

DAVID Y. IGE
GOVERNOR



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CRAIG K. HIRAI
EXECUTIVE DIRECTOR

In reply, refer to:

15:DEV/0114

STATE OF HAWAII
DEPARTMENT OF BUSINESS, ECONOMIC DEVELOPMENT & TOURISM
HAWAII HOUSING FINANCE AND DEVELOPMENT CORPORATION

677 QUEEN STREET, SUITE 300
HONOLULU, HAWAII 96813
FAX: (808) 587-0600

December 15, 2015

The Honorable Ernest Y. Martin, Chairperson
City Council
City and County of Honolulu
530 S. King Street, Room 202
Honolulu, HI 96813

RECEIVED
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CITY COUNCIL
HONOLULU, HAWAII

Subject: Request for Approval of Exemptions Pursuant To Section 201H-38, Hawaii Revised Statutes (HRS), For the Proposed Kapolei Mixed Use Development Located in Kapolei, Oahu, TMK: (1) 9-1-088: 021

The Hawaii Housing Finance and Development Corporation (the "HHFDC") respectfully requests approval of exemptions from statutes, ordinances and rules pursuant to Section 201H-38, Hawaii Revised Statutes (HRS), for the above referenced Kapolei Mixed Use Development affordable and market rate housing project in Kapolei, Oahu, Hawaii (the "Project").

PROJECT OVERVIEW

Kapolei Mixed Use Development is a proposed mixed-use residential and retail project in the City of Kapolei. The proposed project consists of three components to be built in three phases, all located on a 3.036 acre site. The project is in convenient proximity to schools, public transportations, retail shopping, and services.

Phase 1 is an affordable senior rental housing project consisting of a 13-story building, 150-feet in height, which will include 154 affordable studio, one-bedroom, and two-bedroom units. Phase 1 also includes a lobby, community laundry area, 926 square foot community center, a 9,166 square foot recreation deck, circulation, services space, 7,412 square feet of ground floor retail, and 185 parking stalls. The gross building floor area will be approximately 127,822 square feet not including the parking structure. Except for the manager's unit, 100% of the units will be priced in the affordable range for households age 55 years old and older earning between 30% and 60% of the Housing and Urban Development (HUD) Area Median Income (AMI). Maximum rents will be set according to the Hawaii Housing Finance and Development Corporation's (HHFDC) HUD Income, Sales, and Rental Guidelines for the year of initial rental of the units. The units will remain affordable for 61 years from the certificate of occupancy of Phase 1.

Phase 2 is a for-sale condominium consisting of a 13-story building, 150-feet in height, which includes 143 studio, one-bedroom, two-bedroom, and three-bedroom condominium units, a lobby, a 2,058 square foot community center, a 21,492 square foot recreation deck, circulation, services space, 7,086 square feet of ground floor retail, and 170 parking stalls. Seventy-two units (50% + 1 unit) will be priced in the affordable range of households earning between 100% and 120% of the HUD AMI price limit per HHFDC's HUD Income Sales, and Rental Guidelines for the year of initial sales of the units.

Phase 3 consists of a 17,594 net square feet of single story retail, 1,249 net square feet of associated services space, and 56 parking stalls.

The Project unit mix by phases is as follows:

	Phase 1	Phase 2	Phase 3	Total	Unit Size (sf)
Studio Units	22	11	0	33	361-408
1-bedroom Units	110	44	0	154	547
2-bedroom Units	22	77	0	99	761-779
3-bedroom Units	0	11	0	11	1,104
Total Units	154	143	0	297	
Retail	7,412 sf	7,086 sf	17,594 sf	32,092 sf	

Phase 1 Senior Rental Housing target affordability is as follows:

Units	Unit Type and Affordability	Max Rent/Mo.
4	Studios @ 30% AMI	\$503
3	1-Bedroom Units @ 30% AMI	\$539
1	2-Bedroom Unit @ 30% AMI	\$647
18	Studios @ 55% AMI	\$922
106	1-Bedroom Units @ 60% AMI	\$1,078
21	2-Bedroom Units @ 60% AMI	\$1,294
1	Manager's Unit	
154	Total Units Phase 1	

Phase 2 Affordable Condominium target affordability is as follows:

Units	Unit Type and Affordability	Max Sales Price
11	Studios @ 100% AMI	\$324,500
9	1-Bedroom Units @ 100% AMI	\$370,900
45	1-Bedroom Units @ 120% AMI	\$445,000

7	2-Bedroom Units @ 120% AMI	\$500,700
72	Affordable Units	
71	Market Rate Units	
143	Total Units Phase 2	
297	Total Units Phase 1 and 2	

In December 2014 and January 2015, the Applicant received funding awards from the HHFDC for Phase 1, including an allocation of tax exempt bonds and a Rental Housing Revolving Fund (RHRF) Project Award Loan, which will be combined with 4% Low Income Housing Tax Credits (LIHTC). The applicant intends to use the Dwelling Unit Revolving Fund (DURF) as a construction source for Phase 2.

PUBLIC REVIEW

Environmental Assessment

A Final Environmental Assessment (FEA) for the proposed Project was prepared in accordance with Chapter 343, Hawaii Revised Statutes (HRS). A Finding of No Significant Impact (FONSI) was issued by the HHFDC on October 27, 2015. On November 8, 2015, notice of the FEA and FONSI was published in the Environmental Notice by the Office of Environmental Quality Control (OEQC).

The FEA included all appropriate studies including a Phase 1 Environmental Site Assessment, Traffic Impact Analysis Report, Site Infrastructure Assessment Report, and a Residential Market Study. No major issues were raised in any of the studies. Significant comments were received from the City and County of Honolulu Department of Planning and Permitting (DPP), the Department of Parks and Recreation (DPR), Board of Water Supply (BWS), and The James Campbell Company LLC and its affiliated companies including the Kapolei Properties LLC and Campbell Hawaii Investor LLC (collectively the JCC Group). These letters, as well as the applicant's responses, are attached to this transmittal letter as part of HHFDC's For Action (Exhibits E, F, G, and H). The conclusion of the Final EA is that the development of the Project will not have any substantial adverse effect on the environment.

Makakilo/Kapolei/Honokai Hale Neighborhood Board No. 34

On July 24, 2013, Coastal Rim Properties presented the Project to the Makakilo/Kapolei/Honokai Hale Neighborhood Board. On August 21, 2013, the Project architectural consultant gave a presentation to the Makakilo/Kapolei/Honokai Hale Neighborhood Board's zoning and planning committee. Community concerns included adequacy of on-site parking, traffic impact and congestion, impacts to nearby businesses and neighboring Island Pacific Academy school, height of the proposed structures, lack of air conditioning, keeping the promise of providing affordable units, definition of affordable (vs. workforce housing), and the need for office buildings and office employment in the area. On September 23, 2013, the architectural consultant returned to the neighborhood board's zoning and planning committee to provide answers to questions gathered at

the August 21, 2013 committee meeting. He also answered new questions from the board committee members and the general public.

PROPOSED EXEMPTIONS PURSUANT TO HRS §201H-38

On June 16, 2015, the Developer submitted an application to the HHFDC requesting exemptions from statutes, ordinances and rules for the Project pursuant to Section 201H-38, HRS. The requested exemptions fall into three main categories:

1. Exemptions from the Land Use Ordinance (“LUO”) zoning standards;
2. Exemptions from the City of Kapolei Urban Design Plan (“UDP”); and
3. Requested deferral or exemption of certain fees.

The Project information, including the list of proposed exemptions, was distributed to State and County agencies, organizations, area representatives and individuals as part of the environmental review process. The HHFDC Board of Directors approved the Project with the proposed exemptions on November 12, 2015. See enclosed For Action, dated November 12, 2015, which details the exemptions.

SUMMARY

Enclosed, please find the following for your information and consideration:

1. For Action approved by the HHFDC Board of Directors on November 12, 2015;
2. Plans and Outline Specifications for the Project; and
3. Draft Resolution.

Thank you for your favorable consideration of this matter. Should there be any questions or comments, please contact Ken Takahashi, HHFDC Project Manager at 587-0547, or Lisa Imata of Plan Pacific LLC at 521-9418.

Sincerely,



Craig K. Hirai
Executive Director

Enclosures

RESOLUTION

AUTHORIZING EXEMPTIONS FROM CERTAIN REQUIREMENTS RELATING TO THE KAPOLEI MIXED USE AFFORDABLE AND MARKET RATE HOUSING PROJECT AT KAPOLEI, OAHU, HAWAII, TAX MAP KEY (1) 9-1-088: 021.

WHEREAS, Coastal Rim Properties, Inc. (Developer), with the approval of the Hawaii Housing Finance and Development Corporation (HHFDC) proposes to develop Kapolei Mixed Use Development (Project), a mixed-use affordable and market rate housing project which will include 297 rental and for sale condominium units, ground floor retail and parking on 3.036 acre of land located at 1020 Wakea Street in the City of Kapolei, Oahu, identified as Tax Map Key (1) 9-1-088: 021; and

WHEREAS, Phase 1 will include a thirteen (13) story multi-family rental apartment building with a total of one hundred fifty-four (154) units serving senior households with maximum incomes ranging from thirty percent (30%) of the Area Median Income (AMI) to sixty percent (60%) of AMI, as well as 7,412 square feet of ground floor retail space and one hundred eighty-five (185) parking stalls; and

WHEREAS, Phase 2 will include a thirteen (13) story multi-family condominium building with a total of one hundred forty-three (143) units, of which seventy-two (72) units will be affordable units offered to families with maximum incomes ranging from 100% to 120% of AMI, as well as 7,086 square feet of ground floor retail and one hundred seventy (170) parking stalls; and

WHEREAS, Phase 3 will include 17,594 net square feet of ground floor retail, 1,249 net square feet of associated services space, and 56 parking stalls; and

WHEREAS, the Project will also contain two community/recreation rooms totaling 2,984 square feet and 30,658 square feet of outdoor recreation space atop the parking podium; and

WHEREAS, the Project will help address the critical need for affordably priced housing within the City of Kapolei with convenient access to employment centers, public transportation, retail amenities, schools, healthcare facilities, parks; and

WHEREAS, on November 12, 2015, the HHFDC Board of Directors approved the Project with the proposed exemptions; and

WHEREAS, the City Council is empowered and authorized to approve the Project, which may include exemptions from statutes, ordinances, charter provisions, and rules of any government agency relating to planning, zoning, construction standards for subdivisions, development and improvement of land and the construction of units thereon pursuant to Hawaii Revised Statutes Section 201H-38; and

WHEREAS, the Council has reviewed the preliminary plans and specifications for the Project, prepared by SVA Architects, submitted to the Council by HHFDC; and

WHEREAS, the Project is consistent with the housing and community development goals and objectives of the City; and

WHEREAS, the granting of the requested exemptions is necessary for the timely and successful implementation of the Project; and

WHEREAS, the requested exemptions meet minimum requirements of health and safety; and

WHEREAS, the Project does not contravene any safety standards, tariffs, or rates/ fees approved by the Public Utilities Commission or the Board of Water Supply; now, therefore,

BE IT RESOLVED by the Council of the City and County of Honolulu that it approves the Project, which approval includes exemptions from certain requirements for the Project, as set forth in the preliminary plans and specifications for the Project, as follows:

Application Fees and Infrastructure and/or Public Works Fees and Charges

1. Exemption from Sections 18-6.1 and 18-6.2, Revised Ordinances of Honolulu 1990, as amended (ROH), to allow exemption from plan review and building permit fees for Phases 1 and 2. Plan review fees are estimated for each phase at \$25,000 (maximum) and building permit fees are estimated at \$124,000 and \$130,000, respectively.
2. Exemption from ROH Section 14-14.4, to allow exemption from grading and grubbing permit fees for Phases 1 and 2. The grading quantities are not yet determined. The grading permit fee is \$550.00 plus \$55.00 per each additional 1,000 cubic yards or fraction thereof.
3. Exemption from ROH Section 14-12.12, to allow exemption from private storm drain connection license fees for Phases 1 and 2. Fees are estimated at \$1,000 per phase.
4. Deferral from ROH Section 14-6.1 and 14-6.4, to allow deferral of Board of Water Supply connection and Wastewater sewer connection fees for Phases 1 and 2. Fees will be paid upon receipt of certificate of occupancy.
5. Deferral from ROH Section 14-10.3, to allow deferral of payment of residential wastewater system connection and facility charges for Phases 1 and 2. Fees are estimated at \$633,000 and \$588,000, respectively. Fees will be paid upon receipt of certificate of occupancy.

Board of Water Supply Rules and Regulations

6. Deferral from Sections 1-102, 2-202(2), and 2-202(3) of the Board of Water Supply Rules and Regulations to allow a deferral of payment of Water Systems Connection Charges and Facility Charges for resource development, transmission and daily storage for Phases 1 and 2. Fees are estimated at \$250,000 per phase. Fees will be paid upon receipt of certificate of occupancy.

Land Use Ordinance

7. Exemption from ROH, Land Use Ordinance (LUO) Section 21-3.120-2(b) [Table 21-3], to allow residential use in the B-2 Community Business District. Phase 1 will include 154 Senior Housing rental units, and Phase 2 will include 143 multifamily condominium units.
8. Exemption from LUO Table 21-3.4 & Sec. 21-3.110-1(c)(4) & Figure 21-3.7, to allow upper floors of the building to encroach into the building height setback envelope.
9. Exemption from LUO Sec. 21-6.20 [Table 21-6.1], to allow for less than the minimum number of required off-street parking spaces. The requirement for the proposed residential uses is to provide 358 resident and 31 guest parking stalls for a total of 389 required stalls. The Project provides 306 residential parking stalls, or 83 fewer than the requirement.
10. Exemption from LUO Sec. 21-6.100, to allow for fewer than the minimum number of required loading stalls. Based on each phase as a stand-alone project, 7 loading stalls are required. The Project provides 5 loading stalls, or 2 fewer than the requirement.

Kapolei Urban Design Plan

11. Exemption from Kapolei Urban Design Plan Sec. 5.2.2.1 – Building Envelopes – Max Height of Highest Occupied Floor of 125-feet; Sloping Roof Form required, to allow exemption from the requirement of a sloping roof form and to exceed the height limit for the highest occupied floor. The Project includes two towers, each with a height of 130-feet for the highest occupied floor.

and

BE IT FURTHER RESOLVED that as used in this Resolution,

- a. References to HHFDC include any successor agency;
- b. References to specific statutes, ordinances, or regulations include any respective successor statutes, ordinances, or regulations;

and

BE IT FURTHER RESOLVED that this Resolution is void unless construction of the Project commences no later than 24 months after the approval date of this Resolution; and

BE IT FURTHER RESOLVED that the exemptions granted for this Project are not transferable to any other real property; and

BE IT FURTHER RESOLVED that the final plans and specifications for the Project constitute the zoning, building, construction, and subdivision standards for the Project and are approved if those plans and specifications do not substantially deviate from the preliminary plans and specifications submitted to the Council; provided that minor modifications to the design character of the building and/or landscaping may be approved by the HHFDC if such modifications are consistent with the prevailing neighborhood character; and

BE IT FURTHER RESOLVED that no action may be prosecuted or maintained against the City and County of Honolulu, its officials or employees, on account of the actions taken by them in reviewing, approving the plans and specifications, or in granting the exemptions listed herein; and

BE IT FINALLY RESOLVED that copies of this Resolution be transmitted to the Hawaii Housing Finance and Development Corporation, 677 Queen Street, Suite 300, Honolulu, Hawaii 96813, and Coastal Rim Properties, Inc., 16601 Gothard Street, Suite F, Huntington Beach, California 92647.

INTRODUCED BY:

DATE OF INTRODUCTION:

Honolulu, Hawaii

Councilmembers



PROJECT SPECIFICATIONS

Kapolei Mixed Use Development
1020 Wakea Street
Kapolei HI 96707

TMK: 9-1-088: 021

Zoning: B-2 – Community Business

Construction type: High Rise Structures: Type I; Low Rise Structures: Type III or V

DIVISION I GENERAL REQUIREMENTS

General Requirements:

General Contractor to be pre-selected.

Construction contract to be negotiated bid.

AIA General Conditions of the Contract for Construction required.

Builders Risk Insurance by Contractor.

Work Sequence:

Administrative Provisions

General Excise Tax to be excluded from

Project Coordination:

Regulatory & Reference Standards;

Submittals:

CPM construction schedule required by Contractor.

Quality Control:

1. Special testing laboratory services & Special Inspection services provided by Owner.

2. Geotechnical engineering and monitoring provided by Owner.

3. Archaeological monitoring provided by Owner.

Construction Indoor Air Quality:

Construction Facilities: Project Sign, Project Identification by contractor.

Pollution Control

Product Requirements

Contract Closeout

Cutting & patching

Cleaning

Commissioning Requirements:

Soils Remediation & Hazmat abatement:

DIVISION 2 SITE CONSTRUCTION

Best Management Practices:

NPDES by State of HI

Geotextile fabrics:

Earthwork

Trenching

Archaeological Monitoring: Comply with terms established by SHPD

Coastal Rim Properties, Inc.

770 Kapiolani Blvd., #200, Honolulu, HI 96813 | (808) 744-8072

16601 Gothard Street, Suite F, Huntington Beach, CA 92647 | (714) 843-5769

Web: www.coastalrim.com | Fax (714) 843-5724

Termite control — Chemical
Erosion & Sedimentation Control
Site Water Distribution
Sanitary Sewerage
Provide lateral to connection point per Wastewater Branch.
Subdrainage
Storm Drainage
Graded Crushed Aggregate Base Course
Aggregate Subbase Course
Road Mix Bituminous Pavement
Provide where utilities in right-of-way construction required.
Painted Pavement Markings
Tactile Warning Surface
Cement Concrete curbs
Cement Concrete Walkway
Landscape Irrigation System
Mounted Sign & Post
Landscape Planting

DIVISION 3 CONCRETE

Cast-in-Place Concrete:

1. New deep foundations (drilled piers or auger cast plies)
2. Suspended slab-on-grade at ground floor
3. Post-tensioned 2-way slab at upper floors
4. Concrete shear walls at stair shaft and elevator shaft walls.

Concrete Finishing— General:

1. Machine float finish at interior; penetrating sealer.
2. Rock salt finish at exterior slab walkways.

DIVISION 4 MASONRY

Concrete Masonry Units: Unit Masonry infill and partitions at locations per structural drawings.

DIVISION 5 METALS

Fasteners & Anchors

Structural Steel

Cold-Formed Metal Framing

Offset double-stud common walls between units,

Metal Fabrications — General

Metal Fabrications — Steel

Handrails and Railings

Painted aluminum railings.

Expansion Control:

DIVISION 6 WOOD AND PLASTICS

Wood Treatment:

Rough Carpentry:

Architectural Woodwork:

- Prefinished 2.5” wood trim apron & sill
- Wire closet rods & shelves
- Maple-ply flush panel base & upper cabinets

Plastic laminate and fabrications:

- Countertops and splashes (4" integral splash) at kitchens & bathroom vanities
- Bathroom surrounds
- 60" high FRP surround in common toilet and janitor rooms.

DIVISION 7 THERMAL AND MOISTURE PROTECTION

Fluid-Applied Waterproofing: Elastomeric at

Water Repellents: Siloxane penetrating sealer at exterior exposed (unpainted) concrete.

Building Insulation:

- R-19 at exterior stud framing.
- 3-1/2" sound batts at partitions between residential units.

Roof Insulation

1. Radiant barrier at high rooftop level.
2. Tapered polystyrene rigid insulation for drainage slope insulation to provide a R-30 min..

Vapor Retarders: 15mil under-slab vapor barrier.

Weather Barriers: Breathable self-adhered, 10.0 perm rating.

Exterior Siding:

Green Roofing Assemblies:

1. Planter box assembly: FRP at exterior walkway guardrails.

Membrane Roofing:

1. Thermoplastic Membrane Roofing at all roofs. Emissivity to be <.05
2. Fluid-applied traffic topping at exterior slab walkways above conditioned space.

Flashing & Sheet Metal:

1. Sheet metal pans, head flashing, & self-adhered window wrap at aluminum window units.
2. Preformed 26ga sheet metal copings, roofing edges, & flashing edges.

Firestopping:

Joint Sealers & Caulking: low VOC at interior.

DIVISION 8 DOORS & WINDOWS

Steel Doors & Frames: Hollow metal doors, welded frames.

Access Doors

Hardware: Commercial grade.

Glass: Interior glazing and side-lites: tempered 1/4" float glass.

Insulated glazing units: SHGC .40, U=.54 low-E argon.

Mirrors: polished square edge, tempered.

Aluminum windows:

Factory-glazed insulated glazing units: SHGC .40, U=.54 low-E argon. factory painted finish.

Glazed Metal Framing Systems:

Vented sash = 4% of unit area minimum.

Overhead Metal Sectional Doors at loading dock area (1)

DIVISION 9 FINISHES

Metal Support Assemblies

Asymmetrical GWB on metal stud framed wall at corridors and unit demising walls.

7/8" Resilient furring channels, & upper floors ceilings

Gypsum Board:

5/8" Type X, light Level 4 finish (smooth wall finish) typical throughout.

Acoustical Ceilings: 2x4 grid system at Common areas.

Floor Treatment:

- Carpet on acoustical underlayment
- Sheet goods on acoustical underlayment at residential unit bathrooms and kitchens.
- Ceramic Tile at public lobby and community spaces

Wall base: Resilient base in residential units and common areas.

Paints and Coatings:

- 1.GWB, typ. Residential units & common areas: primer + two coats eggshell.
- 2.GWB, Unit Kitchen & Bath: primer + two coats semi-gloss
- 3.Exterior metals doors & frames: two coats alkyd.
- 4.Exterior galvanized steel: prep primer + two coats urethane.

DIVISION 10 SPECIALTIES

Visual Display Boards

Phenolic Toilet Compartments

Louvers & Vents

Identifying Devices: ADA & FFHA compliant

1. All corridor doors
3. Entry doors.
4. Fire Dept. stair identification
5. Accessible parking

Postal Specialties: Mail boxes at Lobby (clear anodized)

Toilet Accessories

1. Typical Unit bathrooms: towel bar, toilet paper dispenser, medicine cabinet, shower curtain rod, robe hook.
2. Grab bars in all Accessible unit bathrooms (toilet & bathtub), (13) units total.
3. Public restroom: toilet paper dispenser, recessed paper towel dispenser & garbage can, framed mirrors, soap dispenser, tampon disposal, toilet seat cover receptacles at all stalls. Finish: brushed stainless

DIVISION 11 EQUIPMENT

Appliances: 30" full size refrigerator, 30" Range Ovens, 30" range hood, washer/dryer. Energy-Star rated.

Fire Extinguishers: semi-recessed at all corridors.

DIVISION 13 SPECIAL CONSTRUCTION

Solar Collectors

Digital Addressable Fire Alarm System

DIVISION 14 CONVEYING SYSTEMS

Elevators: Traction Machine Room-less, 200 fpm, 3,500 – 4,000 lbs. mm capacity.

DIVISION 15 MECHANICAL

Basic Materials & Methods

Cast iron drains & plastic vent typical

Maintenance of Mechanical Systems

Noise & Vibration Control

Mechanical Insulation

Fire Sprinkler System: fully-sprinkled building per NFPA 13

Plumbing System:

1. New water service from street to Mechanical Room, estimated 3" domestic & 6" fire sprinkler

2. Copper main lines & CPVC branch lines hot and cold water shutoffs in each unit.
No Individual unit metering required.
3. Central heat pump hot Water heater.

Plumbing Fixtures & Trim:

- Vitreous china at bathroom lavatories with pop-up drain
- Stainless steel single 10" deep kitchen sink
- Enameled steel bathtubs
- Dual Flush toilets

Refrigerant Piping System

Air Handling System:

1. Residential units: wall units at locations identified on plans.

Ventilation System:

1. All bathrooms: continuous fan
2. Kitchen range hoods: ducted to exterior wall
3. Common rooms: natural ventilation
4. Residential bedrooms: natural ventilation
5. Elevator Control
6. Parking garage
 - level one: Mechanical ventilation (2-stage) on CO2 sensor
 - level two: Natural ventilation

Commissioning of Mechanical & Plumbing systems

Temperature Controls & Instrumentation

Energy Management & Control Systems

Testing & Balancing Air & Water Systems

DIVISION 16 ELECTRICAL

New service from Street to at-grade Electrical Room

Transformer Room & equipment per HECO requirements

Electricity Metering: individually-metered residential units.

Panelboards: 100A service at residential units.

Interior Lighting:

- Residential main living: 8' LED single-track lighting system; recess-mounted in
GWB ceiling.
- Residential bedroom/bath: 6" recessed lighting, CFL bulbs.
- Ceiling Fans: (1) per unit.
- Provide service for through-wall AC unit at residential unit
- Provide (1) junction box at ceiling or top of wall for additional lighting.
- Install (1) hard-wired CO2 sensor at each sleeping area, and smoke detector per code.

Exterior Lighting:

1. Full glare cutoff at all exterior lighting fixtures
2. Lobby level, Streetfront
3. Emergency Lighting, Egress Stairs & Corridors on motion sensor
4. Parking Garage LED

Video Surveillance: Parking Garage throughout. Spot locations at Lobby & Lobby Entry exterior,
wired to management office.

DIVISION 17 TELECOMMUNICATIONS

Telecommunications General Conditions:

1. Entry intercom / access system via telecom lines.
2. Telephone wiring to all units.
3. Cable television wiring to all units.

Telecommunications Rooms
Telecommunications Cabling & Termination

FOR ACTION

I. REQUEST:

Approve the Certification of Coastal Rim Properties, Inc., or Other Successor Entity Approved by the Executive Director, as an Eligible Developer Pursuant to Section 15-307-24, ~~Hawaii Administrative Rules, Proposed Exemptions from Statutes, Ordinances and Rules Pursuant to Section 201H-38, Hawaii Revised Statutes; and Execution of Development Documents for Approved Exemptions for the Kapolei Mixed-Use Development Located in Kapolei, Oahu, TMK No. (1) 9-1-088-021.~~ *and the proposed for Affordable Housing Project Located in Kapolei, Oahu, TMK No.: (1) 9-1-088:021, Including the Developer's Proposed Exemptions, for Processing Under the Provisions of Chapter 201H, Hawaii Revised Statutes*

II. FACTS

Project: Kapolei Mixed-Use Development
 Address: 1020 Wakea Street Kapolei, Hawaii 96707
 HHFDC Involvement: 201H Exemptions
 Landownership: Polo Court Investors, LLC
 Type: Mixed - use
 No. of Units: 297 units, inclusive of manager's unit
 Target Market: Phase 1 – Elderly Housing Project¹

Units	Unit Type and Affordability	Max. Rent/Mo. ²
4	Studio Units @ 30% AMI ³	\$503
3	1-Bedroom Units @ 30% AMI	\$539
1	2-Bedroom Units @ 30% AMI	\$647
18	Studio Units @ 55% AMI	\$922
106	1-Bedroom Units @ 60% AMI	\$1,078
21	2-Bedroom Units @ 60% AMI	\$1,294
1	Manager's Unit	
154	Total Units Phase 1	

Phase 2 – For Sale Condominium

Units	Unit Type and Affordability	Maximum Sales Price ⁴
11	Studio Units @ 100% AMI	\$324,500
9	1-Bedroom Units @ 100% AMI	\$370,900
45	1-Bedroom Units @ 120% AMI	\$445,000
7	2-Bedroom Units @ 120% AMI	\$500,700
72	Affordable Units	
71	Market Rate Units	
143	Total Units Phase 2	
297	Total Units	

Phase 3 – Single-story retail
415 parking stalls total

Unit Types: 33 studio units (360 square feet)

¹ One member of the household must be 55+ (this applies to a minimum of 80% of households); also school aged children are prohibited.

² Based on 2015 maximum rents; landlord pays for all utilities.

³ U.S. Department of Housing and Urban Development area median income.

⁴ Based on 2015 maximum sales prices at 4.5% mortgage interest rate; 1 person household for a studio, 2 persons for a 1-bedroom unit and 3 persons for a 2-bedroom unit. Section 15-307-76, HAR.

Land Area: 154 one bedroom units (534 square feet)
 99 two bedroom units (765 square feet)
 11 three bedroom units (990 square feet)
 3.036 acre (132,248 square feet)
 Zoning: B-2 Community Business
 LUC District: Urban
 TMK: (1) 9-1-088:021
 Developer: Mr. Franco Mola, Coastal Rim Properties, Inc.
 Developer Contact: PlanPacific, Inc.
 Ms. Lisa Imata
 P.O. Box 892735
 Mililani, HI 96789
 (808) 521-9418 (extension 1002)

A. Kapolei Mixed-Use Development (“Project”) is a proposed mixed-use project which will include 297 rental and for sale condominium units, ground floor retail, and parking located in the City of Kapolei, on the southwest corner of Haumea Street and Wakea Street. The site is located on a 3.036 acre parcel zoned Community Business (B-2). See Exhibit “A”, Location Map.

1. Phase 1 is an affordable senior rental housing project consisting of a 13-story building, 150-feet in height, which will include 154 affordable studio, one-bedroom, and two-bedroom units. Phase 1 includes a lobby, community laundry area, 926 square foot community center, a 9,166 square foot recreation deck, circulation, services space, 7,412 square feet of ground floor retail, and 160 parking stalls. The gross building floor area will be approximately 127,822 square feet not including the parking structure. Except for the manager’s unit, 100% of the units will be priced in the affordable range of senior households age 55 years old and older earning between 30% and 60% of the Housing and Urban Development (HUD) Area Median Income (AMI) price limit per Hawaii Housing Finance and Development Corporation’s (HHFDC) HUD Income, Sales, and Rental Guidelines for the year of initial rental of the units. The units will remain affordable for 61 years from the certificate of occupancy of Phase 1.
2. Phase 2 is a for-sale condominium consisting of a 13-story building, 150-feet in height, which includes 143 studio, one-bedroom, two-bedroom, and three-bedroom condominium units, a lobby, a 2,058 square foot community center, a 21,492 square foot recreation deck, circulation, services space, 7,086 square feet of ground floor retail, and 170 parking stalls. 50% + 1 unit will be priced in the affordable range of households earning between 100% and 120% of the HUD AMI price limit per HHFDC’s HUD Income Sales, and Rental Guidelines for the year of initial sales of the units.
3. Phase 3 consists of a 17,594 net square feet of single story retail, 1,249 net square feet of associated services space, and 56 parking stalls.

B. Mr. Franco Mola is the President and Founder of Coastal Rim Properties, Inc. (CRP) and MJF Development Corporation (MJF) with over 35 years of experience in construction, financing, and development. CRP and MJF have completed projects throughout the Western US, Hawaii, and Baja California. Development experience ranges from affordable and market rate projects, rental and for-sale developments, multi- and single-family residential, senior developments, office hotel, retail, large-scale mixed-use developments and master planned communities. Locally, CRP has developed the 176 unit Kulana Hale

Elderly Project located in Makiki, Honolulu and the Kekuilani Village IV at Kapolei which encompass 609 single-family homes, condominiums, and apartments. Two for sale condominium projects, Ohana Hale and 803 Waimanu were approved by HHFDC's Board of Directors on March 12, 2015 and September 10, 2015, respectively. Mr. Mola's reputation is built on his ability to finance, build, and execute all aspects of developments for a broad range of communities.

- C. On July 24, 2013 Coastal Rim Properties representative Mr. Franco Mola and planning consultant Ms. Colette Sokada of Environet presented the Project to the Makakilo/Kapolei/Honokai Hale Neighborhood Board. On August 21, 2013, architectural consultant Mr. Geoff Miasnik of MVE Institutional gave a presentation to the Makakilo/Kapolei/Honokai Hale Neighborhood Board's zoning and planning committee. Community concerns included adequacy of on-site parking, traffic impact and congestion, impacts to nearby businesses and neighboring Island Pacific Academy school, height of the proposed structures, lack of provision of air conditioning, keeping the promise of providing affordable units, definition of affordable (vs. workforce housing), and the need for office buildings and office employment in the area. On September 23, 2013, architectural consultant Mr. Geoff Miasnik of MVE Institutional returned to the neighborhood board's zoning and planning committee to provide answers to questions gathered at the August 21, 2013 committee meeting. He also answered new questions from the board committee members and the general public.
- D. By letter dated September 27, 2013, the City and County of Honolulu, Department of Planning and Permitting (DPP) determined that the Project did not meet its threshold requirements for processing under the provisions of Chapter 201H, Hawaii Revised Statutes (HRS). To be eligible for processing by DPP, projects must include a minimum of 10 percent of the total units being affordable to household earning annual incomes which do not exceed 80 percent of the median income. In addition, a minimum of 20 percent of the total units must be affordable to households earning between 81 to 120 percent of the median income. The remaining affordable units may be affordable to gap group (i.e., 121 to 140 percent) households. A maximum of 50 percent of the total units can be sold at market rates.
- E. On December 11, 2014, the HHFDC Board of Directors approved Resolution No. 071 which provides for the issuance of revenue bonds of up to \$29,818,000 to Coastal Rim Properties, Inc. for the Kulana Hale at Kapolei project, which is the name for the Phase 1 affordable senior housing component of the Project. The approval covers the reservation of \$1,602,490 in annual Federal LIHTC and \$801,245 in annual State LIHTC from the non-competitive pool (4% LIHTC).
- F. On January 8, 2015, the HHFDC Board of Directors approved a Rental Housing Trust Fund (RHTF) Project Award Loan of \$10,684,322 to Coastal Rim Properties, Inc. for the Kulana Hale at Kapolei project.
- G. On June 8, 2015, the HHFDC, as the approving agency, filed a Draft Environmental Assessment for the Kapolei Mixed-Use Development project combined with the 201H list of requested exemptions (Draft EA/201H) to the Office of Environmental Quality Control (OEQC), pursuant to Chapter 343, HRS. OEQC published notice of the Draft EA/201H in the June 8, 2015 issue of The Environmental Notice.
- H. On June 16, 2015, the Developer submitted a request to HHFDC for approvals from certain exemptions from statutes, ordinances, and rules for the project pursuant to Section 201H-38, (HRS). Thereafter, the Developer made several

modifications to the Project and the list of exemptions. Attached as Exhibit "B" are the revised site plan and building elevations.

- I. On October 28, 2015, a Final Environmental Assessment with a Finding of No Significant Impact (FEA-FONSI) was filed with OEQC and is expected to be published in the November 8, 2015 issue of The Environmental Notice.

III. DISCUSSION

- A. Under Section 201H-38 HRS, Housing development; exemption from statutes, ordinances, charter provisions, and rules, the HHFDC may develop on behalf of the State or with an eligible developer, or may assist under a government assistance program in the development of, housing projects that shall be exempt from all statutes, ordinances, charter provisions, and rules of any government agency relating to planning, zoning, construction standards for subdivisions, development and improvement of land, and the construction of dwelling units thereon; provided that:
 1. The corporation finds the housing project is consistent with the purpose and intent of this chapter, and meets minimum requirements of health and safety;
 2. The development of the proposed housing project does not contravene any safety standards, tariffs, or rates and fees approved by the public utilities commission for public utilities or of the various boards of water supply authorized under chapter 54;
 3. The legislative body of the county in which the housing project is to be situated shall have approved the project with or without modifications:
 - a. The legislative body shall approve, approve with modification, or disapprove the project by resolution within forty-five days after the corporation has submitted the preliminary plans and specifications for the project to the legislative body. If on the forty-sixth day a project is not disapproved, it shall be deemed approved by the legislative body;
 - b. No action shall be prosecuted or maintained against any county, its officials, or employees on account of actions taken by them in reviewing, approving, modifying, or disapproving the plans and specifications; and
 - c. The final plans and specifications for the project shall be deemed approved by the legislative body if the final plans and specifications do not substantially deviate from the preliminary plans and specifications. The final plans and specifications for the project shall constitute the zoning, building, construction, and subdivision standards for that project.
 4. The land use commission shall approve, approve with modification, or disapprove a boundary change within forty-five days after the corporation has submitted a petition to the commission as provided in section 205-4, HRS. If, on the forty-sixth day, the petition is not disapproved, it shall be deemed approved by the commission.
- B. Application information on the requested exemptions was included in the Draft EA and forwarded to the agencies, organizations, and individuals listed on the

attached Exhibit "C" for review and comment. A summary of the exemptions requested, agency comments, developer responses and recommended actions are listed in the attached Exhibit "D". None of the exemptions recommended for approval affect health and safety, nor contravenes any safety standards, tariffs, or rates and fees approved by the public utilities commission. Relevant comments submitted by affected agencies and the James Campbell Company on the requested exemptions are as follow:

1. By letter dated July 13, 2015, the City and County of Honolulu, Department of Planning and Permitting (DPP) provided a consolidated list of comments, from its various divisions. DPP's comments and the Developer's response letter are attached as Exhibit "E". Comments specific to the requested exemptions are as follow:
 - a. The Planning Division, Community Planning Branch (CPB), noted that the proposed development of the City Center block primarily for residential uses does not appear to be consistent with the Urban Design Plan (UDP). The UDP's intent for these blocks was to focus on commercial uses (and jobs) in the Kapolei core. CPB also noted that the UDP requires a height setback above 70 feet to avoid over-scaled building forms.
 - b. The Land Use Permits Division, Urban Design Branch, noted that the required off-street parking will need to be provided on-site. Also, it noted that the DPP has not reviewed the Project for compliance with the LUO under the 201H application process.
2. By letter dated June 23, 2015, the City and County of Honolulu, Department of Parks and Recreation (DPR) wrote that they do not support approval of the project. DPR noted that although there are existing park facilities in proximity to the site, the exemption from park dedication requirements was not justified for the market condominium units. DPR required a private park space of 32,670 square feet. The Developer has since increased the amount of private park space to 32,778 square feet and will not request a park dedication exemption. DPR's comments and Developer's response letter are attached as Exhibit "F".
3. The City Board of Water Supply (BWS) commented by letter dated July 30, 2015, that the existing water system is presently adequate to accommodate the proposed project, subject to water availability at the time of the building permit approval. The BWS noted that the applicant will be required to pay for Water System Facilities Charges for resource development, transmission and storage. The BWS comment and Developer's response letter are attached as Exhibit "G". This For Action requests approval of the exemption to defer BWS water system connection and facility charges for resource development, transmission and storage until Developer's request for water meters, to the extent acceptable to BWS. BWS did not comment on the deferral.
4. The DPP Wastewater Branch did not comment. The sewer connection application was reviewed and approved on December 23, 2014. The Developer's request is to defer wastewater connection fees and facilities charges until certificate of occupancy.
5. The James Campbell Company LLC and affiliated companies including the Kapolei Properties LLC and Campbell Hawaii Investor LLC (collectively the JCC Group) provided comments dated July 8, 2015 which noted,

among other things, that (a) the Use Restrictions, Covenants and Reservations of Rights contained in the property’s limited warranty deed dated July 14, 2006, provide that the specified use for the property is an office building with ancillary ground floor retail; (b) the Unilateral Agreement and Declaration for Conditional Zoning dated February 27, 1990 sets forth the condition that projects in the City of Kapolei are subject to the design criteria and review processes in the UDP and that site and architectural plans are subject to DPP review and approval; (c) the infrastructure design criteria and allocations for the property were based on B-2, Commercial zoning and not for higher demands required of projects with significant residential components; (d) the limited availability of on street parking is not an appropriate mitigation for the proposed onsite parking exemptions; (e) upsizing of existing offsite water system infrastructure or new water system infrastructure required for the Project is the responsibility of the Developer; and (e) the JCC Group defers to the City Council on the requested exemptions and fee deferral, and any requests for modifications in the deed provisions or infrastructure payment requirements should be made to the JCC Group after the City Council acts on the exemptions. JCC also commented that the Developer should come in for a discussion on alternative sites for this project to find a site that conforms to the zoning and UDP district designations without the need to seek major land use exemptions through the 201H process.

6. The JCC Group subsequently noted in a letter to HHFDC, dated August 14, 2015, that they would not object to the City Council’s approval of the 201H exemptions, and would be willing to discuss amending the use restrictions contained in the limited warranty deed with the Project’s developer. The JCC Group’s comments and the Developer’s response letters are attached as Exhibit “H”.

C. By letter dated July 7, 2015 Councilmember Kymberly Pine indicated her support for the Kapolei Mixed-Use Development citing the project balances housing, social, educational and environmental needs of the Kapolei community. (See Exhibit “I”).

D. The proposed Total Project Budget is summarized as follows:

Budget/Cost Item	Amount
Purchase land and buildings	\$5,485,000
Site Work	\$4,837,610
New Construction	\$68,693,929
Contingency	\$6,258,536
Permits and Fees	\$3,267,029
Architectural and Engineering	\$3,685,000
Interim Costs	\$6,579,411
Bond Financing Costs	\$670,000
Financing Fees and Expenses	\$628,727
Soft Costs	\$2,727,456
Syndication Costs	\$110,000
Developer’s Fees and Overhead	\$4,694,952
Project Reserves	\$1,651,724
Phase 2 Profit from Condo Sales	\$2,936,763
Total:	\$112,226,137

- E. The estimated total project budget is approximately \$112,226,137 million and the estimated financing structure is as follows:

Source	Interim	Permanent
Phase 1 –LIHTC Proceeds	\$4,853,751	\$19,415,003
Phase 1 –Tax Exempt Bond Loan	\$31,139,878	\$18,190,636
Phase 1 –RHTF	\$10,684,322	\$10,684,322
Phase 1 –3 Costs Deferred Until Conversion to Perm Financing (includes profit on Phase 2)	\$9,083,741	
Phase 1 – Refund of LIHTC Good Faith Deposit		\$69,831
Phase 1 – Federal/State Solar/Cogeneration Tax Credit Equity		\$610,945
Phase 2 – Gross Revenue From Residential Condo Sales		\$51,688,008
Phase 2 – Gross Revenue From Commercial Condo Sales		\$3,167,100
Phase 2 – Construction Loan	\$30,268,958	
Phase 2 – DURF	\$12,979,586	
Phase 2 -3 Sponsor Equity	\$7,335,695	
Phase 3 –Sponsor Equity		\$2,777,591
Phase 3 –Perm Loan		\$5,622,702
Phase 3 – Construction Loan	\$5,880,205	
Total	\$112,226,137	\$112,226,137

- F. The estimated project schedule is as follows:

Process	Date	Duration
Design/Entitlement	April 2015 – April 2016	24 months
Construction Start	April 2016	--
Construction End	August 2018	28 Months

- G. The Phase 1 elderly housing component shall remain affordable for a period of 61 years from the date of the certificate of occupancy of Phase 1. Land use restrictions as required by HHFDC shall be placed on the fee simple interest in the Phase 1 property to ensure that the units remain affordable for the required affordability period.
- H. The affordable For-Sale condominium units in Phase 2 shall be subject to HHFDC's 10-year buy-back and shared appreciation requirements pursuant to Section 201H-47, HRS, and Sections 15-174-121 to 130, Hawaii Administrative Rules ("HAR"). Initial sale of market units shall be subject to a preference given to qualified residents pursuant to Section 201H-47(g) and Section 201H-32, HRS, as approved by HHFDC;
- I. The Developer has indicated they will be submitting for General Excise Taxes ("GET") exemption on the construction costs. Savings from the GET along with the exemptions under 201H will allow the Developer to provide in Phase 1 100% of the one hundred fifty-four (154) units to be priced in the affordable range of households earning between 30% and 60% of the HUD AMI and in Phase 2 seventy-two (72) affordable for-sale condominium units to be priced in the affordable range of households earning between 100% to 120% of the HUD AMI. Should the affordability restrictions for Phase 1 be prematurely terminated for any reason prior to the end of the affordability period and should HHFDC approve

any GET exemptions for development of Phase 1, HHFDC reserves the right to recapture from the Developer and/or Phase 1 a prorated portion of any exemption from GET approved by HHFDC for the development of Phase 1.

- J. To be eligible for exemptions from GET for development expenses, the non-residential uses shall be limited to incidental or de minimis uses that are intended to directly benefit the residents of the Project. See Section 15-306-2, HAR.
- K. Section 15-307-24(b), HAR, provides that the HHFDC Board may certify that the applicant is an eligible developer for the purposes of development of housing projects approved by the corporation under Chapter 201H, HRS, if the Board finds that the applicant:
 - 1. Has demonstrated compliance with all laws, ordinances, rules and other governmental requirements that the applicant is required to meet;
 - 2. Has the necessary experience;
 - 3. Has adequate and sufficient financial resources and support and has secured or has demonstrated the ability to secure a performance or payment bond, or other surety to develop housing projects of the size and type which the applicant proposes to develop; and
 - 4. Has met all other requirements that the corporation determines to be appropriate and reasonable.
- L. The present legal owner of the site is Polo Court Investors, LLC. Coastal Rim Properties, Inc. is one of its two managers and Franco Mola is the President of Coastal Rim Properties, Inc.
- M. The Project's development team includes:
 - 1. Developer: Coastal Rim Properties, Inc
Franco Mola, President
 - 2. EA/201H: PlanPacific, Inc
Consultant Lisa Imata, President
 - 3. Architect: SVA Architects, Inc.
Bill Koster, Principal
 - 4. General Contractor: TBD
 - 5. Legal Counsel: Houlihan Law
John Houlihan
 - 6. Management Agent: Hawaiiana Management Company, Ltd.
Phyllis Kacher, Senior Vice President
- N. HHFDC finds the following:
 - 1. That the Developer is an Eligible Developer pursuant to Section 15-307-24, Hawaii Administrative Rules (HAR);
 - 2. That the Developer's proposal and application for exemptions meet minimum proposal requirements pursuant to Section 15-307-26, HAR;

3. That the Project primarily includes housing units affordable to households with incomes at or below 60 - 140% of the area median income, as determined by HUD;
4. That the Project and proposed exemptions as recommended for approval in Exhibit "D" are consistent with the purpose and intent of Chapter 201H, HRS, and meets minimum requirements of health and safety; and
5. That the exemptions recommended for approval do not contravene any safety standards, tariffs, or rates and fees approved by the public utilities commission for public utilities or the various boards of water supply authorized under Chapter 54, HRS.

IV. RECOMMENDATION

That the HHFDC Board of Directors approve the following for the Kapolei Mixed-Use Development affordable housing project, in Kapolei, Oahu, Hawaii, TMK: (1) 9-1-088:021, substantially as discussed in this For Action:

- A. Certification of Coastal Rim Properties, Inc., or other successor entity approved by the Executive Director, as an Eligible Developer pursuant to Section 15-307-24, HAR;
- B. Development of the Kapolei Mixed-Use Development project with the proposed exemptions from statutes, ordinances and rules of the City and County of Honolulu as recommended for approval, pursuant to Section 201H-38, HRS;
- C. Execution of a development agreement and land use restrictions required for such exemptions as approved by the Executive Director; and
- D. Authorize the Executive Director to take all actions necessary to effectuate the purpose of this For Action;

Subject to the following, unless otherwise approved at the sole discretion of the Executive Director:

- E. Except for a resident manager's unit, all of the units in Phase 1 shall remain affordable to senior households between 30% and 60% or below the AMI for 61 years from the date of the certificate of occupancy of Phase 1. More than half of the units in Phase 2 shall be affordable to households between 100% and 120% or below the AMI. Land use restrictions acceptable to the Executive Director shall be placed on the fee simple title to the property to ensure that the units remain affordable for the period of affordability.
- F. The Project shall not be sold, transferred, or otherwise used to satisfy reserved housing or affordable housing requirement for any other project at any other location;
- G. Execution of a development agreement and restrictions to reflect the requirements of this For Action as acceptable to the Executive Director, including recordation of land use restrictions at the Bureau of Conveyances, within six (6) calendar months from the date of this For Action, unless otherwise extended at the sole discretion of the Executive Director;
- H. Commencement of the Project by December 31, 2017, unless otherwise extended at the sole discretion of the Executive Director;

- I. Completion of the Project by December 31, 2019, unless otherwise extended at the sole discretion of the Executive Director; and
- J. Compliance with all rules and regulations and such other terms and conditions as may be required by the Executive Director.

Attachments: Exhibit "A" – Location Map
 Exhibit "B" – Plans, Elevations and Outline Specifications
 Exhibit "C" – List of Agencies Consulted
 Exhibit "D" – Summary of Exemptions and Recommended Actions
 Exhibit "E" – DPP comments and response letters
 Exhibit "F" – DPR comments and response letters
 Exhibit "G" – BWS comments and response letters
 Exhibit "H" – JCC Group comments and response letters
 Exhibit "I" – Letter of support

Prepared by: Seiji Ogawa, Project Coordinator So
 Ken Takahashi, Project Manager K.J.
 Reviewed by: Richard Prahler, Development Branch Chief MP

Approved by The Board of Directors at its meeting
 on NOV 12 2015, as amended
DEVELOPMENT BRANCH

Please take necessary action.


 EXECUTIVE DIRECTOR

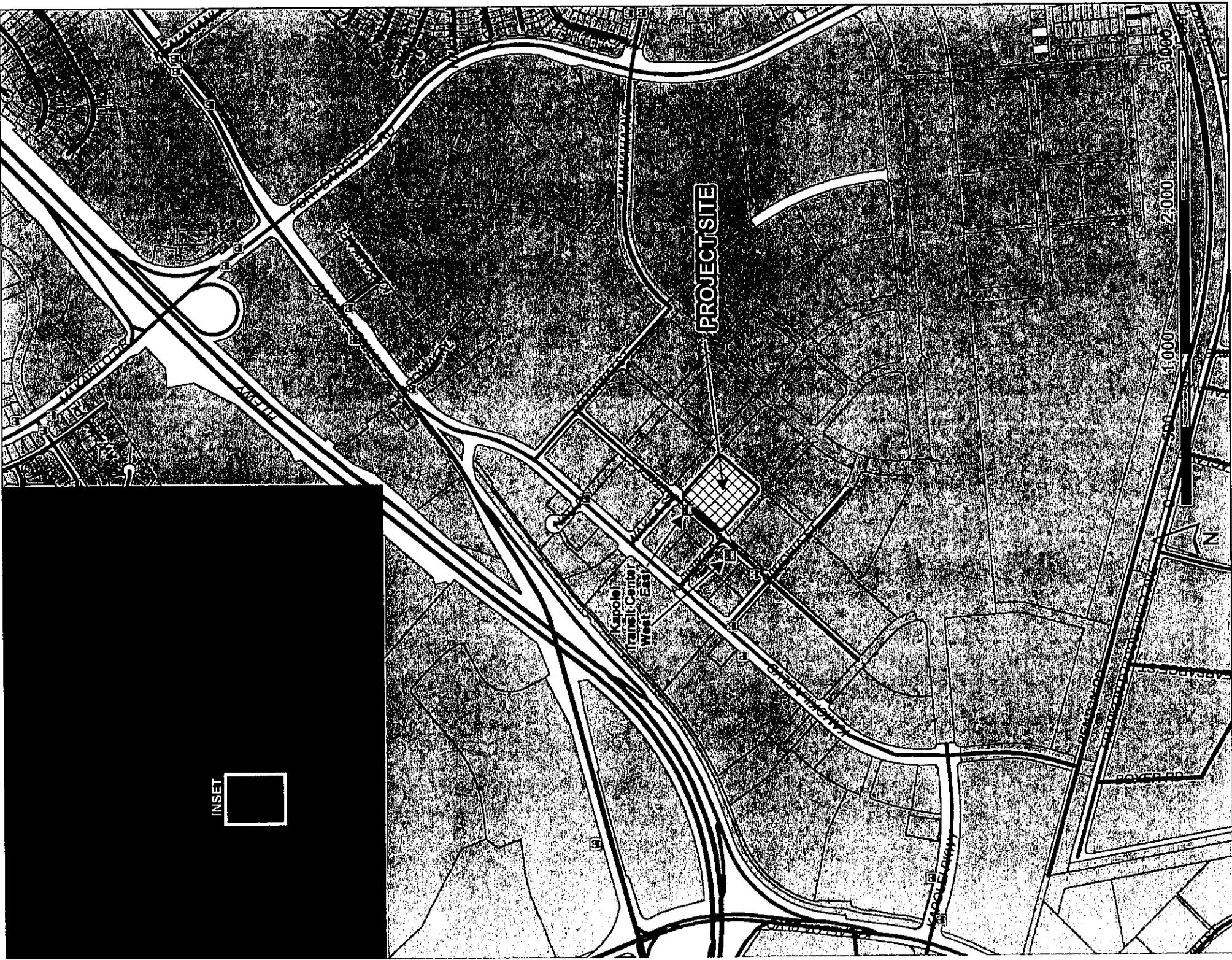


EXHIBIT A

Figure 1: Regional Location Map

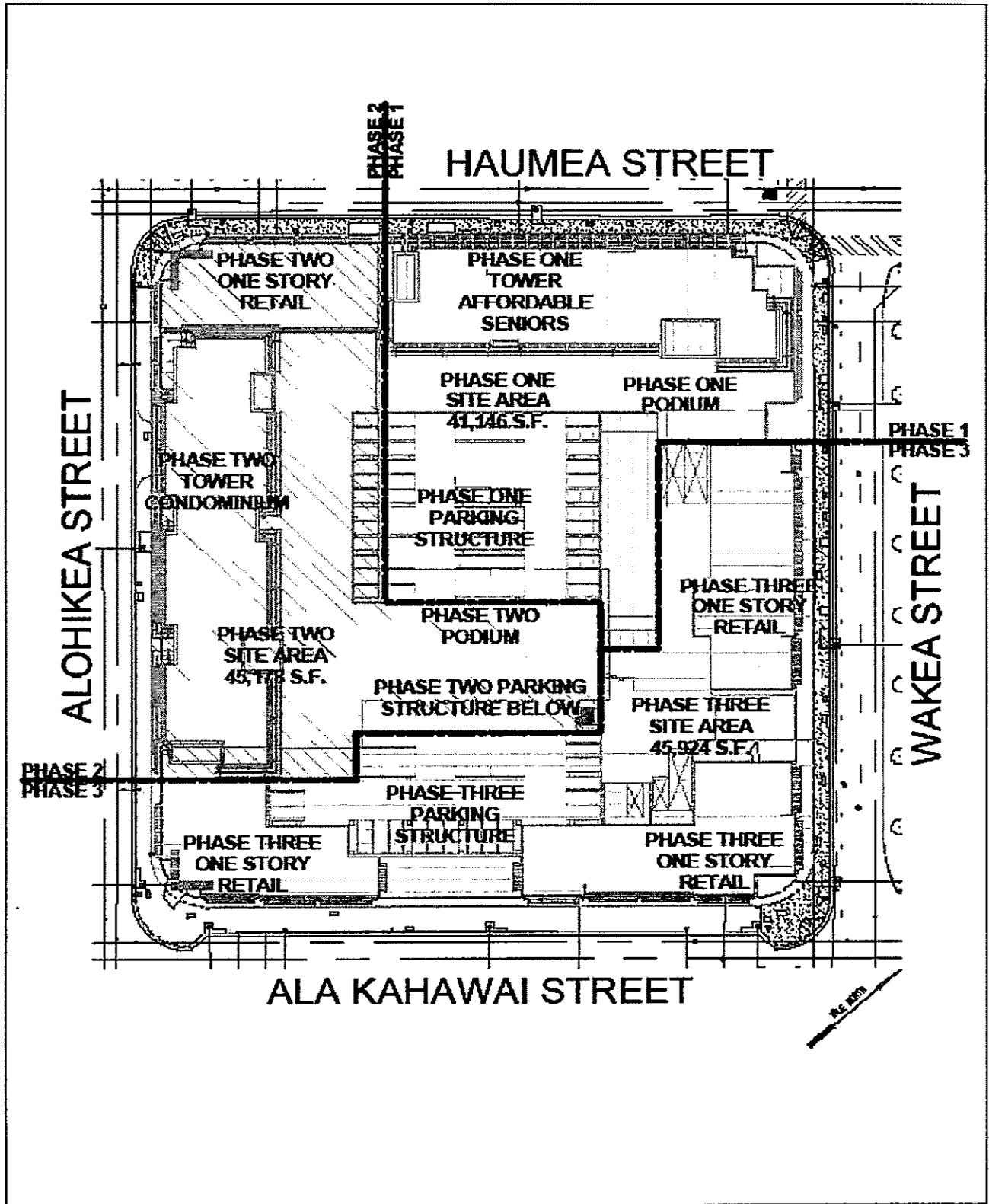


Figure 3: Phase Plan



HAUMEA STREET

ALOHIKEA STREET

Figure 9: Rendering



Figure 17: View from Waikea, Pedestrian Perspective

EXHIBIT B

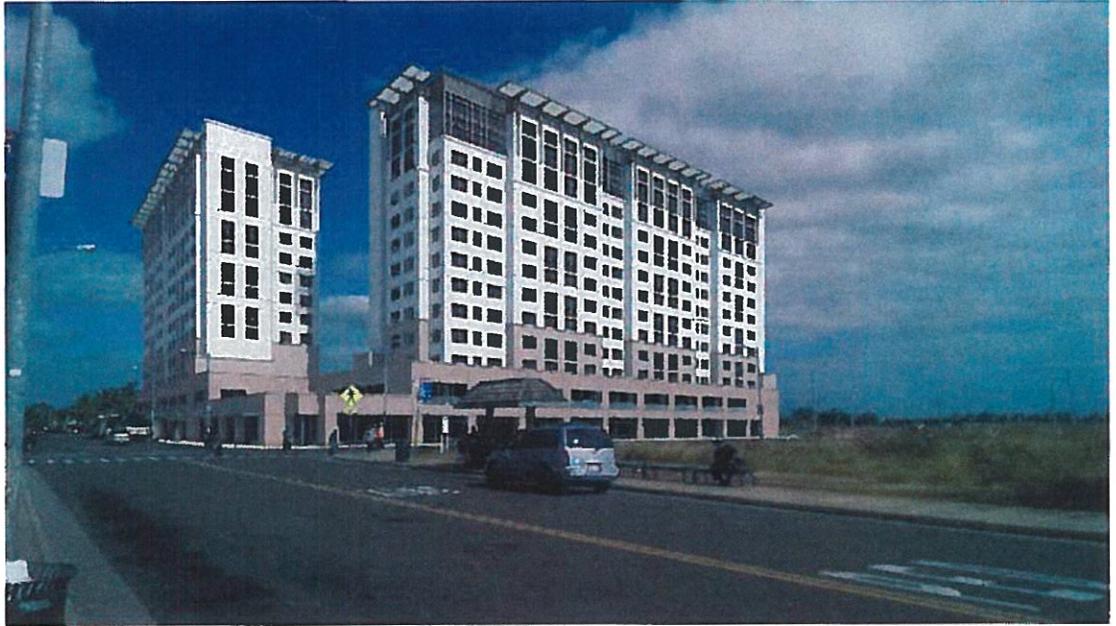


Figure 18: View from Haumea, Pedestrian Perspective

EXHIBIT B



PROJECT SPECIFICATIONS

Kapolei Mixed Use Development
1020 Wakea Street
Kapolei HI 96707

TMK: 9-1-088: 021

Zoning: B-2 – Community Business

Construction type: High Rise Structures: Type I; Low Rise Structures: Type III or V

DIVISION I GENERAL REQUIREMENTS

General Requirements:

General Contractor to be pre-selected.

Construction contract to be negotiated bid.

AIA General Conditions of the Contract for Construction required.

Builders Risk Insurance by Contractor.

Work Sequence:

Administrative Provisions

General Excise Tax to be excluded from

Project Coordination:

Regulatory & Reference Standards;

Submittals:

CPM construction schedule required by Contractor.

Quality Control:

1. Special testing laboratory services & Special Inspection services provided by Owner.

2. Geotechnical engineering and monitoring provided by Owner.

3. Archaeological monitoring provided by Owner.

Construction Indoor Air Quality:

Construction Facilities: Project Sign, Project Identification by contractor.

Pollution Control

Product Requirements

Contract Closeout

Cutting & patching

Cleaning

Commissioning Requirements:

Soils Remediation & Hazmat abatement:

DIVISION 2 SITE CONSTRUCTION

Best Management Practices:

NPDES by State of HI

Geotextile fabrics:

Earthwork

Trenching

Archaeological Monitoring: Comply with terms established by SHPD

Coastal Rim Properties, Inc.
770 Kapiolani Blvd., #200, Honolulu, HI 96813 | (808) 744-8072
16601 Gothard Street, Suite F, Huntington Beach, CA 92647 | (714) 843-5769
Web: www.coastalrim.com | Fax (714) 843-5724

EXHIBIT B

Termite control — Chemical
Erosion & Sedimentation Control
Site Water Distribution
Sanitary Sewerage
Provide lateral to connection point per Wastewater Branch.
Subdrainage
Storm Drainage
Graded Crushed Aggregate Base Course
Aggregate Subbase Course
Road Mix Bituminous Pavement
Provide where utilities in right-of-way construction required.
Painted Pavement Markings
Tactile Warning Surface
Cement Concrete curbs
Cement Concrete Walkway
Landscape Irrigation System
Mounted Sign & Post
Landscape Planting

DIVISION 3 CONCRETE

Cast-in-Place Concrete:

1. New deep foundations (drilled piers or auger cast plies)
2. Suspended slab-on-grade at ground floor
3. Post-tensioned 2-way slab at upper floors
4. Concrete shear walls at stair shaft and elevator shaft walls.

Concrete Finishing— General:

1. Machine float finish at interior; penetrating sealer.
2. Rock salt finish at exterior slab walkways.

DIVISION 4 MASONRY

Concrete Masonry Units: Unit Masonry infill and partitions at locations per structural drawings.

DIVISION 5 METALS

Fasteners & Anchors

Structural Steel

Cold-Formed Metal Framing

Offset double-stud common walls between units,

Metal Fabrications — General

Metal Fabrications — Steel

Handrails and Railings

Painted aluminum railings.

Expansion Control:

DIVISION 6 WOOD AND PLASTICS

Wood Treatment:

Rough Carpentry:

Architectural Woodwork:

- Prefinished 2.5" wood trim apron & sill
- Wire closet rods & shelves
- Maple-ply flush panel base & upper cabinets

Plastic laminate and fabrications:

- Countertops and splashes (4" integral splash) at kitchens & bathroom vanities
- Bathroom surrounds
- 60" high FRP surround in common toilet and janitor rooms.

DIVISION 7 THERMAL AND MOISTURE PROTECTION

Fluid-Applied Waterproofing: Elastomeric at

Water Repellents: Siloxane penetrating sealer at exterior exposed (unpainted) concrete.

Building Insulation:

- R-19 at exterior stud framing.
- 3-1/2" sound batts at partitions between residential units.

Roof Insulation

- 1. Radiant barrier at high rooftop level.
- 2. Tapered polystyrene rigid insulation for drainage slope insulation to provide a R-30 min..

Vapor Retarders: 15mil under-slab vapor barrier.

Weather Barriers: Breathable self-adhered, 10.0 perm rating.

Exterior Siding:

Green Roofing Assemblies:

- 1. Planter box assembly: FRP at exterior walkway guardrails.

Membrane Roofing:

- 1. Thermoplastic Membrane Roofing at all roofs. Emissivity to be <.05
- 2. Fluid-applied traffic topping at exterior slab walkways above conditioned space.

Flashing & Sheet Metal:

- 1. Sheet metal pans, head flashing, & self-adhered window wrap at aluminum window units.
- 2. Preformed 26ga sheet metal copings, roofing edges, & flashing edges.

Firestopping:

Joint Sealers & Caulking: low VOC at interior.

DIVISION 8 DOORS & WINDOWS

Steel Doors & Frames: Hollow metal doors, welded frames.

Access Doors

Hardware: Commercial grade.

Glass: Interior glazing and side-lites: tempered 1/4" float glass.

Insulated glazing units: SHGC .40, U=.54 low-E argon.

Mirrors: polished square edge, tempered.

Aluminum windows:

Factory-glazed insulated glazing units: SHGC .40, U=.54 low-E argon. factory painted finish.

Glazed Metal Framing Systems:

Vented sash = 4% of unit area minimum.

Overhead Metal Sectional Doors at loading dock area (1)

DIVISION 9 FINISHES

Metal Support Assemblies

Asymmetrical GWB on metal stud framed wall at corridors and unit demising walls.

7/8" Resilient furring channels, & upper floors ceilings

Gypsum Board:

5/8" Type X, light Level 4 finish (smooth wall finish) typical throughout.

Acoustical Ceilings: 2x4 grid system at Common areas.

EXHIBIT B

Floor Treatment:

- Carpet on acoustical underlayment
- Sheet goods on acoustical underlayment at residential unit bathrooms and kitchens.
- Ceramic Tile at public lobby and community spaces

Wall base: Resilient base in residential units and common areas.

Paints and Coatings:

- 1.GWB, typ. Residential units & common areas: primer + two coats eggshell.
- 2.GWB, Unit Kitchen & Bath: primer + two coats semi-gloss
- 3.Exterior metals doors & frames: two coats alkyd.
- 4.Exterior galvanized steel: prep primer + two coats urethane.

DIVISION 10 SPECIALTIES

Visual Display Boards

Phenolic Toilet Compartments

Louvers & Vents

Identifying Devices: ADA & FFHA compliant

1. All corridor doors
3. Entry doors.
4. Fire Dept. stair identification
5. Accessible parking

Postal Specialties: Mail boxes at Lobby (clear anodized)

Toilet Accessories

1. Typical Unit bathrooms: towel bar, toilet paper dispenser, medicine cabinet, shower curtain rod, robe hook.
2. Grab bars in all Accessible unit bathrooms (toilet & bathtub), (13) units total.
3. Public restroom: toilet paper dispenser, recessed paper towel dispenser & garbage can, framed mirrors, soap dispenser, tampon disposal, toilet seat cover receptacles at all stalls. Finish: brushed stainless

DIVISION 11 EQUIPMENT

Appliances: 30" full size refrigerator, 30" Range Ovens, 30" range hood, washer/dryer. Energy-Star rated.

Fire Extinguishers: semi-recessed at all corridors.

DIVISION 13 SPECIAL CONSTRUCTION

Solar Collectors

Digital Addressable Fire Alarm System

DIVISION 14 CONVEYING SYSTEMS

Elevators: Traction Machine Room-less, 200 fpm, 3,500 – 4,000 lbs. mm capacity.

DIVISION 15 MECHANICAL

Basic Materials & Methods

Cast iron drains & plastic vent typical

Maintenance of Mechanical Systems

Noise & Vibration Control

Mechanical Insulation

Fire Sprinkler System: fully-sprinkled building per NFPA 13

Plumbing System:

1. New water service from street to Mechanical Room, estimated 3" domestic & 6" fire sprinkler

EXHIBIT B

2. Copper main lines & CPVC branch lines hot and cold water shutoffs in each unit.
No individual unit metering required.
3. Central heat pump hot Water heater.

Plumbing Fixtures & Trim:

- Vitreous china at bathroom lavatories with pop-up drain
- Stainless steel single 10" deep kitchen sink
- Enameled steel bathtubs
- Dual Flush toilets

Refrigerant Piping System

Air Handling System:

1. Residential units: wall units at locations identified on plans.

Ventilation System:

1. All bathrooms: continuous fan
2. Kitchen range hoods: ducted to exterior wall
3. Common rooms: natural ventilation
4. Residential bedrooms: natural ventilation
5. Elevator Control
6. Parking garage
 - level one: Mechanical ventilation (2-stage) on CO2 sensor
 - level two: Natural ventilation

Commissioning of Mechanical & Plumbing systems

Temperature Controls & Instrumentation

Energy Management & Control Systems

Testing & Balancing Air & Water Systems

DIVISION 16 ELECTRICAL

New service from Street to at-grade Electrical Room

Transformer Room & equipment per HECO requirements

Electricity Metering: individually-metered residential units.

Panelboards: 100A service at residential units.

Interior Lighting:

- Residential main living: 8' LED single-track lighting system; recess-mounted in
GWB ceiling.
- Residential bedroom/bath: 6" recessed lighting, CFL bulbs.
- Ceiling Fans: (1) per unit.
- Provide service for through-wall AC unit at residential unit
- Provide (1) junction box at ceiling or top of wall for additional lighting.
- Install (1) hard-wired CO2 sensor at each sleeping area, and smoke detector per code.

Exterior Lighting:

1. Full glare cutoff at all exterior lighting fixtures
2. Lobby level, Streetfront
3. Emergency Lighting, Egress Stairs & Corridors on motion sensor
4. Parking Garage LED

Video Surveillance: Parking Garage throughout. Spot locations at Lobby & Lobby Entry exterior,
wired to management office.

DIVISION 17 TELECOMMUNICATIONS

Telecommunications General Conditions:

1. Entry intercom / access system via telecom lines.
2. Telephone wiring to all units.
3. Cable television wiring to all units.

EXHIBIT B

Telecommunications Rooms
Telecommunications Cabling & Termination

EXHIBIT B

Comments to the Draft Environmental Assessment

The following agencies were provided copies of the Draft EA. Those marked with a (✓) provided comments to the Draft EA. Appendix I contains all comment letters received and responses.

State of Hawaii

- Department of Education ✓
- Department of Business, Economic Development, Tourism - Office of Planning✓
- Department of Hawaiian Homelands✓
- Department of Health - Office of Environmental Quality Control
- Department of Health - Environmental Planning Office
- Department of Health - Wastewater Branch ✓
- Department of Land & Natural Resources - Historic Preservation Division
- Department of Land & Natural Resources - Land Division
- Hawaii Housing Finance & Development Corporation✓
- Department of Transportation✓
- Office of Hawaiian Affairs

City & County of Honolulu

- Board of Water Supply ✓
- Department of Community Services ✓
- Department of Design & Construction ✓
- Department of Environmental Services
- Department of Facility Maintenance ✓
- Department of Parks & Recreation ✓
- Department of Transportation Services ✓
- Department of Planning and Permitting ✓
- Fire Department ✓
- Police Department ✓
- Honolulu Authority for Rapid Transportation✓
- Councilmember Kymberly Pine ✓

SUMMARY OF REQUESTED EXEMPTIONS AND DEFERRALS

Requested Exemptions and Deferrals

Development Standard and Ordinance/Code	Requested Exemptions	Agency Comments	Applicant Rationale for Request	Recommendation
B-2 Community Business District – Land Use Ordinance Sec. 21-3.120-2(b) [Table 21-3] / residential use not permitted	An exemption is sought to allow residential use in the B-2 Community Business District. Phase 1 will include 154 Senior Housing rental units, and Phase 2 will include 143 multifamily condominium units.	DPP comment letter dated July 13, 2015 notes the proposed development does not appear to be consistent with the Kapolei intent of the Urban Development Plan (UDP) for the City Center, which is designated primarily for commercial use. In a letter dated July 8, 2015 the James Campbell Companies expressed a similar concern, but stated subsequently, in a letter dated August 14, 2015, that they were not opposed to the application advancing to City Council.	The proposal for mixed-use development coincide with the goals and intended uses for the City Center district of Kapolei, as outlined in the 'Ewa Development Plan and City of Kapolei UDP. The proposed development also coincides with the development objectives outlined in The Kapolei Town Center Final EIS (1988)	Approval. Related to planning and zoning.
Building Height Setback Envelope; Land Use Ordinance Table 21-3.4 & Sec. 21-3.110-1(c)(4) & Figure 21-3.7	An exemption is sought to allow upper floors of the building to encroach into the building height setback envelope. Refer to Figure 23 of the EA for a diagram.	DPP comment letter dated July 13, 2015 states that the UDP (vis-à-vis the LUO) requires buildings to observe a height setback above 70 feet to avoid over-scaled forms.	The proposed exemption will help lower the cost of construction and subsidize affordability.	Approval. Related to planning and zoning.
Off-street Parking Requirements; Land Use Ordinance Sec. 21-6.20 [Table 21-6.1]	An exemption is sought to allow for less than the minimum required off-street parking spaces. The requirement is to provide 358 resident, 31 guest, and 81 retail parking stalls for a total of 470 stalls. The proposed	DPP comment letter dated July 13, 2015 states that required off-street parking will need to be provided on-site. Honolulu Police Dept. letter dated June 16, 2015 states that HPD has concerns about the project's impact on street parking. James Campbell Companies letter dated July 8, 2015 states that JCC is very concerned by the	The proposed exemption will help lower the cost construction and subsidize affordability. The senior housing residents in Phase 1 will own fewer cars than a conventional resident population.	Approval. Related to planning and zoning.

EXHIBIT D

SUMMARY OF REQUESTED EXEMPTIONS AND DEFERRALS				
Requested Exemptions and Deferrals				
Development Standard and Ordinance/Code	Requested Exemptions	Agency Comments	Applicant Rationale for Request	Recommendation
	project provides 411 parking stalls, 83 fewer than the requirement.	parking exemption proposed given the rapid development of the City of Kapolei and existing parking demands on public streets; and that on-street parking is not an appropriate mitigation for the proposed onsite parking exemption. DTS comment letter dated July 8, 2015 states incentives that will reduce the need for car ownership should be provided to justify the reduction in the residential parking.	Also, the project is in proximity to several bus lines, the proposed light rail extension, employment, and other neighborhood amenities. The project proposes to provide dedicated car-share and bike-share spaces, ample bike parking and discounted bus passes for senior residents.	
Loading Stall Requirement; Land Use Ordinance Sec. 21-6.100	An exemption is sought to allow for fewer than the minimum required loading stalls. When calculating based on each phase as a stand-alone project, 7 Loading Stalls are required. 5 are provided.	No comment on the proposed exemption.	The residential components will share the loading stalls with the commercial components. Overall, if all three phases were considered as one project, no exemption would be needed.	Approval. Related to planning and zoning.
Kapolei Urban Design Plan Sec. 5.2.2.1 – Building Envelopes – Max Height of Highest Occupied Floor of 125-feet; Sloping Roof Form required	An exemption is sought for the requirement of a sloping roof form and to exceed the height limit for the highest occupied floor. 130-feet for the highest occupied floor is proposed.	DPP comment letter dated July 13, 2015 states that the UDP requires a sloping roof form. No comment was provided on the proposed exemption for maximum height of the highest occupied floor.	The proposed sloping roof form exemption will help lower the cost of construction and subsidize affordability. The exemption from the height limit for highest occupied floor helps to maximize affordable units	Approval. Related to planning and zoning.

EXHIBIT D

SUMMARY OF REQUESTED EXEMPTIONS AND DEFERRALS

Requested Exemptions and Deferrals

Development Standard and Ordinance/Code	Requested Exemptions	Agency Comments	Applicant Rationale for Request	Recommendation
			on the site.	
Building Permit/ Plan Review Fees; Revised Ordinances of Honolulu, Sec. 18-6.1 and 18-6.2	For Phase 1 and Phase 2, exemption is sought from plan review and building permit fees. Plan review fees are estimated for each phase at \$25,000 (maximum), and building permit fees are estimated at \$124,000 and \$130,000, respectively.	Agency – DPP No comment on the proposed exemption.	The proposed exemption will help lower the cost of construction and subsidize affordability.	Approval. Related to construction standards for subdivision.
Public Works/Infrastructure Fees; Revised Ordinances of Honolulu, Sec. 14-6.1 and 14.6.4	For Phase 1 and Phase 2, deferral is sought from payment of Board of Water Supply connection and Wastewater sewer connection fees until certificate of occupancy.	Agencies: DPP Wastewater Branch and Board of Water Supply - No comment on the proposed deferral.	The proposed deferral will help lower predevelopment costs and subsidize affordability.	Approval. Related to construction standards for subdivision.
Public Works/ Infrastructure Fees (Grading and Grubbing Fees); Revised Ordinances of Honolulu, Sec. 14-14.4	For Phase 1 and 2, an exemption is sought from grading and grubbing permit fees. The grading quantities are not yet determined. The grading permit fee is \$550.00 plus \$55.00 per each additional 1,000 cubic yards or	Agency – DPP No comment on the proposed exemption.	The proposed exemption will help lower the cost of construction and subsidize affordability.	Approval. Related to construction standards for subdivision.

EXHIBIT D

SUMMARY OF REQUESTED EXEMPTIONS AND DEFERRALS

Requested Exemptions and Deferrals

Development Standard and Ordinance/Code	Requested Exemptions	Agency Comments	Applicant Rationale for Request	Recommendation
	fraction thereof.			
Public Works/ Infrastructure Fees (Private storm drain connection license fee); Revised Ordinances of Honolulu, Sec. 14-12.12	For Phase 1 and Phase 2, an exemption is sought from private storm drain connection license fee, estimated at \$1000 per phase.	Agency – DPP No comment on the proposed exemption.	The proposed exemption will help lower the cost of construction and subsidize affordability.	Approval. Related to construction standards for subdivision.
Public Works/ Infrastructure Fees (wastewater system connection fees and facility charges); Revised Ordinances of Honolulu, Sec. 14-10.3	For Phase 1 and Phase 2, deferral is sought for payment of residential wastewater system connection fees and facility charges until certificate of occupancy. Fees are estimated at \$633,000 and \$588,000 for Phase 1 and 2, respectively.	Agency – DPP Wastewater Branch No comment on the proposed deferral.	The proposed exemption will help lower the cost of construction and subsidize affordability.	Approval. Related to construction standards for subdivision.
Deferral from Board of Water Supply Rules and Regulations; Sections 1-102,2-202(2) and 2-202(3)	For Phase 1 and Phase 2, a deferral from payment of Water Systems Connection Charges and Facility Charges for resource development, transmission and daily storage until certificate of occupancy. Fees are estimated to be approximately	Agency – Board of Water Supply No comment on the proposed deferral.	The proposed exemption will help lower the cost of construction and subsidize affordability.	Approval. Related to construction standards for subdivision.

EXHIBIT D

SUMMARY OF REQUESTED EXEMPTIONS AND DEFERRALS**Requested Exemptions and Deferrals**

Development Standard and Ordinance/Code	Requested Exemptions	Agency Comments	Applicant Rationale for Request	Recommendation
	\$250,000 per phase.			

EXHIBIT D

DEPARTMENT OF PLANNING AND PERMITTING
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 7TH FLOOR • HONOLULU, HAWAII 96813
PHONE: (808) 768-8000 • FAX: (808) 768-8041
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KIRK CALDWELL
MAYOR



GEORGE I. ATTA, FAICP
DIRECTOR

ARTHUR D. CHALLACOMBE
DEPUTY DIRECTOR

2015/ELOG-1148(SB)

July 13, 2015

Mr. Dennis Silva, Jr.
Hawaii Planning, LLC
7 Waterfront Plaza
500 Ala Moana Boulevard, Suite 400
Honolulu, Hawaii 96813

Dear Mr. Silva:

SUBJECT: Request for Comments
Draft Environmental Assessment
Kapolei Mixed Use Redevelopment – 583 Units
Chapter 201H-38, Hawaii Revised Statutes (HRS)
1020 Wakea Street – Kapolei
Tax Map Key 9-1-88: 21

Thank you for the opportunity to comment on the above Draft Environmental Assessment (DEA) on received on June 5, 2015. The developer (Coastal Rim Properties) of the proposed Mixed Use Residential and Retail Project (Project) involving affordable housing will be seeking exemptions from various planning, zoning, and construction standards pursuant to Chapter 201H-38, HRS. The application for exemptions is being processed by the Hawaii Housing and Finance Development Corporation (HHFDC) because, under the particular circumstances presented, the Project was not eligible for processing by the Department of Planning and Permitting (DPP). After the State completes its review process, the request for exemptions will be submitted directly to the City Council for action.

In the DPP letter to Plan Pacific (dated September 27, 2013), we stated that the Affordable Housing Project (some of the affordable units being affordable to households earning up to 140 percent of the median income for Honolulu) by Coastal Rim Properties involving 583 dwelling units, neighborhood retail space, day care, community centers, and park and play space, is not eligible for processing by the DPP because it did not meet the eligibility requirements for minimum percentage of units for certain target income groups. To be eligible for processing by the DPP, projects must include a minimum of 10 percent of the total units being affordable to households earning annual incomes which do not exceed 80 percent of the median income. Similarly, a minimum of 20 percent of the total units must be affordable to households earning between 81 to 120 percent of the median income. The remaining affordable units to be provided may be affordable to gap group households (i.e., 121 to 140 percent). A maximum of 50 percent of the total units can be sold at market rates.

EXHIBIT E

Mr. Dennis Silva, Jr.
July 13, 2015
Page 2

In a subsequent correspondence, the DPP noted that since, contrary to what was previously presented, the Project will be developed in four phases, Phase 1 of the Project may technically be eligible for Chapter 201H-38, HRS processing under the City's eligibility requirements. However, since the Applicant indicated that he was working with HHFDC on a consolidated 201H-38, HRS application for all four phases of the Project, the DPP concurred that the Applicant should continue processing with the HHFDC.

The following DPP branches provided review comments as follows:

A. Site Development Division:

1. Subdivision Branch: No comments on the DEA at this time. We may have additional comments on the proposal when the 201H exemption request is submitted.
2. Traffic Review Branch:
 - a. A timeline or phasing plan of the anticipated dates to obtain major building permit(s) for major construction work, including the projected date of occupancy or opening, should be prepared by the Applicant in a format acceptable to the DPP. The timeline should identify when the construction management plan (CMP) and updates and/or validation to the findings of the initial traffic impact analysis report (TIAR) (dated February 14, 2015), will be submitted for review and approval. The major permitting items should coincide with the necessary approvals for construction plans and building and occupancy permits. Typically, the CMP should be submitted for review and approval prior to the issuance of building permits for major construction work for the three building phases. The TIAR, including supplemental studies or subsequent updates, should be submitted and approved prior to the commencement of each major phase of work, as required. A new TIAR may be required if there is a significant change to the scope or timing of the major work items contained in the initial report.
 - b. The CMP should identify the type, frequency, and routing of heavy trucks and construction-related vehicles. Every effort shall be made to minimize impacts from these vehicles and related construction activities. The CMP should identify and limit vehicular activity related to construction to periods outside of the peak periods of traffic, utilizing alternate routes for heavy trucks, provisions for either on- or off-site staging areas for construction-related workers and vehicles to limit the use of on-street parking around the Project site and other mitigation measures related to traffic and potential neighborhood impacts. Preliminary or conceptual traffic control plans should also be included in the CMP. The Applicant shall document the condition of roadways prior to the start of construction activities and provide remedial measures, as necessary, such as

EXHIBIT E

restriping, road resurfacing, and/or reconstruction if the condition of the roadways has deteriorated as a result of the related construction activities.

- c. An updated TIAR should be prepared and submitted prior to the commencement of the subsequent phase of this development to validate the trip generation rates from the previously completed development and include a projection of the relative impacts to traffic resulting from the upcoming phase. Traffic mitigation measures, such as installation of traffic signals, may be a condition of the development if it is deemed to be warranted, resulting from, in part, by traffic due to this development.
- d. Every effort should be made to make this development cognizant of multi-modal and complete streets strategies. These will include provisions for bicycle racks which are conveniently located within this development for residents and commercial users, internal pedestrian walkways which lead to street intersections, and other similar strategies. Driveways should be located at mid-block to minimize conflicts with intersections and coincide with driveways for future developments. Internal parking areas should be interconnected such that motorists can enter and exit on any street and not be limited to one street. A driveway to provide access to the internal parking stalls should be considered on Haumea Street to reduce traffic demand from Wakea and Alohikea Streets.
- e. 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. Vehicular access points shall be constructed as standard City dropped driveways. Adequate vehicular sight distance shall be provided and maintained at all driveways to pedestrians and other vehicles. Driveway grades shall not exceed five percent (5%) for a minimum distance of 25 feet from the back of the designated pedestrian walkway. Entry gates and ticket dispensers should be recessed as far into the driveway as necessary to avoid any queuing onto public streets. All loading and parking areas shall be designed such that vehicles enter and exit front first.
- f. The developer should meet to discuss traffic related issues for off-site work prior to the submittal of construction plans at their earliest convenience to minimize review comments and expedite the time for plan review.

B. Planning Division, Community Planning Branch:

- 1. City of Kapolei Urban Design Plan: The proposal to develop a City Center block primarily for residential use does not appear to be consistent with the Urban Design Plan (UDP). Within the City Center (B-2 District), six blocks are designated for offices, financial retail, business support services, personal

services, and restaurants. The City Council may have the authority to grant the Land Use Ordinance (LUO) zoning use exemptions and override the UDP requirement. However, it is important to acknowledge that the intent for these blocks was clearly to focus on commercial uses (and jobs) in the Kapolei core. UDP was required to ensure that community-specific goals and objectives would be developed and followed. The Final Environmental Assessment (FEA) should discuss why property outside of the City Center, such as in the Commercial Emphasis Mixed Use District, where residential use at mid- and high-rise heights is permitted, is not feasible. In short, while affordable housing is a critical public need, alternative sites may be more suitable.

2. Other Concerns: The FEA should acknowledge that the UDP requires a sloping roof form, which is to be accommodated within the 150-foot height limit. The UDP also requires buildings to observe a height setback above 70 feet to avoid over-scaled forms.

C. Land Use Permits Division, Urban Design Branch (UDB):

1. Project Profile: The correct lot area is 3.036 acres or 132,248 square feet.
2. Section 2.1.1: Location and Surrounding Area:
 - a. You note that the site is comprised of 3.06 acres or approximately 132,229 square feet. However our records indicate that the site consists of 3.036 acres or 132,248 square feet.
 - b. You note that each of the three phases (1, 2, and 3) has a land area of 41,131 square feet, 44,310 square feet, and 46,788 square feet, respectively. However, the total of these three phases does not add to the total lot area of 132,248 square feet.
 - c. Revise Figures 2a, 2b, and 2c, which depict the first levels of each of the phases. The total floor area (for each of the phases) differs from what you have indicated in the Project Information sheet, under Appendix D. Since each figure is depicting only the first levels of each of the phases, the total floor area of the uses within the first levels of each of the phases should be the same as what you have indicated as the total area for the first levels of each of the phases. The floor area of each of the phase's first levels should be the same as the building area of the structures in each phase.
3. Section 2.1.2: Land Use Designation: You correctly note that multi-family dwelling units are not permitted uses within the B-2 Community Business District. However, your proposal entails the development of multi-family dwellings. Therefore, include a discussion about an exemption from the allowance use.

4. Section 2.2.2: Affordability:

- a. In the Project description, you explained that Phase 1 will consist of 154 affordable senior rental units; and with the exception of the single manager's unit, 100 percent of these rental units will be priced in the affordable range for senior households earning between 30 and 60 percent of the area median income (AMI) for Honolulu, as listed by the Department of Housing and Urban Development. Nonetheless, you listed 8 of the units will be rented in the 30 percent AMI range, 18 of the units will be rented in the 55 percent range and 27 units will be rented in the 60 percent AMI range. Therefore, contrary to what you have described in the previous section, the total rental units priced within the affordable range for senior households earning between 30 and 60 percent is 53 (8+18+27) and not 153; and thus not at 100 percent.
- b. In Phase 2, you indicate that 72 of the 143 units will be restricted at a 140 percent AMI or below. You consequently note that the exact level of restrictions is yet to be determined, but for the purposes of the DEA you assume that the restriction will be 140 percent. Nonetheless, in the same paragraph you state that in order to satisfy the minimum requirement for a 201H application, 50 percent of the total units must be restricted at a 140 percent AMI. Given that your development is an Affordable Housing Project, it is essential that you determine your exact level of restrictions.
- c. Under Table 5 - AMI Levels and Unit Distribution, Phase 1 Units, you indicate that 127 of the affordable senior household rental units will be priced for senior households earning 60 percent of the AMI. Nonetheless, in Section 2.2.2 you have indicated that only 27 of the units will be priced for senior households earning 60 percent of the AMI. Please verify the figures.

5. Section 2.2.3: Proposed Project:

- a. You provided the Floor Area Ratio (FAR) for Phase 1 in this section. Please keep in mind that the FAR is calculated for the entire zoning lot. In addition, the proposed density or FAR of 3.12 (for Phase 1), exceeds the maximum allowable FAR of 2.5 without open space bonuses.
- b. Revise the lot size you list for Phase 3 on Page 19. You indicate that the lot size for Phase 3 is 43,310 square feet; however, in the previous sections and figures you have listed Phase 3 as having a lot area of 46,788 square feet.
- c. Revise the number you list for the gross building area of Phase 3, including the parking structure on Page 20. In the previous paragraph, on Page 19, you indicate that the total gross building area for Phase 3 is 20,390 square feet and the gross area for the parking structure is 21,300

square feet. Therefore, the gross building area of Phase 3, including the parking structure, should be 41,690 square feet (20,390 + 21,300).

- d. **Revise Table 8 (Kapolei Mixed-Use Development – Building Summary).** Provide the floor area that you used to calculate the off-street loading stalls and note which "Use Category", listed in the LUO, will the off-street loading calculation be based on. Similarly, indicate the number of parking stalls to be provided for the proposed retail stores in Phases 1 and 2. In addition, note that the number of off-street parking and loading stalls indicate the stalls to be provided by the Applicant but not those required by the LUO.
 - e. **Revise the off-street parking LUO requirement for retail establishments listed on Page 21.** You indicate that one parking stall is required for every 300 to 400 square feet of retail space, depending on the type. Please note that the off-street parking requirement for retail establishments, per Table 21-6.1 of the LUO, is one parking stall per 400 square feet.
6. **Section 3.3.5: Climate:** Include a section about sea level rise and the potential impact and mitigation.
 7. **Section 3.5: Archaeological and Historic Resources:** Consult with the State Historic Preservation Division to confirm that an additional Archaeological Inventory Survey is not required.
 8. **Section 3.6: Cultural Resources:** Include a section relating to cultural impact assessment.
 9. **Section 3.7: Roadways and Traffic: On-Street Parking:** You state that the on-street parking within the immediate neighborhood partially mitigates the need for on-site parking. Please keep in mind that per the LUO, off-street parking will need to be provided on-site.
 10. **Section 3.14.1: Schools:** The DEA should explain in depth how the construction of the 143 units in Phase 2 will impact the existing schools. Provide more information about these schools and their enrollment capacity.
 11. **Section 5.0: Chapter 201H Application and Exemptions:** You state that "...the EA serves as the 201H application agency and public comment document in addition to meeting the content and submittal requirements for an EA, under Chapter 343, HRS, and Chapter 11-200, Hawaii Administrative Rules". Please note that the DPP has not reviewed the submitted DEA for compliance with the LUO under the 201H application process.
 12. **Section 5.2: Requested Exemptions:** On Page 97, you state that the TIAR's on-street parking is available in the immediate neighborhood. As such, you conclude that these on-street parking stalls will offset the need for on-site

parking. However, as noted previously, required off-street parking will still need to be provided on-site.

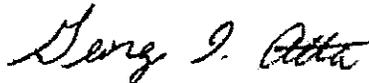
13. Section 6.0: Alternatives: The discussion for the alternatives should be more in depth. Similarly, they should be illustrated diagrammatically.
14. Appendix D: Architectural Plans:
 - a. Under the Project Information Sheet, it is not clear what the Net Area Table is representing. Similarly, the Gross Area Table is inconsistent to what you have outlined within the text. In addition, as outlined before, the off-street parking requirement for retail establishment under the LUO is one stall per 400 square feet. Furthermore, the total site area is incorrect. Please revise all the tables.
 - b. As indicated in Item B(2)(c) herein, the total floor area (for each of the phases) that you indicate differs from the Project Information Sheet, under Appendix D. Make sure that the total floor area of each of the levels for each of the phases matches what you have stated in the Project Summary as well as the Project Information Sheet.
 - c. The plans for each of the phases should be organized in order (i.e., Phase 1 Level 1, Level 2, Level 3, and so on). Similarly, the plans should clearly indicate the proposed uses for each of the levels of each phase.
 - d. The Project Information Sheet, under Appendix D, indicates landscaped open spaces. Provide an open space plan/diagram indicating the proposed landscaped open space.
 - e. The parking layout plan in each of the phases should show the typical dimension for both the standard and compact parking stalls, as well as the loading stalls. Please note that Section 21-6.50 of the LUO identifies the minimum dimensions for parking stalls.
 - f. All building sections and elevations should show the property lines.
 - g. Identify all the adjoining streets in the isometric drawing.
15. Other General Comments:
 - a. Parts of the parking structure will be visible from the adjoining streets. Therefore, it should be adequately screened to minimize light and glare impacts onto surrounding areas. This could be accomplished with landscaping, planter boxes, and/or architectural design elements.

Mr. Dennis Silva, Jr.
July 13, 2015
Page 8

- b. In the Project Summary, you discuss that the Project will be pedestrian friendly. However, in the drawings provided, there are no features to enhance the pedestrian experience. Therefore, to encourage pedestrian movement along the streets and enhance the walking experience, please provide shade or canopy-form trees.
- c. From the renderings, the proposed structures seem stark and austere. For instance, in the open podium area where the two tall buildings intersect on the second and third floors, landscaping can be incorporated to soften the facade of these buildings.
- d. Provide a site plan that clearly shows all access and circulation, such as driveways, entryways, secondary access, pedestrian walkways, utility access easements, parking, and loading areas. The site plan should indicate what is discussed in the Project's description regarding the creation of a pedestrian-engaging open space. All the bounding streets should be indicated. In addition, building footprints for each of the structures should also be demarcated clearly and the proposed uses for each floor of each of the phase.
- e. Provide a building section that diagrammatically identifies proposed uses.
- f. Discuss short term impacts of the Project.

Should you have any questions, please contact Sery Berhanu of our Urban Design Branch at 768-8033 or via email at sberhanu@honolulu.gov.

Very truly yours,



George I. Atta, FAICP
Director

cc: HHFDC,
Attention: Janice Takahashi
Honolulu City Council

EXHIBIT E



October 15, 2015

Mr. George Atta, FAICP
Director
Department of Planning and Permitting
City and County of Honolulu
650 S. King Street, 7th Floor
Honolulu, HI 96813

Dear Mr. Atta:

**Draft Environmental Assessment, Kapolei Mixed-Use Development,
Tax Map Key: 9-1-088: 021**

Thank you for your letter dated July 13, 2015 regarding the above-referenced project (Project). Our responses to your comments are as follows:

A. Site Development Division:

1. *Subdivision Branch:*

No comments on the DEA at this time. We may have additional comments on the proposal when the 201H exemption request is submitted.

Discussion: Subdivision Branch comments are noted.

2. *Traffic Review Branch (TRB):*

a. A timeline or phasing plan of the anticipated dates to obtain major building permit(s) for major construction work, including the projected date of occupancy or opening, should be prepared by the Applicant in a format acceptable to DPP. A timeline should identify when the construction management plan (CMP) and updates and/or validation to the findings of the initial traffic impact analysis report (TIAR) (dated February 14, 2015), will be submitted for review and approval. The major permitting items should coincide with the necessary approvals for construction plans and building and occupancy permits. Typically, the CMP should be submitted for review and approval prior to the issuance of building permits for major construction work for the three building phases. The TIAR, including supplemental studies or subsequent updates, should be submitted and approved prior to the commencement of each major phase of work, as required. A new TIAR may be required if there is a significant change to the scope or timing of the major work items contained in the initial report.

P.O. Box 892735
Mililani, HI
96789

Tel: (808) 521-9418

Discussion: As part of the 201H application submitted and processed through the Hawaii Housing Finance and Development Corporation (HHFDC), a detailed timeline was completed. The timeline will be enclosed as an Appendix in the Final EA. The CMP and any TIAR updates will be incorporated into the overall project timeline.

b. The CMP should identify the type, frequency, and routing of heavy trucks and construction-related vehicles. Every effort should be made to minimize impacts from these vehicles and related construction activities. The CMP should identify and limit vehicular activity related to construction to periods outside of the peak periods of traffic, utilizing alternate routes for heavy trucks, provisions for either on- or off-site staging areas for construction-related workers and vehicles to limit the use of on-street parking around the Project site and other mitigation measures related to traffic and potential neighborhood impacts. Preliminary or conceptual traffic control plans should also be included in the CMP. The Applicant shall document the condition of roadways prior to the start of construction activities and provide remedial measures, as necessary, such as restriping, road resurfacing, and/or reconstruction if the condition of the roadways has deteriorated as a result of the related construction activities.

Discussion: A CMP will be completed during the construction plan processing with DPP. The requirements for a CMP will be added to the Final EA.

c. An updated TIAR should be prepared and submitted prior to the commencement of the subsequent phase of this development to validate the trip generation rates from the previously completed development and include a projection of the relative impacts to traffic resulting from the upcoming phase. Traffic mitigation measures, such as installation of traffic signals, may be a condition of the development

Discussion: The Developer will comply with all DPP requirements for updating the TIAR. Reference to TIAR updates will be added to the Final EA.

d. Every effort should be made to make this development cognizant of multi-modal and complete streets strategies. These will include provisions for bicycle racks which are conveniently located within this development for residents and commercial users, internal pedestrian walkways which lead to street intersections, and other similar strategies. Driveways should be located at mid-block to minimize conflicts with intersections and coincide with driveways for future developments. Internal parking areas should be interconnected such that motorists can enter and exit on any street and not be limited to one street. A driveway to provide access to the internal parking stalls should be considered on Haumea Street to reduce traffic demand from Wakea and Alohikea Streets.

Discussion: The Project will comply with multi-modal and complete streets strategies to the extent possible. The Kapolei UDP requires bicycle parking for 10% of the required parking stalls, which calculates to 50 bicycles. To reach the LEED Platinum level, a

minimum of 15% of Phase 1's residents will have bicycle parking. The main vehicular entrance off of Wakea Street is located mid-block. A secondary entrance/exit is provided on Alohikea Street, and a pedestrian access is provided off of Ala Kahawai Street. There are therefore access points on three of the four sides.

e. 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. Vehicular access points shall be constructed as standard City dropped driveways. Adequate vehicular site distance shall be provided and maintained at all driveways to pedestrians and other vehicles. Driveway grades shall not exceed five percent (5%) for a minimum distance of 25-feet from the back of the designated pedestrian walkway. Entry gates and ticket dispensers should be recessed as far into the driveway as necessary to avoid any queuing onto public streets. All loading and parking areas shall be designed such that vehicles enter and exit front first.

Discussion: Construction plans will be submitted to DPP for review and approval. Traffic control plans will be included in the CMP, as required. Vehicular accesses will be designed to City standards. Entry gates and/or ticket dispensers will be recessed to mitigate queuing. All loading and parking areas are currently designed such that vehicles enter and exit front first.

f. The developer should meet to discuss traffic related issues of off-site work prior to the submittal of construction plans at their earliest convenience to minimize review comments and expedite the time for plan review.

Discussion: The developer will meet with TRB prior to the submittal of construction plans to discuss impacts of off-site work.

B. Planning Division, Community Planning Branch:

1. City of Kapolei Urban Design Plan: The proposal to develop a City Center block primarily for residential use does not appear to be consistent with the Urban Design Plan (UDP). Within the City Center (B-2 District), six blocks are designated for offices, financial retail, business support services, personal services, and restaurants. The City Council may have the authority to grant the Land Use Ordinance (LUO) zoning use exemptions to override the UDP requirement. However, it is important to acknowledge that the intent for these blocks was clearly to focus on commercial uses (and jobs) in the Kapolei core. UDP was required to ensure that community-specific goals and objectives would be developed and followed. The Final Environmental Assessment (FEA) should discuss why property outside the City Center, such as in the Commercial Emphasis Mixed-Use District, where residential use at mid- and high-rise heights is permitted, is not feasible. In short, while affordable housing is a critical public need, alternative sites may be more suitable.

Discussion: Section 5.2.2.2 - Uses in the UDP states, "The predominant uses in [the City Center] district are to be offices, financial, retail, business support services, personal services, and restaurants. Multi-family dwelling units may be permitted on the upper floors of buildings, subject to obtaining the proper zoning from the City & County."

Similarly, the 'Ewa Development Plan, Section 3.6.1.1 states: "The City Center should be the high-density core of the city. Larger office towers should be the predominant form of development in this district, with shopping and restaurants at ground level. The inclusion of apartments within some of the towers should also be encouraged to establish a more dynamic mix of uses and help to maintain an active urban environment in the area."

While commercial tower development is intended to be the primary use in the City Center, these documents clearly support a measure of residential mixed use towers. Also, development of the City Center with day-uses only could potentially lead to lack of activity on the streets in the evenings. The UDP states that the City Center should "encourage a high level of pedestrian day and night-time activities, especially along Wai Aniani Way." Activity at night increases pedestrian safety and furthers the UDP and 'Ewa DP goal of a walkable and pedestrian friendly City Center. Residential mixed use development plays a key role in maintaining vitality at night.

2. *Other Concerns: The FEA should acknowledge that the UDP requires a sloping roof form, which is to be accommodated within the 150-foot height limit. The UDP also requires buildings to observe a height setback above 70 feet to avoid over-scaled forms.*

Discussion: The Final EA will be modified to include an exemption request for the sloping roof form. An exemption to the height setback requirement can be found in Chapter 5 of the Draft EA on page 95. Please refer to Figure 23 – Street Setback Requested Exemption.

C. Land Use Permits Division, Urban Design Branch (UDB):

1. *Project Profile: The correct lot area is 3.036 acres or 132,248 square feet.*

Discussion: The Final EA will state the correct lot area of 3.036 acres or 132,248 square feet.

2. *Section 2.1.1: Location and Surrounding Area:*

a. *You note that the site is comprised of 3.06 acres or approximately 132,229 square feet. However, our records indicate that the site consists of 3.036 acres or 132,248 square feet.*

Discussion: The Final EA will be corrected.

b. You note that each of the three phases (1, 2, and 3) has a land area of 41,131 square feet, 44,310 square feet, and 46,788 square feet respectively. However, the total of these three phases does not add to the total lot area of 132,248 square feet.

Discussion: The phased land areas will be revised to total 132,248 square feet.

c. Revise Figures 2a, 2b, and 2c, which depict the first levels of each of the phases. The total floor area (for each of the phases) differs from what you have indicated in the Project Information sheet, under Appendix D. Since each figure is depicting only the first levels of each of the phases, the total floor area should be the same as what you have indicated as the total area for the first levels of each of the phases. The floor area of each of the phase's first levels should be the same as the building area of the structures in each phase.

Discussion: Figures 2a, 2b, and 2c will be revised in the Final EA.

3. Section 2.1.2: Land Use Designation: You correctly note that multi-family dwelling units are not permitted uses within the B-2 Community Business District. However, your proposal entails the development of multi-family dwellings. Therefore, include a discussion about an exemption from the allowance use.

Discussion: See response to comment #1 in this letter.

4. Section 2.2.2: Affordability:

a. In the Project description, you explained that Phase 1 will consist of 154 affordable senior rental units; and with the exception of the single manager's unit, 100 percent of these rental units will be priced in the affordable range for senior households earning between 30 and 60 percent of the area median income (AMI) for Honolulu, as listed by the Department of Housing and Urban Development. Nonetheless, you listed 8 of the units will be rented in the 30 percent AMI range, 18 of the units will be rented in the 55 percent range and 27 units will be rented in the 60 percent AMI range. Therefore, contrary to what you have described in the previous section, the total rental units priced within the affordable range for senior households earning between 30 and 60 percent is 53 (8+18+27) and not 153; and thus not 100 percent.

Discussion: Table 5 – AMI Levels and Unit Distribution, lists the unit mix as follows: 8 units at 30% AMI; 18 units at 55% AMI; and 127 units at 60% AMI. The narrative in the Final EA will be corrected to reflect the unit mix as listed in Table 5.

b. In Phase 2, you indicate that 72 of the 143 units will be restricted at a 140 percent AMI or below. You consequently note that the exact level of restrictions is yet to be determined, but for the purposes of the DEA you assume that the restriction will be 140 percent. Nonetheless, in the same paragraph you state that in order to satisfy the

minimum requirement for a 201H application, 50 percent of the total units must be restricted at a 140 percent AMI. Given that your development is an Affordable Housing Project, it is essential that you determine your exact level of restrictions.

Discussion: HHFDC has not yet approved the exact affordability levels, so the minimum standard of 140% AMI was used. A minimum of 72 of the 143 units in Phase 2 will be restricted at a maximum of 140% AMI. The exact affordability levels will be determined when the 201H application is approved. When evaluating the affordability requirement for a 201H application, more than 50% of the units must be restricted at a maximum of 140% AMI. All phases have been submitted under the same 201H application, so in this case 225 of the total 297 units meet the affordability standard.

c. Under Table 5 – AMI Levels and Unit Distribution, Phase 1 Units, you indicate that 127 of the affordable senior household rental units will be priced for senior households earning 60 percent of the AMI. Nonetheless, in Section 2.2.2 you have indicated that only 27 of the units will be priced for senior households earning 60 percent of the AMI. Please verify the figures.

Discussion: The narrative in Section 2.2.2 will be revised to reflect the unit mix listed in Table 5 – AMI Levels and Unit Distribution.

5. Section 2.2.3: Proposed Project:

a. You provided the Floor Area Ratio (FAR) for Phase 1 in this section. Please keep in mind that the FAR is calculated for the entire zoning lot. In addition, the proposed density or FAR of 3.12 (for Phase 1), exceeds the maximum allowable FAR of 2.5 without open space bonuses.

Discussion: We anticipate dividing the property by condo property regime (“CPR”) and not by subdivision. FAR references in the Final EA and on the plans will be corrected so the denominator is the entire zoning lot. Since the overall FAR is less than 2.5, no FAR exemption is required.

b. Revise the lot size you list for Phase 3 on Page 19. You indicate that the lot size for Phase 3 is 43,310 square feet; however, in the previous sections and figures you have listed Phase 3 as having a lot area of 46,788 square feet.

Discussion: The lot size of Phase 3 will be revised to reflect consistency throughout the EA.

c. Revise the number you list for the gross building area of Phase 3, including the parking structure on Page 20. In the previous paragraph, on page 19, you indicate that the gross building area for Phase 3 is 20,390 square feet and the gross area for the parking

structure is 21,300 square feet. Therefore, the gross building area of Phase 3, including the parking structure should be 41,690 square feet (20,390 + 21,300).

Discussion: The Phase 3 gross building area will be revised in the Final EA.

d. *Revise Table 8 (Kapolei Mixed-Use Development – Building Summary). Provide the floor area that you used to calculate the off-street loading stalls and note which “Use Category”, listed in the LUO, will the off-street loading calculation will be based on. Similarly, indicate the number of parking stalls to be provided for the proposed retail stores in Phases 1 and 2. In addition, note that the number of off-street parking and loading stalls indicate the stalls to be provided by the Applicant but not those required by the LUO.*

Discussion: Table 8 – Kapolei Mixed-Use Development – Building Summary will be revised. It will include the floor area and Use Category used to calculate the loading stall requirement. The table will also indicate the number of parking stalls required and provided for the residential and retail components.

e. *Revise the off-street parking LUO requirement for retail establishments listed on Page 21. You indicate that one parking stall is required for every 300 to 400 square feet of retail space, depending on the type. Please note that the off-street parking requirement for retail establishments, per Table 21-6.1 of the LUO, is one parking stall per 400 square feet.*

Discussion: The parking stall calculation will be revised accordingly.

6. *Section 3.3.5: Climate: Include a section about sea level rise and the potential impact and mitigation.*

Discussion: A subsection on sea level rise and the potential impact and mitigation will be added to the Final EA.

7. *Section 3.5: Archaeological and Historic Resources: Consult with the State Historic Preservation Division to confirm that an additional Archaeological Inventory Survey is not required.*

Discussion: Based on SHPD’s comment letter dated July 10, 2015 for this project, it is determined that no historic properties are affected by the proposed development.

8. *Section 3.6: Cultural Resources: Include a section relating to cultural impact assessment.*

Discussion: Section 3.6 of the EA has been re-written to better address cultural impact assessment.

9. *Section 3.7: Roadways and Traffic: On-Street Parking: You state that the on-street parking within the immediate neighborhood partially mitigates the need for on-site parking. Please keep in mind that per the LUO, off-street parking will need to be provided on-site.*

Discussion: The Project is requesting a parking exemption for the residential component primarily because parking needs for low income and senior households are lower than conventional households. The juxtaposition to public transit further justifies the parking exemption. While we maintain that street parking does impact the exemption request (for example, if there were no on-street parking, the need for guest parking stalls would increase), the verbiage about on-street parking mitigating the need for on-site parking will be removed.

10. *Section 3.14.1: Schools: The DEA should explain in depth how the construction of the 143 units in Phase 2 will impact existing schools. Provide more information about these schools and their enrollment capacity.*

Discussion: The Final EA will include enrollment capacity for the schools within proximity to the Project site.

11. *Section 5.0: Chapter 201H Application and Exemptions: You state that "... the EA serves as the 201H application agency and public comment document in addition to meeting the content and submittal requirements for an EA, under Chapter 343, HRS, and Chapter 11-200, Hawaii Administrative Rules." Please note that DPP has not reviewed the submitted DEA for compliance with the LUO under the 201H application process.*

Discussion: The 201H application was submitted to HHFDC for review and processing. It is noted that DPP has not reviewed the EA for compliance with the LUO.

12. *Section 5.2: Requested Exemptions: On Page 97, you state that the TIAR's on-street parking is available in the immediate neighborhood. As such, you conclude that these on-street parking stalls will offset the need for on-site parking. However, as noted previously, required off-street parking will still need to be provided on-site.*

Discussion: See comment #9.

13. *Section 6.0: Alternatives: The discussion for the alternatives should be more in depth. Similarly, they should be illustrated diagrammatically.*

Discussion: The Draft EA provides detailed reasoning as to why the proposed alternatives are inferior and don't believe the Applicant should have to invest resources in developing drawings for inferior designs. In our review of other EA's drawings are often not included for the alternatives.

14. *Appendix D: Architectural Plans:*

a. *Under the Project Information Sheet, it is not clear what the Net Area Table is representing. Similarly, the Gross Area Table is inconsistent to what you have outlined in the text. In addition, as outlined before, the off-street parking requirement for retail establishment under the LUO is one stall per 400 square feet. Furthermore, the total site area is incorrect. Please revise all the tables.*

Discussion: The Tables in Appendix D were revised and will be consistent with the text.

b. *As indicated in Item B(2)(c) herein, the total floor area (for each of the phases) that you indicate differs from the Project Information Sheet, under Appendix D. Make sure that the total floor area of each of the levels for each of the phases matches what you have stated in the Project Summary as well as the Project Information Sheet.*

Discussion: The total floor area data were revised and will be consistent throughout the text.

c. *The plans of each of the phases should be organized in order (i.e., Phase 1 Level 1, Level 2, Level 3, and so on). Similarly, the plans should clearly indicate the proposed uses for each of the levels of each phase.*

Discussion: The organization of the plans will be revised accordingly.

d. *The Project Information Sheet, under Appendix D, indicates landscaped open spaces. Provide an open space plan/diagram indicating the proposed landscaped open space.*

Discussion: An Open Space plan / diagram will be added to Appendix D.

e. *The parking layout plan in each of the phases should show the typical dimension for both the standard and compact parking stalls, as well as the loading stalls. Please note that Section 21-6.50 of the LUO identifies the minimum dimensions for parking stalls.*

Discussion: The parking layout plan will be revised accordingly.

f. *All building sections and elevations should show the property lines.*

Discussion: The building sections and elevations will show the property lines.

g. *Identify all the adjoining streets in the isometric drawing.*

Discussion: All adjoining streets will be identified in the isometric drawings.

15. *Other General Comments:*

a. *Parts of the parking structure will be visible from the adjoining streets. Therefore, it should be adequately screened to minimize light and glare impacts onto surrounding areas. This could be accomplished with landscaping, planter boxes, and/or architectural design elements.*

Discussion: Full cutoff light fixtures will be used in the parking structure to reduce glare. If necessary, areas of the parking structure visible from surrounding streets will be screened from view using landscaping and/or architectural design elements.

b. *In the Project Summary, you discuss that the Project will be pedestrian friendly. However, in the drawings provided, there are no features to enhance the pedestrian experience. Therefore, to encourage pedestrian movement along the streets and enhance the walking experience, please provide shade or canopy-form trees.*

Discussion: Shade trees will be included in Appendix D – Architectural Plans. Further detail of the landscape improvements will be incorporated when the landscape plan is fully developed.

c. *From the renderings, the proposed structures seem stark and austere. For instance, in the open podium area where the two tall buildings intersect on the second and third floors, landscaping can be incorporated to soften the façade of these buildings.*

Discussion: Trees will be incorporated in Appendix D – Architectural Plans. Further detail of the landscape improvements will be incorporated when the landscape plan is fully developed.

d. *Provide a site plan that clearly shows all access and circulation, such as driveways, entryways, secondary access, pedestrian walkways, utility access easements, parking, and loading areas. The site plan should indicated what is discussed in the Project's description regarding the creation of a pedestrian-engaging open space. All the bounding streets should be indicated.*

Discussion: The site plans for each phase will be revised to illustrate the above-referenced elements.

e. *Provide a building section that diagrammatically identifies proposed uses.*

Discussion: The proposed uses will be illustrated diagrammatically in the Final EA.

f. *Discuss short term impacts of the Project.*

Discussion: Short-term impacts of the Project and mitigations are discussed in the Draft EA, particularly in Sections: 3.2, 3.7, 3.8, 3.9, and 3.13.3.

Thank you for your comments. Your comment letter will be included in the Final EA.

Sincerely,



Lisa L. Imata
President

DEPARTMENT OF PARKS & RECREATION
CITY AND COUNTY OF HONOLULU

1000 Uluohia Street, Suite 309, Kapolei, Hawaii 96707
Phone: (808) 768-3003 • Fax: (808) 768-3053
Website: www.honolulu.gov

KIRK CALDWELL
MAYOR



MICHELE K. NEKOTA
DIRECTOR

JEANNE C. ISHIKAWA
DEPUTY DIRECTOR

June 23, 2015

Mr. Dennis Silva, Jr., AICP
Hawaii Planning LLC
7 Waterfront Plaza
500 Ala Moana Boulevard, Suite 400
Honolulu, Hawaii 96813

Dear Mr. Silva:

**SUBJECT: Draft Environmental Assessment (EA)
Kapolei Mixed-Use Development
TMK: 9-1-088:021**

Thank you for the opportunity to review and comment on the Draft EA for the proposed Kapolei Mixed-Use Development.

The Department of Parks and Recreation (DPR) does not support approval of the project. The fact that there are existing park facilities in near proximity to the site, does not justify exempting the project from compliance with the DPR Parks Dedication Ordinance (PDO) for market condominium units.

This argument could be made for many, if not all, new market residential developments in urban areas and if accepted, may have the effect of defeating the purpose and intent of the DPR-PDO altogether.

You are invited to call my Secretary, Carolyn Ikehara at 768-3001 to schedule a meeting with me and my staff to discuss our recommendations as to how the condominium units project can comply with the DPR-PDO for the market condominium units.

Should you have any questions, please contact Mr. John Reid, Planner at 768-3017.

Sincerely,

A handwritten signature in black ink that reads "Michele K. Nekota". The signature is fluid and cursive, with a large loop at the end.

Michele K. Nekota
Director

MKN:jr
(612628)

cc: George Atta, Director, Department of Planning and Permitting
Hawaii Housing Finance & Development Corporation

EXHIBIT F



October 15, 2015

Ms. Michele K. Nekota
Director
Department of Parks and Recreation
City & County of Honolulu
1000 Uluohia Street, Suite 309
Kapolei, HI 96707

Dear Ms. Nekota:

**Draft Environmental Assessment, Kapolei Mixed-Use Development,
Tax Map Key: 9-1-088: 021**

Thank you for your letter dated June 23, 2015 regarding the Kapolei Mixed-Use Development (Project). The Draft EA states that the Project provides a total of 27,478 square feet of private park space. The required private park space is 32,670 square feet. Upon consultation with you and your staff, the Applicant will now provide a total of 32,778 square feet of private park space. The Project is now in compliance with the Park Dedication Ordinance and will not request a park dedication exemption.

The Final EA will be revised to eliminate the requested exemption to the park dedication requirements and state and illustrate the proposed park dedication design. The breakdown of the proposed private park space is as follows:

Community Center:	926 square feet
Recreation Center:	2,052 square feet
Phase 1, Recreation Podium:	9,800 square feet
<u>Phase 2, Recreation Podium:</u>	<u>20,000 square feet</u>
Total:	32,778 square feet

Thank you for your comments. Your comment letter will be included in the Final EA.

Sincerely,

A handwritten signature in black ink, appearing to read "Lisa L. Imata".

Lisa L. Imata
President

P.O. Box 892735
Millani, HI
96789

Tel: (808) 521-9418

BOARD OF WATER SUPPLY

CITY AND COUNTY OF HONOLULU
630 SOUTH BERETANIA STREET
HONOLULU, HI 96843



July 30, 2015

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Manager and Chief Engineer

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Deputy Manager and Chief Engineer *ELK*

Mr. Dennis Silva, Jr., AICP
Hawaii Planning LLC
7 Waterfront Plaza
500 Ala Moana Boulevard, Suite 400
Honolulu, Hawaii 96813

Dear Mr. Silva:

Subject: Your Letter Dated June 5, 2015 on the Draft Environmental Assessment for
Kapolei Mixed-Use Development on Wakea Street – TMK: 9-1-088: 021

Thank you for the opportunity to comment on the proposed 297-unit multi-family high rise and commercial development.

The existing water system is adequate to accommodate the proposed development. However, please be advised that this information is based upon current data, and therefore, the Board of Water Supply (BWS) reserves the right to change any position or information stated herein up until the final approval of the building permit application. The final decision on the availability of water will be confirmed when the building permit application is submitted for approval.

This parcel currently has a potable water allocation of 5,000 gallons per day. The estimated water requirements exceed this amount. Therefore, the developer will be required to pay our Water Systems Facilities Charges for resource development, transmission and daily storage for the balance of water requirements.

Water conservation measures are required for all proposed developments. These measures include low-flow plumbing fixtures, utilization of nonpotable water for irrigation using rain catchment and chiller/air handler condensate, cooling tower conductivity meters and water softening recycling systems, drought tolerant plants, xeriscape landscaping, efficient irrigation systems and the use of Water Sense labeled ultra-low-flow water fixtures and toilets.

EXHIBIT G

Mr. Dennis Silva, Jr.
July 30, 2015
Page 2

High-rise buildings with booster pumps will be required to install water hammer arrestors or expansion tanks to reduce pressure spikes and potential main breaks in our water system.

The on-site fire protection requirements should be coordinated with the Fire Prevention Bureau of the Honolulu Fire Department.

The BWS Rules and Regulations require the use of nonpotable water for the irrigation of large landscaped areas if a suitable supply is available. The proposed Kapolei Mixed-Use Development is in close proximity to the BWS Recycled Water System. Thus, nonpotable water in the form of recycled water, which is designated R-1, must be used and the BWS agrees to provide R-1 recycled water to the development subject to the approval of the Agreement for Recycled Water Service.

The proposed project is subject to BWS Cross-Connection Control and Backflow Prevention requirements prior to the issuance of the Building Permit Applications.

If you have any questions, please contact Robert Chun, Project Review Branch of our Water Resources Division at 748-5443.

Very truly yours,



ERNEST Y. W. LAU, P.E.
Manager and Chief Engineer

EXHIBIT G



October 15, 2015

Ernest Y.W. Lau, P.E.
Manager and Chief Engineer
Board of Water Supply
City and County of Honolulu
630 South Beretania Street
Honolulu, HI 96843

Dear Mr. Lau:

**Draft Environmental Assessment, Kapolei Mixed-Use Development,
Tax Map Key: 9-1-088: 021**

Thank you for your letter dated July 30, 2015. The following is our response to your comments.

1. *This parcel currently has a potable water allocation of 5,000 gallons per day. The estimated water requirements exceed this amount. Therefore, the developer will be required to pay our Water Systems Facilities Charges for resource development, transmission and daily storage for the balance of water requirements.*

Discussion: Reference to the current water allocation and applicable fees has been clarified in Section 3.13.1 of the EA.

2. *Water conservation measures are required for all proposed developments. These measures include low-flow plumbing fixtures, utilization of nonpotable water for irrigation using rain catchment and chiller/air handler condensate, cooling tower conductivity meters and water softening recycling systems, drought tolerant plants, xeriscape landscaping, efficient irrigation systems and the use of Water Sense labeled ultra-low-flow water fixtures and toilets.*

Discussion: Reference to the required water conservation measures has been added to Section 3.13.1 of the EA.

3. *High-rise buildings with booster pumps will be required to install water hammer arrestors or expansion tanks to reduce pressure spikes and potential main breaks in our water system.*

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Mililani, HI
96789

Tel: (808) 521-9418

Discussion: Language has been added to Section 3.13.1 of the EA regarding installation of water hammer arrestors or expansion tanks.

4. *The on-site fire protection requirements should be coordinated with the Fire Prevention Bureau of the Honolulu Fire Department.*

Discussion: The Applicant is coordinating with the Honolulu Fire Department on fire protection requirements.

5. *The BWS Rules and Regulations require the use of non potable water for the irrigation of large landscaped areas if a suitable supply is available. The proposed Kapolei Mixed-Use Development is in close proximity to the BWS Recycled Water System. Thus, non potable water in the form of recycled water, which is designated R-1, must be used and the BWS agrees to provide R-1 recycled water to the development subject to the approval of the Agreement for Recycled Water Service.*

Discussion: A discussion of recycled water being provided to the Project is included in Section 3.13.1 of the EA under the subheading Irrigation. The language has been modified to specify the designation of R-1 and to reference BWS's commitment to provide R-1 recycled water subject to the approval of the Agreement for Recycled Water Service.

6. *The proposed project is subject to BWS Cross-Connection Control and Backflow Prevention requirements prior to the issuance of the Building Permit Applications.*

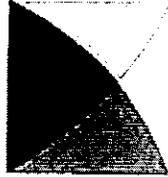
Discussion: Reference of this requirement has been added to the EA.

Thank you for your comments. Your comment letter will be included in the Final EA.

Sincerely,



Lisa L. Imata
President



KAPOLEI

July 8, 2015

Mr. Franco Mola
Coastal Rim Properties
1541 South Beretania Street, #101
Honolulu, HI 96826

Mr. Dennis Silva, Jr., AICP
Hawaii Planning LLC
1001 Bishop Street
ASB Tower, Suite 2755
Honolulu, HI 96813

Dear Messrs. Mola and Silva:

James Campbell Company LLC and Affiliated Companies
Comments on Kapolei Mixed-Use Development Draft Environmental Assessment

The James Campbell Company LLC and affiliated companies, including Kapolei Properties LLC (formerly Kapolei Property Development LLC) and Campbell Hawaii Investor LLC (collectively the "JCC Group"), appreciate this opportunity to comment on the Draft Environmental Assessment for the Kapolei Mixed-Use Development ("EA") published in the June 8, 2015 issue of the Environmental Notice. The JCC Group is the former owner of the subject property, TMK (1) 9-1-088:021 ("Property") and continues to maintain certain rights and responsibilities as the master developer of the City of Kapolei. We have discussed the project concept with Coastal Rim Properties, the developer/applicant for this project, on several occasions over the last two years, but the EA provided us with significantly greater detail on the proposed project.

While we are generally very supportive of high density mixed use projects throughout the City of Kapolei, we have a number of specific comments on the uses proposed for the Property and the contents of the EA. To provide context, we would like to begin by noting several governing covenants, approvals and criteria which currently render the proposed project an inconsistent use on the Property:

1. **Certain Use Restrictions, Covenants and Reservations of Rights Contained in the Property's Limited Warranty Deed dated July 14, 2006.** The JCC Group retains enforcement rights for these applicable provisions of the deed:
 - **Permitted Use of the Property:** The use specified for the Property is an office building with ancillary ground floor retail totaling not less than 200,000 square feet.
 - **Construction of Planned Improvements:** Commercially reasonable best efforts to commence construction of the permitted use within two years (July 2008) and to complete construction within four years (July 2010) were required of the Property owner.

- **Water and Sewer Charges:** The Property Owner is required to reimburse the JCC Group for water and sewer allocations assigned to and utilized for the Property to the extent they are available.
2. Unilateral Agreement and Declaration for Conditional Zoning dated February 27, 1990. The Unilateral Agreement allowed for the B-2, Commercial zoning of the Property. It also sets forth the condition that projects in the City of Kapolei are subject to the design criteria and review processes in the City of Kapolei Urban Design Plan (“UDP”) and that site and architectural plans are subject to Department of Land Utilization (now Department of Planning and Permitting [“DPP”]) review and approval. The JCC Group and DPP retain design review and approval authority over all developments in the City of Kapolei (UDP Section 6.3) and these Unilateral Agreement conditions are enforced accordingly.
 3. City of Kapolei Declaration of Protective Covenants, Conditions and Restrictions dated November 30, 1993 (“CC&R”). The CC&R are dictated by the Unilateral Agreement and are recorded against all land in the City of Kapolei to ensure property owners in the City of Kapolei have a consistent property regime over time. The UDP was incorporated into the CC&R to meet a condition of the 1990 Unilateral Agreement and to ensure design consistency and standards for all property owners. Compliance with applicable terms of the CC&R and the UDP is enforced privately by the JCC Group as declarant.
 4. Infrastructure Capacities and Allocations. While regional and local infrastructure systems in the City of Kapolei were designed to accommodate high density development, demand assumptions for each property were required to plan, design and construct infrastructure improvements. These assumptions ultimately formed property-specific infrastructure allocations that the City and County of Honolulu relies upon to ensure adequate capacities for future development. Infrastructure design criteria and allocations for the Property were based on B-2, Commercial zoning and not for higher demands required of projects with significant residential components.

While the Hawaii Revised Statutes Chapter 201H (“201H”) process proposed for the project seeks several exemptions from City and County of Honolulu Land Use Ordinance (“LUO”) provisions and various fee deferrals, 201H exemptions do not modify the privately enforced real property interests of the JCC Group incorporated in the CC&R and UDP. In addition, while we defer to the Honolulu City Council’s authority to approve a 201H application, thereby changing the underlying allowable use of the Property outside of a zone change process, we retain compliance authority for the covenants listed above with the exception of the Unilateral Agreement for which DPP oversees compliance.

With that background, we offer the following specific comments on the EA:

Section 2.1.1: Please note that the correct title of the document is the City of Kapolei Urban Design Plan. The current version of the UDP was approved by the Honolulu City Council in 2008. The proposed project is in the City Center District, the district within the City of Kapolei intended for the most intensive commercial uses under the UDP. While development of affordable housing is well intentioned and much needed, the project is not an interim use that could change over time. Therefore once the project is built, it will cause a permanent loss of land to accommodate future employment centers in the City of Kapolei as contemplated by the UDP and CC&R.

Sections 2.2.4 and 3.7: While we realize some of the proposed project uses may result in lower parking demands than what is required to meet LUO standards, we are very concerned by the parking exemptions proposed for the project given the rapid development in the City of Kapolei and the existing parking demands on public streets. It is not clear why early project phase parking exemptions are requested while portions of the site remain undeveloped and available for onsite parking. The limited availability of on street parking is not an appropriate mitigation for the onsite parking exemptions proposed for the project. As the surrounding lands are developed, this proposed mitigation will cease to be effective and the onsite under parking situation will be irreversible. Site plan review, including the provision of adequate parking, will be a part of the design review processes described in our comments on Section 4.2.3 below.

Section 3.13.1: The JCC Group allocated 5,000 gallons per day ("GPD") of its reserved water allocation to the Property in 2005. Payments for water system facility charges up to 5,000 GPD are required to be made to the JCC Group and 201H exemptions or deferrals are not applicable. Water allocation to the Property in excess of 5,000 GPD will need to be made by the Board of Water Supply ("BWS") and payments for water system facility charges in excess of 5,000 GPD will be made to the BWS. The JCC Group does not have additional water commitments for the Property. Any upsizing of offsite water system infrastructure already constructed or new water system infrastructure required for the project is the responsibility of the project developer.

Section 3.13.2: Consistent with the deed provision requiring payment to the JCC Group for wastewater allocations assigned to the Property, a 420 persons total capita allocation is assigned to this lot and payment up to that allocation is required to be made to the JCC Group and 201H exemptions or deferrals are not applicable. Wastewater allocation to the Property in excess of 420 persons total capita will need to be made by DPP and payments for wastewater system facility charges in excess of 420 persons total capita will be made to the City and County of Honolulu. Any upsizing of offsite wastewater system infrastructure already constructed or new wastewater system infrastructure required for the project is the responsibility of the project developer.

Section 4.2.3: Consistency with the UDP is assessed by both the City of Kapolei Design Advisory Board ("DAB") and DPP through multi-step design review processes. JCC Group approval based the DAB review is a prerequisite to obtaining building permits through DPP as a function of both the Unilateral Agreement and the CC&R. DPP review and approval of site and architectural plans is required prior to obtaining building permits as a function of the Unilateral Agreement. We encourage applicants to begin the DAB and DPP review processes early in their design process and to run them concurrently to avoid inconsistency of reviews. While design exemptions may be granted through the 201H process, it cannot exempt the project from the concurrent review process by the DAB and the JCC Group under the UDP, which reviews may consider 201H exemptions, but is not bound by any such exemption.

Sections 5.2 and 5.3: We have already addressed many of the requested exemptions listed in these sections in this letter. To summarize, we defer to the Honolulu City Council hearing and approval process on the LUO and City and County of Honolulu fee deferral exemptions requested in Section 5.3. However, these exemptions do not apply to deed and CC&R provisions and infrastructure allocation limits and payments to the JCC Group. Any requests for modifications or changes in the deed provisions or infrastructure payment requirements should only be made to

Messrs. Mola and Silva
July 8, 2015
Page 4

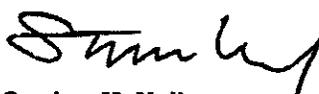
the JCC Group after the Honolulu City Council acts on the project's 201H application. Review of the project by the DAB and the JCC Group under the UDP would occur at that time as well. In addition, although the project is primarily residential in nature, under the CC&R the land is classified as commercial and will be subject to the same CC&R requirements of other commercial lands within the City of Kapolei.

Section 6: We feel there should be a meaningful discussion of alternative sites for this project. There are several similarly sized properties within the City of Kapolei that could conform the project to zoning and UDP district designations without the need to seek major land use exemptions through the 201H process. Again, while we are supportive of high density development in the City of Kapolei and feel residential uses are an important part of most successful mixed use projects, the permanent loss of land available for commercial employment centers if the Property were to be used for primarily residential uses, requires the conclusion that the Property is not the best site for the uses proposed, when alternative sites are readily available.

Section 8: We strongly encourage you to consult closely with DPP on the proposed project early in the processing of your 201H application since the application seeks a zoning exemption. DPP is also intrinsically involved in site plan and architectural reviews as a function of the Unilateral Agreement. Project design review comments are shared between the DAB and DPP throughout the design review process and early consultation is essential to avoid inconsistency.

If you have questions on the information in this letter, or if you would like to discuss our comments, please contact me at (808) 674-3289 or stevek@kapolei.com.

Sincerely,



Stephen H. Kelly
Vice President, Development

ga:04001300\K10390

cc: Janice Takahashi
George Atta

EXHIBIT H



October 15, 2015

Mr. Stephen H. Kelly
Vice-President, Development
Aina Nui Corporation
Kapolei Properties LLC
James Campbell Building, Suite 250
1001 Kamokila Boulevard
Kapolei, HI 96707

Dear Mr. Kelly:

**Draft Environmental Assessment, Kapolei Mixed-Use Development,
Tax Map Key: 9-1-088: 02**

Thank you for your letter dated **July 8, 2015** regarding the above-referenced project (Project). Below are our responses to your comments.

1. *Section 2.1.1: Please note that the correct title of the document is the City of Kapolei Urban Design Plan. The current version of the UDP was approved by the Honolulu City Council in 2008. The proposed project is in the City Center District, the district within the City of Kapolei intended for the most commercial uses under the UDP. While development of affordable housing is well intentioned and much needed, the project is not an interim use that could change over time. Therefore, once the project is built, it will cause permanent loss of land to accommodate future employment centers in the City of Kapolei as contemplated by the UDP and CC&R.*

Discussion: The title of the City of Kapolei Urban Design Plan (UDP) will be corrected in the Final EA. Section 3.6.1 – General Policies in the UDP states, “Allow the City of Kapolei to have a balanced mix of business and residential areas, complimented by the recreational, social and cultural activities of a city. Mixed-use should be permitted and encouraged throughout most of the City area, in order to achieve the diversity and intensity of uses that characterize a city.”

Section 5.2.2.2 - Uses in the UDP states, “The predominant uses in [the City Center] district are to be offices, financial, retail, business support services, personal services, and restaurants. Multi-family dwelling units may be permitted on the upper floors of buildings, subject to obtaining the proper zoning from the City & County.”

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96789

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Further, the 'Ewa Development Plan, Section 3.6.1.1 states: "The City Center should be the high-density core of the city. Larger office towers should be the predominant form of development in this district, with shopping and restaurants at ground level. The inclusion of apartments within some of the towers should also be encouraged to establish a more dynamic mix of uses and help to maintain an active urban environment in the area." In addition, the 'Ewa DP encourages more residential use near transit nodes as stated in Section 3.6.2 – Major Themes, Transit Access and Orientation – "A transit node should be located near the Civic Center and City Center, and medium density residential uses should be encouraged within a five minute walking distance (about 1,300 feet) of the node. Uses adjoining the node should be designed so that they face toward the node, encouraging pedestrian traffic to flow to and from the node." The Site is adjacent to the current Transit Center and within a 5 minute walk of the proposed transit center site at Alohikea and Kama'aha Avenue.

While commercial tower development is clearly intended to be the primary use in the City Center, these documents clearly support a measure of residential mixed use towers. Development of the City Center with day-uses only can lead to lack of activity on the streets in the evenings. The UDP states that the City Center should "Encourage a high level of pedestrian day and night-time activities, especially along Wai Aniani Way." Activity at night increases pedestrian safety and furthers the UDP and 'Ewa DP goal of a walkable and pedestrian friendly City Center. Residential mixed use development plays a key role in maintaining vitality at night.

The height limit in the City Center district of Kapolei is 150-feet. All of the development in this district to date has not been built to this development standard, and thus many of these parcels would be considered underutilized. The proposed development maximizes density and complies with the uses envisioned in the UDP and 'Ewa DP. We therefore do not consider the proposed development to be underutilized or undesirable in the long run, rather we see it as a fully compliant use and part of the long-run vision for the City Center.

1. Sections 2.2.4 and 3.7: *While we realize some of the proposed project uses may result in lower parking demands than what is required to meet LUO standards, we are very concerned by the parking exemptions proposed for the project given the rapid development in the City of Kapolei and the existing demands on public streets. It is not clear why early project phase parking exemptions are requested while portions of the site remain undeveloped and available for onsite parking. The limited availability of on street parking is not an appropriate mitigation for the onsite parking exemptions proposed for the project. As the surrounding lands are developed, this proposed mitigation will cease to be effective and the onsite under parking situation will be irreversible. Site plan review, including the provision of adequate parking, will be part of the design review processes described on Section 4.2.3 below.*

Discussion: The proposed commercial uses are parked to code, while the residential component is parked at 1 stall per unit, with an additional nine stalls. The project concept

has been through several iterations. The initial concept in 2013 was for four towers with 583 units and 588 stalls with approximately 22,000 sf of commercial space. The senior housing was proposed to be parked at one stall per four units, which is common for urban senior housing. Due to HHFDC and community concerns about overbuilding residential use and under-parking, considering the Kapolei cultural norm, the project was scaled back to two towers, and the parking was increased. Through 2014 there were discussions with HHFDC about sharing parking between the commercial uses and the residential uses, and a design and draft EA were developed based on this concept. Through the draft EA review process it became clear that sharing parking was not going to be feasible, and the project was redesigned and scaled back yet again with another increase in parking; at that point the April 2015 draft EA was developed.

Based on the Applicant's significant experience with senior housing in Hawaii (and elsewhere), the Applicant considers senior housing with one stall per unit to be over-parked. Especially as seniors age in place and the average age increases in the community over time, parking needs decrease, and the majority of residents do not drive. Also, the site is an exceptional transit oriented development site, further reducing the need for onsite parking. Throughout the past two years, the developer has expended a significant amount of money, at great risk, and has accommodated community and agency concerns.

Further, based on Department of Transportation Services comments, the Final EA will include Transportation Demand Management (TDM) strategies that provide additional justification for a requested exemption on parking spaces. TDM strategies include: a) Providing car-sharing parking spaces to encourage the use of car sharing; b) To the extent possible, parking will be unbundled to reduce the unit cost by charging for each parking space separately from the residential units; and c) Providing bus passes at a reduced cost to encourage the use of public transportation for the Phase 1 senior residents. These TDM strategies will reduce the need for car ownership thereby resulting in less demand for parking spaces onsite.

2. *Section 3.13.1: The JCC Group allocated 5,000 gallons per day (GPD) of its reserved water allocation to the Property in 2005. Payments for water system facility charges up to 5,000 GPD are required to be made to the JCC Group and 201H exemptions or deferrals are not applicable. Water allocation to the Property in excess of 5,000 GPD will need to be made by the Board of Water Supply (BWS) and payments for water system facilities charges in excess of 5,000 GPD will be made to the BWS. Any upsizing of offsite water system infrastructure already constructed or new water system infrastructure required for the project is the responsibility of the project developer.*

Discussion: The applicant and project civil engineer will consult with BWS on the water allocation issue.

3. *Section 3.13.2: Consistent with the deed provision requiring payment to the JCC Group for wastewater allocations assigned to the Property, a 420 persons total*

capita allocation is assigned to this lot and payment up to that allocation is required to be made to the JCC Group and 201H exemptions or deferrals are not applicable. Wastewater allocation to the Property in excess of 420 persons total capita will need to be made by DPP and payments for wastewater system facility charges in excess of 420 persons total capita will be made to the City and County of Honolulu. Any upsizing of offsite wastewater system infrastructure already constructed or new wastewater system infrastructure required for the project is the responsibility of the project developer.

Discussion: The Applicant and project civil engineer will consult with DPP – Wastewater Branch on the wastewater allocation issue.

4. *Section 4.2.3: Consistency with the UDP is assessed by both the City of Kapolei Design Advisory Board (DAB) and DPP through multi-step design review processes. The JCC Group approval based on the DAB review is a prerequisite to obtaining building permits through DPP as a function of both the Unilateral Agreement and the CC&R. DPP review and approval of site and architectural plans is required prior to obtaining building permits as a function of the Unilateral Agreement. We encourage applicants to begin the DAB and DPP review processes early in their design process and to run them concurrently to avoid inconsistency of reviews. While design exemptions may be granted through the 201H process, it cannot exempt the project from the concurrent review process by the DAB and the JCC Group under the UDP, which reviews may consider 201H exemptions, but is not bound by any such exemption.*

Discussion: The Applicant's architectural team met with key members of the DAB in a series of pre-design meetings, the first of which was held on November 26, 2013, and the second of which was held on December 12, 2013. Representatives from the DAB were Mr. Francis Oda and Mr. Chuck Ehrhorn. Please see attached correspondence summarizing the content of the meetings. The topics covered did not include discussion of parking or residential use on the site. A summary of the meetings will be added to Final EA Section 8.2 – Additional Consultation.

The Applicant will consult with and submit architectural plans and other relevant information to the DAB and DPP as required under the UDP. As stated in the UDP, "The letters and plans submitted by applicants for DAB review will be forwarded to DPP, as will DAB meeting notes and approval status letters. The applicant should include the DAB approval letter to DPP with building permit application." The Applicant will comply with this requirement. Design Review will be added to Final EA Section 4.3 – Approvals and Permits.

5. *Sections 5.2 and 5.3: We have already addressed many of the requested exemptions listed in these sections in this letter. To summarize, we defer to the Honolulu City Council hearing and approval process on the LUO and City and County of Honolulu fee deferral exemptions requested in Section 5.3. However,*

these exemptions do not apply to deed and CC&R provisions and infrastructure allocation limits and payments to the JCC Group. Any requests for modifications or changes in the deed provisions or infrastructure payment requirements should only be made to the JCC Group after the Honolulu City Council acts on the project's 201H application. Review of the project by the DAB and the JCC Group under the UDP would occur at that time as well. In addition, although the project is primarily residential in nature, under the CC&R the land is classified as commercial and will be subject to the same CC&R requirements of other commercial lands within the City of Kapolei.

Discussion: Following approval of the 201H application by the Honolulu City Council, the project developer will consult with the JCC Group on issues and provisions related to the deed and CC&Rs.

6. *Section 6: We feel there should be a meaningful discussion of alternative sites for this project. There are several similarly sized properties within the City of Kapolei that could conform the project to zoning and UDP district designations without the need to seek major land use exemptions through the 201H process. Again, while we are supportive of high density development in the City of Kapolei and feel residential uses are an important part of most successful mixed use projects, the permanent loss of land available for commercial employment centers if the Property were to be used for primarily residential uses, requires the conclusion that the Property is not the best site for the uses proposed, when alternative sites are readily available.*

Discussion: While the site may be zoned for commercial use, the 'Ewa Development Plan and the Kapolei Urban Design Plan both clearly encourage residential mixed use in the City Center district of Kapolei, as discussed in question 1. We feel, therefore, that the project as proposed not only complies with, but actively furthers, the vision set forth in the UDP and 'Ewa Development Plan; the proposed development does not displace an intended use but rather conforms with it. Also, sites for commercial development are not a scarce resource in central Kapolei. The City Center district is comprised of 5 remaining city blocks, each able to accommodate approximately four towers, for a total of 20 sites. The 'Ewa Development Plan also encourages "Commercial Emphasis Mixed Use" in the 10 city blocks adjacent to the City Center – this potentially provides an additional 40 sites. The project developer just purchased the Property and has spent much time and resources planning and designing the Project, so now is not an opportune time to seek alternative sites.

7. *Section 8: We strongly encourage you to consult closely with DPP on the proposed project early in the processing of your 201H application since the application seeks a zoning exemption. DPP is also intrinsically involved in site plan and architectural reviews as a function of the Unilateral Agreement. Project design review comments are shared between DAB and DPP throughout the design review process and early consultation is essential to avoid inconsistency.*

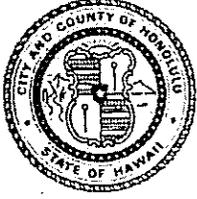
Discussion: The project developer and consultant will meet with DPP to discuss the requested 201H exemptions, site plans, and architectural plans.

Thank you for your comments. Your comment letter will be included in the Final EA.

Sincerely,



Lisa L. Imata
President



CITY COUNCIL
CITY AND COUNTY OF HONOLULU
530 SOUTH KING STREET, ROOM 202
HONOLULU, HAWAII 96813-3065
TELEPHONE: (808) 768-5010 • FAX: (808) 768-5011

KYMBERLY MARCOS PINE
COUNCILMEMBER, DISTRICT 1
TELEPHONE: (808) 768-5001
EMAIL: kmpine@honolulu.gov

July 7, 2015

Mr. Dennis Silva, Jr.
Hawaii Planning LLC
7 Waterfront Plaza
500 Ala Moana Boulevard, Suite 400
Honolulu, Hawaii 96813

Subject: *Supporting Kapolei Mixed-Use Development – Phases 1-3
1020 Wakea Street, Kapolei, Oahu; Tax Map Key: 9-1-088:021*

Dear Mr. Silva:

I am writing this letter to indicate my continued support of the Kapolei Mixed-Use Development – Phases 1 through 3 (Kapolei Project), a 297-unit housing project with 154 units affordable to senior households earning between 30-60% of the area median income, and 72 units affordable to households earning 140% of the area median income and below.

This development plan balances housing, social, educational and environmental needs of the community. As a strong proponent of affordable housing, I am pleased that this project is targeted to fill the growing demand of housing for our kupuna. Uniquely placed in Kapolei, the future residents will be in the vicinity of many excellent medical and social facilities, as well as public transportation options.

Moreover, I am enthusiastic to learn that Phase 1 of the Kapolei Project's design will include an almost 10,000 square foot open space element and is proposed to obtain a Leadership in Energy and Environmental Design (LEED) Platinum Certification, while Phases 2 and 3 will be LEED certifiable to the basic level.

I appreciate Coastal Rim Properties' continued commitment to this much-needed affordable housing project. Should you have any questions or concerns please do not hesitate to contact my office.

Mahalo,

A handwritten signature in black ink, appearing to read "Kimberly Pine", is written over a faint, larger version of the same signature.

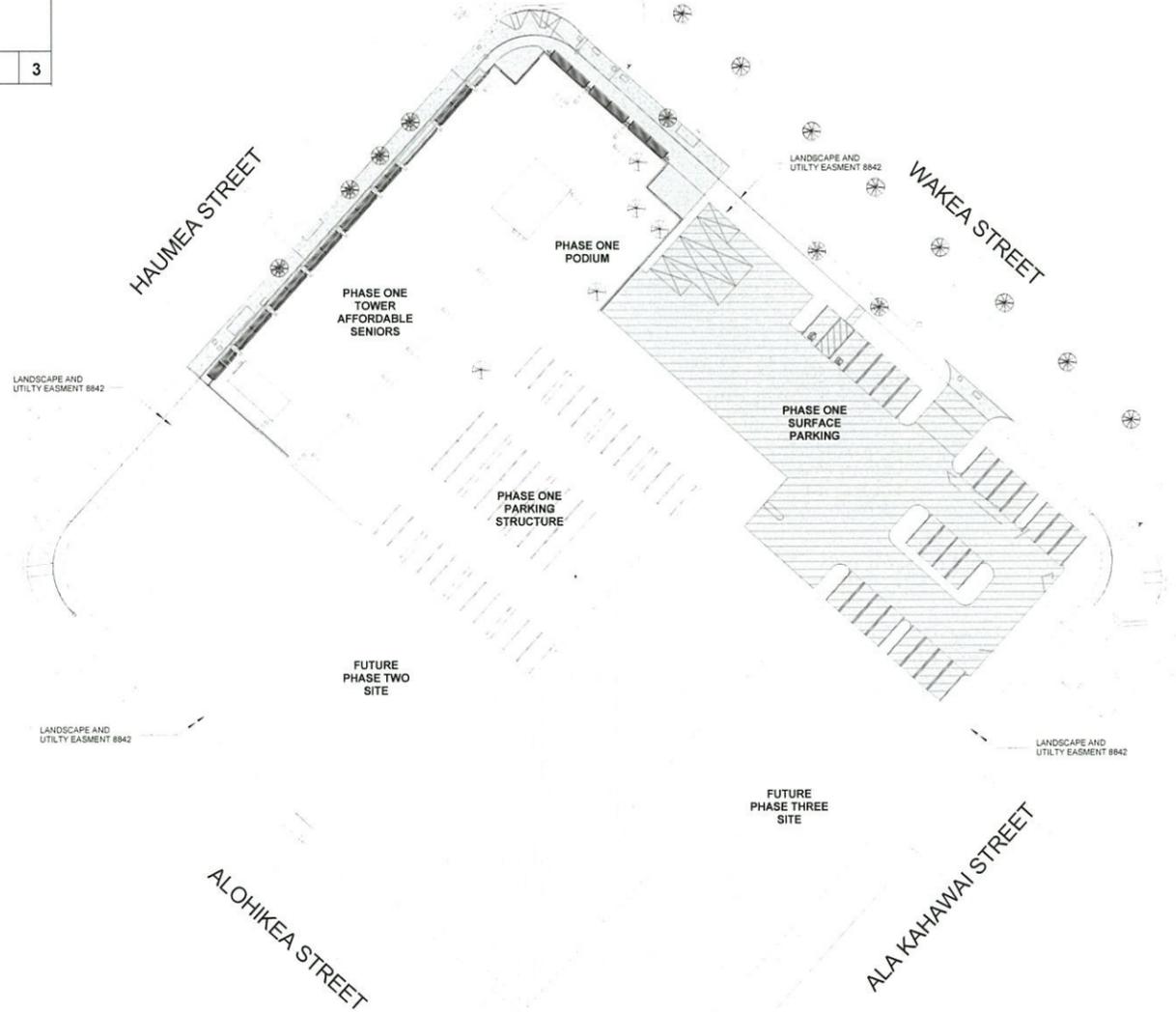
Kimberly Marcos Pine
Councilmember, District 1

EXHIBIT I



VIEW FROM WEST PHASE 1

3



VIEW FROM EAST PHASE 1

2

KAPOLEI MIXED USE

COASTAL RIM PROPERTIES
KAPOLEI, HAWAII

REVISIONS:

DESCRIPTION	DATE

PROJECT NO: 2012-40142
DATE ISSUED: 08/25/2015
SCALE: 1" = 30'-0"

SHEET NUMBER: **A0-0.01**

SHEET TITLE:

**SITE PLAN
PHASE ONE**

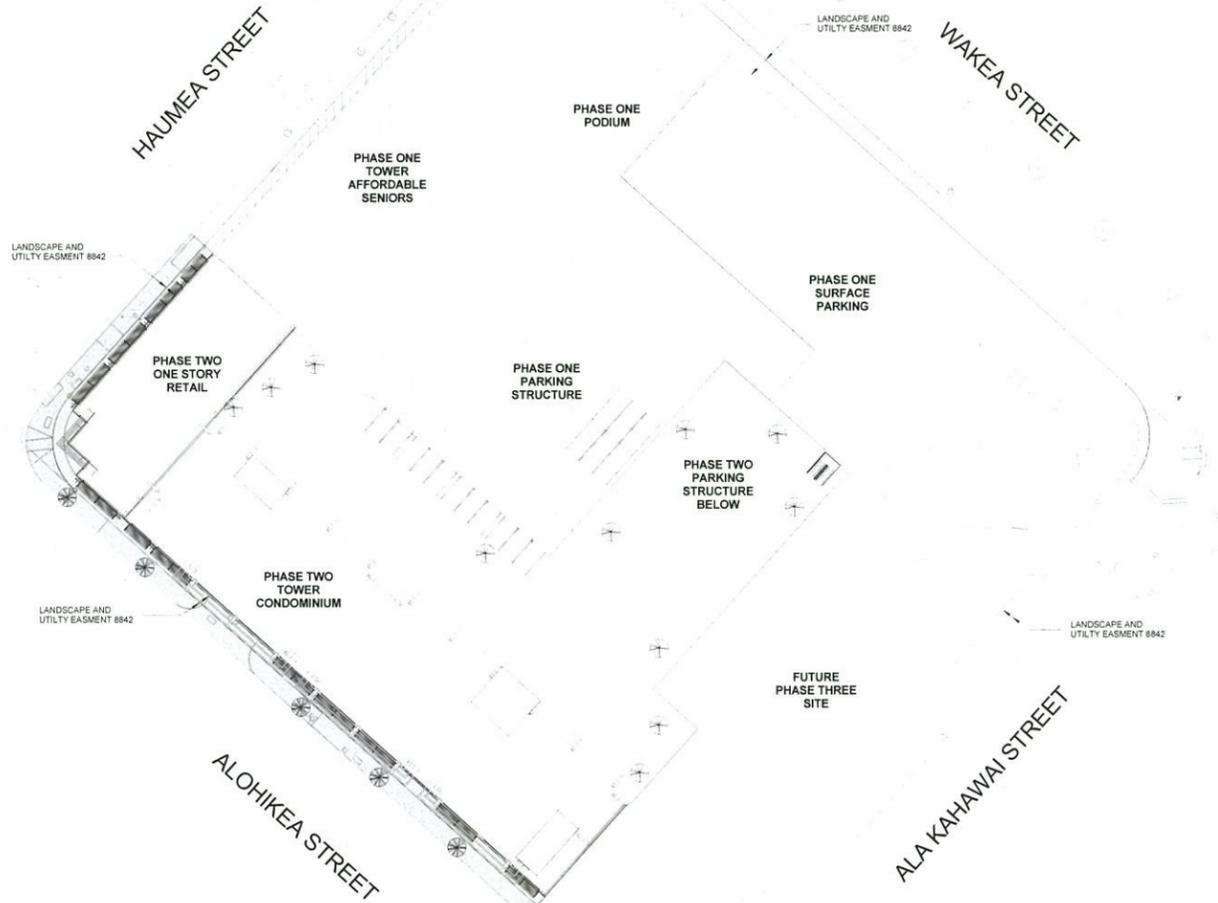


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VIEW FROM WEST PHASE 2 3



VIEW FROM EAST PHASE 2 2

KAPOLEI MIXED USE
COASTAL RIM PROPERTIES
 KAPOLEI, HAWAII

REVISIONS:

DESCRIPTION	DATE

PROJECT NO: 2012-40142
 DATE ISSUED: 08/25/2015
 SCALE: 1" = 30'-0"

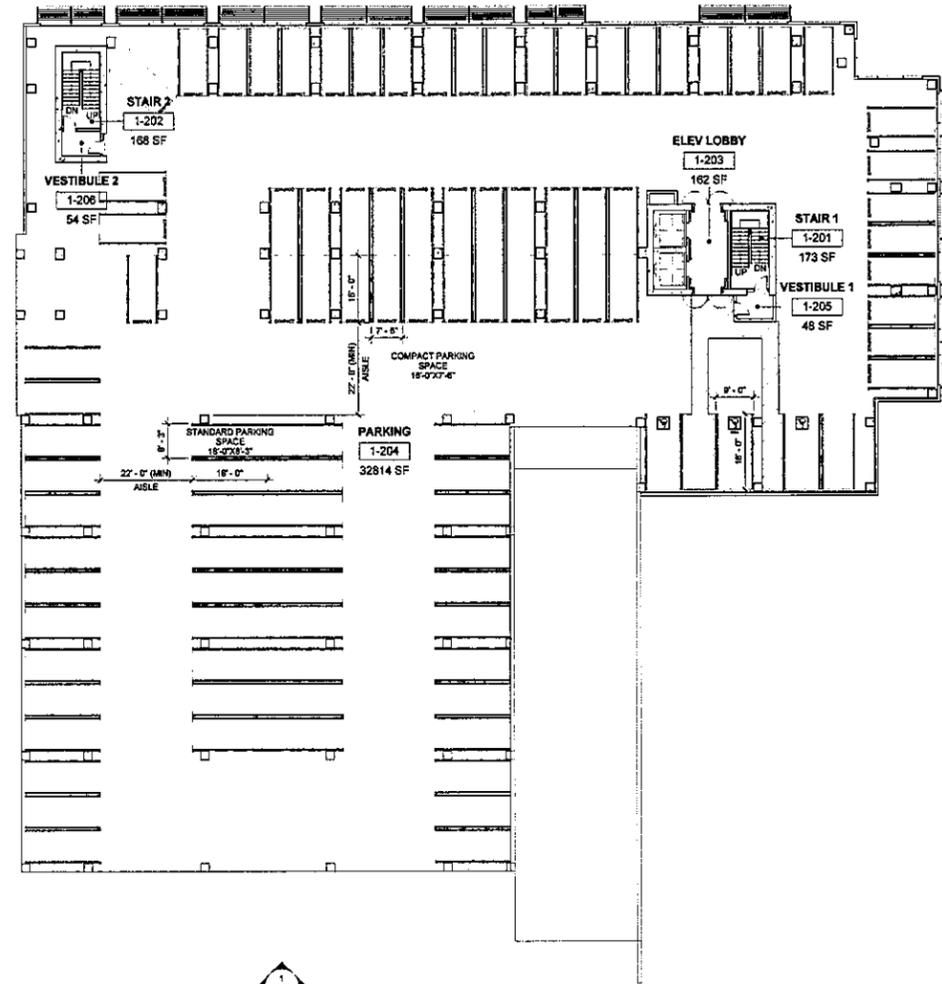
SHEET NUMBER: **A0-0.02**
 SHEET TITLE:

SITE PLAN
PHASE TWO



BUILDING USES

- LOBBY
- PARKING
- STAIRS ELEV



**KAPOLEI MIXED USE
COASTAL RIM PROPERTIES
KAPOLEI, HAWAII**

REVISIONS:

DESCRIPTION	DATE

PROJECT NO: 2012-0142
 DATE ISSUED: 08/25/2015
 SCALE: 1/16" = 1'-0"

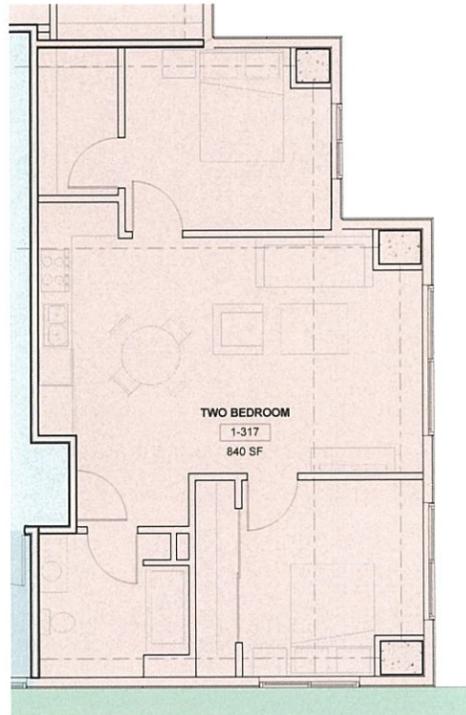
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 SHEET TITLE:

**LEVEL TWO
PHASE ONE**

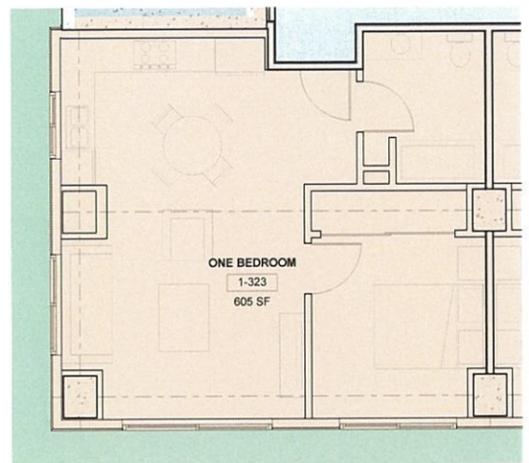


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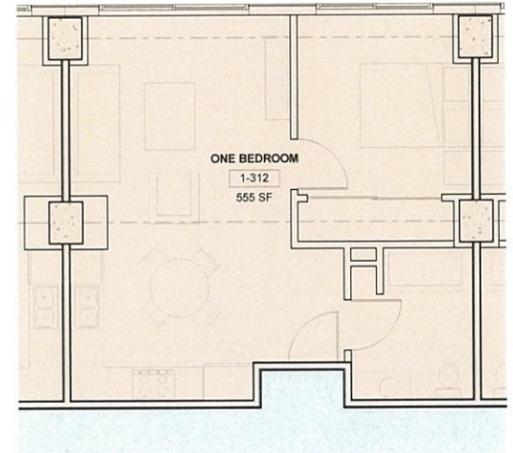
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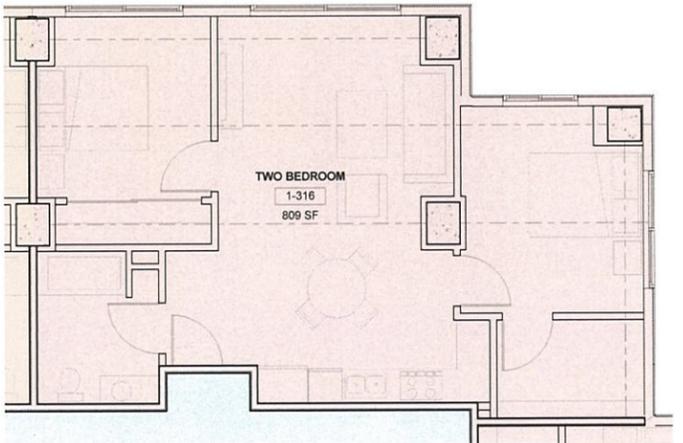
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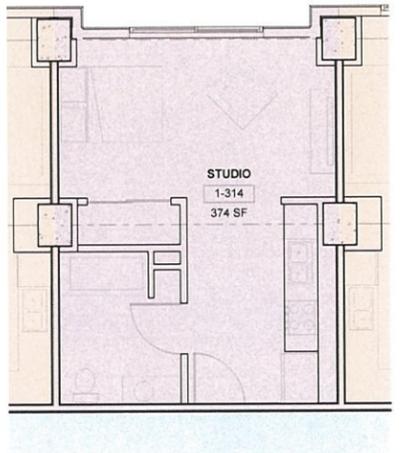
ONE BEDROOM B SENIORS 1/4" = 1'-0" 3



ONE BEDROOM A SENIORS 1/4" = 1'-0" 2



TWO BEDROOM A SENIORS 1/4" = 1'-0" 4



STUDIO SENIORS 1/4" = 1'-0" 1

KAPOLEI MIXED USE
COASTAL RIM PROPERTIES
 KAPOLEI, HAWAII

REVISIONS:

DESCRIPTION	DATE

PROJECT NO: 2012-40142
 DATE ISSUED: 08/25/2015
 SCALE: 1/4" = 1'-0"

SHEET NUMBER: **A1-4.01**
 SHEET TITLE:

UNIT PLANS
SENIOR TOWER

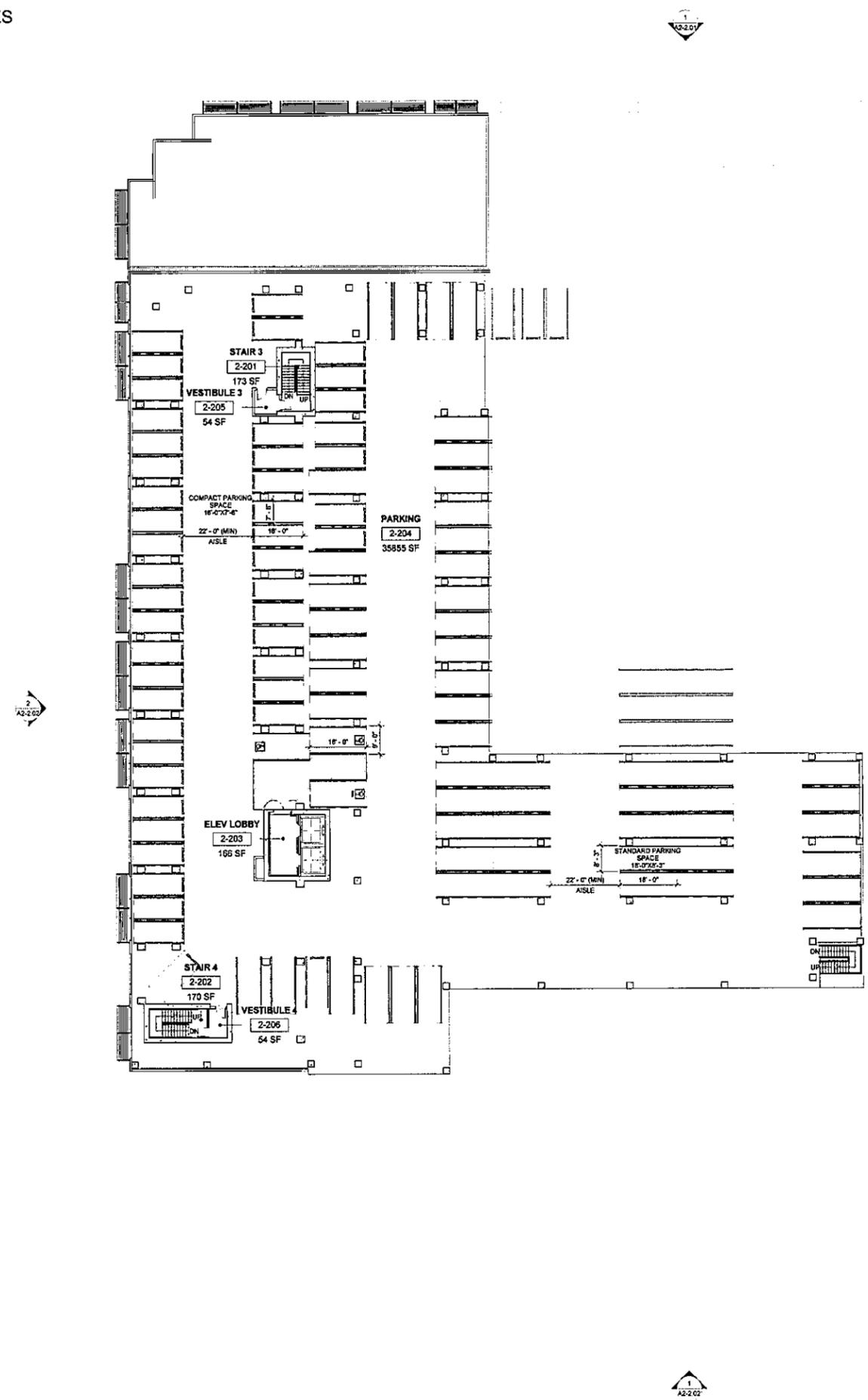


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BUILDING USES

- LOBBY
- PARKING
- STAIRS ELEV



KAPOLEI MIXED USE
COASTAL RIM PROPERTIES
 KAPOLEI, HAWAII

REVISIONS:

DESCRIPTION	DATE

PROJECT NO: 2012-40142
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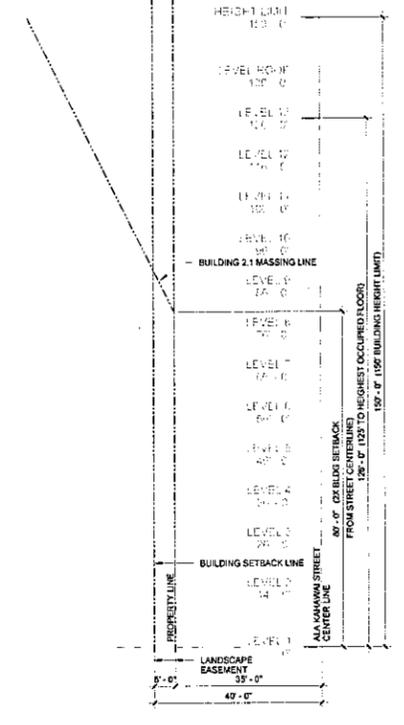
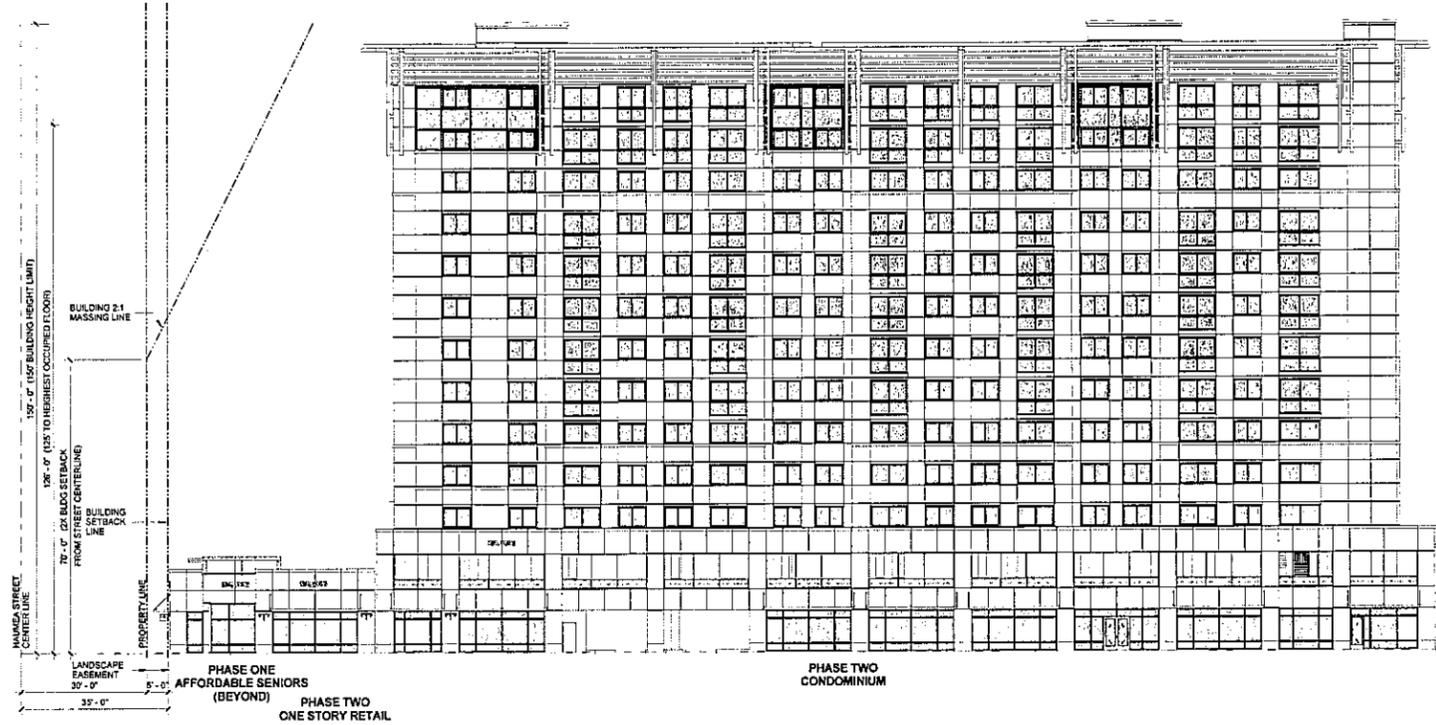
SHEET NUMBER: **A2-1.02**
 SHEET TITLE:

LEVEL TWO
PHASE TWO

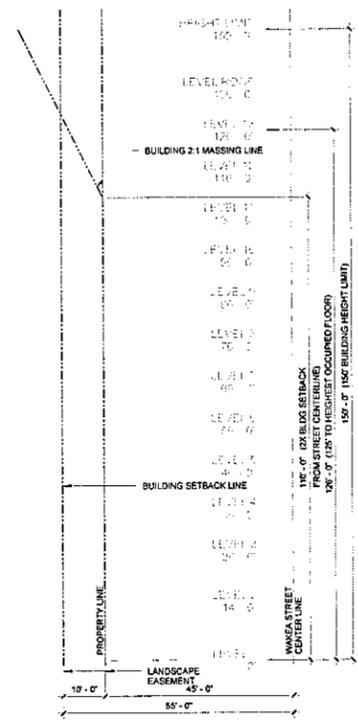
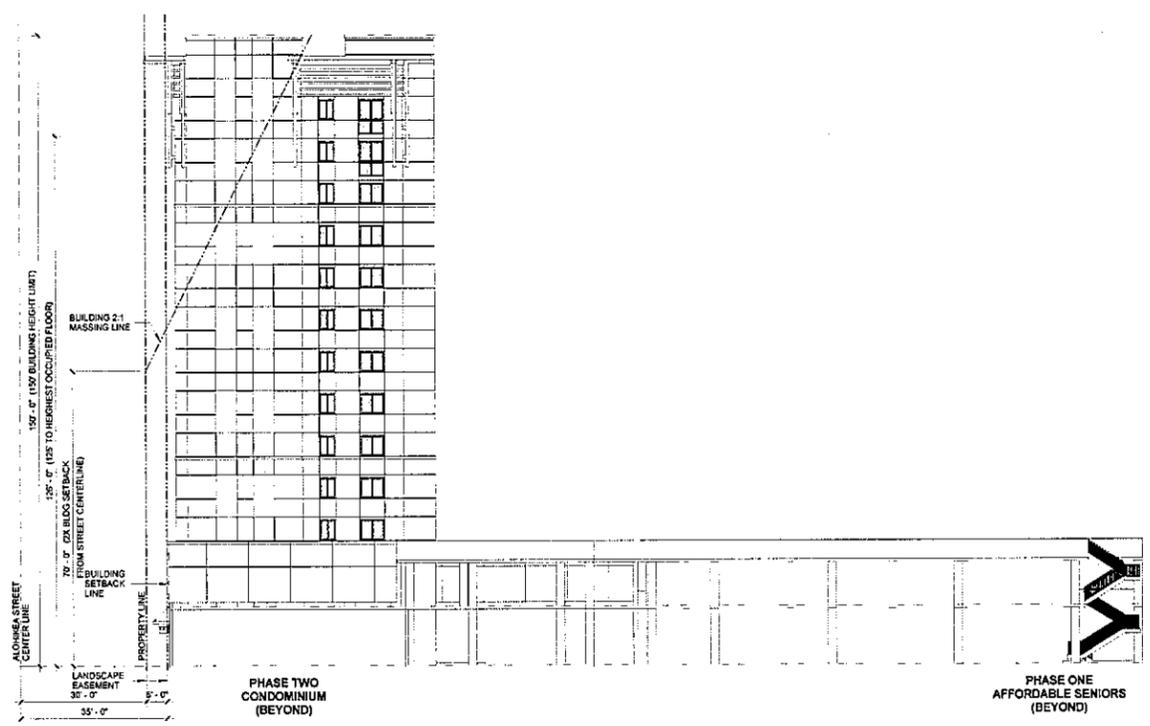


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ALOHIKEA STREET ELEVATION 1/16" = 1'-0" 2



ALA KAHAWAI STREET ELEVATION 1/16" = 1'-0" 1

KAPOLEI MIXED USE
COASTAL RIM PROPERTIES
 KAPOLEI, HAWAII

REVISIONS:

DESCRIPTION	DATE

PROJECT NO: 2012-40142
 DATE ISSUED: --/--/20--
 SCALE: 1/16" = 1'-0"

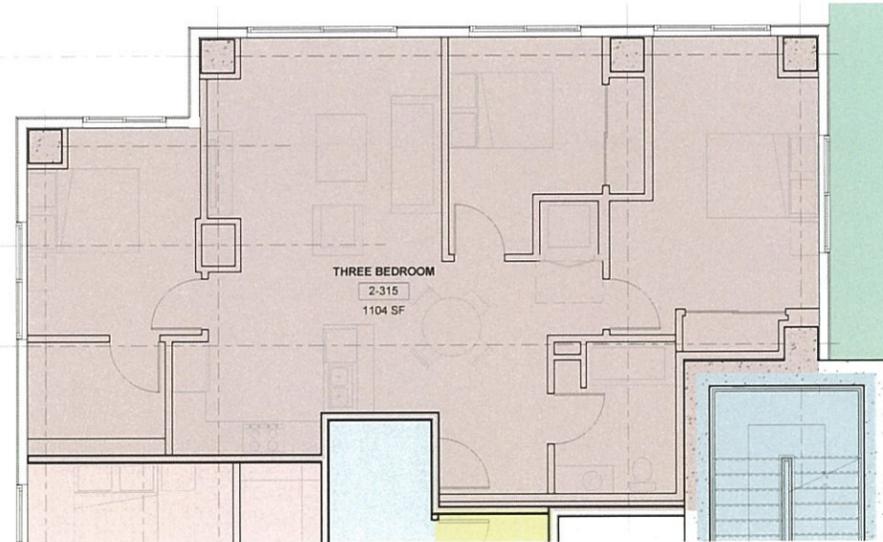
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 SHEET TITLE:

ELEVATIONS
PHASE TWO

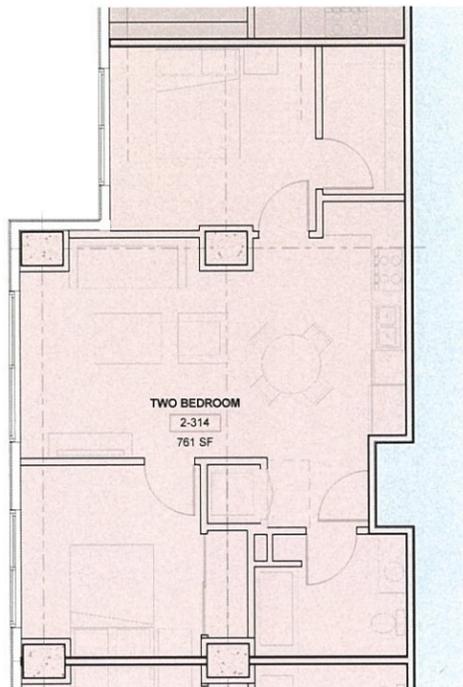


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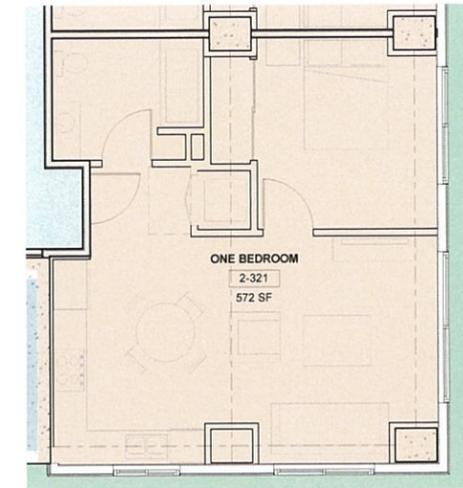
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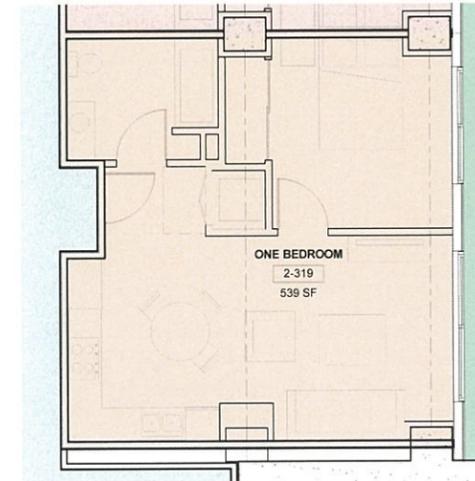
THREE BEDROOM CONDOMINIUM 1/4" = 1'-0" 5



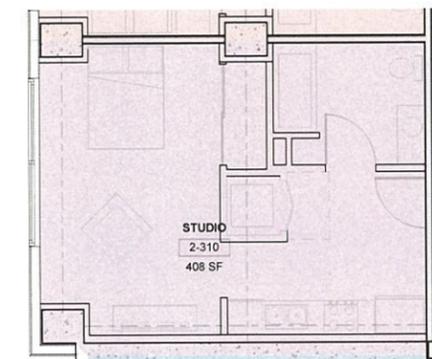
TWO BEDROOM CONDOMINIUM 1/4" = 1'-0" 4



ONE BEDROOM B CONDOMINIUM 1/4" = 1'-0" 3



ONE BEDROOM A CONDOMINIUM 1/4" = 1'-0" 2



STUDIO CONDOMINIUM 1/4" = 1'-0" 1

KAPOLEI MIXED USE
COASTAL RIM PROPERTIES
 KAPOLEI, HAWAII

REVISIONS:

DESCRIPTION	DATE

PROJECT NO: 2012-40142
 DATE ISSUED: 08/25/2015
 SCALE: 1/4" = 1'-0"

SHEET NUMBER: **A2-4.01**
 SHEET TITLE:

UNIT PLANS
CONDOMINIUM



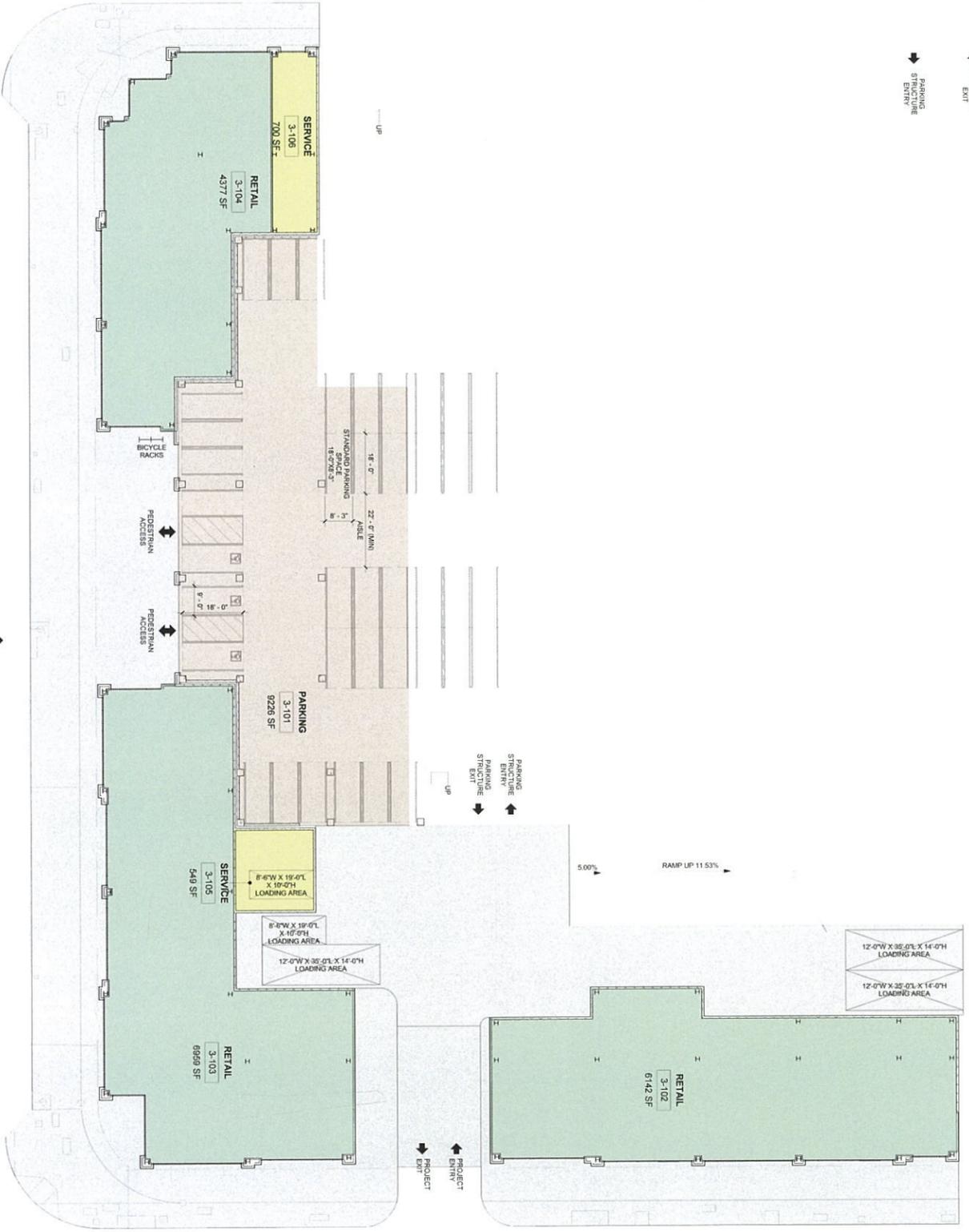
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HAU MEA STREET

- BUILDING USES**
- PARKING
 - RETAIL
 - SERVICE

ALOHIKEA STREET



WAKEA STREET

ALA KAHAWAI STREET

KAPOLEI MIXED USE
COASTAL RIM PROPERTIES
 KAPOLEI, HAWAII

REVISIONS:

DESCRIPTION	DATE

PROJECT NO: 2012-40142

DATE ISSUED: 08/25/2015

SCALE: 1/16" = 1'-0"

SHEET NUMBER: **A3-1.01**

SHEET TITLE:

LEVEL ONE
PHASE THREE

SVA ARCHITECTS
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 TEL: 916.262.2800 WWW.SVAARCHITECTS.COM



PHASE ONE
AFFORDABLE SENIORS

PHASE TWO
ONE STORY RETAIL

PHASE TWO
CONDOMINIUM
(BEYOND)

HAUMEA STREET ELEVATION 1/16" = 1'-0" 2



PHASE THREE
ONE STORY RETAIL

PHASE TWO
CONDOMINIUM
(BEYOND)

PHASE THREE
ONE STORY RETAIL

PHASE ONE
AFFORDABLE SENIORS

WAKEA STREET ELEVATION 1/16" = 1'-0" 1

KAPOLEI MIXED USE
COASTAL RIM PROPERTIES
KAPOLEI, HAWAII

REVISIONS:

DESCRIPTION	DATE

PROJECT NO: 2012-40142
DATE ISSUED: 08/25/2015
SCALE: 1/16" = 1'-0"

SHEET NUMBER: **A4-2.01**
SHEET TITLE:

ELEVATIONS
FINAL PROJECT



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