

MEMORANDUM

October 24, 2025

To: Craig Nakamoto
Executive Director, Hawaii Community Development Agency

Fr: Trisha Kehaulani Watson, J.D., Ph.D.
Honua Consulting, LLC

Re: *Ka Pa'akai* Analysis Memo for the Proposed amendment to Title 15, Chapter 217 of the Hawai'i Administrative Rules (HAR), known as the Mauka Area Rules

Executive Summary

The Hawai'i Community Development Authority (HCDA) proposes to amend Title 15, Chapter 217 of the Hawai'i Administrative Rules (HAR), known as the Mauka Area Rules, which govern development and land use within the Kaka'ako Mauka Community Development District. The proposed amendments specifically address HAR §15-217-57 and Figure Neighborhood Zone 5 (NZ.5), which establish the development standards and maximum allowable density within the Central Kaka'ako Neighborhood Zone. This *Ka Pa'akai* analysis has been prepared to assess potential impacts of the proposed action on Native Hawaiian traditional and customary rights and practices associated with the project area.

A full *Ka Pa'akai* analysis was completed. Based on research and ethnographic data, cultural resources have been identified in the surrounding area; however, the proposed activities are not anticipated to impact these sites, as this is primarily a regulatory activity and includes no ground disturbance or construction activities. The potential for the proposed action to affect or impair cultural resources is considered negligible. No feasible action is required for this activity as the proposed action does not reasonably have the potential to impact cultural resources.

Description of Proposed Action

The Hawai'i Community Development Authority (HCDA) proposes to amend Title 15, Chapter 217 of the Hawai'i Administrative Rules (HAR), known as the Mauka Area Rules, which govern development and land use within the Kaka'ako Mauka Community Development District. The proposed amendments specifically address HAR §15-217-57 and Figure NZ.5, which establish the development standards and maximum allowable density within the Central Kaka'ako Neighborhood Zone. Under the current rule, the maximum permitted floor area ratio (FAR) for this zone is 3.5. The proposed amendment would revert that FAR to 1.5, excluding above-grade off-street parking structures and covered loading areas, until such time as sufficient infrastructure is provided or as determined by the HCDA under several scenarios.



Figure 1. Project Area

The purpose of this amendment is to manage growth in a manner consistent with available infrastructure and community capacity. Kaka’ako has undergone rapid urbanization in recent decades, and infrastructure such as wastewater systems, drainage networks, potable water supply, and transportation corridors have become increasingly stressed. By temporarily reducing the allowable FAR, HCDA seeks to ensure that new development proceeds in a manner that supports public safety, environmental sustainability, and equitable access to infrastructure improvements. The amendment does not authorize any construction or land-altering activity. Rather, it is a policy and regulatory action that will influence the pace, scale, and character of future development applications within the Central Kaka’ako Neighborhood Zone.

In accordance with the constitutional requirements articulated in *Ka Pa’akai o ka ‘Āina v. Land Use Commission* (2000), this analysis identifies the traditional, cultural, and historical resources that may be present in the affected area; examines how the proposed rule may affect the exercise of Native Hawaiian traditional and customary rights; and recommends feasible protective and mitigative measures to ensure those rights are not impaired. The HCDA recognizes that even regulatory actions must be reviewed within the context of the State’s duty to protect Native Hawaiian cultural practices, historic sites, and natural resources.

Background Research & Identification of Cultural Resources

The Kaka’ako region is one of the most historically and culturally significant landscapes on the island of O’ahu. Historically situated between the traditional ahupua’a of Honolulu and Waikīkī, the area once featured a rich mosaic of coastal wetlands, salt pans, fishponds, and low-lying agricultural lands. The lands mauka of Ala Moana Boulevard were once gently sloping plains that transitioned into extensive makai wetlands, known for their salt ponds (pa’akai), fishponds (loko i’a), and nearshore fisheries.

Archaeological and historical evidence indicate that Kaka’ako was part of an extensive cultural landscape that included multiple ‘ili, such as Kukuluāe’o, Kewalo, Ka’ākaukukui, and Honuakaha. These ‘ili were associated with ali’i landholdings, agricultural production, and subsistence resource zones. Oral traditions and early historic records describe salt production as a dominant activity along the Kaka’ako shoreline. The salt works of Kukuluāe’o and Ka’ākaukukui were well known throughout O’ahu and produced high-quality salt traded inter-island. Families maintained small plots where they tended salt beds, drying and storing pa’akai in woven containers for culinary and ceremonial use. The area’s salt ponds, therefore, carried both economic and spiritual value.

The makai portions of Kaka’ako were also noted for their loko i’a and for the collection of limu, shellfish, and other marine resources. Nearby Kewalo Basin served as a natural harbor where fishermen launched canoes and where the ali’i maintained fishponds for mullet (‘ama’ama) and milkfish (awa). The wetlands supported a variety of native plants such as ‘ae’ae (*Bacopa monnieri*) and akulikuli (*Sesuvium portulacastrum*), which played roles in both ecological balance and cultural practice. These resources linked Kaka’ako’s residents to the ocean and to the broader systems of exchange and subsistence that defined pre-contact Hawaiian life.

Moving mauka, the lands within what is now the Central Kaka‘ako Neighborhood Zone were once transitional spaces used for habitation and cultivation. Archaeological investigations over the past several decades, including those conducted prior to major redevelopment projects, have identified numerous cultural deposits, including habitation floors, postholes, hearths, fishhooks, and shell tools. These findings confirm long-term Native Hawaiian occupation and use. The upper reaches of the area likely contained temporary residences associated with salt-making families and perhaps agricultural plots irrigated by shallow groundwater or intermittent streams.

During the early historic period, Kaka‘ako evolved into a mixed community of Hawaiian families, maritime workers, and small-scale industries. The salt works continued to operate into the mid-1800s, but as Honolulu Harbor expanded and the city’s population grew, the area increasingly accommodated shipyards, lumber mills, and storage yards. Yet, even amid these changes, Hawaiian families maintained connections to the area’s coastal resources, continuing to gather fish and limu from Kewalo and the surrounding reef flats.

Cultural significance in Kaka‘ako is also marked by its burial record. Numerous iwi kūpuna (ancestral remains) have been discovered in both the mauka and makai sectors. The area’s sandy soils and proximity to the shoreline made it a preferred burial location for generations. Archaeological Inventory Surveys (AIS) and Burial Treatment Plans (BTPs) approved by the State Historic Preservation Division have documented extensive burial concentrations, particularly near Mother Waldron Park, Coral Street, and the Kaka‘ako Waterfront Park. These burials represent direct physical and spiritual connections to the Native Hawaiian community and require careful protection under HRS Chapter 6E.

Kaka‘ako also holds historical layers that reflect Hawai‘i’s transition from a subsistence-based society to an urban, industrial, and modern state. The area became home to early maritime trades, small factories, and later, affordable housing for working-class families. Institutions such as Mother Waldron Park (established in 1937) and the Kaka‘ako Fire Station represent the evolution of civic life in the district. Despite these transformations, the area’s deep cultural foundations—its salt-making, fishing, and burial traditions—remain embedded in the landscape.

The natural environment of Kaka‘ako has been extensively modified, yet its ecological history remains integral to understanding its cultural significance. The wetlands that once characterized the makai portion acted as natural filters and provided habitat for native waterbirds such as the ‘alae ke‘oke‘o and ae‘o. The reclamation and fill projects of the twentieth century drastically altered these ecosystems, converting wetlands into buildable land. However, the original topography and hydrology continue to influence flooding, drainage, and soil conditions. This environmental history reinforces the interconnectedness of cultural and natural resources. The following maps show the project area and how the area has changed over time.



Legend

 Project Area



Basemap Source: 1855 LaPasse Map of the South Coast of O'ahu

Scale: 1:24,000

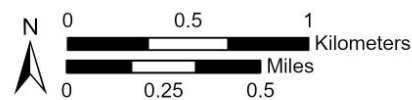
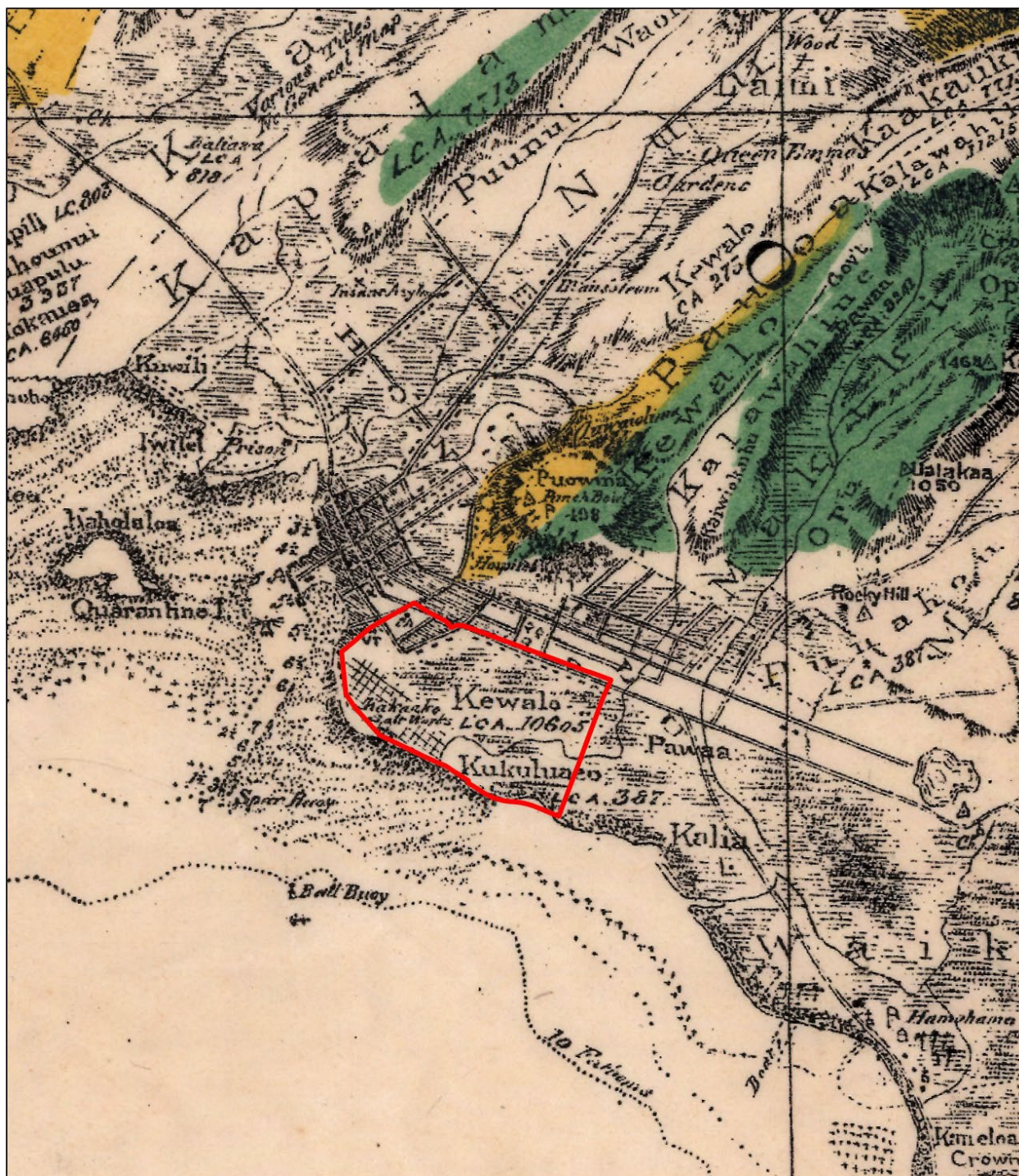


Figure 2. 1855 LaPasse Map showing the Project Area.



Legend

 Project Area



Basemap Source: 1881 Lyons & Covington, Hawaiian Government Survey, O'ahu Island Map

Scale: 1:35,000

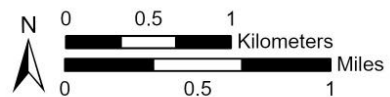
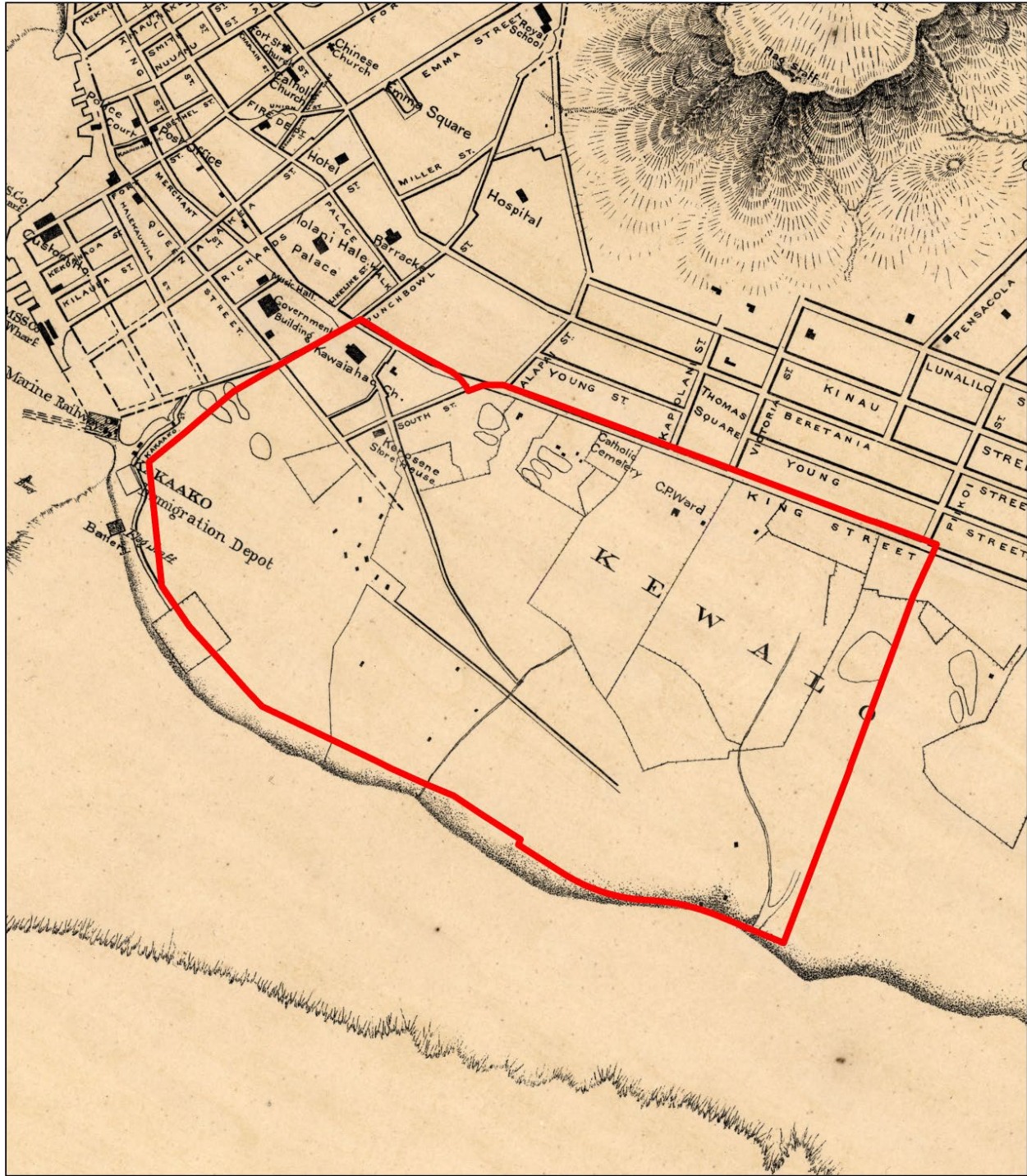


Figure 3. 1881 Lyons map showing the Project Area.



Legend

▭ Project Area



Basemap Source: 1887 Wall, Hawaiian Government Survey, Map of Honolulu

Scale: 1:12,000

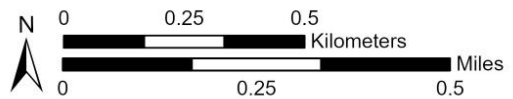
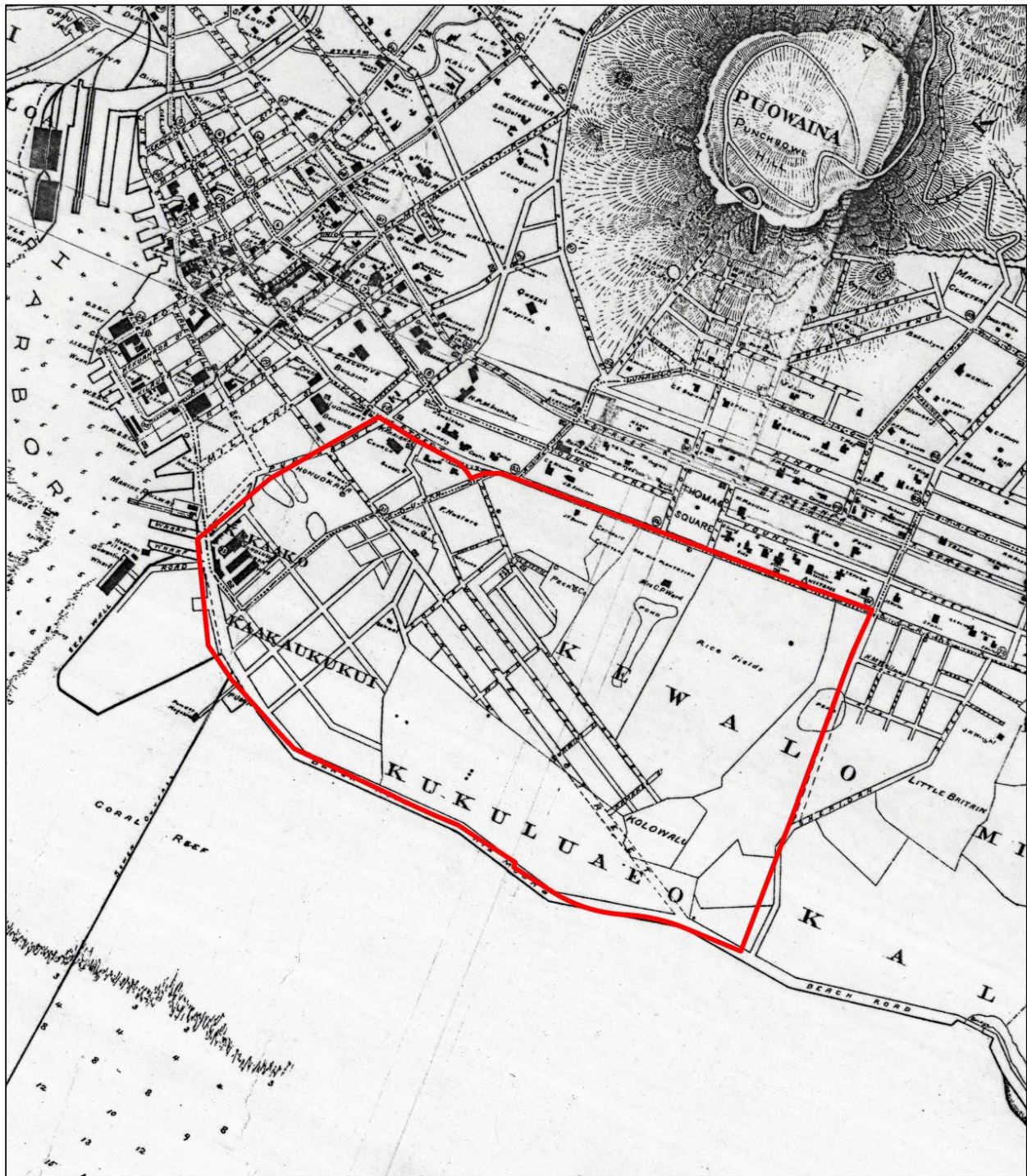


Figure 4. 1887 Wall map showing the Project Area.



Legend

 Project Area



Basemap Source: 1901 Monsarrat, Map of Honolulu

Scale: 1:14,000

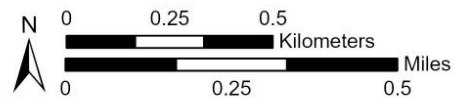


Figure 5. 1901 Monsarrat map of the Project Area



Legend

 Project Area



Basemap Source: 1902 Donn & Wall, Hawai'i Territory Survey, O'ahu Island Map

Scale: 1:35,000

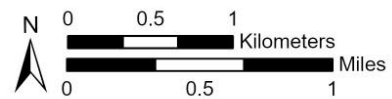
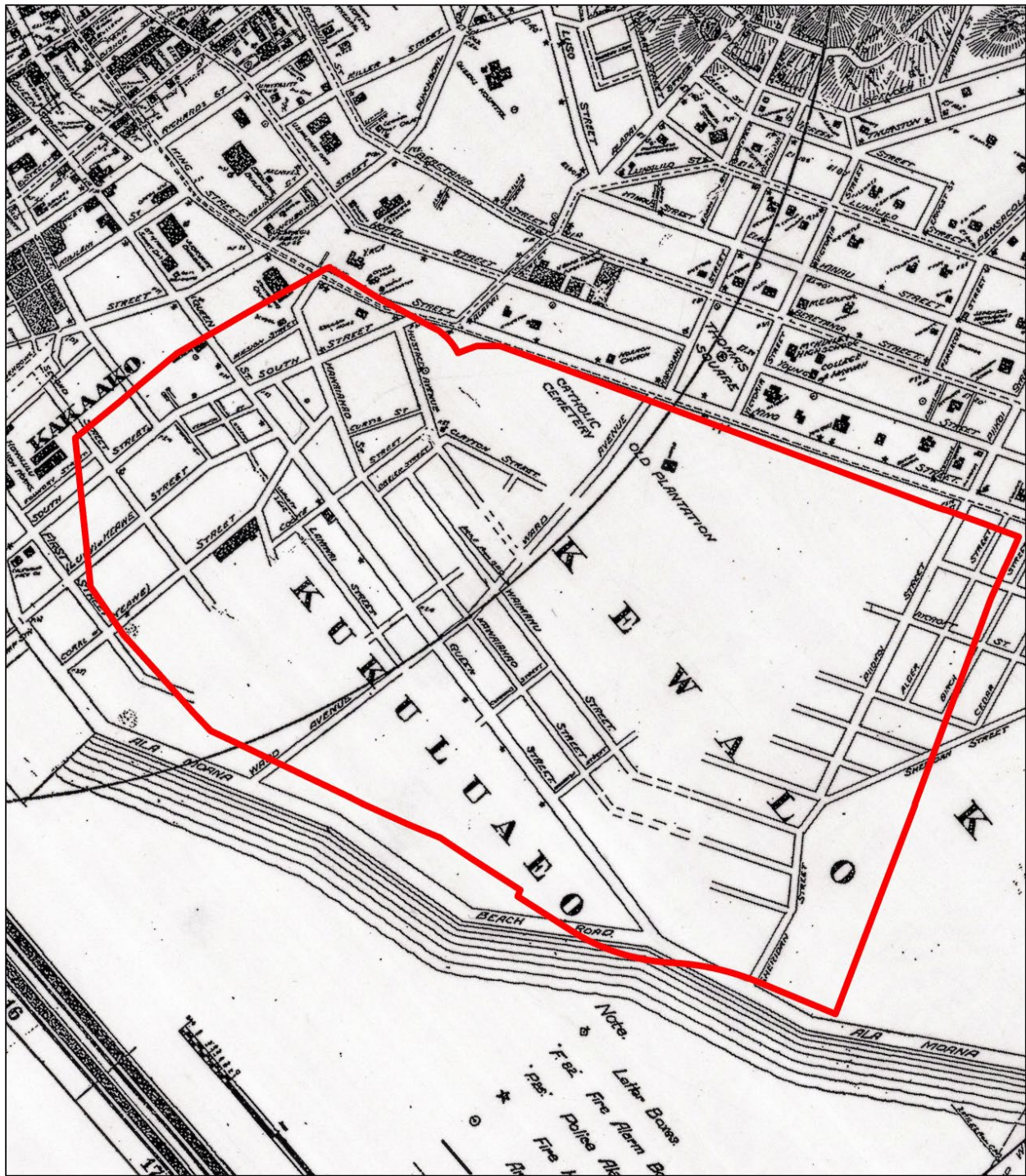


Figure 6. 1902 Donn map showing the Project Area



Legend

▭ Project Area



Basemap Source: 1912 Dove, Map of Honolulu

Scale: 1:10,000

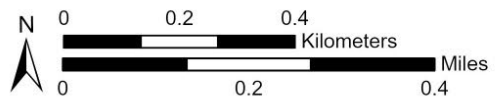
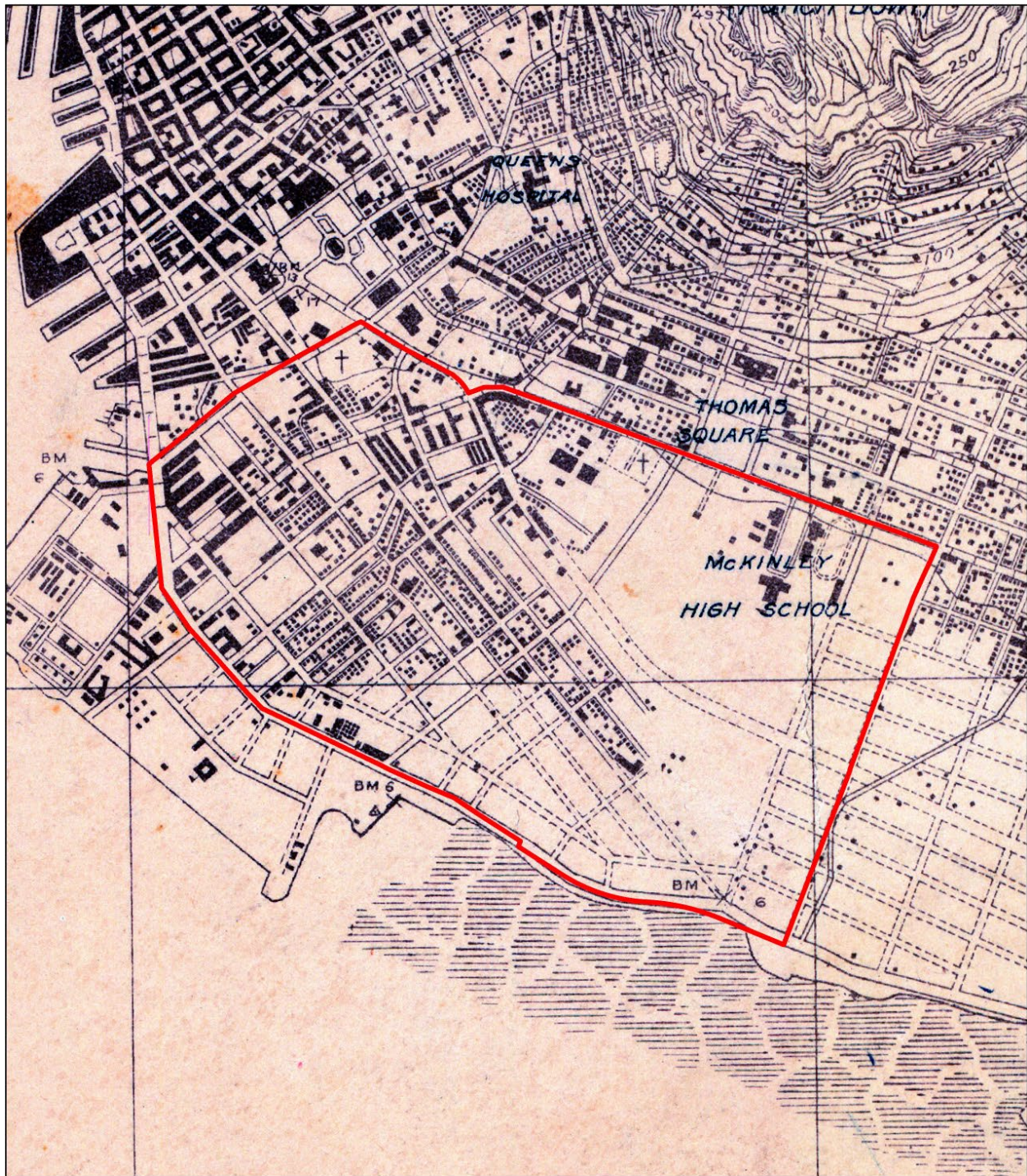


Figure 7. 1912 Dove map showing the Project Area



Legend

 Project Area



Basemap Source: 1927 USGS Topographic Map, Honolulu Quad.

Scale: 1:12,000

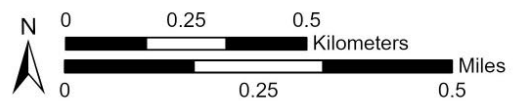
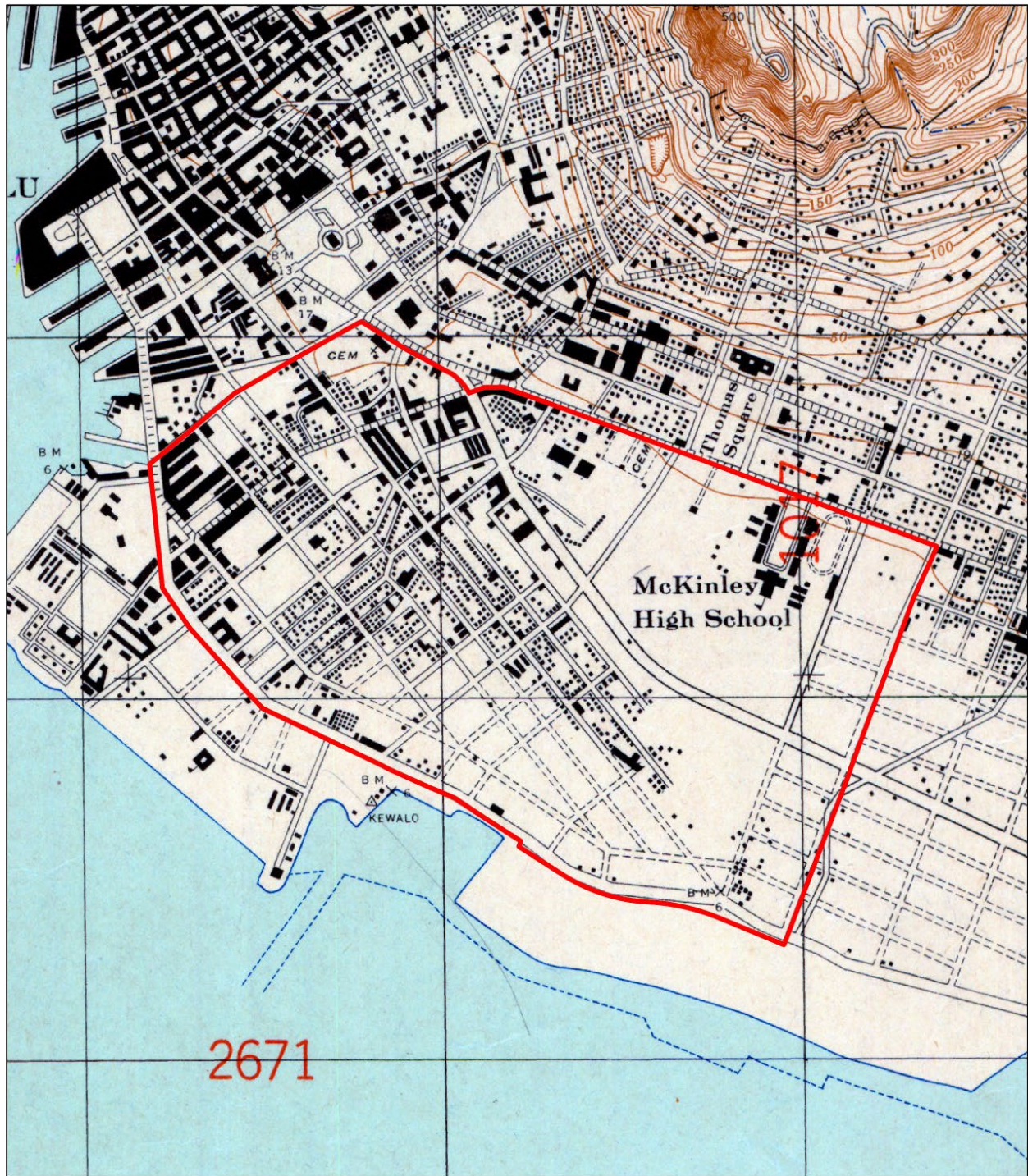


Figure 8. 1927 USGS map showing the Project Area



Legend

 Project Area



Basemap Source: 1933 US Army War Dept. Fire Control Map, Honolulu Quad.

Scale: 1:12,000

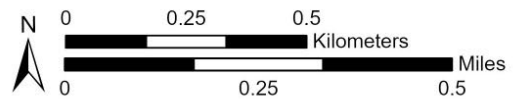


Figure 9. 1933 US Army War Department map showing the Project Area



Legend

 Project Area



Basemap Source: 1952 USGS Aerial Imagery, Honolulu

Scale: 1:12,000

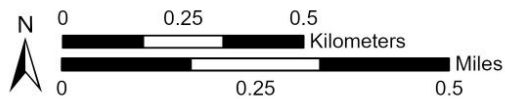


Figure 10. 1952 USGS Aerial Imagery showing the Project Area



Legend



Basemap Source: 1977 USGS Aerial Imagery, Honolulu

Scale: 1:14,000

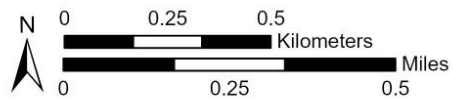


Figure 11. 1977 USGS Aerial imagery showing the Project Area

The historic maps and images included above illustrate the dramatic transformation of Kakaʻako from a coastal wetland and salt-making landscape into one of Honolulu’s most urbanized districts. The 1855 LaPasse Map depicts an undeveloped coastal plain characterized by shallow wetlands, salt pans, and fishponds extending inland from the shoreline. These early maps reveal that the project area once supported a complex system of natural waterways and cultural sites associated with paʻakai production and subsistence gathering, as well as traditional habitation. By 1881 and 1887, the Lyons and Wall maps show gradual subdivision of the land into ʻili boundaries such as Kukuluāeʻo and Kaʻākaukukui, while the presence of trails and early road alignments indicate increasing human activity and coastal access.

By the early 1900s, the Monsarrat and Donn maps reflect the encroachment of urban infrastructure, with the establishment of streets and industrial parcels replacing much of the wetland environment. The 1912 and 1927 maps further document infilling of coastal areas, expansion of Kewalo Basin, and the emergence of maritime facilities and small factories. The 1933 U.S. Army map and 1952 aerial imagery capture the full industrialization of Kakaʻako, with warehouses, rail lines, and road grids dominating what were once cultural and ecological spaces. By 1977, aerial photographs show nearly total urban coverage, with only small remnants of open land. Collectively, these figures reveal a 120-year trajectory from a vibrant Native Hawaiian coastal landscape defined by salt, fish, and agriculture to a built environment marked by reclamation, infill, and dense urban form.

In contemporary times, Kakaʻako has become a dense urban district, but cultural practitioners, community organizations, and descendants continue to advocate for recognition of the area’s Hawaiian heritage. The ongoing use of the name “Kakaʻako” in public spaces, the installation of interpretive signage, and the inclusion of Hawaiian art and language in urban design all reflect a broader recognition that Kakaʻako remains a living cultural landscape.

Therefore, the area affected by the proposed rule, though highly urbanized, retains substantial cultural, historical, and natural significance. It is part of a continuum of land use from mauka agricultural and habitation zones to makai fisheries and salt ponds. It contains archaeological evidence of pre-contact Hawaiian life, historic-period landmarks, and the presence of iwi kūpuna. Its ecological past, although now covered mainly by fill and concrete, remains essential to understanding its cultural meaning. These resources collectively form the foundation upon which this *Ka Paʻakai* analysis proceeds.

Identification of Traditional and Customary Practices

Because the proposed action is a regulatory amendment and not a physical development, it does not directly alter land, water, or access. However, pursuant to the *Ka Paʻakai* framework, it is necessary to evaluate how such a rule may influence the ability of Native Hawaiians to exercise traditional and customary rights in the future, as well as how it may affect the cultural integrity of Kakaʻako as a landscape.

At the most direct level, reducing the maximum allowable FAR from 3.5 to 1.5 temporarily limits the scale of future buildings within the Central Kakaʻako Neighborhood Zone. This action

effectively slows the pace of redevelopment and may reduce the likelihood of large-scale excavation, deep foundation work, or underground parking structures—activities that in the past have led to the discovery and disturbance of iwi kūpuna. From a cultural resource management perspective, this reduction in density provides a beneficial pause, creating conditions for more deliberate and respectful planning. It ensures that infrastructure and cultural considerations remain aligned with development intensity.

Indirectly, the proposed amendment also supports the preservation of the cultural landscape by maintaining a more human-scaled urban form. Lower density can help retain view planes toward the mountains and the ocean, which are essential elements in Hawaiian spatial orientation and cultural identity. The visual and physical connection between mauka and makai is not merely aesthetic; it is a reflection of the ahupua‘a system that linked upland and coastal resources. By restraining excessive vertical development, the rule helps protect this cultural relationship.

From a social standpoint, the amendment may influence patterns of residency and economic activity in Central Kaka‘ako. Lower density may translate to fewer high-rise residential towers and a slower pace of gentrification, thereby preserving space for long-term residents and small businesses that contribute to the area’s cultural diversity. This indirectly supports Native Hawaiian and local families who maintain cultural ties to Kaka‘ako through genealogy, practice, or community involvement. The regulatory change aligns with HCDA’s mandate to balance development with community benefit and to promote mixed-use neighborhoods that reflect Hawai‘i’s cultural heritage.

Conversely, potential adverse effects could arise if the reduced FAR discourages investment in infrastructure or delays the provision of community amenities, such as parks, cultural centers, or open spaces that facilitate public gatherings and education. However, because the amendment expressly conditions future density increases on the provision of “sufficient infrastructure,” it embeds a long-term incentive to plan comprehensively and to ensure that infrastructure improvements—potentially including cultural facilities and interpretive spaces—are achieved before higher intensity development resumes.

With respect to traditional and customary practices, the makai portions of Kaka‘ako, including Kewalo Basin and the waterfront, remain areas where cultural practices persist. Fishing, gathering of limu, and ceremonial activities still occur along the shoreline. These practices are protected by Article XII, Section 7 of the Hawai‘i State Constitution, which affirms Native Hawaiian traditional and customary rights exercised for subsistence, cultural, and religious purposes. The proposed amendment does not alter access to these coastal areas or impose any restriction on such activities. On the contrary, by moderating development pressure in the mauka areas, the rule may reduce cumulative impacts such as runoff and sedimentation that can affect nearshore water quality and marine resources, thereby benefiting traditional practitioners.

Archaeological and burial resources are another domain of potential impact. Past construction in Kaka‘ako has encountered iwi kūpuna, leading to community concern and high-profile consultations. Because the proposed action does not authorize new construction, it presents no immediate threat. In the long term, the rule could improve protection by requiring future

projects to undergo more rigorous cultural review before higher densities are permitted. The HCDA remains committed to coordinating with the State Historic Preservation Division and the O‘ahu Island Burial Council to ensure continued compliance with burial laws and cultural protocols.

There is also a symbolic dimension to consider. Rulemaking signals policy priorities. By reducing allowable density until infrastructure is sufficient, HCDA demonstrates responsiveness to community concerns about overdevelopment and cultural loss. This reinforces public trust in government stewardship of Kaka‘ako, a place where tensions between urbanization and heritage preservation have been long-standing. The action therefore contributes positively to the State’s constitutional obligation to protect cultural rights.

While no direct adverse impacts are anticipated, the potential for indirect effects must be recognized. Slower development may influence economic dynamics, potentially shifting development interest toward other areas of Honolulu where cultural resources are also present. Such shifts require coordinated policy oversight to prevent displacement of impacts. Moreover, as the district evolves under lower density conditions, HCDA should ensure that cultural visibility remains integral to urban design—through public art, Hawaiian naming, and interpretation of historic sites—so that reduced density does not lead to cultural invisibility.

In summary, the proposed amendment is expected to have either beneficial or neutral effects on traditional and customary practices. It neither restricts access nor authorizes disturbance, and it establishes conditions that promote more sustainable and culturally conscious development. By embedding cultural protection within the framework of infrastructure adequacy, HCDA advances a model of planning that aligns with the State’s dual commitments to economic vitality and cultural stewardship.

Findings and Analysis under the *Ka Pa‘akai* Framework

The *Ka Pa‘akai* decision requires agencies to identify feasible measures to protect Native Hawaiian rights once those rights and potential impacts have been described. Although the proposed rule does not entail direct disturbance, HCDA recognizes its duty to implement proactive measures that safeguard cultural and historical integrity in both regulatory processes and future project implementation.

The Hawai‘i Supreme Court in *Ka Pa‘akai* provided a three-part analytical framework to ensure the protection of Native Hawaiian traditional and customary rights while balancing competing development interests. This framework consists of the following steps:

1. Identification of Valued Cultural, Historical, or Natural Resources in the Project Area

The project area lies within the historic district of Kaka‘ako, a coastal landscape of profound cultural and ecological significance situated between the traditional ahupua‘a of Honolulu and Waikīkī. Historically, this area comprised a complex system of wetlands, salt pans (*pa‘akai*), fishponds (*loko i‘a*), and habitation zones that supported generations of Native Hawaiian families. The project area, as shown in **Figure 1**, lies within what were once the ‘ili of

Kukuluāeʻo, Kewalo, Kaʻākaukukui, and Honuakaha—lands renowned for their rich coastal and subsistence resources.

Prior to widespread land reclamation and fill projects of the early twentieth century, the makai portions of Kakaʻako were dominated by salt production and fishing. The *Kukuluāeʻo* and *Kaʻākaukukui* salt ponds were among the largest and most productive on Oʻahu. Families managed these paʻakai fields communally, maintaining shallow evaporation beds and harvesting crystalized salt for use in food preservation, trade, and ceremony. The 1855 LaPasse Map (**Figure 2**) clearly depicts these extensive salt pans along the coastal flats, illustrating a shoreline characterized by ponds, wetlands, and tidal inlets.

By 1881, the Lyons map (**Figure 3**) shows emerging subdivision patterns as Honolulu’s urban boundary expanded westward. However, the map still delineates the network of coastal ponds and wetlands that sustained salt-making and fishing practices. The 1887 Wall map (**Figure 4**) records continued occupation in the area, with early trails, structures, and irrigation features noted near the project site. These maps confirm that Kakaʻako remained an active Native Hawaiian subsistence and production landscape well into the late nineteenth century.

The early twentieth-century maps [Monsarrat (1901, **Figure 5**) and Donn (1902, **Figure 6**)] document the beginning of major land transformation through dredging, filling, and subdivision. The infilling of the coastal ponds and the creation of new streets signaled the onset of industrial expansion that would redefine Kakaʻako’s physical and cultural landscape. Archaeological investigations in this area have revealed the remnants of this earlier era: habitation floors, hearths, shell tools, and iwi kūpuna (ancestral burials) concentrated along the former coastal edge.

The 1912 Dove map (**Figure 7**) and 1927 U.S. Geological Survey map (**Figure 8**) further demonstrate the acceleration of this transition, showing the conversion of wetland and salt pond areas into commercial and residential blocks. The shoreline was straightened, and Kewalo Basin began to take on its modern form as a maritime industrial hub. Despite these changes, Hawaiian families continued to live and work in Kakaʻako, preserving coastal access and maintaining fishing and gathering practices along the reefs of Kewalo and Kaʻākaukukui.

The 1933 U.S. Army War Department map (**Figure 9**) reflects the complete industrialization of the area, with warehouses, lumberyards, and port-related facilities dominating the landscape. The 1952 U.S. Geological Survey aerial imagery (**Figure 10**) reveals extensive fill across the project area, eliminating the last visible traces of wetlands and salt pans. By 1977 (**Figure 11**), Kakaʻako had become fully urbanized, its natural and cultural landscapes replaced by road grids, warehouses, and early high-rise construction.

Through archaeological investigations conducted in the late twentieth and early twenty-first centuries, numerous cultural deposits have been documented within this district. Burial Treatment Plans (BTPs) and Archaeological Inventory Surveys (AIS) approved by the State Historic Preservation Division (SHPD) confirm that iwi kūpuna remain present throughout both the mauka and makai sectors. Concentrations have been particularly noted near Coral Street, Halekauwila Street, and Mother Waldron Park—areas that once bordered the natural

shoreline. The sensitivity of the soils and the frequency of ancestral burials underscore the enduring cultural importance of this landscape.

The historic maps and imagery also illustrate the ecological transformation of Kaka'ako's natural systems. The original wetlands and fishponds functioned as natural filtration systems and provided habitat for native plants such as 'ae'ae (*Bacopa monnieri*) and akulikuli (*Sesuvium portulacastrum*). These ecosystems supported bird species including the 'alae ke'oke'o (Hawaiian coot) and ae'o (Hawaiian stilt). The LaPasse and Lyons maps, in particular, show the extent of these low-lying water features, which once absorbed runoff and buffered storm events. The loss of these natural systems through reclamation has had lasting hydrological implications; even today, flooding and drainage challenges in Kaka'ako reflect the topographic legacy of its former wetlands.

Although the physical landscape has been dramatically altered, Kaka'ako remains culturally resonant for many Native Hawaiian families and community organizations. The persistence of place names such as Kaka'ako, Ka'ākaukukui, and Kewalo in public signage and neighborhood identifiers represents a continued recognition of the area's Hawaiian heritage. Modern efforts, including interpretive installations, community programming, and preservation of open spaces like Mother Waldron Park and Kaka'ako Waterfront Park—serve to reconnect contemporary residents and visitors to the site's deep cultural roots.

Together, the maps and historic images from 1855 through 1977 document a 120-year evolution of the Kaka'ako landscape—from an interconnected network of salt ponds, fishponds, and wetlands to a reclaimed and densely urbanized district. They illustrate the layers of human use, adaptation, and transformation that define the project area and form the foundation for understanding its cultural, historical, and natural significance today.

2. The Extent to Which Those Resources Will Be Affected or Impaired by the Proposed Action

The proposed amendment to HAR §15-217-57 and Figure NZ.5 is a regulatory action that will not directly affect or impair the valued cultural, historical, or natural resources identified within the Kaka'ako project area. Because the amendment does not authorize ground disturbance, construction, or physical alteration of land, no immediate impacts to iwi kūpuna, archaeological deposits, or remaining cultural landscapes are anticipated. The action's primary effect—reducing the allowable floor area ratio (FAR) from 3.5 to 1.5—functions as a temporary development control to ensure that future growth proceeds in step with adequate infrastructure. This limitation may, in fact, serve as a protective measure by slowing the pace of redevelopment and reducing the likelihood of inadvertent discoveries or disturbances to buried cultural materials.

Indirectly, the proposed rule could yield positive outcomes for the preservation of Kaka'ako's cultural and historical character. Lower allowable density will help maintain visual corridors between mauka and makai, preserving the spatial relationships central to Hawaiian cultural identity and the traditional ahupua'a system. It also offers an opportunity for HCDA and the community to integrate cultural and interpretive planning into future infrastructure improvements before higher density is reinstated.

No adverse effects on traditional or customary practices, such as fishing, gathering, or ceremonial activities along the nearby Kewalo shoreline, are expected. On balance, the proposed rule supports the continued recognition and protection of Kaka'ako's cultural heritage by aligning land-use intensity with environmental and cultural capacity, ensuring that future growth respects the historical and ancestral significance of the area.

3. Feasible Actions to Reasonably Protect Native Hawaiian Rights

Because the proposed amendment is regulatory in nature and involves no physical development or land alteration, feasible actions to protect Native Hawaiian rights are effectively moot. The amendment will not result in ground disturbance, changes in access, or any condition that could affect cultural, historical, or natural resources. As such, there is a negligible potential for impacts to Native Hawaiian traditional and customary practices. Existing laws and review processes under HRS Chapter 6E and HCDA's established consultation protocols already ensure adequate protection should any future projects be proposed under the amended rule. No additional mitigation measures are warranted.

Conclusion and Recommendations

The proposed amendment to HAR §15-217-57 and Figure NZ.5 represents a prudent and measured regulatory action by the Hawai'i Community Development Authority (HCDA) to ensure that future development within the Central Kaka'ako Neighborhood Zone aligns with existing infrastructure capacity and community values. The amendment, which temporarily reduces the maximum allowable floor area ratio (FAR) from 3.5 to 1.5, will not directly alter land, water, or cultural resources. It is a non-construction, policy-level adjustment that manages density and sequencing of growth to prevent undue strain on infrastructure and to safeguard the integrity of Kaka'ako's cultural and historical landscape.

Based on the findings of this Ka Pa'akai analysis, there is no evidence that the proposed rule change will adversely affect Native Hawaiian traditional or customary rights, historic properties, or natural resources. Rather, the amendment is expected to have beneficial or neutral outcomes by moderating redevelopment intensity, reducing the likelihood of subsurface disturbance, and providing greater opportunity for comprehensive cultural planning in advance of future projects. The regulatory pause created by this amendment enables HCDA to strengthen its cultural resource management framework and to ensure that community consultation and archaeological oversight remain central to decision-making.

Because the action poses negligible potential for adverse impacts, no additional mitigation or feasible protection measures are warranted at this time. Nonetheless, it is recommended that HCDA continue to maintain and document meaningful consultation with Native Hawaiian organizations, cultural practitioners, and descendant families regarding future land use in Kaka'ako. Continued coordination with the State Historic Preservation Division (SHPD) will also ensure that archaeological and burial protection standards are upheld. Finally, HCDA is encouraged to support public education and interpretive initiatives that honor Kaka'ako's historic role as a center for salt production, fishing, and Hawaiian community life—ensuring that the district's heritage remains visible and respected within Honolulu's evolving urban landscape.

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