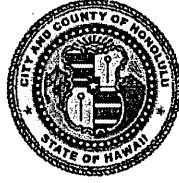


DEPARTMENT OF PLANNING AND PERMITTING
CITY AND COUNTY OF HONOLULU

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September 24, 2021

2021/ELOG-1761(ZS)

Ms. Angela Fong
AM Pacific Group
841 Bishop Street, Suite 400
Honolulu, Hawaii 96813

Dear Ms. Fong:

**SUBJECT: Determination of Environmental Review Requirements
Royal Kunia Phase II - Waikele and Hoaeae
Tax Map Keys 9-4-002: 070, 071, and 078**

This is in response to your letter, received on September 1, 2021, requesting a determination that, based on the prior accepted environmental impact analyses performed, additional environmental review under Hawaii Revised Statutes Chapter 343 is not required for development of the above-referenced lots. We concur that additional environmental review is not required, as explained below.

According to Hawaii Administrative Rules (HAR) Section 11-200.1-11, additional environmental review is not required if the Project is similar to one that has already undergone review and will have similar environmental impacts. According to HAR Section 11-200.1-30, a supplemental environmental impact statement (EIS) is required if the scope of an action will be increased, the intensity of environmental impacts will be increased, mitigating measures originally planned will not be implemented, or where new circumstances or evidence have brought to light different or likely increased environmental impacts not previously dealt with.

The overall Royal Kunia Phase II mixed use development has been planned for decades, and its components have been modified over time. On September 23, 1989, the former Department of General Planning accepted an EIS for the development. On May 28, 1996, the former Planning Department issued a finding of no significant impact for an environmental assessment (EA) with modified components. The currently proposed version of the development includes further modifications. The following table compares the components of the overall Royal Kunia Phase II project as described in the 1989 EIS, the 1996 EA, and as currently proposed:

EXHIBIT "12"

Component	1989 EIS	1996 EA	Currently Proposed
Single-family dwellings	272.8 acres (1,500 units)	290.8 (1,250 units)	198.3 acres (925 single-family units and 925 multi-family units)
Multi-family dwellings	56 acres (900 units)	64.3 acres (750 units)	
Public park	16 acres	11.1 acres	10 acres across multiple locations
Public school	6 acres	8 acres	12 acres
Industrial uses	130 acres	123.7 acres	123.7 acres
Golf course	171.7 acres	None	None
Agricultural park	None	151.1	150 acres
Solar	None	None	161 acres
Circulation	17.4 acres	Incorporated above	Incorporated above
Totals	669.9 acres (2,400 dwelling units)	655 (2,000 dwelling units)	655 acres (1,850 dwelling units)

The acreage of the components described in the 1996 EA and listed above actually add up to a total of 649 acres, not 655 acres as stated in the EA: Your correspondence explains that acreages shown at this stage of development are approximate. Even when considering approximate calculations, it is clear that the overall Royal Kunia Phase II Project, as currently proposed, will have a residential component that is significantly smaller in area and includes fewer single-family units than described in both the 1989 EIS and the 1996 EA, but at the same time includes more multi-family units than described in both the 1989 EIS and the 1996 EA. Haseko Royal Kunia, LLC proposes to develop the residential and public park components on the subject Tax Map Keys. The first stage is a 300-unit cluster housing Project.

Over the years, long-range plans and land use classifications have been changed, accommodating the proposed development. The Central Oahu Sustainable Communities Plan (COSCP) provides for the eventual development of the Royal Kunia master planned residential community to help accommodate the need for affordable housing. Its urban land use map shows that the development is within the community growth boundary and the residential component is within the area designated for residential and low-density apartment development. The state land use designation has been reclassified from Agricultural to Urban, with the exception of the area for the proposed agricultural park. In terms of City and County zoning designations, the land

was once entirely within the AG-1 Restricted Agricultural District. The zoning has since been changed to a mix of AG-1, R-5 Residential, A-1 Low-Density Apartment, B-1 Neighborhood Business, and P-2 General Preservation Districts. The current zoning designations are consistent with the currently proposed development pattern. This shows that the development is substantially similar to previous iterations that underwent environmental review. In fact, the 1996 EA described a modified Project that spread residential development into areas zoned AG-1, and the current proposal designates that area for solar. This brings the development into greater compliance with governmental long-range plans and reduces impacts of a more sprawling residential component. And in light of the fact that the 1989 EIS identifies the loss of prime agricultural land as an unavoidable impact of the Project, it is now possible to reduce that impact with a solar farm that incorporates agricultural production.

Impacts on traffic, drainage, water, wastewater and other infrastructure were assessed in both the EIS and EA. A smaller, more compact residential component will result in similar or reduced environmental impacts. A number of impact mitigation measures are discussed in both the EIS and the EA. The EIS states Kunia Road will be improved to accommodate traffic. It also states that land for a 5-acre park and ride facility has been dedicated to the City on lands *makai* of the Project site, which would encourage multi-modal transportation. Similarly, the 1996 EA states that Royal Kunia Phase II is designed to strategically concentrate multi-family development, schools, parks, commercial uses, and industrial uses in order to create neighborhood centers and emphasize the use of multi-modal transportation and walkability. The EA indicates that all residential areas will be within a 10-minute walking distance of a park site. The currently proposed version of the Project is denser and distributes park land across multiple locations. These modifications are likely to create a community that is even more walkable and conducive to multi-modal transportation. Specific details of the Project will be assessed during the cluster permit process in order to minimize impacts and ensure compliance with approved plans and regulations.

Because the current proposal involves more multi-family units within a smaller area of land, it is possible that denser development could include taller apartment buildings. The EIS states that the low-density apartment component is to average 16.07 units per apartment, but does not specify apartment heights. Subsequent versions of the proposed development do not specify apartment density or heights either. The EIS states that while the proposed development will create a distinct visual difference, there are no significant public views or visual features that will be impacted and it will instead extend the urban character already established through the nearby Village Park development. However, the COSCP does identify panoramic views of the Waianae mountains and the ocean from Kunia Road as important public views. The EIS includes features designed to mitigate visual impacts, such as substantial landscaped setbacks along Kunia Road, large bodies of open space, street tree plantings, underground utility systems, as well as a variety of residential building colors and roof lines to add visual texture to the development. The EA also describes the use

of landscape buffers and roadway improvements as visual impact mitigation measures. These mitigating measures can still be incorporated into the final design. Any modifications that result in increased environmental impacts or neglect the originally planned mitigation measures will require additional environmental review, in accordance with state law.

Information and policy surrounding climate change has advanced since the EIS and EA were published. The Project is about 400 feet above sea level and will not be impacted by sea level rise. However, increases in storm intensity and frequency due to climate change could necessitate additional stormwater management capacity for the Project site. The 1996 EA discusses the intention to locate a detention basin to accommodate stormwater and discharge it into the nearby Waikele Stream. Final plans will be reviewed and impacts will be mitigated during the cluster permit and building permit processes for compliance with the City's rules relating to water quality. Further, you state that the Project will help to reduce greenhouse gas emissions through the installation of solar on residential buildings. Therefore, there will be no additional impacts resulting from new circumstances associated with the Project.

The overall Royal Kunia Phase II mixed use development, as currently proposed, is similar to previous iterations that have already undergone review, and will have similar environmental impacts. The scope of the action has not been increased, nor have the intensity of environmental impacts. Mitigating measures originally planned will still be implemented, and there are no new circumstances or evidence that bring to light different or likely increased environmental impacts not previously dealt with. We will publish this determination in *The Environmental Notice*.

Should you have any questions, please contact Zack Stoddard, of our staff, at (808) 768-8019, or zachary.stoddard@honolulu.gov.

Very truly yours,


FOR Dean Uchida
Director