



**HAWAII COMMUNITY
DEVELOPMENT AUTHORITY**

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JOSH GREEN, M.D.
GOVERNOR

STERLING HIGA
CHAIRPERSON

CRAIG K. NAKAMOTO
EXECUTIVE DIRECTOR

Ref. No.: KAK 24-016

November 22, 2024

Sent Via Electronic Mail to: albert.h.palmer@hawaii.gov

Mr. Albert Palmer
Development Section Chief
Hawaii Housing Finance and Development Corporation
677 Queen Street, Suite 300
Honolulu, HI 96813

Re: Kaiāulu O Kalaeloa Affordable Housing Community; Located at
91-1309 Roosevelt Avenue on Tax Map Key: 9-1-013: 079
Kalaeloa Community Development District (KCDD), Honouliuli Ahupua‘a,
Ewa District

Dear Mr. Palmer,

At a meeting held on November 13, 2024, the Hawai‘i Community Development Authority (“HCDA”) received the request from Ikaika ‘Ohana, pursuant to § 201H-38 (“201H-38”), Hawaii Revised Statutes (“HRS”), to construct a public/private affordable housing development (“Project”) located within the Kalaeloa Community Development District (KCDD) in the Honouliuli Ahupua‘a, Ewa District.

Our comments are based on the latest copy of the Project’s proposal that was submitted to the HCDA on November 12, 2024 (“Proposal”). Through the consulting process that HCDA has been engaged in prior to the November 12, 2024 submission date, comments were given to Ikaika ‘Ohana and Hawaii Housing Finance and Development Corporation (regarding the Proposal). Our comments below apply to both the Proposal and the Project submittals. The Proposal is part of Ikaika ‘Ohana’s 201H-38 application through the Hawai‘i Housing Finance and Development Corporation (“HHFDC”). The comments below are based on the Proposal which is attached as Exhibit A.

I. BACKGROUND

The Project site is located at Lot 13051-D on Parcel 4, bound by Franklin Street to the west (“Ewa”), Roosevelt Avenue to the north (“Mauka”), and Saratoga Avenue to the south. The Developer’s drawings for the proposed Project are attached as Exhibit A.

II. DISCUSSION AND ANALYSIS

The Project is being proposed as a 201H-38 development with over fifty percent of the units qualifying as affordable housing units. As permitted under 201H-38, Ikaika ‘Ohana

is requesting the following exemptions from Chapter 215 of Title 15, Hawai‘i Administrative Rules:

- Section 15-215-62(c)(1-6) – Large Lot Development – Thoroughfare Network
- Section 15-215--62(d)(4) – Large Lot Development – New Buildings-Mid-Block Crossing
- Section 15-215-62(d)(5) – Large Lot Development – New Buildings-Courtyard Dimensions
- Section 15-215-62(d)(6) – Large Lot Development – New Buildings-Mid-Block Crossing/Courtyard
- Section 15-215-62 (d)(7) – Large Lot Development – New Buildings-Alley
- Section 15-215-43 (f) (3)(A) – Architectural Standards
- Section 15-215-43 – Frontage Type – Figure 1.6 Frontage Types
- Section 15-215-43 – Density – Figure 1.3 Development Standards Summary
- Section 15-215-43 – Height – Figure 1.3 Development Standards Summary
- Section 15-215-43 - Lei Building – Open Space Requirement– Figure BT.9 D.2 & D.3 Lei Building
- Section 15-215-43 – Lei Building– Ratio of Each Story Allowed– Figure BT.9 Table BT.9-1 Lei Building
- Section 15-215-47 (c)(2) – Width of curb cut and setback from adjacent property
- Section 15-215-47(l)(4) – Loading Stall Height
- Section 15-215 –43(c) – Fences
- Section 15-215-64 – Dedication of Public Facilities
- Chapter 15-215 – Future Amended Kalaeloa Community Development District Rules

III. HCDA COMMENTS

On November 12, 2024, the HCDA received an email from the Developer’s agent with the final application materials and proposed exemptions and/or deferrals, pursuant to HRS §201H-38. HCDA staff provided comments, both to the Developer and HHFDC, in a letter dated November 22, 2024. This letter sets forth HCDA’s initial comments regarding the Project. A summary of the initial comments is listed below:

1. Section 15-215-62(c)(1-6) – Large Lot Development – Thoroughfare Network

The sidewalk along Franklin Street should be extended from the property line to Roosevelt Avenue.

2. Section 15-215 –43(c) – Fences

In lieu of a 6-foot-high fence along Franklin Street, the ground level units should be directly accessible from the street and provide a more active, pedestrian-friendly

- frontage environment --- such as what is being provided along Roosevelt Avenue. Slatted fences and gates up to 4-feet high, for example, could be used to enclose small, usable mini-yards for each ground floor unit. Alternatively, the Franklin Street frontage could include trees and/or wider sidewalks with other pedestrian amenities to create a more active frontage.
3. HCDA is willing to work with the developer to engage the landowner of Franklin Street to further the implementation of such improvements.

IV. CONCLUSION

The HCDA staff understands that some of the details of the Project will evolve as the design progresses. Ikaika ‘Ohana shall update the HCDA as the Project progresses and allow time for HCDA review and comment on substantial design changes. Ikaika ‘Ohana shall seriously consider and address the comments noted herein as soon as possible. The HCDA will provide additional comments after further design refinements have occurred.

Please contact Ms. Charlene K. Oka, AIA, of our Planning and Development Section, at (808) 594-0318 or by email at charlene.k.oka@hawaii.gov should you have any questions regarding this matter.

Sincerely,

Craig Nakamoto

Craig K. Nakamoto
Executive Director

Attachment (1): Exhibit A – Applicant Submittal (“Proposal”)