands “far up Lualualei.” Water from this spring is said to have been used on “carefully tended terraces” which were still producing taro in the 1940s from the “ancient plantings” (Handy 1940 cited in Sterling and Summers 1978:63). Many of these places, as well as others in the region, are listed in *Place Names of Hawaii* (Pukui et al. 1974) as quoted below.

*Nānā-kuli. Land section...stream, valley...and surfing area...Lit., look at knee (said to be named in honor of the tattooed knee of Ka‘ōpuluhulu, a priest whose chief, Ka-hahana, turned a deaf [kuli] ear to his advice, and when asked about his knee, told of his relationship with the chief, thus rebuking him); or look deaf (said because people in the area had not enough food to offer passersby; hence they looked at them and pretended to be deaf). (Pukui et al. 1974:162)*

Wai‘anae was a part of larger historical processes shaping politics and the control of resources across O‘ahu and the greater Hawaiian archipelago long before Westerners appeared. Over the course of the 16th and 17th centuries rule in the islands was increasingly consolidated into fewer hands. Single ali‘i eventually ruled entire islands that had once been divided up, although lesser chiefs retained a degree of local power. Before this consolidation, the Ko‘olau, ‘Ewa-Wai‘anae-Waiālua, and Kona districts of O‘ahu were ruled by independent chiefs. By the mid-18th century, the great island-wide kings of Hawai‘i Island and Maui began extending their rule between islands. Kahekili of Maui was the first to extend his influence over O‘ahu, initially through the encouragement of an O‘ahu ali‘i whom he had fostered as a son on Maui, and then through all-out military conquest. Many of the local ali‘i who had previously ruled the Wai‘anae district were tortured and killed defending their independence from the rule of Maui. By the 1790s, Westerners and their technology had become a critical factor in the contest for interisland dominion being waged between the ali‘i of Maui, O‘ahu, and Hawai‘i Island. In 1795, Kamehameha the Great defeated Kalanikūpule at the battle of Nu‘uanu to politically unify the inhabited Hawaiian islands, except Kaua‘i, under a single kingship.

Only a few years later, Vancouver’s 1798 voyage traveled up the Wai‘anae coast from ‘Ewa, O‘ahu’s southwest plain. He described the leeward coast as “one barren, rocky waste, nearly destitute of verdure, cultivation or inhabitants,” excepting a narrow valley in the middle, where “the bases of the mountains retire further from the seashore [winding] some distance through the hills.” The only village they encountered in the area, or had encountered at all since passing Pearl Harbor, was one situated around a little bay near the promontory of Mauna Lahilahi, near Mākaha (Handy et al. 1972:467–468). That would mean that no habitation sites were observed in the project area at the cusp of Western contact.

### *The Great Māhele*

Several legislative acts during the period 1845–1855 codified a sweeping transformation from the centuries-old Hawaiian traditions of royal land tenure to the western practice of private land ownership. Most prominent of these enactments was the Māhele of 1848 which was immediately followed by the Kuleana Act of 1850. No Land Commission Awards were awarded in the immediate vicinity of the project area.

### *Historic Land Use*

After the Māhele, large tracts of land in Wai‘anae were leased or purchased as grants for ranching, initiating a series of landscape changes in the region. The Waianae Sugar Plantation was founded in 1878 by H.A. Widemann; its cultivated lands encompassed much of the makai portion of Wai‘anae and eventually extended to 3,332 acres in Lualualei that were used for both sugarcane agriculture and cattle ranching (Commissioner of Crown Lands 1902). With these new endeavors, the community in the region grew substantially. By 1884, Wai‘anae was listed in the Hawaiian Directory as one of the largest settlements on O‘ahu, second only to Honolulu.

During the 1890s the Oahu Railway and Land Co. (OR&L) railroad was constructed to bring crops and animals from the Leeward Coast to Pearl Harbor. This railway eventually ran through the Wai‘anae District and around Ka‘ena Point to Kahuku. Vestiges of the old rail line can still be seen along Farrington Highway. Two sections of this railway also extended into Wai‘anae Valley to transport sugarcane harvested from the plantations there.

Sugarcane production and military activity dominated the first half of the 20th century on the Leeward Coast. Much of Pōka‘ī Bay was acquired by the military through an Executive Order as a staging area for its troops. World War II was devastating for the Waianae Sugar Plantation as high paying defense jobs created a labor shortage. All sugarcane production in the Wai‘anae District was eliminated at this time due to labor shortages, water shortages, military procurement of land, and other more productive agricultural regions taking over. The OR&L railroad was officially abandoned in 1946. After World War II, numerous residences were developed in the coastal area along the roadways and urban development gradually increased as the years progressed.

### *Soil Type and Previous Ground Disturbance*

The project site is mapped as coral outcrop. There may be a thin layer of soil on the project site associated with previous uses of the site and for landscaping purposes. The limited soil on the site today was likely imported in the past.

Plantation agriculture is not known to have utilized the project site. Developments have been present at the site since at least the 1940s. In the late 1950s or early 1960s, Mōhihi Street was built and a gas station was established on a portion of the project parcel. The gas station expanded to use nearly the entire parcel and included two canopies and a small building. The gas station was removed in the 1990s. Gas stations cause substantial ground disturbance due to the presence of multiple underground storage tanks, underground piping, and foundations for canopies and buildings.

### *Previous Archaeological Studies in Project Vicinity*

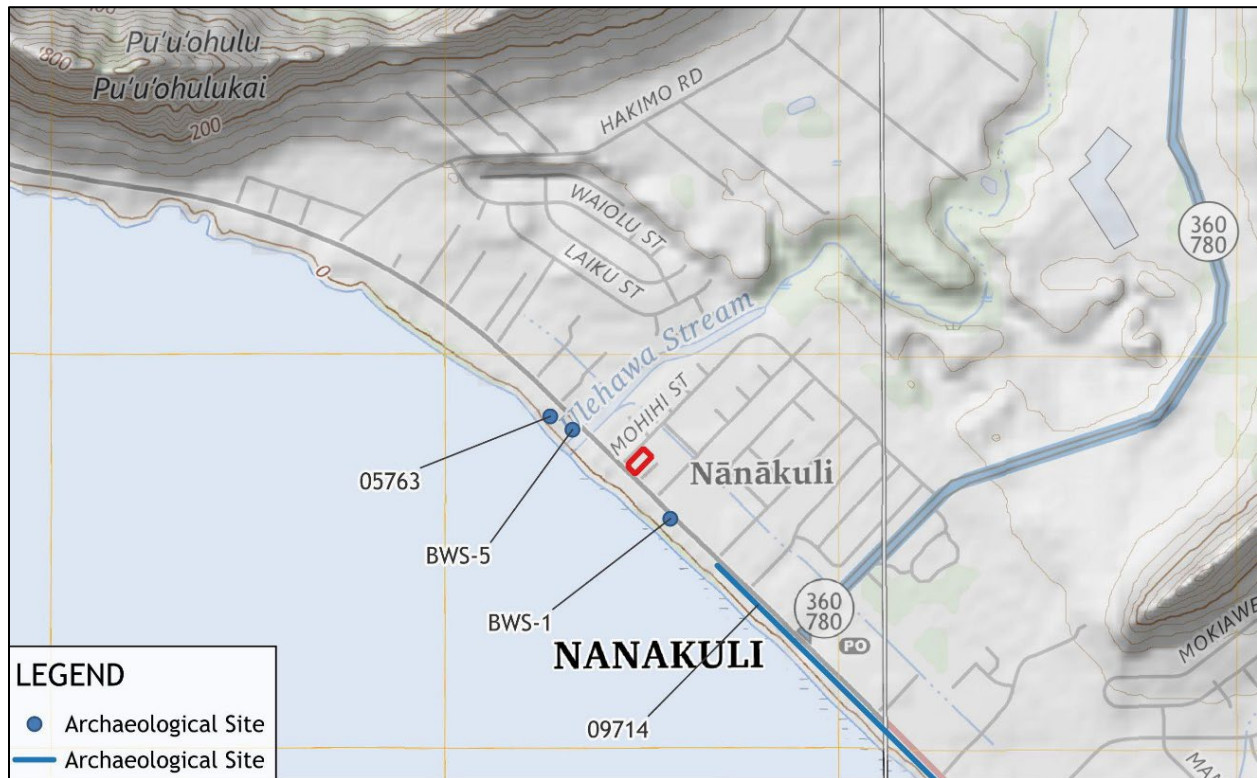
Numerous archaeological studies have been conducted in Lualualei; however, the project site has not been previously studied. The historic sites identified within roughly 0.3 mile of the project site during previous studies in the area are summarized in Table 3-2 and Figure 3-1.

**Table 3-2: Previously Recorded Archaeological Sites Within 0.5 km of the Project Site**

Site Number	Site Description	Author and Year	Status
50-80-07-05763	Traditional to early historic subsurface cultural layer.	McDermott and Hammatt 2000	Intact; sample collected for radiocarbon dating.
50-80-12-09714	OR&L Right-Of-Way.	Knaus 1983	Intact.
BWS-1	Traditional to early historic subsurface cultural layer.	Ostroff and Desilets 2005	Intact.
BWS-5	Traditional to early historic subsurface cultural layer.	Ostroff and Desilets 2005	Intact; sample collected for radiocarbon dating.

Source: Keala Pono (2025b)

**Figure 3-1: Previously Identified Archaeological Sites in the Project Area**



Source: Keala Pono (2025b)

A 25.5-mile-long stretch of the OR&L Co. right-of-way that is on the National Register ends at the intersection of Farrington Highway and Lualualei Road in Nānākuli, roughly 1,900 feet southeast of the project site. The OR&L tracks (unused, State Inventory of Historic Places (SIHP) 09714) continue to Ma‘aloa Street, and the OR&L right-of-way continues to Ulehawa Stream.

The cultural layers consist of charcoal-enriched layers. Radiocarbon dating of BWS-5 yielded a radiocarbon age of 180±40 BP and a 2σ calibrated date range of AD 1640–1960, placing its age on the cusp of traditional and early historic. Cultural layer SIHP 05763 yielded a radiocarbon age of 250±60 BP and a 2σ calibrated date range of AD 1470–1950, also placing its age between traditional and early historic.

An archaeological inventory survey was conducted in association with the Farrington Highway Drainage Improvements project along the makai side of Farrington Highway between Lualualei Place and Ulehawa Stream, just northwest of the current project location. No archaeological

resources were identified. Archaeological monitoring did not identify any archaeological resources either.

### 3.2.2 SMA and CZM Objectives, Policies, and Guidelines

Development in the SMA should protect, preserve, and restore natural or human-made historical and cultural resources.

The CZM's policies are to:

- A) Identify and analyze significant archaeological resources;
- B) Maximize information retention through preservation of remains and artifacts or salvage operations; and
- C) Support state goals for protection, restoration, interpretation, and display of historic resources.

### 3.2.3 Cultural Impact Assessment and Ka Pa'a Kai Analysis

Articles IX and XII of the Constitution of the State of Hawai'i impose on government agencies a duty to promote and protect the cultural beliefs, practices, and resources of native Hawaiians and other ethnic groups when discharging their respective mandates, including issuing permits and approvals such as a SMA permit. To clarify the State's obligation to protect native Hawaiian customary and traditional practices while reasonably accommodating competing private interests, the Hawai'i Supreme Court provided the following analytical framework as an outcome of Ka Pa'akai O Ka 'Aina v. Land Use Commission (94 Hawai'i 31, 7 P.3d 1068, September 11, 2000). This framework is referred to as "Ka Pa'akai Analysis" and consists of a three-part assessment of:

1. "Valued cultural, historical, or natural resources" in the project area, including the extent to which traditional and customary native Hawaiian rights are exercised in the project area;
2. The extent to which those resources—including traditional and customary native Hawaiian rights—will be affected or impaired by the proposed action; and
3. The feasible action(s), if any, to be taken to reasonably protect native Hawaiian rights if they are found to exist.

#### *Identification of Traditional and Customary Practices in Project Area*

The Ka Pa'akai Analysis was conducted through a multi-phase process from June to August 2025. Guiding documents for this work including The Hawai'i Environmental Council's Guidelines for Assessing Cultural Impacts. Personnel involved with this study include Windy McElroy, PhD, Principal Investigator of Keala Pono Archaeological Consulting, and Gina McGuire, PhD, Ethnographer. Interviewees were selected because they met one or more of the following criteria:

1. Was referred by Keala Pono Archaeological Consulting or State Historic Preservation Division (SHPD);
2. Had/has ties to the project area or vicinity;
3. Is a known Hawaiian cultural resource person;

4. Is a known Hawaiian traditional practitioner; or
5. Was referred by other cultural resource professionals.

Four individuals participated in the current study. Background research has not identified any resources on the site and those interviewed did not identify cultural practices or resources that occur on the project site.

#### *Impact Determination*

There was a general consensus among those interviewed that there would be low or no impact to cultural access, gathering practices, or archaeological sites given the project area's history as a gas station and location within a previously disturbed commercial area. The potential for positive outcomes to come from the proposed development, if done in a pono way, was shared.

Because no known cultural practices or resources occur on the project site, the Applicant has concluded the proposed commercial development will not affect the rights customarily and traditionally exercised for subsistence, nor affect cultural and religious purposes possessed by ahupua'a tenants who are descendants of native Hawaiians. In addition, the proposed project does not affect or impair any Hawai'i State Constitution, Article XII, Section 7 uses, or the feasibility of protection of those uses. The potential for impact to historic properties is discussed in Section 3.2.4.

#### *Feasible Actions to Reasonably Protect Native Hawaiian Rights*

Because no Native Hawaiian rights will be affected by the proposed project no action is needed to protect those rights.

Individually or collectively, the interviewees recommended the following:

- Monitor for the possibility of encountering iwi kūpuna during ground disturbance.
- Educate construction crews on what to do if iwi kūpuna are encountered.
- If iwi kūpuna are encountered, contact the Burial Council and/or cultural practitioners from the area.
- Inter any iwi kūpuna encountered in place and build the development around encountered iwi.
- Ensure that any environmental issues that may have occurred from the previous gas station are addressed.
- Keep an eye out for the fuel tanks that may have remained in place after the gas station vacated.
- Participate in cleaning up the neighboring Ulehawa Stream.
- Support local school programs or other community efforts as other businesses in Nānākuli have.
- Select tenants for the development that prioritize healthy options for local residents (e.g., no liquor stores).

- Encourage and support Native Hawaiian language presence within the development.
- Have open and transparent conversations with community members and follow recommendations that are shared.

After considering the unput of those interviewed, the developer has decided it is reasonable to perform archaeological monitoring during ground disturbance, which will identify iwi kūpuna and other cultural and historic resources present in the subsurface. Resources encountered, if any, will be managed in a manner consistent with HRS Chapter 6E. Archaeological monitoring is discussed in Section 3.2.5.

### 3.2.4 Potential Impacts and SMA/CZM Consistency

As discussed in Sections 3.2.1 and 3.2.3, there a no above ground historic or cultural resources on the project site or nearby. Therefore, no impacts to any above ground historic resources are anticipated.

As discussed above, no archaeological, historic, or cultural resources are present on the project site, which was previously in use as a gas station and is now vacant. Excavation, which is detailed in Section 2.2.2, will be necessary for some aspects of the proposed development. Given the history of encountering human skeletal remains and artifacts in the sandy subsurface along the Wai‘anae coastline, it is considered possible cultural or historic resources may be encountered during the excavation required. Due to the composition of the subsurface (coral outcrop) and extensive previous disturbance, the likelihood of encountering subsurface resources is considered very low. The project will continue to consult with SHPD and implement appropriate measures.

The project will ensure consistency with the SMA/CZM objectives through the implementation of the measures outlined in Section 3.2.5 and compliance with SMA permit conditions.

### 3.2.5 Avoidance, Minimization, or Mitigation Measures

Prior to the issuance of construction permits or building permits for the project, the Applicant will submit to DPP a copy of the written SHPD HRS § 6E-42 determination and statement that the permitting process may proceed.

The following measures will also be implemented during construction:

- Brief project construction workers on the history of the area and inform them of the possibility of inadvertently encountering unknown historic/cultural resources, including human remains.
- Cease all activities if historic/cultural resources (such as artifacts; shell, bone, or charcoal deposits; rock or coral alignments; pavings; or walls) are inadvertently encountered during construction activities and notify SHPD pursuant to HAR § 13-280-3. If iwi kūpuna (i.e., ancestral remains) are identified, all earth moving activities in the area would stop, the area would be cordoned off, and SHPD, the medical examiner, and the Honolulu Police Department would be notified pursuant to HAR § 13-300-40.

### 3.3 Scenic and Open Space Resources

#### 3.3.1 Existing Conditions

The objective of CCH's *O'ahu General Plan* (2021), regarding aesthetic and scenic resources (Chapter III. Natural Environment and Resource Stewardship, Objective B) is to:

*preserve and enhance natural landmarks and scenic views of O'ahu for the benefit of both residents and visitors as well as future generations.*

CCH's *Wai'anae Sustainable Communities Plan* (WSCP) is being updated. The current plan, which was adopted on March 2, 2012, reaffirms Wai'anae's role in O'ahu's development patterns as intended in the *O'ahu General Plan*, by establishing policies and guidelines for future development. It makes a clear priority of preserving and enhancing scenic, recreational, and cultural features of the Wai'anae landscape that help define the community's sense of place. Significant stationary views are identified from: (i) Mākaha Beach Park, (ii) Mauna Lahilahi Beach Park, (iii) Pōka'i Bay Beach Park, and (iv) Mā'ili Beach Park. The WSCP acknowledges that the large-scale open spaces of the region are not immediately apparent from Farrington Highway, the main coastal roadway. Along most of the highway, residential and commercial development blocks the driver's view of the large valleys of the region.

Figure 2-2 provides two photographs towards the ocean, taken from Mōhihi Street and the project parcel itself. As can be seen in these photographs, a coastal dune on the makai side of Farrington Highway blocks ground level views of the ocean from the highway.

#### 3.3.2 SMA and CZM Objectives, Policies, and Guidelines

Development within the SMA should protect, preserve, and whenever desirable, restore or improve the quality of coastal scenic and open space resources. Alterations to existing land forms and vegetation, other than for the cultivation of coastal dependent crops, must be limited so they result in minimum adverse impacts on water resources, beaches, coastal dunes, and scenic or recreational amenities. Development that is not dependent on the coast is encouraged to locate mauka of the SMA.

CZM policies related to scenic and open space are:

- A) Identify valued scenic resources in the coastal zone management area;
- B) Ensure that new developments are compatible with their visual environment by designing and locating those developments to minimize the alteration of natural landforms and existing public views to and along the shoreline;
- C) Preserve, maintain, and, where desirable, improve and restore shoreline open space and scenic resources; and
- D) Encourage those developments that are not coastal dependent to locate in inland areas.

### 3.3.3 Potential Impacts and SMA/CZM Consistency

During construction of the proposed project, activities, equipment, material, vehicles, and workers will be visible to nearby residents and the public along Mōhihi Street and Farrington Highway, contributing to a temporary and minor visual impact. These impacts will be most visible from Mōhihi Street and Farrington Highway; line of sight from the shoreline is obstructed by a coastal dune.

Once built, the proposed project does not have the potential to meaningfully affect any scenic views, panoramas, or valued scenic resources identified in any State or CCH report, including the *O‘ahu General Plan* or the WSCP, relative to existing conditions. The proposed project site is located on the mauka side of the highway and will not impact makai views from Farrington Highway.

Because the proposed project will be constructed on land that is currently vacant, it will constitute a new visual presence in the area and views mauka from Farrington Highway in the vicinity of Mōhihi Street will be altered. However, the height of the proposed structure is consistent with other development in the vicinity, including adjacent two-story residences oriented towards the shoreline and away from the project site. The proposed commercial building will not substantially alter any important viewplane or vista in the area, nor will it significantly alter natural landforms or existing views to or along the shoreline. As a result, the visual impact of the proposed project will be negligible, and the project is consistent with SMA/CZM objectives and the rural community character of the area.

### 3.3.4 Avoidance, Minimization, and Mitigation Measures

The proposed development is designed to comply with applicable rules and regulations, including height limits.

## **3.4 Coastal Ecosystems**

### 3.4.1 Existing Conditions

The following ecosystems are present on or near the project parcels:

- Wetlands. The area southwest of the parcel, across Farrington Highway, is Ulehawa Beach and the Pacific Ocean, which is classified as estuarine and marine wetland. Farrington Highway and the sand dunes in the park serve as a buffer between the project parcel and the shoreline.
- Beaches and Coastal Dunes. See discussion in Section 3.8.
- Flora. Existing vegetation on the project parcel consists primarily of non-native species of grass and other low-lying volunteer shrubs. None of the flora is listed as threatened or endangered and none is known to be considered invasive. The vegetation is periodically controlled.
- Fauna. The only fauna observed on the project parcels during a recent visit were introduced passerine birds that are common in the area. Although not observed, it is likely that other introduced species are occasionally or regularly present, including rats,

mice, cats, dogs, and mongooses. Several federally and state-listed species (e.g., Hawaiian hoary bat, Band-rumped Storm-Petrel, Hawaiian Petrel, Newell's Shearwater, and waterbirds) may appear in the project's vicinity; however, none have been observed on the project parcel. Green sea turtle, Hawksbill sea turtle and Olive Ridley sea turtle may also appear in the nearshore environment in the project vicinity; however, the parcel is not a shoreline lot and is mauka of Farrington Highway. There is currently no designated critical habitat for them in the project area.

### 3.4.2 SMA and CZM Objectives, Policies, and Guidelines

Development within the SMA should protect valuable coastal ecosystems, including reefs, beaches, and coastal dunes from disruption, and minimize adverse impacts on all coastal ecosystems. Solid and liquid waste treatment and disposition must be managed to minimize adverse impacts on SMA resources.

CZM policies related to coastal ecosystems are:

- A) Exercise an overall conservation ethic, and practice stewardship in the protection, use, and development of marine and coastal resources;
- B) Improve the technical basis for natural resource management;
- C) Preserve valuable coastal ecosystems of significant biological or economic importance, including reefs, beaches, and dunes;
- D) Minimize disruption or degradation of coastal water ecosystems by effective regulation of stream diversions, channelization, and similar land and water uses, recognizing competing water needs; and
- E) Promote water quantity and quality planning and management practices that reflect the tolerance of fresh water and marine ecosystems and maintain and enhance water quality through the development and implementation of point and nonpoint source water pollution control measures.

### 3.4.3 Potential Impacts and SMA/CZM Consistency

The proposed project will be built on a vacant lot on coral outcrop and will not interact with any coastal ecosystems, reefs, beaches, or coastal dunes. The only fill material imported to the project parcels will consist of structural fill placed under foundations. The quantity of fill is anticipated to be roughly 153 cubic yards of drain rock and 250 cubic yards of structural fill. The fill material will be obtained from a commercial quarry operation. Due to the source of the structural fill, it is not anticipated that invasive species will be present in the material.

Liquid wastes will be managed through the Wai'anae Wastewater Treatment Plant. Solid waste will be collected by a private refuse collection company. New landscaping will be established as construction is being wrapped up. The new landscaping will be drought and salt-tolerant and be naturally hardy or endemic to the shoreline area. A sprinkler system will be installed to provide irrigation for the landscaping. The irrigation system will be designed in a manner that prevents water from traversing beyond the property line.

Artificial lighting used during construction or over the long-term can be disruptive to protected avifauna and marine life in their navigation, nesting, and reproductive cycles. Therefore, all installed outdoor lighting will be fully shielded, and no nighttime work (from sunset to sunrise) will occur during construction. In addition, all outdoor light fixtures or bulbs will not exceed a color temperature of 4,000 degrees Kelvin.

No significant impacts to coastal ecosystems are expected because the project parcel is not a shoreline lot, does not harbor any unusual ecosystems or species, and all proposed development is mauka of the shoreline setback area. In addition, the avoidance and minimization measures listed in Section 3.4.4 will be implemented. Consequently, the coastal ecosystem will be protected and the potential for adverse impact is negligible. The project is also consistent with the SMA/CZM objectives, policies, and guidelines.

#### 3.4.4 Avoidance, Minimization, and Mitigation Measures

The following avoidance and minimization measures related to coastal ecosystems will be employed:

- Exterior light fixtures will be fully shielded using full cutoff fixtures with the light directed downward so that the light bulb is only visible from below the light fixture. Exterior light fixtures will not directly illuminate the shoreline, sandy beach, or ocean waters. All outdoor artificial light sources will not exceed a color temperature of 4,000 degrees Kelvin.
- Construction activities will be limited to daylight hours (sunrise to sunset).
- Woody plants greater than 15 feet in height are not present. If any are established before construction begins, they will not be disturbed, removed, or trimmed during the Hawaiian hoary bat birthing and pup rearing season (June 1 through September 15).
- All construction activities will cease if a protected species is within 150 feet of the work area, unless it is on the opposite side of Farrington Highway. Construction activities would only recommence after the animal voluntarily leaves the area. In addition, construction debris that may pose an entanglement threat to protected marine species will be removed from the work area at the end of each day.
- The project will comply with CCH's *Rules Relating to Water Quality*.
- The irrigation system will be designed and operated in a manner that prevents water from traversing beyond the property line.
- The importation of fill material will be minimized and limited to structural fill obtained from a commercial quarry.
- Prior to and during construction activities, when personnel, materials, vehicles, or equipment are being relocated from one location to another, and when construction activities have concluded, materials, vehicles, and equipment will be cleaned of excess soil and debris to minimize the risk of spreading invasive species using the current recommendations from the O'ahu Invasive Species Committee (OISC).
- The Applicant (or their representative) will distribute a copy of the most recently updated OISC *Decontamination Protocols for Prevention of Invasive Species*

(“Protocols”) to all workers and/or post the Protocols in a visible location accessible to workers and delivery/haul-out contractors. The current contact email and phone number for the OISC will also be visibly posted at the project site during pre-construction and construction activities. All on-site workers will be instructed to review the species photos and inspection/cleaning protocols prior to commencing work.

- If species on the OISC invasive species target list are encountered on the site, at any time, the Applicant will immediately contact the OISC to report the species found. The Applicant will implement measures recommended by the OISC and/or the responsible State or Federal agency in charge of eradication of the invasive species.

### **3.5 Economic Uses**

#### **3.5.1 Existing Economic Conditions**

The project site is currently vacant and is surrounded by residential and neighborhood commercial land uses. There are no regulated fishing areas near the project site. The closest regulated fishing area is Pōka‘ī Bay (Wai‘anae Harbor) located about 4.8 miles northwest of the project site. There are no economic uses of the marine resources near the project site.

There are no designated “fishing grounds” in Hawai‘i. There are areas where larger fish (marlin, ahi, mahi, etc.) and bottom fish (onaga, ‘ehu, ‘ōpakapaka, etc.) are generally pursued; those areas tend to be where fish aggregating devices (FAD) and artificial reefs have been established or the water depth and natural habitat are favorable (e.g., Penguin Banks or Pinnacle). The nearest such fishing areas to the project site are the ‘Ewa Deepwater Artificial Reef, Pōka‘ī Bay and offshore FADs, which are miles from the project site.

#### **3.5.2 Existing Traffic Conditions**

The proposed project will be located on the southeast corner of the intersection of Farrington Highway and Mōhihi Street in Nānākuli, O‘ahu, Hawai‘i. To assess the potential for traffic-related project impacts, the Applicant has worked with its consultant, Traffic Management Consultants, Inc. to prepare a Traffic Assessment (TA) for the proposed project. The resulting report, *Transportation Assessment Report for the Proposed Nanakuli Commercial Building, Nanakuli, Oahu, Hawaii, Tax Map Key: (1) 8-7-035:005*, forms the basis for the information and analysis in this subsection. The report evaluates existing roadways and traffic conditions, assesses project trip generation; and provides recommendations for improvements that will mitigate traffic impacts, as needed. The following is a summary of those findings.

Farrington Highway is the State of Hawai‘i arterial highway on the Wai‘anae Coast, which carries about 45,000 vehicles per day, total for both directions. Farrington Highway is a two-way, four-lane undivided highway, which is generally oriented in the north-south directions. Paved shoulders are provided on both sides of Farrington Highway for bicycles. A concrete sidewalk is provided for pedestrians on the east (i.e., mauka) side of Farrington Highway. An exclusive left-turn lane is provided on southbound Farrington Highway at Mōhihi Street. The posted speed on Farrington Highway is 35 miles per hour in the vicinity of the project. Figure 3-2 summarizes existing traffic volumes on Farrington Highway.

Mōhihi Street is a two-lane, two-way CCH roadway. Mōhihi Street is signalized at its T-intersection with Farrington Highway. While the intersection is under the State of Hawai'i jurisdiction, the traffic signals are maintained and operated by the CCH.

Lualualei Naval Road is a two-lane, two-way roadway, which provides access to the U. S. Navy Radio Transmitter Facility in Lualualei. Lualualei Naval Road is signalized at its T-intersection with Farrington Highway. Lualualei Naval Road is located about 2,000 feet south of Mōhihi Street.

Princess Kahanu Avenue is a two-way, two-lane roadway, which provides access to the Princess Kahanu Estates Subdivision. Princess Kahanu Avenue is signalized at its intersection with Farrington Highway, opposite the Ulehawa Beach Park Driveway. Princess Kahanu Avenue is located about 1,500 feet north of Mōhihi Street.

TheBus stops are located on both approaches of Farrington Highway at Mōhihi Street. A bus turnout and shelter are provided at TheBus stop on southbound Farrington Highway. TheBus stop on northbound Farrington Highway is located along the project site frontage. TheBus Routes 40, C, and 403 provide transit service to Nānākuli.

The traffic signals along Farrington Highway throughout Nānākuli operate on a 240-second cycle length, during the peak periods of traffic, resulting in long delays for side street traffic and pedestrians crossing the Highway. Highway improvements on Farrington Highway are expected to include the modification of the traffic signal timing and coordination along the Highway. Shorter traffic signal cycle lengths should be considered to reduce the vehicle delays on Mōhihi Street.



- i) Use of designated locations is not feasible;
- ii) Adverse environmental effects and risks from coastal hazards are minimized; and
- iii) The development is important to the State's economy.

#### 3.5.4 Potential Impacts and SMA/CZM Consistency

The project will not have an adverse impact on the economy of Nānākuli or the broader region. The project will provide modest short-term economic benefits through construction jobs and long-term benefits via the jobs the new commercial venue will provide. The new businesses will also provide benefit, bringing additional goods and services closer to the Nānākuli community and Farrington Highway, the main arterial for the region. The site is appropriately zoned for the proposed use. The proposed development, which is roughly 130 feet from the shoreline, been conceived of and designed to minimize exposure to coastal hazards and potential adverse social, visual, and environmental impacts. Therefore, the project is not anticipated to result in a change to the economic use of adjacent parcels or the surrounding area and is consistent with SMA/CZM objectives, policies, and guidelines.

Further, the proposed project is consistent with applicable land use rules and will not require or promote additional growth or development in its vicinity, such as through the expansion of public utilities or roadways. It will constitute commercial use of a B-1 Community Business zoned parcel in an existing commercial and residential community. The necessary public infrastructure (e.g., roads and utilities) are already present in the area and expansion of these services will not be required to support the project. Surrounding lands have already been developed for many years at the intensity proposed by this project.

#### 3.5.5 Potential Traffic Impacts

The proposed retail development will generate vehicular movements to and from the site that do not occur today. Trip generation was based on generally accepted techniques developed by the Institute of Transportation Engineers (ITE) and published in *Trip Generation*, 10<sup>th</sup> Edition. The trip generation for the retail space was based upon the average ITE peak hour trip rates for a shopping center. The office space was analyzed with the average ITE peak hour trip rates for a small office building. The caretaker unit was analyzed using the average ITE trip rates for single-family housing. Density was calculated by the square feet of gross leasable floor. Table 3-3 summarizes peak hour trip generation for the proposed project.

**Table 3-3: Project Peak Hour Vehicular Trip Generation**

Land Use (ITW Code)	Density	AM Peak Enter	AM Peak Exit	AM Peak Total	PM Peak Enter	PM Peak Exit	PM Peak Total
Retail (820)	5,635 square feet	3	2	5	10	11	21
Office (712)	4,248 square feet	7	1	8	3	7	10
Single-Family Housing (210)	1 dwelling	0	1	1	1	0	1
	<b>Total Trips</b>	10	4	14	14	18	32

Note : Numbers represent vehicles per hour.  
Source: Traffic Management Consultant, Inc. (2020)

The small number of vehicular trips generated by the proposed project is expected to increase the AM and PM peak hour traffic at the intersection of Farrington Highway and Mōhihi Street by less than one (1) percent. Consequently, the proposed commercial building is not expected to significantly impact peak hour traffic operations. For example, the delay for vehicle movements on Mōhihi Street during the morning peak hour will increase by only 1.2 seconds.

During the brief construction phase, the largest vehicle accessing the site is likely to be concrete trucks with a turning radius of about 42 to 43.5 feet. The corner of Mōhihi Street and Farrington Highway has a 35-foot radius. Mōhihi Street is roughly 50 feet wide. A concrete truck ([the largest design vehicle anticipated at the intersection](#)) should be able to make a right turn from Farrington Highway without intruding into another lane.

### 3.5.6 Avoidance, Minimization, and Mitigation

The Applicant has developed the following avoidance and minimization measures related to traffic impacts in response to a request made by the State of Hawai‘i Department of Transportation (HDOT) in its letter, dated July 21, 2020 (HWY-PS 2.3224):

- Direct site access on Farrington Highway shall not be permitted. The historic driveway off Farrington Highway will not be restored. A 15-foot-wide setback along the project site frontage on Farrington Highway shall be provided for future highway improvements.
- The Contractor shall prepare a Construction Traffic Management Plan (CTMP) for the proposed project. The CTMP shall include: all infrastructure improvements that may be removed or constructed within the HDOT Right-of-Way (ROW); a description of the operations and construction activities; hours of operations; and the estimated number of construction vehicle trips to and from the project site, during the peak periods of traffic.
- Although no improvements are currently planned within the ROW , any work which may be required by permitting agencies will be designed in accordance with HDOT standards at no cost to the State of Hawai‘i. Construction plans, prepared by

professional engineer(s) licensed in the State of Hawai‘i, will be submitted to HDOT for its review and approval, prior to applying for a permit to perform the work.

- After the proposed project is constructed and fully occupied, a post-traffic study should be prepared by a traffic engineer to analyze the traffic signal timing at the intersection of Farrington Highway and Mōhihi Street. If the traffic signal timing requires adjustment, a revised signal timing request shall be submitted to HDOT for its review and acceptance.

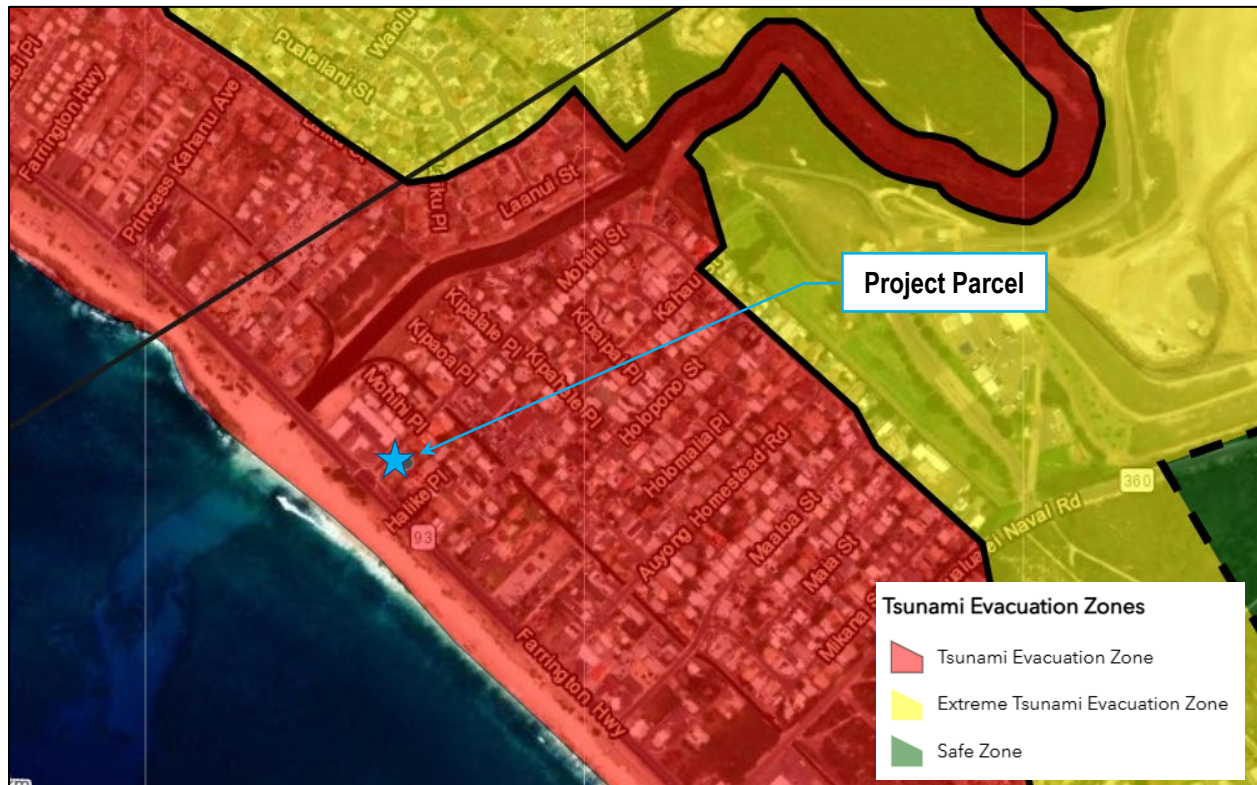
### 3.6 Coastal Hazards Analysis

#### 3.6.1 Existing Conditions

##### *Tsunami Hazard*

The subject site is within the tsunami evacuation zone (Figure 3-3).

**Figure 3-3: Tsunami Evacuation Zones**

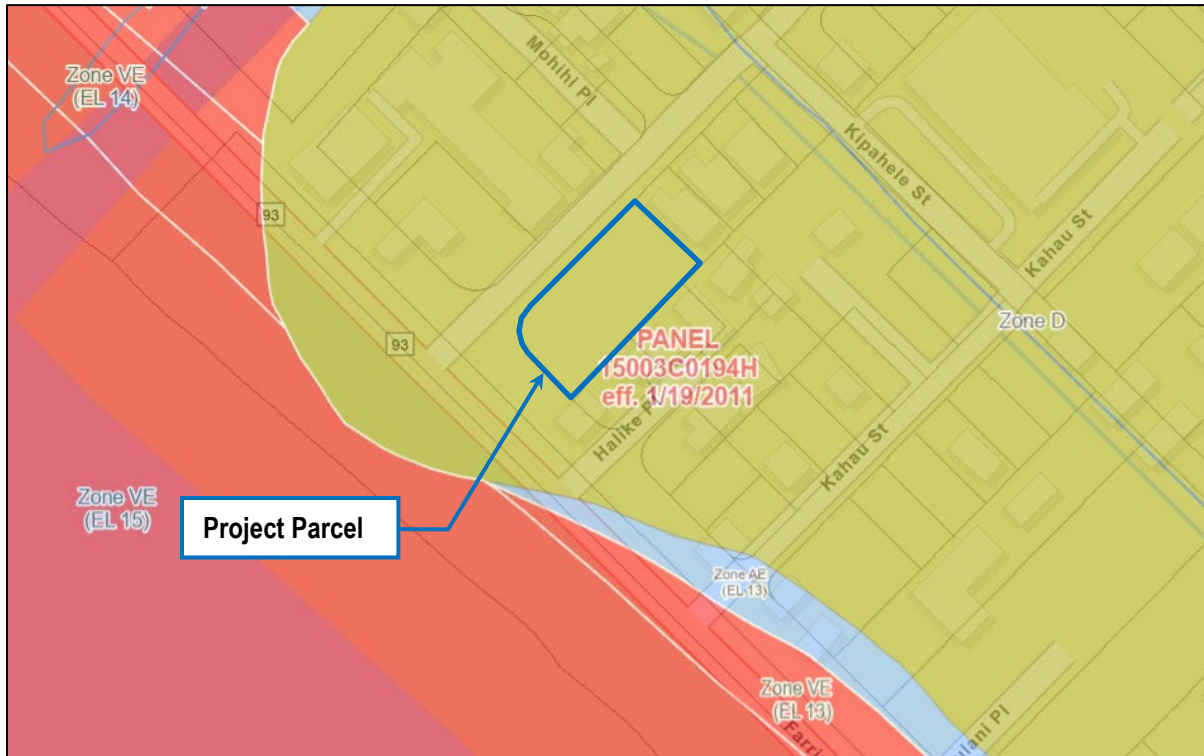


Source: City and County of Honolulu (2025).

##### *Flooding Hazards and Storm Surge*

The National Flood Insurance Program, administered by the Federal Emergency Management Agency (FEMA), maintains floodplain and flood hazard maps for use in determining a reference height that allows property insurance companies to assess flood risk. FEMA has designated the entire project parcel as being in Flood Zone D (Figure 3-4). Flood Zone D is the flood insurance rate zone that corresponds to areas in which flood hazards are undetermined, but possible.

**Figure 3-4: Flood Zone Map**



Source: State of Hawai'i, Department of Land and Natural Resources, Flood Hazard Assessment Tool, <https://fhat.hawaii.gov/> (Accessed October 29, 2025).

There are no streams, ponds, wetlands, or other water resources on or adjacent to the project site. The nearest perennial stream is Ulehawa Stream approximately 400 feet to the northwest and the Pacific Ocean, approximately 130 feet southwest of the project site, is designated as an estuarine and marine wetland.

According to the National Oceanographic and Atmospheric Agency (NOAA) National Storm Surge Hazard Maps (Figure 3-5), during a Category 4 storm a storm surge of less than 3 feet would affect a very small portion on the mauka side of the project parcel.

**Figure 3-5: Storm Surge Hazard, Category 4 Hurricane**



Source: <http://coast.noaa.gov/floodexposure/> (downloaded October 29, 2025).

### *Annual High Waves Hazard*

The Hawai'i Sea Level Rise Vulnerability and Adaptation Report (Hawai'i Climate Change Mitigation and Adaptation Commission (HCCMAC), 2017) included numerical modeling to estimate the potential impacts that a 0.5, 1.1, 2.0, and 3.2-foot rise in sea level would have on coastal hazards, including annual high wave flooding. As shown in Figure 3-6, no portion of the project parcel is modeled to be affected by annual high wave flooding between now and roughly 2100, as sea level gradually rises 3.2 feet.

**Figure 3-6: Annual High Wave Hazard, Sea Level Rise of 3.2 feet**



Source: <https://www.pacioos.hawaii.edu/shoreline/slr-hawaii/> (downloaded October 29, 2025).

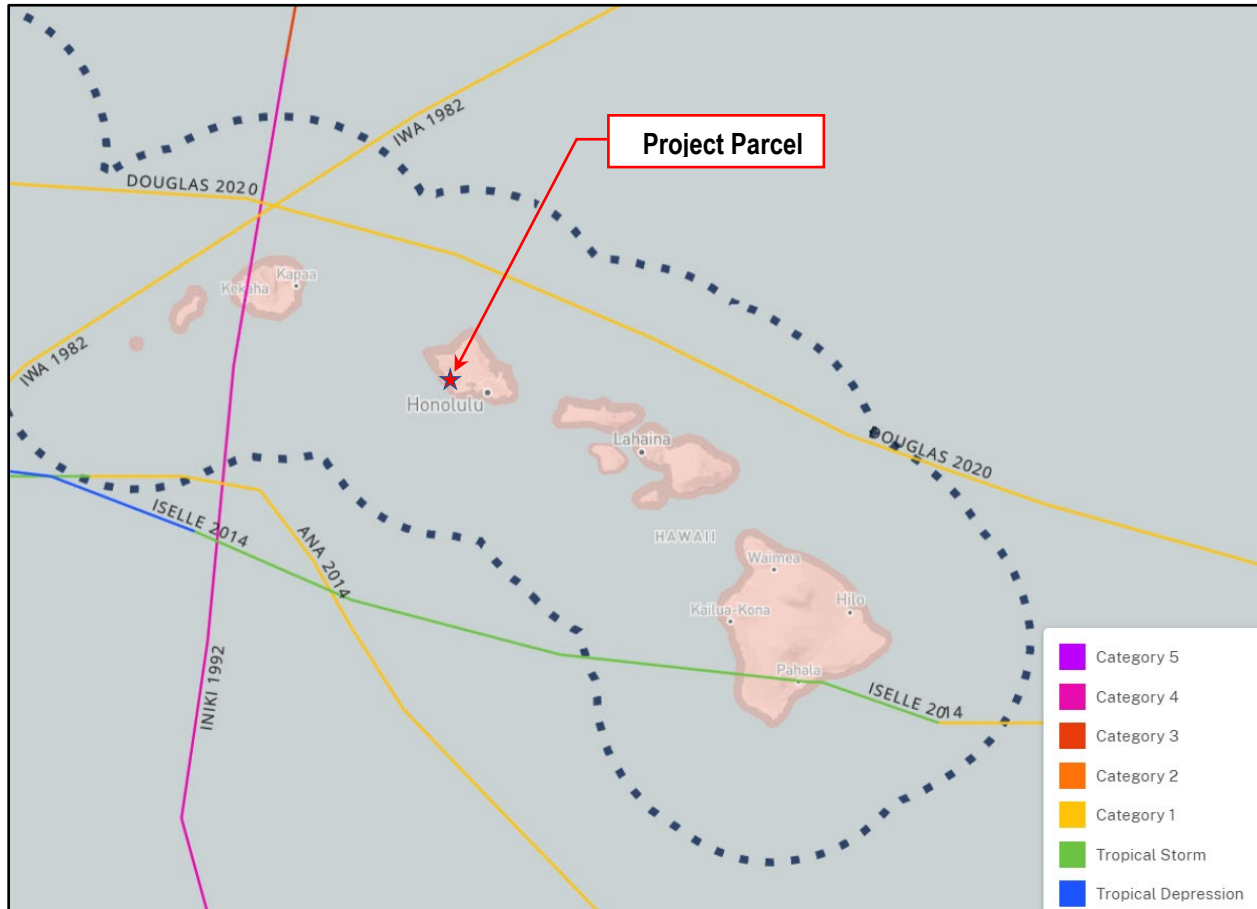
### *Storm Hazard*

The official Central Pacific Hurricane Season runs from June 1 through November 30; the primary hurricane season in Hawai'i is considered July through September. During this period, tropical storms generally form off the west coast of Mexico and move westward across the Central Pacific. These storms typically pass south of the Hawaiian Islands and sometimes have a northward curvature near the islands. Late season tropical storms follow a somewhat different track, forming south of Hawai'i and moving north toward the islands. When these storms generate sustained wind speeds over 64 knots (74 mph) they are hurricanes. A handful of hurricanes have passed within 60 miles of the main Hawaiian Islands since 1980 (Figure 3-7):

- 'Iwa in November 1982 (Category 1)
- 'Iniki in September 1992 (Category 4)
- Iselle in August 2014 (Category 1)
- Ana in October 2014 (Category 1)

- Douglas in July 2020 (Category 1)

**Figure 3-7: Hurricanes Within 60 Miles of the Main Hawaiian Islands (1980-2023)**



Source: <https://coast.noaa.gov/hurricanes/#map=4/32/-80> (accessed September 16, 2021).

The damage and injury associated with these meteorological phenomena is the result of high winds, marine overwash (a.k.a., storm surge, discussed above), heavy rains, tornadoes, and other intense small-scale winds and high waves. The intensity of the hazard is typically proportional to the proximity (distance) from the storm and the intensity (category) of the storm. The nearest storm to the site over the last 40 years was Hurricane Douglas, a Category 1 storm roughly 30 miles to the north in 2020. Douglas did not cause major damage on O‘ahu.

### *Erosion Hazard*

The causes of coastal erosion and beach loss in Hawai‘i are numerous. Factors that contribute to coastal erosion and beach loss include:

- Construction of shoreline hardening structures, which, while limiting coastal land loss landward of the structure, does not alleviate beach loss and may accelerate erosion on the seaward side of the structures by reducing sediment deposition.
- Reduced sediment supply either from landward or seaward (primarily reef) sources. Obvious causes, such as beach sand mining and structures that prevent natural access to back-beach deposits, remove sediment from the active littoral system. More

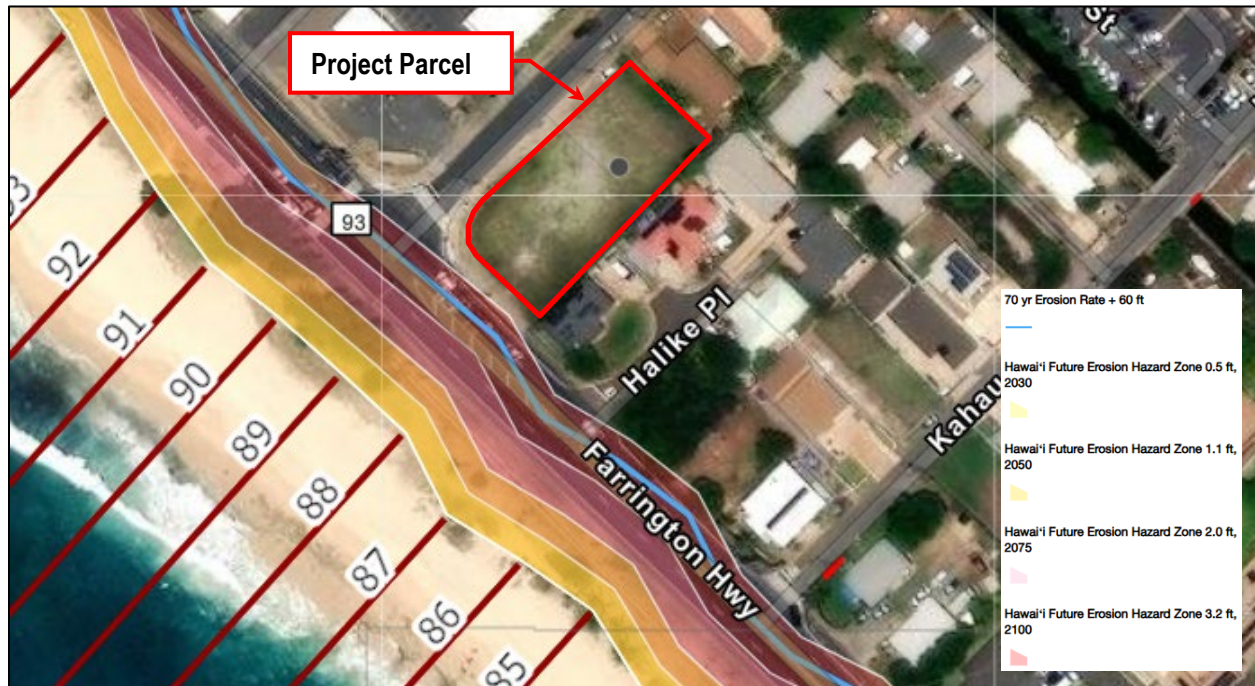
complex issues may be related to reef health and carbonate production which, in turn, may be linked to changes in water quality.

- Large storms, which can transport sediment beyond the littoral system.<sup>1</sup>
- Sea level rise, which leads to a landward migration of the shoreline.

The Coastal Geology Group in the School of Ocean and Earth Science and Technology at the University of Hawai‘i developed a web map that provides information from their Hawai‘i Shoreline Study. As part of the study, they developed “Future Erosion Hazard Zones,” which are lands that are projected to be vulnerable to coastal erosion by a specified year and associated height of sea level rise. The hazard zone is not meant to be a prediction of the exact lands that will be eroded in the future, nor a prediction of where the shoreline will be in the future. Rather, the erosion hazard zone represents lands that fall within a zone with a certain likelihood of exposure to erosion, according to probabilistic modeling.

The University of Hawai‘i Coastal Geography Group website indicates that shoreline erosion will not affect the project parcel prior to 2100 but is projected to affect Farrington Highway and the public sidewalk (Figure 3-8). Figure 3-9 provides the transects closest to the project site, which have erosion rates of -0.16 and -0.17 feet per year.

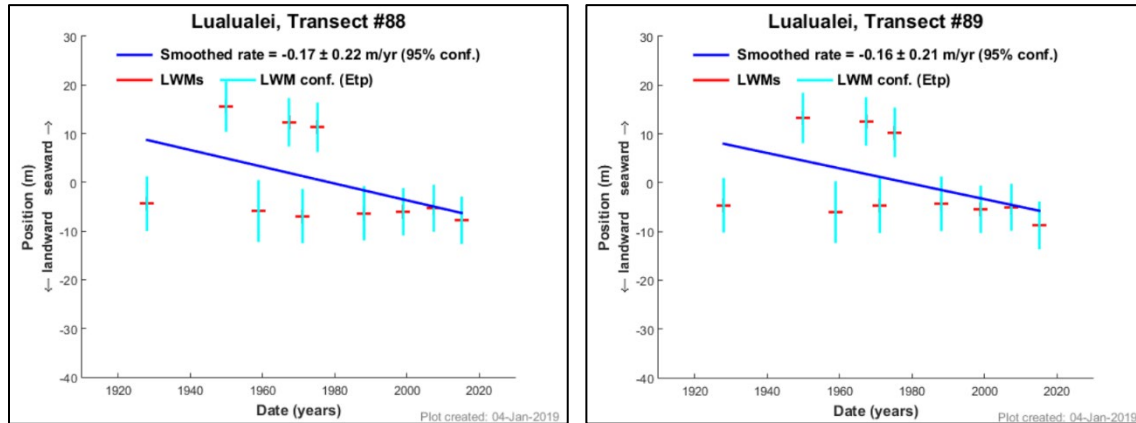
**Figure 3-8: Hawai‘i Shoreline Study Map**



Source: <https://www.soest.hawaii.edu/crc/index.php/hawaii-shoreline-study-web-map/> (accessed October 29, 2025).

<sup>1</sup> The littoral system is the area from the landward edge of the coastal upland (e.g., the certified shoreline) to the seaward edge of the nearshore zone (e.g., the edge of the shallow fringing reef).

**Figure 3-9: Lualualei Transect #88 and 89**



Source: [https://www.soest.hawaii.edu/crc/ArcOnline/Oahu/TransectPlots/METERS/Nanakuli\\_METERS\\_89.png](https://www.soest.hawaii.edu/crc/ArcOnline/Oahu/TransectPlots/METERS/Nanakuli_METERS_89.png)

*Sea Level Rise Hazard*

The global community of climate scientists has concluded that sea levels are currently rising and that this trend is expected to continue for the foreseeable future. The Intergovernmental Panel on Climate Change (IPCC) has predicted (IPCC, 2013) that the average temperature in the Hawaiian Islands is likely to increase by 0.9° F to 1.7° F (0.5° to 1.5 C°) by 2100, rainfall is likely to decrease by, at most, 10 percent, and sea level could rise between 0.85 to 3.2 feet (0.26 to 0.98 meter). Given that likelihood, it is incumbent upon planners to look at the potential effects this trend could have on development and examine ways in which project designs can accommodate these changes.

The Hawai‘i Sea Level Rise Vulnerability and Adaptation Report (HCCMAC, 2017) modeled the three chronic flood hazards associated with Sea Level Rise (SLR): (i) passive flooding; (ii) annual high wave flooding; and (iii) coastal erosion. The combined footprint of these three hazards defines what the report terms the “Sea Level Rise Exposure Area” (SLR-XA) and indicates flooding in the area will be associated with “long-term, chronic hazards punctuated by annual or more frequent flooding events.” Figure 3-10 shows the SLR-XA in the vicinity of the project site with 3.2 feet of sea level rise.

**Figure 3-10: Sea Level Rise Exposure Area, Sea Level Rise of 3.2 feet**



Source: <https://www.pacioos.hawaii.edu/shoreline/slr-hawaii/> (downloaded October 29, 2025).

As these figures illustrate, as sea level rises the SLR-XA will advance toward the makai boundary of the parcel, abutting the parcel once sea level rise reaches 3.2 feet. As shown in Figure 3-10, Farrington Highway would be impacted well before that, as would any utilities in the highway right-of-way.

DPP also requests that, as part of the SMA permit process, that planners consider 6 feet of sea level rise. To partially illustrate the impact of Sea Level Rise (SLR) on the project vicinity, Figure 3-11 depicts passive flooding associated with 6 feet of sea level rise, which was generated by NOAA. Per the SLR Viewer, the project parcel will not be subject to passive flooding in a 6-foot SLR scenario.

**Figure 3-11: Passive Flooding with Six Feet of Sea Level Rise**



Source: Sea Level Rise : State of Hawai'i Sea Level Rise Viewer, An Interactive Mapping Tool in Support of the State of Hawai'i Sea Level Rise Vulnerability and Adaptation Report. <http://www.pacioos.hawaii.edu/shoreline/slr-hawaii/> (accessed October 29, 2025).

### *Volcanic/Seismic Hazard*

Like all O'ahu, the project site is designated by the Uniform Building Code (UBC) as Seismic Zone 2a. Current building codes, including the International Building Code (IBC), include minimum design criteria for structures to address the potential for damage due to seismic disturbances specific to each seismic zone. There is no threat of volcanic eruptions directly affecting the project area.

### 3.6.2 SMA and CZM Objectives, Policies, and Guidelines

Development within the SMA should reduce impacts of coastal hazards on life and property, and must be designed to minimize impacts from landslides, erosion, sea level rise, siltation, or failure in the event of earthquake.

CZM policies related to coastal hazards are:

- A) Develop and communicate adequate information about the risks of coastal hazards;
- B) Control development, including planning and zoning control, in areas subject to coastal hazards;
- C) Ensure that developments comply with requirements of the National Flood Insurance Program; and

D) Prevent coastal flooding from inland projects.

### 3.6.3 Potential Impacts and SMA/CZM Consistency

The proposed project is consistent with the SMA/CZM policies because (i) no development is proposed in the shoreline setback area; (ii) no portion of the development is in the 3.2-foot SLR-XA; and (iii) the development is not in a flood risk area.

The proposed project will not have a discernable impact on the susceptibility of the area to coastal zone hazards (e.g., tsunamis, flooding, high waves, storms, erosion, sea level rise, or seismicity).

The range of coastal hazards may episodically or chronically impact the project parcel and any improvements upon it, including the proposed project. There are several factors that temper the scale of impact associated with the coastal hazards; these include, (i) development is not proposed in the shoreline setback area or erosion hazard areas; (ii) the project parcel is not anticipated to be affected by hurricane storm surges; and (iii) the parking lot will have a finished elevation of 9 feet and the ground level of the building will have a finished elevation of 10 feet. Hazards with the potential to directly impact the portion of the parcels where development is proposed over the design life of those developments are:

- Tsunamis may occur and have the potential to directly impact the entire parcel. Impacts to the ground-level improvements would not be expected to threaten human health and safety because tenants will comply with tsunami evacuations.
- Storms (high wind) may occur but would be unlikely to have a substantial adverse effect on the proposed structure since it is required to be designed to withstand high winds.
- Earthquakes may occur. The potential for adverse effect associated with earthquakes will be minimized by building the proposed dwellings in compliance with applicable codes that address Seismic Zone 2a hazards.
- Although sea level rise is not anticipated to directly affect the project site, Farrington Highway may be susceptible to storm surges, which may adversely impact access to the project parcel.

The level of impact associated with these hazards is anticipated to be less than significant.

### 3.6.4 Avoidance, Minimization, or Mitigation Measures

In general, the proposed project will address coastal hazards and their associated potential impacts in a similar manner as new development has for years. This will include:

- Meeting or exceeding IBC's minimum design standards for Seismic Zone 2a.
- Conforming to the 2012 International Residential Code and Hawai'i State Building Code (HRS Chapter 107), as amended by CCH.
- Not placing structures in the shoreline setback.
- On-site storm water runoff will be directed into an inflation trench and planting areas, minimizing the potential for flooding.

The site owner and Applicant understand the CCH will, through the SMA permitting process, require they acknowledge the following:

- That the project parcels are susceptible to coastal hazards, which may result in harm to or loss of life and property.
- That land makai of the regulatory shoreline is State public land, falls within the State Land Use Conservation District, and must remain available for public use and recreational activities.
- That should any portion of a structure encroach into State public land, the State Board of Land and Natural Resources may require the removal of the structure or a lease for the encroachments extending into the State public land.
- That no claim of hardship due to erosion, sea level rise, or any other coastal hazard may be asserted in order to obtain approval for a Shoreline Setback Variance for a new shoreline protection structure.
- The owner/applicant, successor owners, and interested parties shall hold harmless and indemnify the City for any responsibility that may result from adverse impacts associated with sea level rise and coastal erosion.

### **3.7 Managing Development and Public Participation**

#### **3.7.1 Existing Conditions**

The *O‘ahu General Plan* (General Plan), the WSCP, and ROH Chapter 21 LUO inform, guide, managed, and regulate development in the CCH and, specifically, Nānākuli. ROH Chapter 26 Shoreline Setback Ordinance governs aspects of development near the shoreline.

As discussed in Section 1.3, on July 3, 2020, Hawaii Planning, LLC, acting on behalf of the Applicant, sent letters to the agencies and individuals identified in Table 1-1. All responses received were carefully considered during preparation of this EA.

This EA has been prepared to: (i) communicate the potential short- and long-term impacts of the proposed action; (ii) provide management agencies with the necessary information and analysis to make informed decisions; and (iii) afford the public an opportunity to review and comment on it.

#### **3.7.2 SMA and CZM Objectives, Policies, and Guidelines**

The development review process should stimulate public awareness, education, and participation in coastal management.

CZM policies related to managing development are:

- A) Use, implement, and enforce existing law effectively to the maximum extent possible in managing present and future coastal zone development;
- B) Facilitate timely processing of applications for development permits and resolve overlapping or conflicting permit requirements; and

C) Communicate the potential short and long-term impacts of proposed significant coastal developments early in their life cycle and in terms understandable to the public to facilitate public participation in the planning and review process.

CZM policies related to public participation are:

- A) Promote public involvement in coastal zone management processes;
- B) Disseminate information on coastal management issues by means of educational materials, published reports, staff contact, and public workshops for persons and organizations concerned with coastal issues, developments, and government activities; and
- C) Organize workshops, policy dialogues, and site-specific mediations to respond to coastal issues and conflicts.

### 3.7.3 Consistency with Land Use Plans, Policies, and Controls

#### *O‘ahu General Plan*

The *O‘ahu General Plan* was adopted by the City Council on December 1, 2021. The *O‘ahu General Plan* is a comprehensive statement of objectives and policies which sets forth the long-range aspirations of O‘ahu’s residents and the strategies of actions to achieve them. It is the focal point of a comprehensive planning process that addresses physical, social, economic and environmental concerns affecting the CCH. This planning process serves as the means of coordination by which the CCH government provides for the future growth of the metropolitan area of Honolulu.

The *O‘ahu General Plan* poses several objectives related to commercial businesses. Section III, Natural Environment and Resource Stewardship, Objective A: To protect and preserve the natural environment, states:

#### *Policy 4*

*Require development projects to give due consideration to natural features such as slope, flood and erosion hazards, water- recharge areas, distinctive land forms, and existing vegetation.*

#### *Policy 6*

*Design surface drainage and flood-control systems in a manner which will help preserve their natural settings.*

**Discussion:** As detailed in Section 2.2.4, the proposed project includes measures to address drainage and flood control in a manner that addresses these policies.

Section VII, Physical Development and Urban Design, Objective A, proposes: “To coordinate changes in the physical environment of Oahu to ensure that all new developments are timely, well-designed, and appropriate for the areas in which they will be located.” Further developing this theme, Section VII, Objective A, Policy 7 states:

Policy 7

*Locate new industries and new commercial areas so that they will be well related to their markets and suppliers, and to residential areas and transportation facilities.*

**Discussion:** The proposed site is appropriate for commercial use as it and parcels across Mōhihi Street are zoned B-1 for neighborhood business. The proposed building will accommodate the needs of the surrounding neighborhood. The project will avoid any undesirable “sprawl” of development because the subject site is designated, and previously used, for commercial purposes. The proposed development is consistent with the character of development and environmental qualities of the surrounding Nānākuli community in both nature and scope.

Furthermore, Section VII, Objective D states, “To maintain those development characteristics in the urban-fringe and rural areas which make them desirable places to live.” Specific policies follow from that, including:

Policy 1

*Develop and maintain urban-fringe areas as predominantly residential areas characterized by generally lower-rise, lower-density development which may include significant levels of retail and service commercial uses as well as satellite institutional and public uses geared to serving the needs of households.*

**Discussion:** The proposed project will contain commercial and retail uses geared towards serving the needs of households in the area.

Policy 4

*Maintain rural areas that reflect an open and scenic setting, dominated by small to moderate size agricultural pursuits, with small towns of low-density and low-rise character, and which allows modest growth opportunities tailored to address area residents’ future needs.*

**Discussion:** The proposed project is in the developed town portion of Nānākuli, will be a low-rise, two-story commercial building, and maintain the rural character of the community without displacing agricultural pursuits.

*Wai‘anae Sustainable Communities Plan*

The WSCP (DPP, 2012) summarizes the role of Wai‘anae in O‘ahu’s development pattern as follows:

*...preservation of the rural landscape and of the rural lifestyle of the Wai‘anae District’s people.*

And elsewhere that the:

*...vision for the future of the Wai‘anae District is that all members of our community – from the kūpuna (grandparents/elders) to the mo‘omo‘o (children, including those yet unborn) have their essential needs met.*

The WSCP's proposed land use policies are intended to provide guidance for future actions and agency decision-making. General policies are broad statements of intent that express the CCH's overall philosophy toward particular land uses and their effective management. Planning principles and guidelines provide more specific guidance in terms of planning, design, and implementation of projects and programs. The overarching theme of the WSCP is that the Wai'anāe region should remain relatively stable and oriented toward maintaining and enhancing the region's ability to sustain its safe, clean, and diverse character and the relaxed lifestyle that flows from it.

In Section 3.9 Commercial and Industrial Uses, the plan states that (DPP, 2012):

*Encourage the establishment of appropriate commercial businesses that will provide jobs and goods and services in the Wai'anāe District, especially within the designated Country Town and Village Center areas. Public agency actions in this area may include the approval of appropriate commercial zoning, provision of infrastructure, beautification of main streets, tax abatements, technical assistance, training in small business management, grants, and loans. Commercial businesses should be allowed only in the Rural Residential areas, except for those small-scale country businesses that are compatible with agricultural land uses.*

Section 3.9.3.1 of the WSCP provides specific design guidelines for neighborhood commercial establishments. These guidelines include the following (DPP, 2012):

*Buildings should be residential in scale: Height, size, and massing of the building should be compatible with adjacent residential structures.*

*Total floor area of any building should not exceed 10,000 square feet.*

*Building forms and roof lines should incorporate some design variation in order to avoid large uniform walls or large roof plates.*

*Exterior materials and colors should be compatible with those used in adjacent residences.*

*Access to parking and loading areas should be from an arterial or collector street.*

*Storefronts should be oriented to pedestrian ways, with parking in the rear of the commercial buildings.*

*Parking and loading areas should be screened from nearby residential areas and from the street.*

*Lighting and signage should be relatively low key so as to avoid conflict with nearby residential areas.*

**Discussion:** The proposed action is intended to provide appropriate, accessible space for commercial enterprises to serve the Wai'anāe community in an area designated as Rural Residential in the WSCP. The businesses which this commercial space will support will provide jobs, goods, and services in the plan area. Thus, the proposed action is supportive of these policies of the WSCP.

The proposed action is also generally consistent with the design guidelines in Section 3.9.3.1 of the Wai‘anae Sustainable Communities Plan. The building is residential in scale at two stories. The floor area of the business area is under 10,000 square feet. Large, uniform walls have been avoided, with the exception of walls along the residential property lines where increased privacy is typically preferred by adjacent residents. Exterior materials and colors were selected to be compatible with those used in the surrounding neighborhood. Vehicular access for parking and loading is provided from Mōhihi Street, a collector street, consistent with minimizing impacts on residential streets and HDOT requirements regarding Farrington Highway. While parking is not located at the rear of the building, the area is small in scale and will be screened from nearby residences. Storefronts remain clearly visible from the sidewalk to support pedestrian activity. No signage or lighting is proposed that would conflict with or negatively affect adjacent residential uses. Overall, the project incorporates the intent of the design guidelines and has been thoughtfully designed to blend with and support the character of the surrounding community.

### *Land Use Ordinance*

The purpose of the CCH’s LUO, contained in ROH Chapter 21, is to regulate land use in a manner that will encourage orderly development in accordance with adopted land use policies, including the *O‘ahu General Plan* and the WSCP. These standards govern the location, height, area, and site of structures, yard areas, off-street parking facilities, and open spaces, and the use of structures and land for agriculture, industry, business, residences, and other purposes.

### LUO Article 3

The action is in the CCH’s B-1 Neighborhood Business District. The intent of the B-1 Neighborhood Business District is to allow for relatively small areas in rural town centers which serve the daily retail and other business needs of the surrounding population. Because the proposed project consists of construction of a two-story commercial building for retail and commercial use meant to serve the neighborhood and community, it is an allowable use per the CCH’s LUO. In addition, the proposed development will meet all applicable design standards including maximum building area, height, and other factors, as summarized in Table 3-4.

**Table 3-4: Summary of LUO Compliance**

LUO Standard	B-1 Zone	Existing Conditions	Proposed Project
Minimum Lot Area	5,000 square feet	19,737 square feet	19,737 square feet
Minimum Lot Width and Depth	50 feet	100 feet	100 feet
Front Yard	10 feet	NA	<a href="#">15 feet (fronting Farrington Highway)</a>
Side and Rear Yard (see note)	0 or 5 feet	NA	<a href="#">10 feet (fronting Mōhihi Street)</a> 5 feet (all others)
Maximum Density Floor Area Ratio	1.0	NA	0.53
Maximum Height	40 feet	NA	26.2 feet
Height Setbacks (see note)	2:1 over 15' on side/rear adjacent to residential	NA	Complies (Sheet A201)

Source: LUO Standard and B-1 Zone columns: Land Use Ordinance, Department of Planning and Permitting, City and County of Honolulu, Revised September 2025. Action column: Planning Solutions, Inc. and Roy K. Yamamoto Architect.

[Note for Front Yard: A 15-foot-wide setback along the project site frontage on Farrington Highway shall be provided for future highway improvements, as stipulated by HDOT in their letter, dated July 21, 2020 \(HWY-PS 2.3224\).](#)

Note for Side and Rear Yard: Where the side or rear property line of a zoning lot adjoins the side or rear yard of a zoning lot in a residential, apartment or apartment mixed use district, there shall be a side or rear yard which conforms to the yard requirements for dwelling use of the adjoining district. In addition, see Section 21-4.70-1 for landscaping and buffering requirements.

Note for Height Setbacks: B-1 District Transitional Height Setback. Where a zoning lot adjoins a zoning lot in a residential district, the residential district height setbacks will be applicable at the buildable area.

#### LUO Article 4

[The parcel is not a flag lot. The yard areas will not be developed in a manner inconsistent with LUO § 21-4.30. The roof overhangs will not extend more than 30 inches into yard areas, including the yards adjacent to residential parcels. No retaining walls are proposed. Landscaping will be provided to screen the parking lot, and the trash enclosure will be screened by six-foot-tall walls on three sides. Outdoor lighting will be fully shielded to eliminate direct illumination of adjacent residential parcels. The caretaker unit will not be utilized as a transient vacation rental or bed and breakfast home.](#)

#### LUO Article 5

[The project will provide for one Owner’s unit or “caretaker unit.” According to LUO §21-5.50-3\(e\)\(2\) “Caretaker unit – standards” states:](#)

*(2) Except in the P-2, AG-1, and AG-2 zoning districts, one accessory caretaker dwelling is permitted for each principal use; provided that:*

*(A) No more than four caretaker units are allowed per zoning lot;*

*(B) The accessory caretaker dwelling must be located in an area that does not interrupt or interfere with the principal use; and*

*(C) In the business, business mixed-use, industrial, and industrial mixed-use zoning districts, the caretaker dwelling must be above or behind the principal use.*

The caretaker unit will be located on the second floor in the southwest corner of the building and will not interrupt or interfere with the commercial activities in the building. The unit will comply with all requirements.

### LUO Article 6

The project will provide the required off-street parking. ROH § 21-6.20 requires 1 off-street parking spot for every 500 square feet of commercial space, and 1 off-street parking spot for every 1,000 square feet of living space (i.e., the caretaker unit). With approximately 9,871 square feet of commercial area, 20 off-street parking spots are required; for the 800 square foot caretaker unit, 1 off-street parking spot is required, for a total of 21 stalls. In addition, pursuant to ROH § 21-6.110 the off-street loading requirement for a commercial structure is 1 loading stall per 10,000 square feet. In total, 21 parking stalls will be provided: (i) 19 standard stalls; (ii) 2 ADA-accessible stalls; and (iii) 1 loading stall will be provided. The proposed project will also provide for bicycle parking: 5 short-term parking spots and 1 long-term.

### *Shoreline Setback Ordinance*

ROH Chapter 26 Shoreline Setback Ordinance establishes the shoreline setback at “Sixty feet plus 70 times that annual coastal erosion rate, up to a maximum setback of 130 feet.” Section 3.6 includes an Erosion Hazard section that discusses the annual coastal erosion rate. The average erosion rate of the two transects nearest the project parcels is -0.17 feet per year. Therefore, the shoreline setback is 72 feet. The site’s makai property line is roughly 130 feet from the shoreline. Therefore, all proposed development is mauka of the shoreline setback and the proposed development complies with the Shoreline Setback Ordinance.

### 3.7.4 Potential Impacts and SMA/CZM Consistency

The proposed project is complying with applicable plans, policies, and controls regarding coastal development and development in the B-1 zone. No variances will be requested. As such, the project will have a negligible impact on existing development. The Applicant will continue to work cooperatively with all government agencies with oversight responsibilities to facilitate efficient processing of permits and informed decision-making by the responsible parties.

On September 15, 2020, a project representative attended the Nānākuli-Mā‘ili Neighborhood Board meeting and provided information regarding the project. Another presentation regarding the project will be made to the Nānākuli-Mā‘ili Neighborhood Board prior to submitting an SMA Major application to DPP. DPP will hold a public hearing in support of the SMA Major application, providing the public with an additional opportunity for participation. Finally, the City Council will consider a resolution during which the public can provide testimony at a Zoning Committee hearing and a full council hearing.

Through the completed and upcoming public outreach events and project consistency with applicable plans and policies, the proposed project will be consistent with the SMA/CZM objectives.

### 3.7.5 Avoidance, Minimization, or Mitigation Measures

The site owner and Applicant understand the CCH will, through the SMA permitting process, require they acknowledge that bed and breakfast homes and transient vacation units, as those terms are defined in ROH Chapter 21, the Land Use Ordinance, are not allowed on the project parcel.

## **3.8 Beach and Coastal Dune Protection**

### 3.8.1 Existing Conditions

According to the Hawai'i SLR Viewer the entire parcel, as well as the surrounding community, is mapped as Coral outcrop (CR) per U.S. Geological Survey (USGS) records. There are no dunes or marine sands on the parcel.

There is a sandy beach and dunes makai of the parcel, across Farrington Highway. The project site is mapped as a coral outcrop and is not part of a coastal dune system.

### 3.8.2 SMA and CZM Objectives, Policies, and Guidelines

Development within the SMA should facilitate beach management and protection by safeguarding beaches and coastal dunes for public use and recreation, the benefit of ecosystems, and use as natural buffers against coastal hazards. New structures should be located mauka of the shoreline setback line to conserve open space, minimize interference with natural shoreline processes, and minimize the loss of improvements due to erosion.

CZM policies related to beaches and coastal dunes are:

- A) Locate new structures inland from the shoreline setback to conserve open space, minimize interference with natural shoreline processes, and minimize loss of improvements due to erosion;
- B) Prohibit construction of private shoreline hardening structures, including seawalls and revetments, at sites having sand beaches and at sites where shoreline hardening structures interfere with existing recreational and waterline activities;
- C) Minimize the construction of public shoreline hardening structures, including seawalls and revetments, at sites having sand beaches and at sites where shoreline hardening structures interfere with existing recreational and waterline activities;
- D) Minimize grading of and damage to coastal dunes;
- E) Prohibit private property owners from creating a public nuisance by inducing or cultivating the private property owner's vegetation in a beach transit corridor; and
- F) Prohibit private property owners from creating a public nuisance by allowing the private property owner's unmaintained vegetation to interfere or encroach upon a beach transit corridor.

### 3.8.3 Potential Impacts and SMA/CZM Consistency

The Proposed Action will not substantially modify site topography. The project does not involve the establishment of shoreline hardening structures and does not involve any development within the shoreline setback. Only minor grading mauka of the shoreline setback area is proposed and is limited to using material excavated for foundations to create the desired grade. No impacts to beaches or coastal geomorphic dunes are anticipated.

The development will not have an adverse effect on the beach or coastal dune and is consistent with the SMA/CZM policies.

### 3.8.4 Avoidance, Minimization, or Mitigation Measures

The project will implement BMPs (Section 2.2.1) to avoid and minimize potential construction-phase impacts. The measures outlined in Section 3.4.4 regarding landscaping and irrigation will be implemented.

## **3.9 Marine and Coastal Resources**

### 3.9.1 Existing Conditions

There are no wetlands, bays, estuaries, or other water features on the project parcel. Ulehawa Beach/Pacific Ocean on the makai side of Farrington Highway is designated as an estuarine and marine wetland. In addition, Ulehawa Stream is located roughly 400 feet to the northwest. There are no unusual marine or coastal resources in the project area. No research, study, or use (other than recreational discussed in Section 3.1) of the marine or coastal resources is known to occur in the project area.

### 3.9.2 SMA and CZM Objectives, Policies, and Guidelines

Development within the SMA should promote the protection, use, and development of marine and coastal resources to ensure that these resources are ecologically and environmentally sound and economically beneficial. Impacts on water resources, beaches, coastal dunes, and scenic or recreational amenities resulting from the construction of structures must be minimized. Development within wetland areas should be limited to activities that are dependent on or enhance wetlands or are otherwise approved by appropriate State and federal agencies. Examples include traditional Hawaiian agricultural uses such as wetland taro production, aquaculture, and fishpond management, as well as activities that clean and restore traditional wetland areas or create new wetlands in appropriate areas.

CZM policies related to marine resources are:

- A) Ensure that the use and development of marine and coastal resources are ecologically and environmentally sound and economically beneficial;
- B) Coordinate the management of marine and coastal resources and activities to improve effectiveness and efficiency;

- C) Assert and articulate the interests of the State as a partner with federal agencies in the sound management of ocean resources within the United States exclusive economic zone;
- D) Promote research, study, and understanding of ocean and coastal processes, impacts of climate change and sea level rise, marine life, and other ocean resources in order to acquire and inventory information necessary to understand how ocean development activities relate to and impact upon ocean and coastal resources; and
- E) Encourage research and development of new, innovative technologies for exploring, using, or protecting marine and coastal resources.

### 3.9.3 Potential Impacts and SMA/CZM Consistency

The proposed project will not involve work that affects any bays, estuaries, or water features. The proposed development will not occur in Ulehawa Beach/Pacific Ocean and the development is not expected to have an adverse impact on water quality. Due to the size of the project's disturbance area (<1 acre), it will not trigger the requirement for a National Pollutant Discharge Elimination System, Notice of Intent – Construction (NPDES NOI-C). Nevertheless, during construction, BMPs relating to storm water management that comply with CCH's *Rules Relating to Stormwater Quality* will be implemented. Storm water from the hardscape areas of the development will be directed to landscaped areas and infiltration/retention trenches, which are 5 feet wide by 170 feet long and 5.5 feet deep.

No adverse impacts to marine and coastal resources are anticipated and the proposed development is consistent with SMA/CZM policies.

### 3.9.4 Avoidance, Minimization, and Mitigation Measures

Storm water will be managed on-site, and construction-related activities will employ standard BMPs relating to storm water management and will comply with CCH's *Rules Relating to Stormwater Quality*.

## **3.10 Cumulative Impact or Significant Effect and Compelling Public Interest**

Cumulative effects are impacts which result from the incremental effects of an activity when added to other related past, present, and reasonably foreseeable future action, regardless of which agency, organization, or individual undertakes such action(s). Cumulative impacts may result from individually minor but collectively significant actions taking place over time.

### 3.10.1 Existing Conditions

The parcel in this area has been developed and used for commercial purposes for decades. The project site is like other business parcels nearby, including those across Mōhihi Street. The existing and proposed development is consistent with the *O'ahu General Plan* and the WSCP (Section 3.7.3).

### 3.10.2 SMA and CZM Objectives, Policies, and Guidelines

Development within the SMA should not have any cumulative impact or significant effect, unless minimized to the extent practicable and clearly outweighed by public health, safety, or other compelling public interest.

### 3.10.3 Potential Impacts and SMA/CZM Consistency

The discussion in Sections 3.1 through 3.9 address the impacts associated with the development proposed on the parcel. The proposed development is consistent with applicable plans, policies, and land use controls for the project site. No other development is known to be planned in the immediate vicinity of the proposed project. In addition, the proposed project is not contingent on any other action, public or private, and will not individually cause future actions to be taken by any public or private entities. Because the proposed project will not result in any significant effects individually, nor is there compelling public interest in it, it also does not have the potential to contribute to secondary or cumulative impacts either and is wholly consistent with SMA/CZM policies related to cumulative and/or secondary impacts.

## 4.0 DETERMINATION

### 4.1 Significance Criteria Findings

Hawai‘i Administrative Rule §11-200.1-14 establishes procedures for determining if an EIS should be prepared or if a FONSI is warranted. HAR §11-200.1-14(d) provides that proposing agencies should issue an environmental impact statement preparation notice for actions that it determines may have a significant effect on the environment. HAR §11-200.1-13(b) lists the following criteria to be used in making that determination. After each significance criteria is a brief description of why the proposed project will not have a significant impact.

1. *Irrevocably commit a natural, cultural, or historic resource;*

No unusual, rare, or protected natural or cultural resources or historic resources are known to be present on the project site. It does not involve the loss of any significant or valuable natural, cultural, or historic resources. Measures outlined in Section 3.2.5 address the potential for the presence of unknown subsurface cultural and historic sites.

2. *Curtail the range of beneficial uses of the environment;*

The project is consistent with applicable plans, policies, and controls (Section 3.7.3). Commercial use of the site is considered a beneficial use and will not curtail other beneficial uses in the region.

3. *Conflict with the State’s environmental policies or long-term environmental goals established by law;*

The proposed project does not conflict with the long-term environmental policies, goals and guidelines of the State of Hawai‘i. The project’s potential adverse impacts are primarily associated with short-term construction-related activities and can be mitigated through adherence to standard construction mitigation practices. As discussed in Section 3.7.3, the Proposed Action is consistent with all applicable plans, policies, and controls. Further, the Proposed Action is consistent with the State of Hawai‘i’s long-term environmental policies and goals, as expressed in HRS Chapter 344 and elsewhere in state law.

4. *Have a substantial adverse effect on the economic welfare, social welfare, or cultural practices of the community and State;*

The Proposed Action will provide short-term economic benefits in the form of construction jobs as well as employment associated with the operation of businesses that occupy the commercial units in the future. The proposed project will also positively impact the social welfare of the region by providing commercial amenities for the residents of the community.

5. *Have a substantial adverse effect on public health;*

The proposed project is anticipated to have a positive impact on the public health by providing commercial services to the community. The potential temporary construction-phase impacts related to noise, air quality, and water quality will be addressed through construction management practices outlined in Section 2.2.1 and

- will not adversely affect public health. The project site is not near and will not impact hospitals or medical centers.
6. *Involve adverse secondary impacts, such as population changes or effects on public facilities;*

The Proposed Action will not produce substantial secondary impacts, nor will it foster population growth, impose adverse economic impacts, or stress public facilities or services. Instead, it involves redeveloping a commercial site in a manner consistent with its intended use and consistent with neighboring businesses.
  7. *Involve a substantial degradation of environmental quality;*

Construction activities associated with the proposed project will result in relatively insignificant short-term impacts to noise, air quality, and traffic in the immediate project vicinity. The proposed project will not degrade environmental quality with the incorporation of the recommended mitigation measures during the construction phase. The Proposed Action will not have substantial long-term environmental effects.
  8. *Be individually limited but cumulatively have substantial adverse effect upon the environment or involves a commitment for larger actions;*

The proposed project is not anticipated to have a considerable cumulative effect on the environment (Section 3.10). The Proposed Action does not require a commitment to a larger action or any action beyond the project site and is not intended to facilitate substantial economic or population growth.
  9. *Have a substantial adverse effect on a rare, threatened, or endangered species, or its habitat;*

As discussed in Section 3.4, no rare, threatened, or endangered species are known to utilize the project site, and no activities are contemplated that will pose a threat to rare, threatened, or endangered species, or their habitat. In addition, the Proposed Action will not utilize any resource or habitat needed for the protection of rare, threatened, or endangered species.
  10. *Have a substantial adverse effect on air or water quality or ambient noise levels;*

Noise levels and airborne emissions will temporarily increase during construction activities. BMPs (Section 2.2.1) will be implemented and any effects will be brief, minor, and restricted to the immediate vicinity of the project site. Once construction is completed, the proposed project will not produce substantial airborne emissions, waterborne pollution, or noise.
  11. *Have a substantial adverse effect on or be 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;*

As discussed in Section 3.6.1, and due to its proximity to the shoreline, the project site is in a Tsunami Evacuation Zone. The parcel abuts the SLR-XA at 3.2 feet of sea level rise on the makai side. The proposed project will cover much of the site with impervious surfaces, which will increase the volume of runoff relative to the presently

vacant site. Grading for the new project will drain runoff towards Mōhihi Street where planting areas and infiltration trenches will minimize the potential for flooding. The proposed continued use of the parcels for commercial purposes is consistent with applicable plans, policies, and controls, indicating that state and local governments consider the site appropriate for commercial development. The measures outlined in Section 3.6.4 will result in the proposed project having a less than significant effect.

12. *Have a substantial adverse effect on scenic vistas and viewplanes, during day or night, identified in county or state plans or studies; or,*

The proposed building will not impact important makai views from Farrington Highway since the project site is located on the mauka side of the highway. The mauka view will be altered with the proposed building on currently vacant land but will be consistent with the neighboring two-story residences in the vicinity. The proposed project will support the rural community character of Nānākuli.

13. *Require substantial energy consumption or emit substantial greenhouse gases.*

Construction and operation of the proposed project will not require a substantial increase in energy consumption. The proposed project will require the use of modest amounts of energy. However, once the relatively brief construction phase is complete, the proposed project will require only as much energy as is typical of a small business. The project will not emit substantial quantities of greenhouse gases.

## 4.2 Determination

In view of the foregoing, the Applicant's assessment is that the Proposed Action will not have a significant adverse impact on the environment. DPP concurs with this assessment and has issued a FONSI for the Proposed Action.

## **5.0 CONSULTATION AND DISTRIBUTION**

### **5.1 Early Consultation**

A critical component of the planning effort for the Proposed Action was developing and implementing an early consultation program to inform public agencies and obtain their input regarding the project's purpose, scope, potential impacts, and recommended mitigation measures. This is discussed in Section 1.3 and Table 1-1 identifies the agencies and individuals that were sent early consultation letters. Early consultation included a presentation to the neighborhood board on September 15, 2020.

### **5.2 Distribution of the DEA**

The Applicant has provided this EA to the parties listed in Table 5-1 with a request for review and comment.

#### **Table 5-1: DEA Distribution List**

##### **Federal Agencies**

U.S. Fish and Wildlife Service

##### **State Agencies**

Hawai'i Department of Health (HDOH)  
HDOH Environmental Planning Office  
Office of Environmental Quality Control  
HDOH Wastewater Branch  
Department of Land and Natural Resources (DLNR)  
DLNR Land Division  
DLNR State Historic Preservation Division  
DLNR Office of Conservation and Coastal Lands  
Department of Transportation  
Office of Planning and Sustainable Development

##### **City and County of Honolulu**

Department of Planning and Permitting  
Board of Water Supply  
Department of Facility Maintenance  
Honolulu Fire Department  
Honolulu Police Department  
Office of Climate Change, Sustainability and Resiliency  
Nānākuli-Mā'ili Neighborhood Board No. 36

### **5.3 DEA/AFONSI Comments**

Written submissions concerning the DEA/AFONSI were received during the 30-day comment period from the agencies, organizations, and individuals listed in Table 5-2. Substantive comments in those submissions were carefully considered during preparation of this FEA/FONSI.

**Table 5-2: Comments Received on the DEA/AFONSI**

Agency/Organization	Individual
n/a	J. Perry, Wai‘anae Resident
Department of Planning and Permitting	Dean Uchida, Director
Honolulu Fire Department	Jason Samala, Assistant Chief
Board of Water Supply	Ernie Lau, Manager & Chief Engineer
Office of Planning and Sustainable Development	Mary Alice Evans, Director
Department of Parks and Recreation	Laura Thielen, Director
Department of Transportation Services	J. Roger Morton, Director
Hawai‘i Department of Health	n/a

#### **5.4 Responses to DEA/AFONSI Comments**

[Response to substantive comments are provided below.](#)



January 2026

State of Hawaii  
Office of Planning and Sustainable Development  
PO Box 2359  
Honolulu, Hawaii 96804

**Subject: Response to Comment on Draft Environmental Assessment for the 87-1818 Farrington Highway Commercial Building Project, TMK No. 7-7-035:005**

Dear Ms. Thielen:

Thank you for your November 17, 2021, letter with comments. We appreciate the time you spent reviewing the DEA and preparing your response.

To simplify your review, we have reproduced your substantive comments below in italics, followed by our response:

**Comment 1**

*The EA should discuss triggers of preparation of an EA for the ROH Chapter 25 requirement that any proposed development requiring a SMA use permit shall be subject to an assessment by the agency in accordance with the procedural steps set forth in HRS Chapter 343. The Final EA should refer to Hawaii Administrative Rules (HAR) Chapter 11-200.1, rather than Chapter 11-200 (see Draft EA page 36.).*

**Response**

This information has been added to Section 2.1 of the Final Environmental Assessment (FEA).

**Comment 2**

*The Draft EA, page 12, acknowledges that the project site lies completely outside of the 3.2 ft sea level rise exposure area. While sea level rise projections indicate that the subject property may not experience impacts under 2.0 ft or 3.2 ft of sea level rise, please note that Farrington Road may be subject to inundation from storm surges and therefore impact access to the proposed project site.*

## **Response**

Text has been added to Section 3.6.3 of the FEA that states “Although sea level rise is not anticipated to directly affect the project site, Farrington Highway may be susceptible to storm surges, which may adversely impact access to the project parcel.”

## **Comment 3**

*In enacting Act 224, SLH 2005, the legislature found that light pollution in Hawaii's coastal areas and artificial lighting illuminating the shoreline and ocean waters can be disruptive to avian and marine life. The exterior lighting and lamp posts associated with the proposed residence project shall be cutoff luminaries to provide the necessary shielding to mitigate potential light pollution in the coastal areas and lessen possible seabird strikes. No artificial light, except as provided in HRS §§ 205A-30.5(b) and 205A-71(b), shall be directed to travel across property boundaries toward the shoreline and ocean.*

## **Response**

Text has been added to Section 3.4.4 of the FEA that states “Exterior light fixtures will be fully shielded using full cutoff fixtures with the light directed downward so that the light bulb is only visible from below the light fixture. Exterior light fixtures will not directly illuminate the shoreline, sandy beach, or ocean waters. All outdoor artificial light sources will not exceed a color temperature of 4,000 degrees Kelvin.”

## **Comment 4**

*The proposed project will cover much of the project site with impervious surfaces, which will increase the volume of runoff relative to the presently undeveloped condition of the site. The OPSD recommends that the Final EA assess the increase in onsite surface runoff due to the proposed development based on a 50-year, 1-hour storm, and discuss the drainage system required to direct on site runoff into catch basins, landscaped areas, and/or a detention area.*

## **Response**

Text has been added to Section 2.2.4 of the FEA that states “During larger storms, such as 50-year or 100-year events, stormwater generated on-site may exceed the capacity of the retention system. During these larger storms, stormwater runoff will continue to be directed to on-site landscaped areas and the retention system. Stormwater exceeding the capacity of on-site infiltration and retention will flow to the storm drain at the southern corner of the Mōhihi Street/Farrington Highway intersection. According to information available from the City and County of Honolulu, a 24-inch-diameter pipe extends from that storm drain to Ulehawa Stream channel.”

Department of Transportation Services

January 2026

Page 3

You may download a copy of the FEA at the Environment Review Program's website (<https://planning.hawaii.gov/erp/>) once its availability is announced in *The Environmental Notice*.

If you have any questions or concerns regarding this project, please contact me at (808) 550-4559.

Sincerely,

James Hayes

Planner



January 2026

Jason Samala, Assistant Chief  
Honolulu Fire Department  
City and County of Honolulu  
636 South Street  
Honolulu, Hawai'i 96813

**Subject: Response to Comment on Draft Environmental Assessment for the 87-1818 Farrington Highway Commercial Building Project, TMK No. 7-7-035:005**

Dear Assistant Chief Samala:

Thank you for your November 3, 2021, letter concerning the *Draft Environmental Assessment for the 87-1818 Farrington Highway Commercial Building (DEA)*. We appreciate the time you spent reviewing the DEA and preparing your response.

Thank you for your input concerning access roads and water supply. Fire access roads will be provided per National Fire Protection Association (NFPA) guidance. Water supply for fire protection will also follow NFPA guidance. These elements will be a part of the building permit application and submitted to HFD for review and approval.

You may download a copy of the Final Environmental Assessment at the Environment Review Program's website (<https://planning.hawaii.gov/erp/>) once its availability is announced in *The Environmental Notice*.

If you have any questions or concerns regarding this project, please contact me at (808) 550-4559.

Mahalo,

James Hayes  
Planner



January 2026

Ernest Y.W. Lau, Manager and Chief Engineer  
Board of Water Supply  
City and County of Honolulu  
630 South Beretania Street  
Honolulu, Hawai'i 96843

**Subject: Response to Comment on Draft Environmental Assessment for the 87-1818 Farrington Highway Commercial Building Project, TMK No. 7-7-035:005**

Dear Mr. Lau:

Thank you for your November 8, 2021, letter concerning the *Draft Environmental Assessment for the 87-1818 Farrington Highway Commercial Building* (DEA). We appreciate the time you spent reviewing the DEA and preparing your response.

We appreciate your confirmation that the existing water system is adequate to accommodate the proposed commercial development. We understand final decision of availability of water will be confirmed once the building permit application has been submitted for review. We will also address on-site fire protection requirements with the Honolulu Fire Department through the building permit process.

You may download a copy of the Final Environmental Assessment at the Environment Review Program's website (<https://planning.hawaii.gov/erp/>) once its availability is announced in *The Environmental Notice*.

If you have any questions or concerns regarding this project, please contact me at (808) 550-4559.

Mahalo,

James Hayes  
Planner



January 2026

Laura H. Thielen, Director  
Department of Parks and Recreation  
City and County of Honolulu  
1000 Ulu'ōhi'a Street, Suite 309  
Kapolei, Hawai'i 96707

**Subject: Response to Comment on Draft Environmental Assessment for the 87-1818 Farrington Highway Commercial Building Project, TMK No. 7-7-035:005**

Dear Ms. Thielen:

Thank you for your November 19, 2021, letter concerning the *Draft Environmental Assessment for the 87-1818 Farrington Highway Commercial Building* (DEA). We appreciate the time you spent reviewing the DEA and preparing your response.

We appreciate your confirmation that the proposed project will not impact any facility or program of the Department of Parks and Recreation and that you have no further comments on the EA process.

You may download a copy of the Final Environmental Assessment at the Environment Review Program's website (<https://planning.hawaii.gov/erp/>) once its availability is announced in *The Environmental Notice*.

If you have any questions or concerns regarding this project, please contact me at (808) 550-4559.

Mahalo,

James Hayes  
Planner



January 2026

J. Roger Morton, Director  
Department of Transportation Services  
City and County of Honolulu  
650 South King Street, 3<sup>rd</sup> Floor  
Honolulu, Hawai'i 96813

**Subject: Response to Comment on Draft Environmental Assessment for the 87-1818 Farrington Highway Commercial Building Project, TMK No. 7-7-035:005**

Dear Mr. Morton:

Thank you for your November 22, 2021, memorandum (Ref. No. TP10/21-865848) concerning the *Draft Environmental Assessment for the 87-1818 Farrington Highway Commercial Building* (DEA). We appreciate the time you spent reviewing the DEA and preparing your response.

To simplify your review, we have reproduced your substantive comments below in italics, followed by our response:

### **Comment 1**

*Draft Environmental Assessment (DEA), page 18, Section II.E.7 and DEA, page 44, Appendix I, Site/Ground Floor Plan. Page 18 indicates two driveways on Mohihi Street providing site access; this does not match the site plan shown in Appendix I, page 44, which indicates that there will only be one driveway on Mohihi Street. The Department of Transportation Services (DTS) prefers that that there be only one driveway on Mohihi Street.*

### **Response**

Thank you for drawing this to our attention. In the forthcoming Final Environmental Assessment (FEA), both the site plan now found in Figure 2-4, and the project description now found in Section 2.2.1, indicate that access to the site will be via a single driveway off of Mōhihi Street. The plans attached to the FEA do indicate an existing driveway to the site off of Farrington Highway; this driveway is vestigial and will not be used in any way as part of the proposed development.

## **Comment 2**

***Bus Stop Improvements.** Investigate the feasibility of improving the bus stop fronting the project site; this may include, but is not limited to, constructing a shelter, installing lighting, benches, and other amenities, and relocating a bus stop onto private property to better enforce the “No Lying Down at Bus Stops” Ordinance (Revised Ordinances of Honolulu, Section 13-12).*

## **Response**

The project proponent will investigate this; however, the State of Hawai‘i Department of Transportation has required the project provide a 15 foot setback from Farrington Highway. Therefore, the feasibility of relocating the bus stop onto private property is dramatically decreased.

## **Comment 3**

***Street Usage Permit.** A street usage permit from the DTS should be obtained for any construction-related work that may require the temporary closure of any traffic lane or pedestrian mall on a City street.*

## **Response**

The Applicant acknowledges that, should any of the work related to construction of the proposed project necessitate a lane closure, it will need to obtain a Street Usage Permit from your department prior to doing so.

## **Comment 4**

***Neighborhood Impacts.** The area representatives, neighborhood board, as well as the area residents, businesses, emergency personnel (fire, ambulance, and police), Oahu Transit Services, Inc. (TheBus and TheHandiVan), etc., should be kept apprised of the details and status throughout the project and the impacts that the project may have on the adjoining local street area network.*

## **Response**

The Applicant will continue to coordinate with the area’s elected officials, neighborhood board, emergency services, and the neighborhood board throughout the planning and construction process for the proposed project. A presentation to the Neighborhood Board’s NB No. 36 Nanakuli-Mailii Housing and Zoning Committee meeting was provided on Thursday, December 4, 2025, at 6:30 p.m. at the Nānākuli Public Library. A presentation to the full board is anticipated in February 2026.

**Comment 5**

*Bus Stops. The project site is in the immediate vicinity of bus stops. Please coordinate roadway improvements with DTS - Transportation Mobility Division (TMD). Contact DTS-TMD at [TheBusStop@honolulu.gov](mailto:TheBusStop@honolulu.gov)*

**Response**

Thank you for this information. The Applicant will coordinate with DTS's Transportation Mobility Division as the project approaches implementation.

**Comment 6**

*Disability and Communication Access Board (DCAB). Project plans (vehicular and pedestrian circulation, sidewalks, parking and pedestrian pathways, vehicular ingress/egress, etc.) should be reviewed and approved by DCAB to ensure full compliance with Americans with Disabilities Act requirements.*

**Response**

The Applicant will provide the Disability and Communication Access Board with a copy of the project plans and a request for review and comment.

You may download a copy of the FEA at the Environment Review Program's website (<https://planning.hawaii.gov/erp/>) once its availability is announced in *The Environmental Notice*.

If you have any questions or concerns regarding this project, please contact me at (808) 550-4559.

Sincerely,

James Hayes  
Planner



January 2026

Ms. Dawn Takeuchi Apuna, Director  
Department of Planning and Permitting  
City and County of Honolulu  
650 South King Street, 7<sup>th</sup> Floor  
Honolulu, Hawai'i 96813

**Subject: Response to Comment on Draft Environmental Assessment for the 87-1818 Farrington Highway Commercial Building Project, TMK No. 7-7-035:005**

Dear Ms. Apuna:

Thank you for your November 22, 2021, memorandum (Ref. No. TP10/21-865848) concerning the *Draft Environmental Assessment for the 87-1818 Farrington Highway Commercial Building* (DEA). We appreciate the time you spent reviewing the DEA and preparing your response.

To simplify your review, we have reproduced your substantive comments below in italics, followed by our response:

### **Comment 1**

*The final EA should discuss if the site and floor plans have considered or incorporated the design guidelines for neighborhood commercial establishments, as listed in Section 3.9.3.1 of the Waianae Sustainable Communities Plan.*

### **Response**

The proposed building has been designed to be consistent with the neighborhood commercial design guidelines in Section 3.9.3.1 of the Wai'anāe Sustainable Communities Plan. The building is residential in scale at two stories, with a commercial space floor area under 10,000 square feet. Large, uniform walls have been avoided, except walls along the residential property lines where increased privacy is typically preferred by adjacent residents. Exterior materials and colors are selected to be compatible with those used in the surrounding neighborhood. Vehicular access for parking and loading is provided from Mōhihi Street, a collector street, consistent with minimizing impacts on residential streets. While parking is not located at the rear of the building, the area is small in scale and will be screened from nearby residences. Storefronts remain clearly visible from the sidewalk to support pedestrian activity. No signage or lighting is proposed that would conflict with or negatively affect

adjacent residential uses. Overall, the project incorporates the intent of the design guidelines and has been thoughtfully designed to blend with and support the character of the surrounding community.

## **Comment 2**

*The final EA should include a thorough assessment of an alternative configuration that brings the building up along the street frontages and tucks the parking lot behind the building, in order to improve pedestrian safety and mitigate aesthetic impacts.*

## **Response**

An alternative configuration that brings the building up to the street frontage with parking located behind the structure was considered. However, this layout was determined to be less compatible with the surrounding residential context. The proposed L-shaped massing allows the building to sit lower and more comfortably alongside the neighboring homes, reducing the perceived scale from the street and providing a more sensitive transition between commercial and residential uses.

Locating the parking area behind the building would also shift vehicular activity deeper into the site and closer to existing residences. In contrast, the proposed configuration keeps vehicular access and parking along Mōhihi Street, where movements are clearly visible from the sidewalk and street, supporting better pedestrian awareness and safety. Keeping parking in its current location also helps avoid potential conflicts between pedestrians approaching storefronts and vehicles circulating behind the building.

For these reasons, while the street-front building configuration was evaluated, the proposed layout was determined to better balance neighborhood compatibility, site circulation, and pedestrian safety.

## **Comment 3**

*The Planning Commission is currently considering changes to the master use table and specific use standards that would allow multi-family units above ground floor commercial uses, without requiring the residents to be associated with the commercial uses. Therefore, the final EA should include a thorough assessment of an alternative that maximizes the number of dwelling units located above the ground-floor commercial uses in compliance with the existing development standards (i.e., height, floor-area-ratio, etc.). Should the proposed amendment be adopted, having this alternative in the final EA would allow for this Project to adjust to provide more housing.*

## **Response**

As discussed in Section 3.7.3 of the FEA, the project is consistent with applicable sections of the Land Use Ordinance in effect today.

#### **Comment 4**

*The final EA should include a more thorough description of the proposed exterior lighting that considers height, shielding, color temperature, intensity, and timing. The proposed lighting should be designed to minimize environmental impacts.*

#### **Response**

Section 2.2.1 now includes an expanded discussion of exterior lighting. All lighting for the Project will be designed to minimize environmental impacts and to be compatible with the surrounding residential neighborhood. Fixtures will be low in height, fully shielded, and directed downward to prevent glare and light spill onto adjacent properties. Color temperatures will be limited to warm, low-Kelvin lighting to reduce skyglow and potential impacts on wildlife. Lighting levels will be kept at the minimum necessary for safety, and automatic timers or controls will be used to ensure that lights operate only during required evening hours.

#### **Comment 5**

*The final EA should include a more thorough description of how stormwater will be managed on site. The draft EA states that the proposed action will increase impervious area and stormwater will be directed towards Mohihi Street. This section should include the anticipated stormwater volumes and frequency of flooding, and propose mitigation measures to accommodate as much stormwater as possible on site. Such measures could include the use of porous pavement, rain gardens, bioswales, or other green infrastructure features to facilitate stormwater infiltration and biofiltration.*

#### **Response**

A new Section 2.2.4 has been added to the FEA to characterize the existing environment, changes in stormwater volumes that may occur as a result, and proposed mitigation measures.

#### **Comment 6**

*Please correct the narrative on page 18, regarding the driveways proposed for the site. The narrative should be revised to match the site plan.*

#### **Response**

The discussion of site access now takes place in Section 2.1 and Section 2.2.1 of the FEA-FONSI, which clarify that vehicular access to the site, parking, and loading will be off Mōhihi Street at an existing driveway location. Although an existing driveway off of Farrington Highway is currently present, it will be demolished and replaced with a new concrete sidewalk.

**Comment 7**

*A traffic assessment should be provided regarding the existing traffic conditions and any impact the trips generated from development will have on traffic. If there are potential impacts from the development, a traffic impact analysis will be required.*

**Response**

To address this comment, the Applicant has prepared a Traffic Assessment for the proposed project, *Transportation Assessment Report for the Proposed Nanakuli Commercial Building, Nanakuli, Oahu, Hawaii, Tax Map Key: (1) 8-7-035:005*. Section 3.5 of the FEA-FONSI has been revised to include a summary of its findings. The complete Traffic Assessment will be submitted with the SMA permit application.

**Comment 8**

*Construction plans for all work within or affecting public streets should be submitted for review and approval. Traffic control plans during construction should also be submitted for review and approval, as required.*

**Response**

The Applicant will work with its contractor(s) to ensure that any work with or affecting public streets be submitted to the Department of Planning and Permitting for review and approval, including any traffic control plans, as necessary.

**Comment 9**

*Adequate vehicular sight distance shall be provided and maintained at all driveways to pedestrians and other vehicles.*

**Response**

Adequate, unobstructed vehicular sight distance will be provided and maintained at the driveway.

**Comment 10**

*All loading and trash pick-up areas shall be designed such that vehicles enter and exit front first. All trash pick-up activities shall be done on-site. Provide adequate on-site turn-around areas and ensure that the layout of parking spaces in the loading/delivery area does not interfere with turning maneuvers for large vehicles.*

**Response**

All loading and trash pick-up activities will occur entirely on-site. There is sufficient maneuvering space behind the accessible stalls to allow both loading vehicles and trash trucks

to enter, service the site, and exit front-first. The layout of the parking stalls has been configured so that vehicle turning movements are unobstructed, and the loading/delivery area provides adequate turnaround space for larger service vehicles.

**Comment 11**

*Bicycle parking or bike racks should be provided within this Project and shall be located in a safe and convenient location.*

**Response**

Bicycle parking is provided nearby the stairwell off Farrington.

**Comment 12**

*Landscaping shall be located and maintained such that it will not interfere with pedestrian and vehicular sight lines.*

**Response**

The pōhinahina hedge landscaping is low-growing and will not interfere with pedestrian and vehicular sight lines.

You may download a copy of the FEA at the Environment Review Program's website (<https://planning.hawaii.gov/erp/>) once its availability is announced in *The Environmental Notice*.

If you have any questions or concerns regarding this project, please contact me at (808) 550-4559.

Sincerely,

James Hayes  
Planner



January 2026

Clean Air Branch  
Department of Health  
State of Hawai'i  
[cab@doh.hawaii.gov](mailto:cab@doh.hawaii.gov)

**Subject: Response to Comment on Draft Environmental Assessment for the 87-1818 Farrington Highway Commercial Building Project, TMK No. 7-7-035:005**

Dear Clean Air Branch:

Thank you for your standard comments for land use reviews in response to the *Draft Environmental Assessment for the 87-1818 Farrington Highway Commercial Building* (DEA). We appreciate the time you spent reviewing the DEA and preparing your response.

We appreciate the information provided in the standard comments; however, the project does not include an element that would require an air pollution control permit, will not involve asbestos, and comply with applicable rules, including those related to fugitive dust.

You may download a copy of the Final Environmental Assessment at the Environment Review Program's website (<https://planning.hawaii.gov/erp/>) once its availability is announced in *The Environmental Notice*.

If you have any questions or concerns regarding this project, please contact me at (808) 550-4559.

Mahalo,

James Hayes  
Planner



January 2026

Mr. J. Perry

**Subject: Response to Comment on Draft Environmental Assessment for the 87-1818 Farrington Highway Commercial Building Project, TMK No. 7-7-035:005**

Dear Mr. Perry:

Thank you for your October 25, 2021, email concerning the *Draft Environmental Assessment for the 87-1818 Farrington Highway Commercial Building* (DEA). We appreciate the time you spent reviewing the DEA and preparing your response.

To simplify your review, we have reproduced your substantive comments below in italics, followed by our response:

### **Comment 1**

*All commercial businesses and/or private sales of alcohol, tobacco, and vaping etc. All commercial businesses and/or private sales of guns and harmful firearms/weapons. All commercial businesses and/or private sales of all activities that may promote illegal gambling, illegal drugs, human trafficking, massage parlors, Pawn shops, etc. All commercial business and/or private advertisement signs larger than 8 ½" x 11". All commercial businesses and/or private tenants, owners, etc. enforce All city, state, and federal regulations, and ordinance, etc. (example loitering on the property).*

### **Response**

The owners want to be good stewards of the community and will endeavor to obtain tenants that reflect this sentiment. There will be no promotion of illegal activities or substances. All signage and construction will be in conformance with State and City regulations. City, state, and federal rules and regulations will be enforced.

You may download a copy of the FEA at the Environment Review Program's website (<https://planning.hawaii.gov/erp/>) once its availability is announced in *The Environmental Notice*.

J. Perry  
January 2026  
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If you have any questions or concerns regarding this project, please contact me at (808) 550-4559.

Sincerely,

James Hayes  
Planner

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