

DEVELOPMENT PERMIT APPLICATION
HUNT COMMUNITIES HAWAII LLC PARCEL 10

I. INTRODUCTION

Hunt Communities Hawaii LLC (“Hunt” or “Applicant”), a wholly-owned affiliate of Hunt Companies, Inc., submits this Development Permit Application (“PDP”) to the Hawaii Community Development Authority (“HCDA”) for various renovations and site improvements for a non-conforming commercial warehouse and retail space on Hunt Parcel 10 (“Parcel 10”) within the Kalaeloa Community Development District (“KCDD”) (the “Project”).

The Project will revitalize the commercial productivity and use of the property, and as further discussed in this Application, consists of multi-phase interior and exterior improvements to an existing commercial building that was previously used as a grocery store, light industrial warehouse, and storage yard. Further, the scope of the Project work will include necessary updates to the aging electrical infrastructure and security improvements to ensure proper enclosure of Parcel 10. Notably, the previous tenant had a power outage for two weeks, which had a significant impact on its ability to stay in business in Kalaeloa. In addition, there was a death on site several years ago due to security issues. Completion of the proposed renovations will enable Hunt to re-purpose the warehouse and retail space to serve future commercial tenants consistent with the Kalaeloa Master Plan.

The Project conforms with the Kalaeloa Master Plan Mixed-Use Concept (4.1.1) because the Project will serve a diverse range of commercial tenants, including warehouse storage and distribution, offices, and retail services. The proposed renovations are necessary to revitalize the property’s marketability and amenities to accommodate commercial tenants and to maximize its productive use.

II. LOCATION AND PROJECT SITE

A. Tax Map Key (TMK)

The Project is located on TMK (1) 9-1-013-097. See Exhibit D (Site Plan). Hunt purchased the property via quitclaim deed in December, 2017 (recorded in Land Court Document No. T-10215309).

B. Surrounding Streets & Parcels

Parcel 10 is located along Monterey Street (to the north); Enterprise Avenue (to the west); and Randolph Street (to the south) within the KCDD. The Kumuhonua Transitional Living Center, a residential transitional service apartment building, is located northwest of the Project site at the intersection of Enterprise Avenue and Yorktown Street. The Department of Hawaiian Home Lands owns a commercial warehouse adjacent to the Project site along Monterey Street. The Project is located approximately three blocks north of the Kalaeloa Airport.

C. Surrounding Uses

Consistent with the Kalaeloa Master Plan Mixed-Use Concept, the surrounding parcels include the Kumuhonua Transitional Living Center and similar commercial warehouse facilities. The surrounding uses in the area primarily serve a variety of commercial purposes, including warehouse storage, manufacturing, and base yards. The Project is therefore compatible with the land use character of the surrounding properties.

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D. Site Description

The Project is on Parcel 10, which is 3.809 acres (approximately 165,920 sf). The Project consists of improvements to two, connected nonconforming structures. Warehouse Building 152, has a street address of 91-1049 Enterprise Ave (“Warehouse Building”), and Retail Building 1763 has a street address of 91-1051 Enterprise Ave, Kapolei, HI 96707 (“Retail Building”). The Warehouse Building and Retail Building are collectively referred to as the “Project Building”.

The Project involves interior and site improvements to the approximately 31,108 sf, one story, nonconforming Project Building, including underground electrical upgrades, and fencing along the Enterprise Avenue and Randolph Street perimeter of the Project Building.

The east side of Parcel 10 includes an existing chain-link fence and a paved open area that was previously leased to VIP Towing, a vehicle towing company, until 2021 (“VIP Towing Site”). Plans for soil remediation on the VIP Towing Site are ongoing, and (except for a request for a variance for the height and materials of the fence around the perimeter of the VIP Towing Site) the Project does not include this remedial work.¹

The original Quonset hut warehouse on Parcel 10 was built in 1943 and originally served as a commissary for the Barbers Point Naval Air Station. In 1999, the U.S. Navy abandoned Parcel 10 due to the closure of the Barbers Point Naval Air Station and the property sat idle for about ten years. In 2010, Parcel 10 was repurposed into a commercial property and the Project Building was leased to Tamura’s Market for retail and warehouse use. In 2021, Tamura’s Market vacated the Project Building.

In 2020, Swinerton, a commercial construction company, agreed to become the primary commercial tenant once Tamura’s Market vacated the property. However, in 2021, Swinerton ultimately decided to decrease the desired square footage, and only lease the Warehouse Building and a portion of the parking lot. The Retail Building and portions of the lot remain vacant. The improvement work is necessary to separate the Warehouse Building space from the Retail Building space, create a common area for restroom access, and provide the essential life and safety requirement to accommodate multiple tenants.

In its current state, Parcel 10 is not being utilized to the fullest market potential as a commercial property and can potentially accommodate multiple commercial tenants on site upon completion of the Project.

III. KALAELOA COMMUNITY DESIGN DISTRICT (“KCDD”) LAND USE AND ZONING DESIGNATION

A. T3 General Urban Zone (KCDD Figure 1.2)

Parcel 10 is designated within the urban district of the State Land Use District Boundaries. Per the KCDD Regulating Plan, Parcel 10 and the adjacent parcels are designated

¹ Hunt is separately planning to seek a Rules Clearance from HCDA, grading permit from the City and County, and SHPD for the remedial work on the VIP Towing Site. See Hawaii Administrative Rules (HAR) § 15-215-80.

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in the T3 General Urban Zone. See KCDD Figure 1.2 (KCDD Regulating Plan). The T3 General Urban Zone permits the construction and maintenance of industrial buildings, which is consistent with the current existing use of Parcel 10 and the proposed Project. See KCDD Figure 1.3 (KCDD Development Standards Summary).

B. Light Industrial and Warehousing (KCDD Figure 1.7)

The goal of the proposed renovations and site improvements is to maintain Parcel 10 in its current character and use as a commercial warehouse with certain light industrial capabilities. Parcel 10 will remain in compliance with the acceptable land use activities within its designated zone because light industrial and warehousing activities are permitted in the T3 General Urban Zone. See KCDD Figure 1.7 (KCDD Land Use).

IV. PROJECT DESCRIPTION

A. Summary of Project Work

Pursuant to HAR § 15-215-78, all new improvement projects and developments in the KCDD require the developer to obtain a permit.

The Project involves various renovations and site improvements to both the interior and exterior of the Project Building and surrounding area. The Project has two phases (inclusive of subphases 2A and 2B), and includes the installation of a new underground electrical line to connect the Project Building with Hawaiian Electric Company (“HECO”) infrastructure along Enterprise Avenue. See Exhibit C (Summary of Project improvements and phasing). The following is a summary of the improvements:

Phase 1:

- **Removal of existing refrigeration and freezer units located along the exterior of the Project Building:** The refrigeration and freezer units served the retail needs of Tamura’s Market and no longer serve any productive use to future commercial tenants.
- **Various interior improvements to the warehouse building (structural, mechanical and electrical):** Interior improvements are necessary to update the infrastructure capabilities of the Project Building to support the needs of future commercial tenants. The Project Building is subject to frequent electrical outages and short-circuit issues due to antiquated circuits and wiring. The previous tenant, Tamura’s, for example, experienced frequent power outages, including a two-week power outage that significantly affected its ability to continue business in Kalaeloa. The proposed interior improvements will revitalize certain antiquated deficiencies of the Project Building and improve the property’s capability to serve a diverse range of potential commercial tenants.
- **Exterior and site perimeter improvements (installation of new chain link security fencing throughout perimeter of property along Enterprise Avenue and Randolph Street, pavement repairs, warehouse door replacements, interior/exterior repainting, exterior lighting repair and replacement):** Installation of new fencing, doors and lighting installation, among other improvements, will revitalize the visibility of

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both the perimeter and exterior of the Project Building. These improvements will also support the safety and security of tenants and the public.

Phase 2A:

- **Additional interior renovations (structural, mechanical and electrical improvements, egress corridors, lighting and power upgrades, fire sprinkler alterations); exterior site lighting and chain link security fencing around the perimeter of the VIP Towing Site:** Phase 2A improvements to the interior of the Project Building include updating aging infrastructure and amenities to support the needs of future commercial tenants. In addition, these phase 2A improvements will improve safety conditions and ensure that the Project Building is equipped with appropriate fire sprinkler coverage. Phase 2A also includes exterior site lighting and site fencing for the VIP Towing Site.

Phase 2B:

- **Exterior underground electric utility work and minor building electrical work:** As part of the necessary electrical infrastructure improvements, the Project will also improve the electrical connection between the Project Building and HECO's power grid by installing a new underground power line to ensure that the Project Building has sufficient electrical capacity to provide power to multiple commercial tenants, and minor building electrical work to accommodate the new connection.

B. Project Building Improvements

As described above in Section IV.A., the main scope of the Project includes interior and exterior renovations and site improvements to the Project Building. The Project Building qualifies as a non-conforming structure pursuant to HAR § 15-215-89(b) because the Quonset hut warehouse was lawfully constructed in 1943 before the establishment of the HCDA and enactment of the KCDD rules.

The Project will not expand the floor area of the Project Building (and instead, will remove a total of 2,251 sf of existing floor area, consisting of an enclosed area (238 sf) and a covered delivery area (350 sf) along the Randolph Street side of the Warehouse Building; and a portion of a fire riser room (236 sf) and the walk in refrigerator / freezers (1,427 sf) on the east side of the Warehouse Building). See Exhibit D (Sheet AD001.0). As such, the Project Building may continue to be occupied, operated, and maintained in a state of good repair. See HAR § 15-215-89(e). Further, because the floor area of the proposed construction will not exceed twenty-five per cent of the floor area of the structure as it legally existed as of the date of the adoption of the KCDD rules on October 27, 2012, the Project Building may be altered or enlarged without compliance with all the provisions of subchapter 2 (regulating plan, transect zones and thoroughfare plan), subchapter 3 (general development standards) and subchapter 4 (district wide standards) of the KCDD rules. See HAR § 15-215-89(e)(4).

The Project, including the proposed renovations and site improvements, will support the continued function of the Project Building as a permitted nonconforming use because the building will remain as a commercial warehouse and retail space without any alterations to the property's intended use and character. Because the Project Building will no longer serve as a

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grocery retail store, removal of the existing refrigeration and freezer units is necessary to accommodate future warehousing and commercial activities. New exterior walls will be installed to replace the exterior-facing refrigeration panel that once covered a portion of the exterior. The interior renovation work will update the aging infrastructure of the Project Building and provide more open space to accommodate future tenants. Interior improvements also include select demolition, toilet renovations, repainting, and installation of a larger door opening to the main warehouse building entrance.

Altogether, the Project will revitalize the commercial potential and productive of the Project Building into a modern facility that can be utilized by a wider variety of commercial and industrial businesses.

C. Site Fencing

The Project includes the installation of exterior fencing and lighting along the Enterprise Avenue and Randolph Street perimeter of the Project Building to provide clear designations of edge property boundaries and further enhance the visibility and security of the building. In the past, the Project Building has been subject to various security issues resulting from theft, homelessness and graffiti among other safety concerns. As a result, the proposed fencing and lighting installations are necessary to protect the commercial character and use of the Project Building and property stored on site.

The proposed fencing involves two areas of Parcel 10: (1) installation of an approximately 191 foot long chain link fence along the Enterprise Avenue side of the Project Building, and an approximately 245 foot long chain link fence along the Randolph Street side of the Project Building; and (2) installation of an approximately 181 x 263-foot chain link fence around the perimeter of the VIP Towing Site. Because these fences will be either six-feet (6'-0") or eight-feet (8'-0") in height (exceeding the three-foot height limitation for front and/or side yard fences), Hunt requests a variance for the height of the fences as further discussed in Section VII. See HAR § 15-215-43(c) and 15-215-81. Hunt also requests a variance to use chain link security fencing material with a black colored mesh fabric for the proposed site fencing work to ensure proper enclosure of the property as further discussed in Section VII. See HAR § 15-215-43(c) and 15-215-81. The site fencing work will complement the proposed renovations and site improvements to revitalize Parcel 10 with minimal deviation and adverse impacts to the transect.

D. HECO Connection Improvements

As described above in Section IV.A., the Project includes the installation of an underground electrical line segment starting at the Project Building edge facing the parking lot that will extend through the parking lot to the property edge along Monterey Street. The proposed underground electrical installation work is in conformance with the KCDD architectural standards for utilities services. See HAR § 15-215-43(f)(3). The new electrical service line (and minor building electrical upgrades) are necessary to update the Project Building's antiquated electrical infrastructure and to increase service capacity to accommodate future commercial tenants.

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E. Other Project Information

1. Landscape and Recreation Space

Pursuant to HAR § 15-215-44, all required yards shall be landscaped. The Project will not change, disrupt, and alter the existing landscape and recreation space on property. As described above in Section IV.A., the scope of the proposed renovations and site improvements are relatively minor and primarily limited to the existing Project Building. Further, the current landscape space located adjacent to the parking lot along Enterprise Avenue and Monterey Street will not be affected by the fencing. As such, the existing landscaping and recreation space should be allowed to continue for this nonconforming structure pursuant to HAR § 15-215-89(e)(4).

2. Location and Size of Open Space

Current KCDD rules require all lots shall have a minimum of 20% open space. See HAR § 15-215-46. The Project will not change, disrupt, and alter any open spaces currently available on property. As described above in Section IV.A., the Project will not expand the floor area of the Project Building. Parcel 10 currently provides 9,376.82 square feet of open space or approximately 5.65% (9,376.82 / 165,920 square feet) of the entire Lot 10 is currently and will remain open space. As such, the existing open space should be allowed to continue for this nonconforming structure pursuant to HAR § 15-215-89(e)(4).

3. Documentation of compliance with green building standards (N/A)

This requirement is inapplicable to the Project because the scope of work involves renovations and site improvements to an existing non-conforming property, and the Project will not increase the floor area of the Project Building. See HAR § 15-215-48.

4. Fulfillment of public facilities dedication requirement (N/A)

This requirement is inapplicable to the Project. The Project will not increase the floor area of the existing Project Building and, as such, Applicant is not required to dedicate land for public facilities. See HAR § 15-215-64.

5. Fulfillment of reserved housing requirement (N/A)

This requirement is inapplicable to the Project. Parcel 10 is a commercial property and no residential units will be developed on the property.

6. Relocation analysis of businesses displaced (N/A)

This requirement is inapplicable to the Project. No businesses will be displaced or affected either during or upon completion of the proposed renovations and site improvements.

7. Development schedule and phasing

Hunt anticipates that project work will commence sometime in 2024 once all required permits, including the PDP, have been obtained. The renovations to the Project Building (Phase 1) and site improvements (Phase 2A) will take around nine weeks to be completed. The

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electrical connection work (Phase 2B) will commence in the third quarter of 2024 with a target completion sometime in the fourth quarter of 2024. The entire Project is expected to be completed by the end of the 2024 calendar year.

V. COMPLIANCE WITH KALAELOA RULES PURSUANT TO HAR § 15-215-78(e)

Pursuant to HAR § 15-215-78(e), the HCDA must make the following findings of fact in connection with the approval of a development permit: (1) consistency with the Kalaeloa Master Plan (“KMP”); (2) compliance with the KCDD rules; and (3) the proposal will not have a substantial adverse effect on surrounding and land uses and will be compatible with the existing and planned land use character of the surrounding area.

The Project complies with each of the requirements of HAR § 15-215-78(e) as summarized below:

A. (1) KMP Consistency

The Project complies with and advances the goals, policies, and objectives of the KMP. Specifically, KMP Section 3.1 encourages the “creation of a sustainable urban environment where a community can work, learn and play.” See KMP at § 3.1. One important element of a sustainable urban environment includes new employment opportunities and economic development. See KMP at § 3.2. The Project will support the vision for a sustainable urban environment at Kalaeloa through the placement of new commercial tenants on property and increased employment opportunities that these business entities will provide to local residents. The KMP acknowledged that the 1999 closure of the Barbers Point Naval Air Station resulted in the loss of 618 jobs but that only 100 new jobs were created thereafter. See KMP at § 3.2. As a former military commissary, Parcel 10 is currently not being utilized to the maximum potential as a commercial property offering warehousing and light industrial capabilities.

Completion of the Project will revitalize the commercial potential of the Project Building to attract new commercial tenants, including possible aviation-related industries and technological research and development sectors. The Project’s goal to enable maximum commercial productivity is consistent with KMP Section 3.2, and the identified industries that aligns with Kalaeloa, such as aviation-related industries (KMP at § 3.2.1) and technology research and development KMP at § 3.2.3). In addition, the KMP encourages the mixed-use development in the context of commercial, retail, office, and residential uses with respect to properties located near Kalaeloa Airport. See KMP at § 4.1.1.4. The Project will not expand the density and character of Parcel 10 and will therefore, remain consistent as a commercial property in the mixed-use area. Based on the foregoing, the Project is consistent with the vision of the KMP.

B. (2) KCDD Rules Compliance

The Project complies with all applicable KCDD rules and development standards. Further, the Project does not involve the construction of any new buildings and the proposed renovations will not expand the floor area of the current existing warehouse building. Please see the ***Compliance Table to Kalaeloa Rules and Development Standards*** attached hereto as Exhibit A for a summary of the Project’s compliance to each of the applicable KCDD rules and applicable development standards pursuant to HAR § 15-215-78(e)(2). Most of the KCDD rules and development standards are inapplicable to the Project because the scope of work

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does not involve the expansion of the floor area for the nonconforming structure. See HAR § 15-215-89(e)(4).

C. (3) Compatibility

The Project will not pose an adverse effect on surrounding land use. As described in Section IV, the scope of work is primarily contained to renovations and site improvements to the warehouse building and exterior perimeter of the property. The Project is intended to revitalize the warehouse building and the property exterior to accommodate new commercial tenants that seeks to engage in warehousing and commercial activities consistent with other current tenants on premise. Because the Project will not result in any changes to the density and character of Parcel 10 as a commercial warehouse and retail space, the Project will not create any adverse effects on the surrounding land use that would otherwise alter the nature of the area as a mix-use general urban zone.

As noted in Section II, nearby properties include a transition center and similarly situated commercial warehouse buildings, which is consistent with the transect T3 general urban zone. Thus, the revitalization of Parcel 10 to accommodate future commercial tenants is compatible with the existing and planned land use character of the surrounding area.

VI. COMPLIANCE WITH HAWAII REVISED STATUTES (HRS) CHAPTER § 206E

The Project complies with the goals and policies of HCDA pursuant to HRS Chapter 206E. Please see the ***Compliance Table to HCDA Goals and Policies (HRS Chapter 206E)*** attached hereto as Exhibit B for a summary of the Project's compliance to each of the applicable goals and policies provided in HRS Chapter 206E. The Project will advance multiple HCDA goals and policies to promote economic development in the Kalaeloa District, and that the proposed renovations and site improvements will not pose adverse effects in conflict with other pertinent State policies.

VII. VARIANCE REQUEST

A. New Chain Link Fence Installation(s) Throughout Perimeter of Parcel 10

As part of this Application, Hunt also requests that HCDA approve the following variance requests in connection with the proposed new chain link security fencing that will be installed along portions of Parcel 10:

- HAR § 15-215-43(c), Architectural Standards: Increase the permitted height of the proposed fences along Randolph Street and Enterprise Avenue from three feet (3'-0") to eight feet (8'-0"). The chain link security fence will also include a sliding security gate fronting Enterprise Avenue.
- HAR § 15-215-43(c), Architectural Standards: Increase the permitted height of the VIP Towing Site fence from three feet (3'-0") to six feet (6'-0").
- HAR § 15-215-43(c)(1), Architectural Standards: Authorize the use of chain link security fencing material for all of the fences. The chain link security fencing material will also

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include a black colored mesh fabric that will be embedded to cover the chain link security fences.

Pursuant to HAR § 15-215-81, Applicant is entitled to seek relief from the strict application of Kalaeloa Rules and Development Standards. Approval of a variance requires the following findings of fact: (1) uniqueness; (2) lack of self-created hardship; (3) minimal deviation; (4) character of the transect; and (5) no adverse impact. See HAR § 15-215-81(d). The variance request is necessary because strict application of the current fencing height restrictions of HAR § 15-215-43(f)(3) would deprive Hunt of the privileges enjoyed by similar commercial warehouse properties. Hunt believes that Parcel 10 presents certain unique and special conditions that merits this variance request, as summarized below.

1. Uniqueness

Several unique physical conditions are present with respect to Parcel 10. First, the shape of Parcel 10 is not perpendicular to the streets as the property is situated in the middle of a multi-street intersection – Yorktown Street, Enterprise Avenue, and Monterey Street. As a result, the Project Building is exposed to multiple points of entry and exit.

Second, unused open space is situated along the perimeter of Parcel 10 facing the corner of Randolph Street and Enterprise Avenue. The requested variance to install a eight-foot (8'-0") fence along the Randolph Street and Enterprise Avenue perimeter and a six-foot (6'-0") fence along the perimeter of the VIP Towing Site will address security and safety concerns as this area is currently exposed with unlimited access from the open perimeter intersection.

In addition, although more development is planned and taking place in the KCDD, there remain days and times when there is relatively little pedestrian and vehicular traffic in the vicinity of Parcel 10, and security fences above three feet are necessary to secure the premises, since fences under six feet are easily scalable. The proposed security fence around the VIP Towing Site is also necessary to protect this area and prevent unauthorized access to the remediation area.

These factors are unique physical conditions within the meaning of HAR § 15-215-81(d)(1), particularly given that, unlike a new proposed structure, Hunt is limited in its ability to address these physical conditions through changes to the existing nonconforming structure. Fencing is necessary to protect the safety and security of the structure and its occupants.

2. Lack of Self-Created Hardship

The exposure to multiple streets, relative lack of activity on certain days and times, and the necessity to protect the Project Building and VIP Towing Site from unauthorized access are not self-created hardships. Applicant is not responsible for the street design, relative level of activity in the area, or the actions of the prior lessee of the VIP Towing Site, which now necessitates remediation and protection.

3. Minimal Deviation

Applicant is requesting a small increase in the fencing height from three feet (3'-0") to six feet (6'-0") and eight feet (8'-0"). In doing so, Applicant is requesting the minimum deviation necessary as the objective of the new fencing installations is to enclose the property boundaries

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and to provide increased security, protection, and visibility presence. In addition, the proposed use of chain link security fencing material with a black mesh fabric cover design aligns with common exterior fence installations of similarly situated commercial warehouse properties. Because the east side of Parcel 10 already includes a chain link fence, the proposed installation of additional chain link security fencing throughout the perimeter of the property will not create any substantial deviation from current character and features of Parcel and the surrounding area.

4. Character of the Transect

The requested variance will not alter the existing or planned character of the surrounding area's designation as a T3 urban general zone. The increased height of the fence installation is consistent with similarly situated commercial properties that require certain control features to limit open access from the exterior streets, and to provide sufficient security and safety features for commercial tenants. Further, the proposed chain link security fencing material with a black mesh fabric cover design is commonly used to enclose commercial properties similar to Parcel 10. Applicant notes that it appears that chain link fencing material is currently being used to enclose the perimeter of the Kumuhonua Transitional Living Center. The requested variance will not impair any of the adjacent properties as Parcel 10 is surrounded by similarly situated commercial warehouses and open parking lots. The requested variance will also promote the public welfare by protecting occupants and property, while also protecting the public from potential hazards by restricting access to a commercial warehouse and remedial area

5. No Adverse Impact

The requested variance will not create any adverse impacts to the adjacent properties. The proposed fencing installations will provide better visibility and security features to Parcel 10 to minimize various security and safety concerns.

VIII. COMPLIANCE WITH HISTORIC PRESERVATION REVIEW PURSUANT TO HRS CHAPTER 6E

Hunt submitted applicable documentation for the Project complying with the requirements of HRS Chapter 6E and HAR Chapter 13-284 to the State Historic Preservation Division ("SHPD").

Attached as Exhibit E is the information for compliance with HAR § 15-215-63(b).

IX. PUBLIC CONSULTATION & COMMUNITY OUTREACH

Hunt is committed to conducting productive public consultation and community outreach efforts to ensure that the Kalaeloa community is adequately informed of the Project's goals, scope of work, and construction schedule. Hunt plans to meet with key community stakeholders, including adjacent neighbors, agencies, organizations, and elected officials regarding the Project. In addition, Hunt will also schedule a presentation before the Makakilo/Kapolei/Honokai Hale Neighborhood Board No. 34 and have representatives available in-person to address any questions or concerns.

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X. CONCLUSION

The Project meets the requirements of HRS Chapter 206E and HAR § 15-215-78(e), and therefore is entitled to the requested development permit. The Project will revitalize the existing Project Building and exterior perimeter of Parcel 10 without any significant changes and alterations to the character and density of the property and surrounding uses. The Project complies with and advances all pertinent HCDA policies and development standards, including the KMP, KCDD, and HRS 206E. The requested variance for the proposed new fencing on the perimeter of the warehouse and the VIP Towing Lot is also reasonable and complies with the variance requirements of HAR § 15-215-81.

Based on the foregoing, Hunt respectfully requests HCDA to grant the required development permit and variance for the Project.

EXHIBITS

- A. HAR § 15-215 compliance table
- B. HRS Chapter 206E compliance table
- C. Summary of Project improvements and phasing
- D. Project Plans (including location map, site plan, building massing, floor plans, exterior elevations and sections, and plot plan)
- E. Compliance with SHPD requirements per HAR § 15-215-63(b).