RES25-026
Testimony

MISC. COMM. 43

COUNCIL

COUNCIL Meeting

Meeting Date: Jan 29, 2025 @ 10:00 AM

Support: 0

Oppose: 24

I wish to comment: 1

Name:	Email:	Zip:
Kyle Kajihiro	kyle.kajihiro@gmail.com	96826
Representing:	Position:	Submitted:
Self	Oppose	Jan 27, 2025 @ 11:48 AM

Testimony:

While I support more affordable housing as a general policy, I oppose this particular project because it fails to consider significant cultural and environmental impacts. There are other sites more suitable for affordable housing. The proposed site is the location of the one of the three royal fishponds of ʻEwa. The Lahaina fire illustrated the importance of understanding the history of wai in Hawaiʻi's landscapes and the tragic shortsightedness of those who filled in the wetlands and fishponds, allowing Lahaina to become dry and susceptible to fire. With climate change and rising seas, this area is vulnerable and should be protected for its cultural and environmental significance. Why is this project being given special consideration for exemption from normal policies? Have all potential conflicts of interest been carefully scrutinized? A full EIS should be done.

Name:	Email:	Zip:
Robert Deedman	rdeedman58@gmail.com	96701
Representing:	Position:	Submitted:
Self	Oppose	Jan 27, 2025 @ 06:17 PM

Name:	Email:	Zip:
Kellee Hearther	calikellee@gmail.com	96701
Representing:	Position:	Submitted:
Self	Oppose	Jan 27, 2025 @ 09:20 PM

Testimony:

Resolution 25-26 Committee Report 13 The Hale o Līpoa Affordable Rental Housing Development 201H Project. OPPOSE

Aloha Chair Waters, Vice Chair Weyer, Floor Leader Cordero, and Members of the Council,

As I, Kellee Hearther, from 'Aiea, 'Ewa, O'ahu strongly oppose the building of Hale o Līpoa altogether, I therefore oppose any and all exemptions for this flawed proposed project. The resolution lists some twenty-five (25) exemptions including everything from not having to pay application and permitting fees to zoning for perimeter and maximum height to development standards. Page 2 of the Resolution states that “the granting of the exemptions is necessary for the timely and successful implementation of the project.” Aren’t fees and permits and requirements put in place for a reason?

Proposed affordable housing is not an excuse to authorize exemptions that are meant to protect and preserve the sanctity of the ʻāina and safety of residents.

People are fleeing the shoreline on the North shore and you are proposing a building across the street from the shoreline

in ‘Aiea. No exemptions. No Hale o Līpoa.

Mahalo nui for your serious consideration,

Kellee Hearther

January 29, 2025

Name:	Email:	Zip:
Richlen Nakamoto	niknak.hawaii@gmail.com	96839
Representing:	**Position:**	**Submitted:**
Self	Oppose	Jan 27, 2025 @ 11:31 PM

Testimony:

Resolution 25-26 Committee Report 13 The Hale o Līpoa Affordable Rental Housing Development 201H Project. OPPOSE

Aloha Chair Waters, Vice Chair Weyer, Floor Leader Cordero, and Members of the Council,

As I, Richlen Nakamoto, strongly oppose the building of Hale o Līpoa altogether, I therefore oppose any and all exemptions for this flawed proposed project. The resolution lists some twenty-five (25) exemptions including everything from not having to pay application and permitting fees to zoning for perimeter and maximum height to development standards. Page 2 of the Resolution states that “the granting of the exemptions is necessary for the timely and successful implementation of the project.” Aren’t fees and permits and requirements put in place for a reason?

Proposed affordable housing is not an excuse to authorize exemptions that are meant to protect and preserve the sanctity of the ‘āina and safety of residents.

People are fleeing the shoreline on the North shore and you are proposing a building across the street from the shoreline in ‘Aiea. No exemptions. No Hale o Līpoa.

Mahalo nui for your serious consideration,

Richlen Nakamoto

Name:	Email:	Zip:
Nicole Nakamoto	nikkiadamjones@gmail.com	96822
Representing:	**Position:**	**Submitted:**
Self	Oppose	Jan 27, 2025 @ 11:32 PM

Testimony:

Resolution 25-26 Committee Report 13 The Hale o Līpoa Affordable Rental Housing Development 201H Project. OPPOSE

Aloha Chair Waters, Vice Chair Weyer, Floor Leader Cordero, and Members of the Council,

As I, Nicole Nakamoto, strongly oppose the building of Hale o Līpoa altogether, I therefore oppose any and all exemptions for this flawed proposed project. The resolution lists some twenty-five (25) exemptions including everything from not having to pay application and permitting fees to zoning for perimeter and maximum height to development standards. Page 2 of the Resolution states that "the granting of the exemptions is necessary for the timely and successful implementation of the project." Aren't fees and permits and requirements put in place for a reason?

Proposed affordable housing is not an excuse to authorize exemptions that are meant to protect and preserve the sanctity of the ʻāina and safety of residents.

People are fleeing the shoreline on the North shore and you are proposing a building across the street from the shoreline in ʻAiea. No exemptions. No Hale o Līpoa.

Mahalo nui for your serious consideration,
Nicole Nakamoto

Name: Michael Davis	Email: onelongstory@gmail.com	Zip: 96817
Representing: Living Life Source Foundation / Loko I'a Pa'aiau	Position: Oppose	Submitted: Jan 28, 2025 @ 05:42 AM

Name: Katie Hearther	Email: katie.hearther@gmail.com	Zip: 96701
Representing: Self	Position: I wish to comment	Submitted: Jan 28, 2025 @ 06:20 AM

Testimony:
Resolution 25-26 Committee Report 13 The Hale o Līpoa Affordable Rental Housing Development 201H Project. OPPOSE

Aloha Chair Waters, Vice Chair Weyer, Floor Leader Cordero, and Members of the Council,

As I, Katie Hearther from ʻAiea, Ewa, Oahu strongly oppose the building of Hale o Līpoa altogether, I therefore oppose any and all exemptions for this flawed proposed project. The resolution lists some twenty-five (25) exemptions including everything from not having to pay application and permitting fees to zoning for perimeter and maximum height to development standards. Page 2 of the Resolution states that "the granting of the exemptions is necessary for the timely and successful implementation of the project." Aren't fees and permits and requirements put in place for a reason? These exemptions are deeply concerning and should be opposed by all who care for the ʻāina.

Proposed affordable housing is not an excuse to authorize exemptions that are meant to protect and preserve the sanctity

of the ʻāina and safety of residents.

People are fleeing the shoreline on the North shore and you are proposing a building across the street from the shoreline in ʻAiea. No exemptions. No Hale o Līpoa.

Mahalo nui for your serious consideration,
Katie Hearther

January 29, 2025

Name: Jordan Yoshimoto	Email: yoshimoto.jordan@gmail.com	Zip: 96706
Representing: Loko I'a Pa'aiau	Position: Oppose	Submitted: Jan 28, 2025 @ 06:51 AM

Name: Bruce Keaulani	Email: bkeaulani@kaitogakko.org	Zip: 96822
Representing: Loko'ia Pa'iau	Position: Oppose	Submitted: Jan 28, 2025 @ 06:56 AM

Name: Liann Jimmons	Email: liannjimmons@gmail.com	Zip: 96826
Representing: Self	Position: Oppose	Submitted: Jan 28, 2025 @ 07:47 AM

Testimony:

Resolution 25-26 Committee Report 13 The Hale o Līpoa Affordable Rental Housing Development 201H Project. OPPOSE

Aloha Chair Waters, Vice Chair Weyer, Floor Leader Cordero, and Members of the Council,

I, Liann Jimmons, from Loko Iʻa Paʻiau, Oahu strongly oppose the building of Hale o Līpoa altogether, I therefore oppose any and all exemptions for this flawed proposed project. The resolution lists some twenty-five (25) exemptions including everything from not having to pay application and permitting fees to zoning for perimeter and maximum height to development standards. Page 2 of the Resolution states that “the granting of the exemptions is necessary for the timely and successful implementation of the project.” Aren’t fees and permits and requirements put in place for a reason? These exemptions are deeply concerning and should be opposed by all who care for the ʻāina.

Proposed affordable housing is not an excuse to authorize exemptions that are meant to protect and preserve the sanctity of the ʻāina and safety of residents.

People are fleeing the shoreline on the North shore and you are proposing a building across the street from the shoreline in ʻAiea. No exemptions. No Hale o Līpoa.

Mahalo nui for your serious consideration,

Liann Jimmons

January 28 2025

Name:	Email:	Zip:
Christina Agullana	tinagullana@yahoo.com	96789
Representing:	Position:	Submitted:
Self	Oppose	Jan 28, 2025 @ 08:23 AM

Name:	Email:	Zip:
Christina Agullana	tinagullana@yahoo.com	96789
Representing:	Position:	Submitted:
Self	Oppose	Jan 28, 2025 @ 08:32 AM

Name:	Email:	Zip:
Emilie Parry	RootbridgeEcosystems@gmail.com	96817
Representing:	Position:	Submitted:
Self	Oppose	Jan 28, 2025 @ 08:48 AM

Name:	Email:	Zip:
Yuko Barretto	yuko.barretto@gmail.com	96797
Representing:	Position:	Submitted:
Self	Oppose	Jan 28, 2025 @ 08:59 AM

Testimony:

Aloha Chair Waters, Vice Chair Weyer, Floor Leader Cordero, and Members of the Council,

I am a volunteer at Loko ʻIa Pāʻaiau.

We have been restoring the home to Moʻi Wahine Kalanimanuia, who reigned peacefully over the island of Oʻahu in the 1400s and have touched hundreds and hundreds of lives in the process. What community needs now is not another urban space but place of healing, where we can all come together.

I STRONGLY OPPOSEthe building of Hale o Līpoa altogether, I therefore oppose any and all exemptions for this flawed proposed project. The resolution lists some twenty-five (25) exemptions including everything from not having to pay application and permitting fees to zoning for perimeter and maximum height to development standards.

Resolution states that “the granting of the exemptions is necessary for the timely and successful implementation of the project.” Aren’t fees and permits and requirements put in place for a reason? These exemptions are deeply concerning and should be opposed by all who care for the ‘āina.

Yes, we do need affordable housing, but reckless development is not the answer. It is not an excuse to authorize exemptions that are meant to protect and preserve the sanctity of the ‘āina and safety of residents.

Mahalo for all you do for our community and thank you for the opportunity to submit this testimony.

Yuko Barretto

January 28, 2025

Name:	Email:	Zip:
Danielle Espiritu	info@kalauao.org	96701
Representing:	**Position:**	**Submitted:**
Hoʻōla Hou iā Kalauao	Oppose	Jan 28, 2025 @ 09:01 AM

Testimony:

Aloha Chair Waters, Vice Chair Weyer, Floor Leader Cordero, and Members of the Council,

My name is Danielle Espiritu, and I am submitting testimony on behalf of Hoʻōla Hou iā Kalauao, a nonprofit organization focused on restoring ‘āina (land) and kānaka (people) in the ahupuaʻa (land division) of Kalauao in ‘Ewa, Oʻahu. We OPPOSE Resolution 25-023 and Resolution 25-026, granting a special management major permit and exemptions to Līpoa Development LLC for the Hale o Līpoa project at 98-150 Lipoa Place.

Hoʻōla Hou iā Kalauao cares for Kaʻōnohi, a spring-fed loʻi kalo (irrigated taro field) and māla (garden space) directly ma uka (inland) and just down the street of the proposed development. The loʻi we care for receives water directly from the aquifer. Further development, especially so close to Kaʻōnohi, could result in the inability to continue farming loʻi kalo there. We have already seen a significant drop in water level due to overdevelopment in the area and overtaxing of the aquifer. Should the water level continue to drop, there will not be enough water coming up through the springs to flood patches, and we would lose that cultural practice entirely in this area. Any damage to the aquifer and freshwater lens due to construction and the need to support additional development will have direct impacts on the springs and loʻi at Kaʻōnohi. We are the last loʻi kalo within several ahupuaʻa in either direction and so we are talking about a direct threat to the remaining traditional farming and cultural practices in a huge land area. These are cultural practices protected by law.

In addition, the site chosen for the proposed development is culturally significant in and of itself as it is the site of Opu, a historic 10.5 acre fishpond commissioned by Kalaimanuia (Kalanimanuia), mōʻī wahine (queen) of Oʻahu. Residents of the area are well aware that the space floods often. It is a fishpond. With the potential for sea level rise in the coming years, it would not only be disrespectful, but irresponsible for the city to support such a build.

To be clear, we are not anti-affordable housing. As those who give our lives in service to our community, we are huge advocates for housing and services to be made affordable to our people. Instead, we are critical of the way “affordable housing” has been used as the sheep skin to conceal ulterior motives of developers and corporations whose actions will have unsustainable long-term ramifications that our community will need to live with. There is significant housing available on island; however, we lack regulations that curb the greed that makes those units unavailable to working, local people. Let’s stop using “affordable housing” as a way to justify more development of ‘āina that could in fact feed and heal our community.

In the case of Loko Opu and the decision to build on top of a historic fishpond, members of our community have voiced concerns and opposition to this development at every juncture - town hall meetings, neighborhood board meetings, city council meetings, and on record in the cultural interviews included in the impact assessment.

As I shared in my 2023 cultural impact assessment interview included below, the choice to allow this development to move forward is a choice to ignore community and practitioner concerns.

Please do not approve these resolutions, and do not allow this project to continue.

Ke aloha,

Danielle Espiritu
Hoʻōla Hou iā Kalauao
info@kalauao.org

Included below are relevant excerpts from my Hale o Līpoa Cultural Impact Statement interview from August 26, 2023.

3) What is your association to the subject property (family land, work place, etc.)?
I am a part of an organization named Hoʻōla Hou iā Kalauao that cares for a spring-fed loʻi kalo and farm space directly uka (upland) of the planned development. Kaʻōnohi the name of the farm space we care for, it is also the name of the ‘ili ‘āina in the area. Kaʻōnohi is just across the street of the proposed development. The springs that feed the ‘āina at Kaʻōnohi come directly from the aquifer. Over the last decade, and especially in the last 5 years, we have noticed changes in the springs at Kaʻōnohi. Water levels have dropped significantly and some areas have shown elevated salinity levels, all of which happened in conjunction with increased development and construction in the surrounding area. Due to the proximity of the planned development to Kaʻōnohi, any construction and development will have a direct impact on our ability to continue farming loʻi kalo traditionally, a cultural practice carried on in Hawaiʻi since time immemorial. While Kalauao and ‘Ewa were once famous for its abundance in water and resources, overdevelopment and contamination have left their mark. We are the last loʻi kalo in several ahupuaʻa in either direction and so we are talking about a direct threat to the remaining traditional farming and cultural practices in a huge land area. These are cultural practices protected by law.

In terms of my personal family connection to the area, my ʻohana lives down the street. We are two traffic lights away from the proposed development, and yet in a completely different ahupuaʻa. To have ahupuaʻa that were so thin, speaks to the abundance of resources in Kalauao and Waimalu, and in the broader ʻEwa moku.

5) Could you share your manaʻo relevant to the ʻAiea area, or Kalauao Ahupuaʻa, and the surrounding region (personal anecdotes, moʻolelo, mele, oli, place names, etc.)?

One interpretation of the name Kalauao is a multitude of clouds. Ka – the, lau – many/400 (like we would say with the word laulima), ao – light or clouds. Our placenames give us insight into what our kūpuna observed over many generations, and so that tells me about the weather patterns in the area. Kalauao, and the larger moku of ʻEwa was famous for freshwater. We see that in many of the names in this area. Waimalu, Waiau, Waimanō, Waiawa, Waipiʻo, Waipahū, Waikele. The word wai (freshwater) is repeated over and over. There are moʻolelo of Kāne and Kanaloa going throughout the moku of ʻEwa with their ʻōʻō (digging sticks). They would travel, plunge their ʻōʻō in the ground, and wai, freshwater, would come up. There are moʻolelo of Kalanimanuia (Kalaimanuia) making her residence in Kalauao because of the abundance of freshwater in the area. She was the daughter of Kukaniloko, for whom the sacred birth stones are named. Both are renowned mōʻī wahine, queens, of Oʻahu. Kalanimanuia is credited with developing many of the loʻi kalo and loko iʻa in the area. In Kalauao specifically, the area uka of the proposed development would have been spring-fed loʻi kalo going all the way up toward the uplands, and the water there would empty into Opu, one of the fishponds Kalanimanuia is credited with constructing. Opu, no longer in tact, would have been in the area of the proposed development. On the other side of Kalauao, closer to Kalauao stream, ʻauwai were constructed to create a sophisticated engineering system that would direct water from the stream into loʻi kalo and then back into the stream again. That fresh water would then go into Pāʻaiau, another fishpond of Kalanimanuia where it would mix with salt water attracting fish and creating a suitable environment for them to grow. Some kūpuna say there were upwards of 100 fishponds throughout Puʻuloa, which served as the breadbasket for the ʻEwa moku. Puʻuloa was also famous for the iʻa hāmau leo, or oysters, that were once abundant. There are also moʻolelo tied to manō and moʻo in the area.

6) As far as you remember and your experiences, how has the area changed? Could you share how it was when you were young and how it's different now?

My grandparents who lived in ʻEwa in the 1940s and 50s used to be able to gather fish and shellfish from Puʻuloa, just down the road and in walking distance of the proposed development. They grew up swimming in the streams and gathering and eating from them and from the ocean. My mother remembers Waimalu stream being cemented and channelized in the 1960s, part of Waiʻeli (the ridge separating Kalauao and Waimalu) being blown up to make way for what is now Moanalua Road, and the land being drilled in order for the huge posts that are now the freeway to be put up. Kamaʻāina were forced to relocate. We saw similar things along Kamehameha Hwy for the rail project. I was born in the 1980s and grew up primarily in the 1990s, and for my entire lifetime I have not been able to touch the streams or ocean water in our community because I have known it was contaminated. There are signs posted in the areas where my kūpuna used to gather food that say DO NOT EAT FISH & SHELLFISH. Within three generations, Puʻuloa and the surrounding streams have gone from a source of food and sustenance, to one of potential danger due to contamination and unregulated development, urbanization, industry, and militarization. We are now in the critical generation that will

determine the future health of our aquifer and subsequently our springs.

7) Do you know of any traditional sites or historically significant buildings which are or were located on the Property site--for example: cultural sites, archaeological sites, historic structures and/or burials? Please elaborate.
There was a fishpond name Opu in the area where the proposed development is located. The freshwater coming from springs and loʻi kalo further uka would flow down and into the fishpond, mixing with salt water and would provide food. As mentioned, Kalanimanuia, mōʻī wahine of Oʻahu was credited with the construction of Opu as well as the surrounding loʻi kalo and loko iʻa.

8) Do you think the proposed development would affect any place of cultural significance or access to a place of cultural significance? Please elaborate.
As mentioned above, Kaʻōnohi is the only loʻi kalo in either direction for several ahupuaʻa. This is shocking considering ʻEwa, and Kalauao in particular were once famous for its abundance in food and freshwater. The vast majority of the food-growing areas, which often took the form of loʻi kalo and loko iʻa, are now filled and cemented. Kaʻōnohi is the last loʻi kalo in Kalauao and one of very few in the entire moku of ʻEwa. The proposed development, and any further development of the surrounding area, poses a direct threat to Kaʻōnohi, the nearby spring fed loʻi kalo. We have already seen a significant drop in water level due to overdevelopment in the area. Further development, especially so close to Kaʻōnohi, could result in the inability to continue farming loʻi kalo there. Should the water level continue to drop, there will not be enough water coming up through the springs to flood patches and we would lose that cultural practice entirely in this area. What happens in one area will have direct impacts in another.

9) Are you aware of any traditional gathering practices at the Property area and/or within the surrounding areas both past and ongoing?
There is a loʻi kalo across the street, directly uka of the proposed development. Native Hawaiian varieties of taro, some that were well known in ʻEwa, are being grown in the flooded style there as they have been for generations in Hawaiʻi. Other Native dryland crops are being grown traditionally there. Food is being prepared traditionally there. Hawaiian and non-Hawaiian families are gathering to perpetuate these Native Hawaiian cultural practices just uka of the proposed development area. These practices require water. In addition, a hui is restoring Loko Pāʻaiau not far away.

10) While development of the area continues, what could be done to lessen the adverse effects on any current cultural practices in the area?
The choice to develop is choosing to ignore community concerns. Perhaps landowners should think innovatively and generationally, looking for green solutions that allow ʻāina and people to heal, reconnect, and build in a way that benefits both. What might it look like to restore the abundance of ʻEwa that is literally just below the surface? 11) Are you aware of any other cultural concerns the community might have related to cultural practices within or in the vicinity of the Property site and its surrounding areas? Mahiʻai (farmers) are concerned about how development in ʻEwa will affect freshwater, and subsequently, all cultural practices that rely on it. What happens when the springs dry up? How do you farm loʻi kalo without water? You cannot… In addition, we have already seen with the tragedy on Maui what happens when

resources are exploited for generations, water is extracted, and Native water and resource management systems are not allowed to function as they should. We are already overtaxing the aquifer, something that would not be happening if development were monitored with a generational mindset. Water levels have dropped significantly in the last decade alone. Additional developments will mean more water must be pumped into buildings to support more people in an already concentrated area. In addition, any damage to the aquifer and freshwater lens will have direct impacts on the springs and loʻi nearby.		
Name: Stacy Chong	Email: shp@healaniland.com	Zip: 96701
Representing: Healani Land Company	Position: Oppose	Submitted: Jan 28, 2025 @ 09:08 AM
Name: Aaron Mattis	Email: aaron_mattis@yahoo.com	Zip: 96734
Representing: Self	Position: Oppose	Submitted: Jan 28, 2025 @ 09:29 AM
Name: Nick Agullana	Email: nickagullana@yahoo.com	Zip: 96789
Representing: Loko I'a Pa'aiau	Position: Oppose	Submitted: Jan 28, 2025 @ 09:32 AM
Name: Nicole Matsumoto	Email: nmatsumoto@healaniland.com	Zip: 96821
Representing: Self	Position: Oppose	Submitted: Jan 28, 2025 @ 09:51 AM
Name: Kehaulani Lum	Email: aliipauahi@gmail.com	Zip: 96701
Representing: Ali'i Pauahi Hawaiian Civic Club	Position: Oppose	Submitted: Jan 28, 2025 @ 09:53 AM
Name: Claire Tamamoto	Email: Claire2164@gmail.com	Zip: 96701
Representing: Aiea Community Association	Position: Oppose	Submitted: Jan 28, 2025 @ 10:14 AM
Name: Alexandra D'Angelo	Email: kananidangelo@gmail.com	Zip: 96701
Representing:	Position:	Submitted:

Self	Oppose	Jan 28, 2025 @ 10:51 PM

Testimony:

Resolution 25-26 Committee Report 13 The Hale o Līpoa Affordable Rental Housing Development 201H Project. OPPOSE

Aloha Chair Waters, Vice Chair Weyer, Floor Leader Cordero, and Members of the Council,

I, Alexandra D'Angelo, from ʻAiea, strongly oppose the building of Hale o Līpoa altogether, I therefore oppose any and all exemptions for this flawed proposed project. The resolution lists some twenty-five (25) exemptions including everything from not having to pay application and permitting fees to zoning for perimeter and maximum height to development standards. Page 2 of the Resolution states that "the granting of the exemptions is necessary for the timely and successful implementation of the project." Aren't fees and permits and requirements put in place for a reason? These exemptions are deeply concerning and should be opposed by all who care for the ʻāina.

Proposed affordable housing is not an excuse to authorize exemptions that are meant to protect and preserve the sanctity of the ʻāina and safety of residents.

People are fleeing the shoreline on the North shore and you are proposing a building across the street from the shoreline in ʻAiea. No exemptions. No Hale o Līpoa.

Mahalo nui for your serious consideration,

Alexandra D'Angelo

Name:	Email:	Zip:
Kimberly Moa	kimberly.moa@gmail.com	96701
Representing:	**Position:**	**Submitted:**
Self	Oppose	Jan 29, 2025 @ 12:40 AM

Testimony:

Re: Testimony in Opposition to RES25-023 and RES25-026 related to Hale O Lipoa Project

Aloha Chair Waters, Vice Chair Weyer, Floor Leader Cordero, and Members of the Council,
My name is Kimberly Kamaluokeakua Moa. Mahalo for the opportunity to submit testimony in opposition of Resolution 25-23 and 25-26 related to Hale o Lipoa.

I am a resident of ʻAiea residing in the ahupuaʻa of Kalauao in a home that's been in my ʻohana for going on four generations. I am also an Aiea Community Association Board Member, Aliʻi Pauahi Hawaiian Civic Club Member, one of the kiʻai loko (fishpond caretakers) of Loko Iʻa Pāʻaiau and my ʻohana has longtime pilina with the ʻāina and caretakers of the loʻi kalo at Kaʻonohi, just mauka of the project site near Pearlridge Center.

I am writing in opposition of Resolution 25-23 and Resolution 25-26, granting a special management major permit and exemptions to Līpoa Development LLC for the Hale o Līpoa project at 98-150 Lipoa Place.

As kanaka maoli and a cultural practitioner who has been working alongside others in my community for over a decade to restore the fishery and wetlands of Kalauao, I am deeply concerned that this project will have an adverse impact on the aquifer and the surrounding wai and kai of Kalauao, both during and after its construction. The freshwater ʻauwai that flows near the project will carry pollution flow into the harbor and the construction itself and continued use of water resources into the future would further overtax and potentially damage the water table and freshwater lens in the area which would have direct impacts on the existing springs and loʻi of Kalauao and the return of endangered native species nearshore and mauka of the project area.

In addition to its adverse impact on our ʻāina and wai, the proposed development threatens the sacred and culturally significant site of Loko Opu, a historic fishpond commissioned by mōʻī wahine of Oʻahu, Queen Kalaimanuia, as well as the broader ecosystem that includes Loko Iʻa Pā'aiau, Loko Paʻakea, and the springs and loʻi of Kalauao, all of which could be irreparably harmed by this project.

Community members from all of the entities mentioned in the developer's project proposall have voiced concerns and opposition to this development at every juncture, including on public record and within the EA impact assessment. These concerns have continuously been dismissed and ignored by the developer and government entities engaged in moving this project forward without adequate consideration of its adverse effects, and they have failed to engage in meaningful consultation or collaboration with our community to this point. This is a pattern I don't expect to change into the future in spite of the developer's claim.

Affordable housing is a major concern for all of us who live Hawaii and especially those of us who were born and are indigenous to Hawaii. However, our community is already bearing the brunt of infrastructure and development for the County and State and will soon be host to a new OCCC Jail, a Stadium District, as well as additional TOD development in coming years. The increased density's impact on our ʻāina, and the wai beyond and below it, will be immeasurable.

Voting in favor of these resolutions would prioritize harmful development over ecological and cultural preservation and would once again ignore our community concerns.

Mahalo nui loa,

Kimberly Moa
Aiea Resident
98-124 Kihale Street, Unit B
Aiea, HI 96701

Name:	Email:	Zip:
Alex Philippou	zoephlpp48@gmail.com	96825
Representing:	Position:	Submitted:
Self	Oppose	Jan 29, 2025 @ 07:51 AM

Testimony:

Aloha Chair Waters, Vice Chair Weyer, Floor Leader Cordero, and Members of the Council,

I am a friend of ʻAiea and I oppose Resolutions 25-23 (CD1) and 25-26 which grant a Special Management Use Major permit and exemptions to a mainland-led speculator to build an 8 story, block long building right across the street from the shoreline, on Līpoa Place. These resolutions do NOT require any environmental or cultural studies. However, this site sits upon the second of three fishponds built by Mõʻī Wahine Kalanimanuʻia, Loko 'Opu.

A SMA area is supposed to protect the environment and the people's access to the harbor. This measure completely ignores that and also requires no community benefit. The developers proposal, however, continuously mentions mālama 'āina. A true concern for ʻāina would motivate the developers to complete an EIS and then seek a more appropriate site for their development. Not seek exemptions to rush an already flawed project.

While the building site may appear to have no negative impact on cultural or traditional practice, the construction of this so called affordable housing will destroy all opportunity for the restoration of the Queen's historic fishpond complex (over 30 acres), growth of indigenous limu and restoration of loʻi kalo; a system that fed generations of this community and can do so again.

Of added note, the project's own report finds that the site may experience a potential environmental concern, as it is located in close proximity to a business that uses a large quantity of petroleum projects. It further describes the presence of asbestos and lead paint and recommends a hazardous materials survey prior to demolition. As a matter of caution, given that the site sits over the Waimalu Aquifer, an important water source, approval of the permit before this is done is reckless.

The project site is also noted as being within the area of inundation of the 1% flood and will be well within the 3 and 7 feet rise, within the near future.

A very important flaw in the report says that the closest water source to the property is the Kalauao Stream. In fact, the ʻauwai (ditch) that carries fresh water from Kahuewai (Kalauao Springs/Sumida Watercress Farm) passes parallel to the property, only feet away, and a drainage ditch that carries runoff from the property feeds directly into the ʻauwai and downstream into the harbor.

A statement from the council's website about the swearing in of the City Council at the beginning of 2025 states that "The ceremony symbolizes a continued dedication to public service and incorporating new perspectives into the city's

governance." One may ponder what the definition of public service is if the council ignores the will of the people. New perspectives should include a hard look at what worked for this ʻāina and its people in the past. Zealous development is not always the answer.

The community does not want this building on this site. It is too close to the shoreline, in an area that already floods, and will erase all possibility of recreating a space where residents can subsist from the land and build relationships with these sacred spaces and each other.

A different site for this project would provide housing AND fishery restoration, instead of burying the opportunity for the community to restore the complex of royal fishponds and revitalize its natural resources. Please vote no to Resolutions 25-23 and 25-26!

Mahalo for your serious consideration of the community's wishes.

Name:	Email:	Zip:
Alison Ka`olinokaimana, & Jason Yasuoka-Arakaki	kaolinokaimana@gmail.com	96701
Representing:	Position:	Submitted:
Self	Oppose	Jan 29, 2025 @ 09:41 AM

Resolution 25-26 Committee Report 13 The Hale o Līpoa Affordable Rental Housing Development 201H Project. OPPOSE

Aloha Chair Waters, Vice Chair Weyer, Floor Leader Cordero, and Members of the Council,

My name is Robert Deedman and I live in Aiea, I strongly oppose the building of Hale o Līpoa altogether, I therefore oppose any and all exemptions for this flawed proposed project. The resolution lists some twenty-five (25) exemptions including everything from not having to pay application and permitting fees to zoning for perimeter and maximum height to development standards. Page 2 of the Resolution states that "the granting of the exemptions is necessary for the timely and successful implementation of the project." Aren't fees and permits and requirements put in place for a reason?
Proposed affordable housing is not an excuse to authorize exemptions that are meant to protect and preserve the sanctity of the 'āina and safety of residents.
People are fleeing the shoreline on the North shore and you are proposing a building across the street from the shoreline in 'Aiea. No exemptions. No Hale o Līpoa.

Mahalo nui for your serious consideration,

Robert Deedman
99-969 Aiea Hts Dr
Unit G
Aiea, HI 96701

January 29, 2025

Resolution 25-26 Committee Report 13 The Hale o Līpoa Affordable Rental Housing Development 201H Project. OPPOSE

Aloha Chair Waters, Vice Chair Weyer, Floor Leader Cordero, and Members of the Council,

As I, Michael J. Davis from Nu'uanu / Honolulu strongly oppose the building of Hale o Līpoa altogether, I therefore oppose any and all exemptions for this flawed proposed project. The resolution lists some twenty-five (25) exemptions including everything from not having to pay application and permitting fees to zoning for perimeter and maximum height to development standards. Page 2 of the Resolution states that "the granting of the exemptions is necessary for the timely and successful implementation of the project." Aren't fees and permits and requirements put in place for a reason?

Proposed affordable housing is not an excuse to authorize exemptions that are meant to protect and preserve the sanctity of the 'āina and safety of residents.

People are fleeing the shoreline on the North shore and you are proposing a building across the street from the shoreline in 'Aiea. No exemptions. No Hale o Līpoa.

Mahalo nui for your serious consideration,

Michael J. Davis

Loko I'a Pa'aiau

January 29, 2025

Resolution 25-26 Committee Report 13 The Hale o Līpoa Affordable Rental Housing Development 201H Project. OPPOSE

Aloha Chair Waters, Vice Chair Weyer, Floor Leader Cordero, and Members of the Council,

I, Jordan Yoshimoto, from Ewa, Oahu strongly oppose the building of Hale o Līpoa altogether, I therefore oppose any and all exemptions for this flawed proposed project. The resolution lists some twenty-five (25) exemptions including everything from not having to pay application and permitting fees to zoning for perimeter and maximum height to development standards. Page 2 of the Resolution states that "the granting of the exemptions is necessary for the timely and successful implementation of the project." Aren't fees and permits and requirements put in place for a reason? These exemptions are deeply concerning and should be opposed by all who care for the ʻāina.

Proposed affordable housing is not an excuse to authorize exemptions that are meant to protect and preserve the sanctity of the ʻāina and safety of residents.

People are fleeing the shoreline on the North shore and you are proposing a building across the street from the shoreline in ʻAiea. No exemptions. No Hale o Līpoa.

Mahalo nui for your serious consideration,

Jordan Yoshimoto

January 28 2025

Resolution 25-26 Committee Report 13 The Hale o Līpoa Affordable Rental Housing Development 201H Project. OPPOSE

Aloha Chair Waters, Vice Chair Weyer, Floor Leader Cordero, and Members of the Council,

I, Bruce Keaulani, from Loko'ia Pa'iau, Oahu strongly oppose the building of Hale o Līpoa altogether, I therefore oppose any and all exemptions for this flawed proposed project. The resolution lists some twenty-five (25) exemptions including everything from not having to pay application and permitting fees to zoning for perimeter and maximum height to development standards. Page 2 of the Resolution states that "the granting of the exemptions is necessary for the timely and successful implementation of the project." Aren't fees and permits and requirements put in place for a reason? These exemptions are deeply concerning and should be opposed by all who care for the 'āina.

Proposed affordable housing is not an excuse to authorize exemptions that are meant to protect and preserve the sanctity of the 'āina and safety of residents.

People are fleeing the shoreline on the North shore and you are proposing a building across the street from the shoreline in 'Aiea. No exemptions. No Hale o Līpoa.

Mahalo nui for your serious consideration,

Bruce Keaulani

January 28 2025

Resolution 25-23 CD1 related to granting a SMA Major permit to 98-150 Līpoa Place. OPPOSE

Aloha Chair Waters, Vice Chair Weyer, Floor Leader Cordero, and Members of the Council,

I am a resident of ʻAiea (or friend of ʻAiea) and I oppose Resolutions 25-23 (CD1) and **25-26** which grant a Special Management Use Major permit and exemptions to a mainland-led speculator to build an 8 story, block long building right across the street from the shoreline, on Līpoa Place. It does NOT require any environmental or cultural studies. This site sits upon the second of three fishponds built by Mōʻī Wahine Kalanimanu'ia, Loko 'Opu. A SMA area is supposed to protect the environment and the people's access to the harbor. This measure completely ignores that and also requires no community benefit. The developers proposal, however, continuously mentions mālama 'āina. A true concern for ʻāina would motivate the developers to complete an EIS and then seek a more appropriate site for their development. Not seek exemptions to rush an already flawed project.

While the building site may appear to have no negative impact on cultural or traditional practice, the construction of this so called affordable housing will destroy all opportunity for the restoration of the Queen's historic fishpond complex (over 30 acres), growth of indigenous limu and restoration of lo'i kalo; a system that fed generations of this community and can do so again.

Of added note, the project's own report finds that the site may experience a potential environmental concern, as it is located in close proximity to a business that uses a large quantity of petroleum projects. It further describes the presence of asbestos and lead paint and recommends a hazardous materials survey prior to demolition. As a matter of caution, given that the site sits over the Waimalu Aquifer, an important water source, approval of the permit before this is done is reckless.

The project site is also noted as being within the area of inundation of the 1% flood and will be well within the 3 and 7 feet rise, within the near future.

A very important flaw in the report says that the closest water source to the property is the Kalauao Stream. In fact, the ʻauwai (ditch) that carries fresh water from Kahuewai (Kalauao Springs/Sumida Watercress Farm) passes parallel to the property, only feet away, and a drainage ditch that carries runoff from the property feeds directly into the ʻauwai and downstream into the harbor.

A statement from the council's website about the swearing in of the City Council at the beginning of 2025 states that "The ceremony symbolizes a continued dedication to public service and incorporating new perspectives into the city's governance." One may ponder what the definition of public service is if the council ignores the will of the people. New perspectives should include a hard look at what worked for this ʻāina and its people in the past. Zealous development is not always the answer.

The community does not want this building on this site. It is too close to the shoreline, in an area that already floods, and will erase all possibility of recreating a space where residents can subsist from the land and build relationships with these sacred spaces and each other. The supporters are campaign donors, unions or outside companies who stand to make millions from this project.

A different site for this project would provide housing AND fishery restoration, instead of burying the opportunity for the community to restore the complex of royal fishponds and revitalize its natural resources. Please vote no to Resolutions 25-23 and 25-26!

Mahalo for your serious consideration of the community's wishes,

Christina R K Agullana

Concerned Citizen and Steward of Loko I'a Pāaiau,

January 28 2025

Resolution 25-26 Committee Report 13 The Hale o Līpoa Affordable Rental Housing Development 201H Project. OPPOSE

Aloha Chair Waters, Vice Chair Weyer, Floor Leader Cordero, and Members of the Council,

I, Christina R K Agullanai, from Loko'ia Pa'iau, Oahu strongly oppose the building of Hale o Līpoa altogether, I therefore oppose any and all exemptions for this flawed proposed project. The resolution lists some twenty-five (25) exemptions including everything from not having to pay application and permitting fees to zoning for perimeter and maximum height to development standards. Page 2 of the Resolution states that "the granting of the exemptions is necessary for the timely and successful implementation of the project." Aren't fees and permits and requirements put in place for a reason? These exemptions are deeply concerning and should be opposed by all who care for the 'āina.

Proposed affordable housing is not an excuse to authorize exemptions that are meant to protect and preserve the sanctity of the 'āina and safety of residents.

People are fleeing the shoreline on the North shore and you are proposing a building across the street from the shoreline in 'Aiea. No exemptions. No Hale o Līpoa.

Mahalo nui for your serious consideration,

Christina R K Agullana

January 28 2025

Resolution 25-26 Committee Report 13 The Hale o Līpoa Affordable Rental Housing Development 201H Project. **OPPOSE**

Aloha Chair Waters, Vice Chair Weyer, Floor Leader Cordero, and Members of the Council,

As I, Emilie Parry from Honolulu, strongly oppose the building of Hale o Līpoa altogether, I therefore oppose any and all exemptions for this flawed proposed project. The resolution lists some twenty-five (25) exemptions including everything from not having to pay application and permitting fees to zoning for perimeter and maximum height to development standards.

Page 2 of the Resolution states that "the granting of the exemptions is necessary for the timely and successful implementation of the project." To bypass fees, permits and regulation requirements is to *compound risks and vulnerabilities for the ecological, cultural and citizen health and safety.*

Proposed affordable housing is not an excuse to authorize exemptions that are meant to protect and preserve the sanctity of the ʻāina and safety of residents.

Affordable and appropriate housing, safely constructed and in resonance with the values and cultures of Native Hawai'i, is possible, but this Hale o Līpoa development project offers none of these criteria, while endangering the wellbeing and safety of those people the proposal is claiming to help.

Due to increasing climate risks and impacts, people are fleeing the shoreline on the North shore and this proposal plans to build across the street from the shoreline in ʻAiea. **No exemptions. No Hale o Līpoa**.

Mahalo nui for your serious consideration,

Emilie Parry

Rootbridge Ecosystems

January 28, 2025

HEALANI
LAND COMPANY INC.

January 28, 2025

Chair Waters and Honorable Members of the Honolulu City Council
530 S. King St.
Honolulu Hale
Honolulu, HI. 96813

RE: Opposition to Resolution 25-26, CD1 Authorizing Exemptions from Certain Requirements Relating to the Hale O Lipoa Affordable Rental Housing Development Project in Aiea O'ahu

Aloha Chair Waters and Honorable Members of the Honolulu City Council.

Mahalo nui loa for the opportunity to enlighten the Council on a matter of great concern to Malama Pa'akea o Waimalu and the community we reside in. Our organization continues to partner with Loko I'a Pā'aiau, on the continued restoration of our culturally significant sacred spaces and urge the Department to defer the requested exemptions from certain requirements relating to the Hale Lipoa affordable rental housing development project which is before you, today, until required assessments can be performed to better understand the long term impacts of these requested changes.

On December 31, 2024 a request was submitted by Dawn Takeuchi Apuna the Director of the Department of Planning and Permitting (DPP), to grant several exemptions for the Hale o Lipoa development project.

HRS Chapter 343
This request is to exempt the development from required environmental documentation requirements. Within the Environmental Assessment completed in May 2024 and published by the State Office of Planning and Sustainable Development, it is documented by Keala Pono Architectural Consulting that "…it (the project) has the potential to affect natural and cultural resources located within and adjacent to the project, as well as affect natural and cultural resources in the area. Awareness of this should be at the forefront to prevent any adverse effects from occurring as a result of this development. Impacts identified by interviewees focused on those related to fresh water resources, impacts to lo'I kalo and farming, limu, and interference with the stream…". It goes on to state "The applicant will work with community-based organization, such as the Aiea Community Association, neighborhood board, Ali'i Hawaiian Civic Club, among others, to facilitate outreach…". As there is the potential for adverse affects to the surrounding community especially fresh water resources, it would seem to warrant further assessment.

Even within the report submitted by the Department of Planning and Permitting (File No. 2024/SMA-86(ST)), it is stated under section B. Historic and Cultural Resources: "Previous archaeological studies within one kilometer of the Project have revealed Lo'I deposits (State

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Inventory of Historic Places [SIHP] 50-80-09-7150), an OR&L remnant (SIHP 50-80-12-9714), two historic drainage culverts (SIHP 50-80-09-7567), and Loko Opu fish pond (SIHP 50-80-09-109)." The identified artifacts seem to qualify this as an "environmentally sensitive area" and would require further investigation to better understand any long term impacts.

The ecosystem that once comprised Queen Kalanimanu'ia's three royal ponds, Loko I'a Pā'aiau, Loko 'Opu (project site), and Loko Pa'akea is a treasure that can be restored, in the same way that the royal fishpond known as Mokuhinia and its sacred island, Mokuola, in Lahaina, are being championed by Governor Green and Native Hawaiian leaders, in the post-fire restoration plans. Awarding of the SMA Permit – Major, to a structure that resembles the chunky architecture and bulk of the Waiau Power Plant, in an area of such historic and ecological importance, would destroy any opportunity for future generations to experience the innovative technology that Native Hawaiian fishponds represent, both in terms of food sustainability, traditional ecological knowledge, rising tides and climate resilience. It would further ignore Section 219.100-2, relating to TOD Neighborhood Plans, as approved by the City Council, to ensure the protection, preservation and recognition of traditional Hawaiian cultural properties in the area. In addition, the Primary Urban Center Development Plan lists 12 guiding principles including: 11. Care for our Island Heritage: Respect Native Hawaiian culture and knowledge and celebrate the rich cultural diversity for the PUC. Build upon the unique history, landmarks, and natural environment of the PUC and preserve it for future generations.

Of added concern, the project's own environmental report finds that the site may experience a potential environmental concern, as it is located in close proximity to a business that uses a large quantity of petroleum projects. It further describes the presence of asbestos and lead paint on the site and recommends a hazardous materials survey prior to demolition. For all these reasons, we are requesting further environmental studies be required to understand the full potential impacts.

Besides the obvious environmental challenges that should be remedied by robust investigation, above and beyond a Phase 1 study, given the Special Management Area status, the project also fails to demonstrate that it will be a truly affordable housing project (100% low income ideal), since funding has not yet been obtained. The project requests an exemption from providing a community benefit while asking for increased height and FAR based on it providing affordable housing. It should be documented as part of the resolution that IF the developer does not qualify for either affordable housing scenario (LITEC or RHRF), they will need to resubmit for exemptions and approvals.

<u>Aiea-Pearl City Transit Oriented Development Special District</u>
There is a comment in the request B.3 that is in response to community concerns to maintain the historic character of Kalauao and its historic lowland agricultural and subsistence farming along the shoreline:

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> The community has expressed concerns about maintaining the historic character of Kalauao and its historic lowland agricultural and subsistence farming along the shoreline. The general theme in the Kalauao (Pearlridge) Station Area Plan of connectivity of parks and open space with the PHHT in the lower areas should provide more importance to the recognition of former fishpond and cultural heritage associated with the Kalauoa Spring and Stream. The Applicant has committed to a building design that maximizes the catalytic nature of redeveloping this older apartment neighborhood close to the transit station (Exhibits A and B) while insisting that its careful foundation construction and adherence to short and long-term drainage and storm water management and control, will not negatively impact either groundwater or nearby surface water sources used for fishpond and wetland restoration efforts.

The developer insists its careful foundation construction and adherence to short and long-term drainage and storm water management and control, will not negatively impact either groundwater or nearby surface water sources used for fishpond and wetland restoration efforts. How does the developer intend to insure this when the plans haven't even been shared to be able to assess its impacts? How would the developer propose to rectify any negative impacts imposed by this project? Shouldn't we all have learned from the fiasco at Red Hill and its irreparable damage done to our aquifer and fresh water accessibility? No amount of money can repair a potential crack in the lens of the aquifer, penetration and pollution of the underground fresh water system, as well as burying native Hawaiian artifacts and historic sites forever.

Health, Safety, and Infrastructure

We are deeply concerned that the Board of Water Supply's Primary Urban Center Watershed Management Plan is being wholly disregarded. Even though there are areas in the community that are more ideal for such a project and would likely not generate community opposition, such as at the Old Kamehameha Swap Meet Site, the project insists that the site is the best alternative and, consequently, fails to: 1) Promote sustainable watersheds; 2) Protect and enhance water quality and quantity; 3) Protect Native Hawaiian rights and traditional and customary practices; and, 4) Facilitate public participation, and education. At a time when the wells in the area have been shut, possibly permanently, even the BWS is not guaranteeing that there will be sufficient water for the project, as it calls for a review at the time of permitting.

For reference, a 2007 Central Oahu Watershed Study (HBWS (Honolulu Board of Water Supply). (2007). Central Oahu Watershed Study, Final Report. Prepared by Oceanit, Townscape, Inc., Eugene Dashiell), commissioned by the Honolulu Board of Water Supply, the USACE, and the City and County of Honolulu Department of Environmental Services, includes an overview of the Kalauao Stream watershed and detailed descriptions of the watershed conditions. Relevant sections on Kalauao watershed (ahupua'a) conditions including climate, soils, hydrogeology, ground water, surface water, flooding and drainage patterns, nearshore

waters, terrestrial ecosystems, traditional and customary rights and practices, and settlement history are described and relevant sections summarized below. The study also includes a lengthy chapter on water use, as that was a large driver for the study, as well as a chapter on projects and programs (HBWS 2007). Relevant to the Loko I'a Pā'aiau project, the study describes projects and programs suggested to address identified watershed issues. A number of program or project priorities identified in the study, including fishpond restoration, wetland restoration and protection, and ecological restoration in Pearl Harbor, are specifically targeted by the proposed actions at Loko I'a Pā'aiau and Pa'akea.

Groundwater

Groundwater is water that flows or seeps downward and saturates soil or rock, supplying springs and wells. Groundwater is used for water consumption, agricultural irrigation, and industrial applications. Groundwater properties are often described in terms of depth to aquifer, aquifer or well capacity, water quality, and surrounding geologic composition. Sole-source aquifer designation provides limited protection of groundwater resources that serve as drinking water supplies. Groundwater provides essentially all municipal, military, and diversified agricultural uses in Central O'ahu (HBWS 2007).

Although they are surrounded by seawater, the Hawaiian Islands are underlain by large quantities of fresh groundwater, which are the result of the large mountainous island landmasses causing orographic rainfall (rain that is produced from the lifting of moist air over a mountain). The rainfall recharges Oahu at an average rate of 23.3 inches per year, with the spatial distribution of recharge mimicking the spatial distribution of the precipitation. The permeable soils and rocks that compose the uplands allow easy infiltration of the abundant rainfall to accumulate as fresh groundwater. These geologic conditions allow for the subsurface movement of water with low-permeability geologic features impounding large amounts of water in the thick groundwater reservoirs.

Five large springs heavily influence the stream flows into Pearl Harbor: Kalauao, Waiau, Waimanu, Waiawa, and Waikele. These springs are located along the shoreline and are considered the largest and most significant spring complex in the Hawaiian Islands. The largest spring is the Waimanu-Waiau Spring, which drains into East Loch and has a median flow of 32 mgd. The springs issue from points along the edge of the upper confining member of the aquifer and represent overflow of the artesian basin rather than artesian springs.

Groundwater that accumulates in high rainfall regions in higher elevations of Central Oahu is considered superb in quality and needs no treatment before being used as drinking water (HBWS 2007). The quality of groundwater as it reaches urbanized areas is affected by the

introduction of dissolved matter generated by surface activities and the intrusion of saltwater into basal lenses due to freshwater withdrawal. Historically, the infiltration of rainfall and irrigation return water replenished groundwater reserves, but brought with it the additional fertilizers, salts, pesticides, and residues resistant to breakdown in the soil column. (HBWS 2007). In areas once fed primarily by irrigation, such as areas above the Ewa caprock Aquifer System Area, the lost input of freshwater has contributed to reduced sustainable yield and increased saltwater intrusion.

Pearl Harbor receives freshwater input from the Waimalu, Waipahu-Waiawa, and Pearl Harbor aquifer systems. The aquifers of Oahu contain two flow regimes: shallow freshwater and deep saltwater. The freshwater floats on underlying saltwater in a condition of buoyant displacement (Hunt 1996). The freshwater in the basalt aquifer floats on top of the denser saltwater at depths of up to 900 feet. The movement of groundwater is controlled by bedrock fractures and local hydrologic conditions that influence the supply and distribution of water. In the Ko'olau Range, the hydraulic gradient in the basin was found to be from 1.2 to 3 feet per mile. The Pearl Harbor area is underlain by two aquifers: a sedimentary caprock aquifer and a basaltic aquifer. Sedimentary caprock is typically composed of fine-grained sediment and lies atop an unconfined aquifer in which water moves downward to the zone of saturation (i.e., water table). The caprock is underlain by an impermeable stratum that overlies and confines the basaltic aquifer. Contaminants have a potential migration pathway, because overlying basalts and soils are highly permeable, except in areas overlain by sedimentary caprock (Grovhoug 1992). Groundwater also saturates sediments on coastal plains, particularly layers of limestone.

The thickness of the unconsolidated caprock aquifer is unknown at the Loko I'a Pā'aiau site. It is anticipated that the capstone aquifer in the Loko I'a Pā'aiau and adjacent area is saturated with freshwater from precipitation and potentially with groundwater discharging from the underlying basalt. The water table is anticipated to be 6 to 18 inches below land surface (NRCS 2023). Most of the groundwater in the capstone aquifer at the I'a Pā'aiau site is discharging to Pearl Harbor; however, this subsea discharge could be affected by nearby pumping wells.

Near the Loko I'a Pā'aiau site are several up-gradient supply wells. An agricultural supply well is just north of the area, less than a mile away. Northwest of the area, multiple municipal wells are located along Kalauao Stream. A few of these wells are about a mile away, while most on Kalauao Stream are about 1.5 miles. Some of these wells withdraw up to 13.4 mgd of groundwater.

These areas are near to the project site.

HEALANI
LAND COMPANY INC.

A very important error in the report says that the closest water source to the property is the Kalauao Stream. In fact, the ‘auwai (ditch) that carries fresh water from Kahuewai (Kalauao Springs/Sumida Watercress Farm) passes parallel to the property, only feet away, and a drainage ditch that carries runoff from the property feeds directly into the ‘auwai and downstream into the harbor.

The fact that the name of the project, Hale O Līpoa echoes the abundance of the highly prized seaweed that once grew in the nearshore waters, justifies the wisdom of requiring studies, to ensure that the project will not have any adverse impact upon the water fronting the project, Loko I’a Pā'aiau, or even Loko I’a Pa’akea, to the west of the project.

We implore you to pause to assess the potential long term impact this development will have on our community.

Mahalo for your time and thoughtful consideration.

Sincerely,

Stacy Chong
CEO and President
Healani Land Company

Resolution 25-26 Committee Report 13 The Hale o Līpoa Affordable Rental Housing Development 201H Project. OPPOSE

Aloha Chair Waters, Vice Chair Weyer, Floor Leader Cordero, and Members of the Council,

I, Nick AGullana from Kailua, Oahu strongly oppose the building of Hale o Līpoa altogether, I therefore oppose any and all exemptions for this flawed proposed project. The resolution lists some twenty-five (25) exemptions including everything from not having to pay application and permitting fees to zoning for perimeter and maximum height to development standards. Page 2 of the Resolution states that "the granting of the exemptions is necessary for the timely and successful implementation of the project." Aren't fees and permits and requirements put in place for a reason? These exemptions are deeply concerning and should be opposed by all who care for the ʻāina.

Proposed affordable housing is not an excuse to authorize exemptions that are meant to protect and preserve the sanctity of the ʻāina and safety of residents.

People are fleeing the shoreline on the North shore and you are proposing a building across the street from the shoreline in ʻAiea. No exemptions. No Hale o Līpoa.

Mahalo nui for your serious consideration,

Nick Agullana

January 28 2025

Resolution 25-26 Committee Report 13 The Hale o Līpoa Affordable Rental Housing Development 201H Project. OPPOSE

Aloha Chair Waters, Vice Chair Weyer, Floor Leader Cordero, and Members of the Council,

I, Nick Agullana, from Mililani, Oahu strongly oppose the building of Hale o Līpoa altogether, I therefore oppose any and all exemptions for this flawed proposed project. The resolution lists some twenty-five (25) exemptions including everything from not having to pay application and permitting fees to zoning for perimeter and maximum height to development standards. Page 2 of the Resolution states that "the granting of the exemptions is necessary for the timely and successful implementation of the project." Aren't fees and permits and requirements put in place for a reason? These exemptions are deeply concerning and should be opposed by all who care for the ʻāina.

Proposed affordable housing is not an excuse to authorize exemptions that are meant to protect and preserve the sanctity of the ʻāina and safety of residents.

People are fleeing the shoreline on the North shore and you are proposing a building across the street from the shoreline in ʻAiea. No exemptions. No Hale o Līpoa.

Mahalo nui for your serious consideration,

Nick Agullana

January 28 2025

January 28, 2025

Aloha Chair Waters and Honorable Members of the Honolulu City Council,

I am writing to **strongly oppose Resolution 25-23 and Resolution 25-26** and the granting of a Special Management Area Major Permit for the proposed affordable housing project on **Lipoa Place**.

While I fully support the need for more **affordable housing**, I cannot support this particular project. It fails to address the **significant cultural and environmental impacts** of building on a site that is home to one of the **three royal fishponds of ʻEwa**. This land, historically tied to **Queen Kalanimauia** and the ancient fishpond **Loko ʻOpu**, is of immense cultural value and should be preserved, not developed.

The recent devastation in Lahaina from the wildfires underscores the critical importance of understanding and protecting Hawaiʻi's **natural and cultural landscapes**, especially **wai (water) systems** like fishponds that are vital to our ecosystem. The destruction in Lahaina, in part due to the loss of wetlands and fishponds, serves as a stark reminder of the shortsightedness of disregarding these important sites. With the threats of **climate change** and **rising sea levels**, this area is particularly vulnerable and must be preserved for the benefit of **future generations**, or our **keiki**.

Why is this project being considered for **exemption** from the normal policies that protect our **aina**? Have all **potential conflicts of interest** been fully reviewed and disclosed?

Given the historical and environmental significance of this land, a **full Environmental Impact Statement (EIS)** must be conducted to assess all potential impacts thoroughly before any development moves forward.

We need to **value the land**, respect its cultural history, and ensure its protection for our children's future. Please **deny this resolution** and require the developer to undertake a comprehensive **EIS**.

Thank you for your time and consideration.

Mahalo,

Nicole Matsumoto

Kehaulani Lum
Ali'i Pauahi Hawaiian Civic Club
99-045 Nalopaka Place, 'Aiea, Hawai'i 96701
allipauahi@gmail.com

January 28, 2025

The Honorable Councilmember Tommy Waters, Chair
The Honorable Matt Weyer, Vice Chair
Honolulu City Council Members
City Council Chamber

Re: Opposing Resolutions 25-23 CD1 and 25 - 26 CD1 relating to granting a SMA Major Permit to 98-150 Lipoa Place. Hearing: Wednesday, January 29, 2025, 10:00 a.m.

Rendering of Proposed Hale O Lipoa Project





1920 Aerial view of project site (large pond at bottom of photo)

Aloha Chair Waters, Vice Chair Weyer, and Distinguished Members of the Council,

Mahalo nui loa for the opportunity to appear in person today. It is with a heavy heart that I bring forth Ali'i Pauahi Hawaiian Civic Club's (APHCC) **opposition** to Resolution 25-23 CD1 and, by extension, Resolution 25-26 CD1, as we believe that the site of Loko I'a 'Opu, the 10.5 acre royal fishpond attributed to Queen Kalanimanu'ia, the grandmother of Kakuhihewa, is not the right space for such a massive development.

For over 400 years, the area fed our ancestors, until it was disrupted by greed, plantation fill, water diversion, and post-World War II low-rise urbanization. Contrary to the statement that it is not part of the shoreline, beneath its acre of fill lies the remnants of a once-thriving coral bed and pond. The waters from upland springs still flow alongside and beneath it. Native birds fly from the ocean to uplands above it. Kalanimanu'ia's home and pond, Loko I'a Pā'aiau, is located just beyond the proposed building, in the photo provided. The harbor of Pu'uloa, is just makai. One cannot say that this is not in a coastal area with any degree of truth. The building's very name, referencing the prized līpoa seaweed that once proliferated in the surrounding waters, announces it.

Ali'i Pauahi Hawaiian Civic Club was one of only two community participants at the applicant's first public engagement session and was present when it appeared before the 'Aiea Community Association. We have never received a response to our requests from the project proponents.

We oppose the resolutions because we believe that the project is flawed, short-sighted, a potential waste of government funds, a visual, ecological and environmental blight, and because there are other sites where a true affordable housing project can be built within the community. We urge the Council to create a real beacon of affordable housing on safe mauka lands; not on that which the community, State, County, and Federal Governments envisioned decades ago as a coastal protection zone to "preserve, protect, develop, and where possible, restore and enhance the nation's coastal zone resources….". Also, to reflect upon the fact that 'Aiea will soon become home to thousands of affordable housing units, over the next twenty years, as the stadium is developed.

APHCC is a 50+year-chartered member of the Association of Hawaiian Civic Clubs. Headquartered only a mile away from the site in question, we sit on the board of the 'Aiea Community Association, which, after nearly 30 years of effort, successfully championed the current building of 146 affordable housing units for kūpuna on the former 'Aiea Sugar Mill site. Six years ago, we helped convince the City to not sell the parcel to the State for another use, and, instead, to release the RFP for Aloha Ia o Halewiliko. This is a community-visioned project, filled with the perseverance and aloha of its beloved members.

In 2015, we were one of only two active civic club representatives to advocate for increased rental housing trust funds (a $40,000,000 infusion). We also sat on the Legislative Working Group which identified a traditional Hawaiian living space, called, "Kauhale," as a model plan for our indigenous community. And, we were invited by the City to speak in support of ADUs, as a means to nurture 'ohana, especially for our kūpuna.

I offer this ho'olauna because I want you to know that we are kindred spirits, when it comes to identifying real solutions to creating truly affordable housing. We support permanent affordable housing that is safe, of high quality, loving and built in the proper place.

At the same time, our kupuna left us a mission which compels our kuleana as mālama 'āina stewards, through which we honor ecological and cultural harmony and look to our ancestors for guidance, in the 'olelo no'eau: "**He Ali'i ka 'āina, he kauwa ke kanaka. Land is the chief, the human being is the servant."**

We echo the testimony of the 'Aiea Community Association, which first inspired our community to restore our Ali'i's fishpond legacy. We oppose this project which will be built on one of the most significant historic sites on our island, yet to be archaeologically lifted, as the pond built by

Kalanimanu'ia, O'ahu's highest sovereign who was born at Kūkaniloko and ruled during the time of Machu Picchu, in peace, abundance and no war.

Individually, the site may appear to untrained eyes to have no adverse impact on cultural or traditional practice. But, through the lens of the SMA, the cumulative effect of its construction will destroy all opportunity for the restoration of the Queen's historic fishpond complex (over 30 acres) and the traditional ecological system surrounding it that fed our ancestors for generations and, as the oceans rise, can do so again. Only steps away from its projected front door, the harbor is being cleansed of 80 years of detritus. This new structure cannot be built without impaling the depths of the water system 90' below and injecting cement and fill that does not currently exist nor belong there.

As a lineal descendant of the last konohiki of 'Aiea and Kapakule, the fishing shrine at the entrance to Pu'uloa, I have been blessed to continue the practice of raising a child in a multi-generational kauhale, on ʻāina that fed our ancestors for hundreds of years and which we pray will continue to survive amidst the feverish pace of overdevelopment today.

I am also the head of an organization created by graduates of The Kamehameha Schools that has contributed to the well-being of our ʻāina, through over a decade of resources and labor, alongside thousands of members of the community and the U.S.Navy, to transform the health and safety of Pearl Harbor and its shoreline fisheries, especially, Loko I'a Pā'aiau, on the Kalauao Stream, only steps from the proposed project.

Contrary to the findings of DPP and the Committee, the proposed project does **not** satisfy this, nor, does it comply with SMA guidelines that must be achieved before a SMA Major permit can be approved, including: **1)** mitigation measures; **2)** preservation of important archaeological sites (Loko 'Opu, the 10-acre "great" fishpond attributed by Kamehameha Schools' to O'ahu's most Kapu sovereign, Queen Kalanimanu'ia - the grandmother of Kakuhihewa) see: https://www.ksbe.edu/assets/site/special_section/regions/ewa/Halau_o_Puuloa_Kalauao.pdf), as well as the waters that flow from the nearby Kahuewai Spring waters into the Pearl Harbor National Historic Site; **3)** building height restrictions; and, **4)** drainage improvements to mitigate flooding or to control siltation in coastal waters (especially, increased fill which may already be susceptible to tidal rise).

Of added note, the project's own report finds that the site may experience a potential environmental concern, as it is located in close proximity to a business that uses a large quantity of petroleum projects. It further describes the presence of asbestos and lead paint on the site and recommends a hazardous materials survey prior to demolition. As a matter of caution, given that the site sits over

the Waimalu Aquifer and an important water source, it is reckless for a permit to be given, before this is conducted.

The project site is also noted as being within the area of inundation of the 1% flood and will be well within the 3 and 7 feet rise, within the near future. Moreover, it sits in the highest risk red zone for wildfire, identical to that of Lahaina.

A very important flaw in the report says that the closest water source to the property is the Kalauao Stream. In fact, the ‘auwai (ditch) that carries fresh water from Kahuewai (Kalauao Springs/Sumida Watercress Farm) passes parallel to the property, only feet away, and a drainage ditch that carries runoff from the site feeds directly into the ‘auwai and downstream into the harbor.

The fact that the name of the project, Hale O Līpoa echoes the abundance of the highly prized and fragrant seaweed that once grew in the nearshore waters, justifies the wisdom of requiring studies, to ensure that the project will not have any adverse impact upon the waters alongside, in front of and below, as well as Loko I’a Pā'aiau and Loko I’a Pa’akea, to the west of the project.

Despite several attempts to urge a more robust and pono study on the potential adverse impacts upon the waters of Pu’uloa that the community has been cleaning for over a decade, we have received no communication from the Developer nor its representatives, in response. Instead, the project has moved zealously ahead, with indifference. This is not a sign of a sincere interest in engaging with the community; something that its report says that it will do as a mitigation action.

The ecosystem that once comprised Queen Kalanimanu’ia’s three royal ponds, Loko I’a Pā'aiau, Loko ‘Opu (project site), and Loko Pa’akea is a treasure that can be restored, in the same way that the royal fishpond known as Mokuhinia, in Lahaina, is being championed by Governor Green and Native Hawaiian leaders, in the post-fire restoration plans. Indeed, Kalauao and Lahaina are closely related, as Kalanimanu’ia and Pi’ilani, the chief of Maui, were first cousins who managed and built fishponds in the same generation.

Awarding of the SMA Permit – Major, to a structure that resembles the chunky architecture and bulk of the Waiau Power Plant, in an area of such historic and ecological importance, would destroy any opportunity for future generations to experience the innovative technology that Native Hawaiian fishponds represent, in terms of food sustainability, traditional ecological knowledge, rising tides and climate resilience. It would further ignore Section 219.100-2, relating to TOD Neighborhood Plans, as approved by the City Council, to ensure the protection, preservation and recognition of traditional Hawaiian cultural properties in the area.

As stewards who have succeeded in encouraging the return of dozens of endangered species to the nearshore area fronting the project site, proving the wisdom and efficiency of restoration over speculation, we are deeply concerned that the Board of Water Supply's Primary Urban Center Watershed Management Plan is being wholly disregarded. Even though there are areas in the community that are more ideal for such a project, including thousands of new homes to be built on the Aloha Stadium site, the project insists that this is the best alternative and, consequently, fails to: 1) Promote sustainable watersheds; 2) Protect and enhance water quality and quantity; 3) Protect Native Hawaiian rights and traditional and customary practices; and, 4) Facilitate public participation and education.

At a time when the wells in the area have been shut, possibly permanently, even the BWS is not guaranteeing that there will be sufficient water for the project, as it calls for a review at the time of permitting.

For reference, a 2007 Central Oahu Watershed Study (HBWS (Honolulu Board of Water Supply). (2007). Central Oahu Watershed Study, Final Report. Prepared by Oceanit, Townscape, Inc., Eugene Dashiell), commissioned by the Honolulu Board of Water Supply, the USACE, and the City and County of Honolulu Department of Environmental Services, includes an overview of the Kalauao Stream watershed and detailed descriptions of the watershed conditions. Relevant sections on Kalauao watershed (ahupua'a) conditions including climate, soils, hydrogeology, ground water, surface water, flooding and drainage patterns, nearshore waters, terrestrial ecosystems, traditional and customary rights and practices, and settlement history are described and relevant sections summarized below. The study also includes a lengthy chapter on water use, as that was a large driver for the study, as well as a chapter on projects and programs (HBWS 2007). Relevant to the Loko I'a Pā'aiau project, the study describes projects and programs suggested to address identified watershed issues. A number of program or project priorities identified in the study, including fishpond restoration, wetland restoration and protection, and ecological restoration in Pearl Harbor, are specifically targeted by the proposed actions at Loko I'a Pā'aiau.

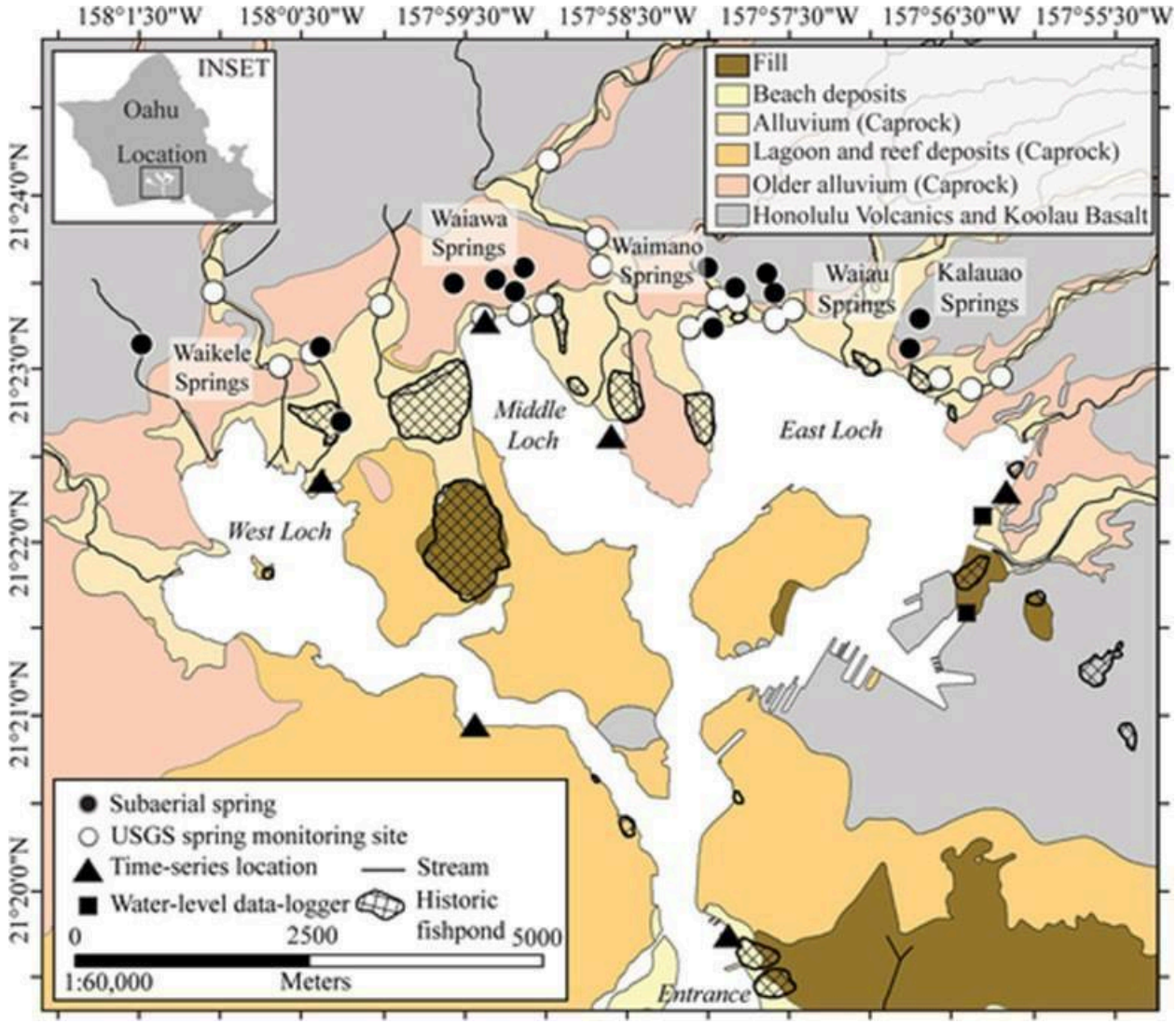
While the HBWS study is somewhat dated, it still highlights the long-standing and on-going need for comprehensive actions to address excess sediment from upland sources affecting Central Oahu streams (such as Kalauao Stream) and Pearl Harbor, to improve land management practices and sediment control for the purposes of improving water quality. The watershed study included six separate programs with recommendations needed to address gaps and begin to rectify the terrestrial-sourced sediment issue:

- A sediment source study and analysis to identify the courses and volumes of sediment polluting Pearl Harbor and freshwater tributary streams

- Stream erosion and sediment control to address sedimentation as a major non-point source of contamination of stream deltas and Pearl Harbor waters, risk to aquatic life including food chain and bioaccumulation issues, and reduced flood capacity
- Best management practices (BMPs) to reduce erosion and stormwater impacts on surface water quality
- Total Maximum Daily Load allocation modeling to address complex water quality management problems of toxic contaminants, sediments, and nutrients produced at point and nonpoint sources
- Stream habitat restoration to address degraded native habitats from water pollution, invasive species introduction, and channelization and riparian zone modifications that threaten native stream fauna, including turbidity and trash, as well as other parameters that impact water quality and have a direct correlation to the health of aquatic species
- Riparian buffer zones, to increase vegetated cover and functions in the many areas with limited or no vegetation, leaving the streams at risk to increased sediment loading, increased temperatures, decreased water quality and reduced ability to attenuate flood waters

The list above points to a large-scale and systemic problem with upland sources of excess sediment impacting aquatic resources throughout the Central Oahu watershed and Pearl Harbor. As one example, multiple acres and tens of thousands of cubic yards of accumulated trash and debris-laden sediment has built up along the East Loch shoreline and at the mouth of Kalauao Stream in the vicinity of the project area and Loko I'a Pā'aiau. The programs noted above provide solid evidence of a high-priority problem affecting marine life (especially sedentary species) (and human life), smothering estuarine habitats, degrading water quality, and increasing the risk of sediment delivered pesticides, toxins, bacteria, heavy metals, excess nutrients, and pathogens to the habitats of threatened and endangered birds and other native fauna.

Geologic Setting



Pearl Harbor geological setting. Source: Kelly et al. 2018

Pearl Harbor is at the base of the Ko'olau volcanic mountain range. This range is the remnant of the Koolau shield volcano, which along with the remnant of the Waianae volcano, form the island of Oahu. The Koolau formation is composed almost exclusively of highly heterogeneous basaltic lava flows. Loko I'a Pā'aiau is mapped in an alluvial geologic unit ("Qa") defined as poorly sorted sand and gravel alluvium of the Koolau volcano, as depicted below (Kelly et al. 2018). These unconsolidated surficial deposits are from the Holocene and Pleistocene periods, and along with marine sediment and reef limestone deposits interspersed with volcanic tuff, form a wedge up to 1,000 feet thick in places, commonly referred to as caprock. The caprock overlies the lava flows of the basaltic aquifer near the coast. Caprock typically has a lower conductivity than the basaltic rocks and confines the underlaying

basal aquifer, impeding the natural coastal discharge of groundwater from the basalt, allowing groundwater storage in the volcanic aquifers to be greater than it would be without the caprock. Much of Oahu's extensive groundwater resources are the result of the island's well-developed coastal-plain caprock (USGS 2020).

Waters

Estuarine Waters

Isolation from oceanic currents and tides means that Pearl Harbor water quality is mostly influenced by both natural and human-made sources on land, including several freshwater springs, streams, storm drains, and watersheds (USACE 2022). The water of Pearl Harbor has always been relatively turbid from stream runoff and other sources of sediment; however, runoff-related sedimentation increased dramatically in the nineteenth century with deforestation, ranching and grazing of hillsides, declining use of taro ponds—which acted to retain stormwater, and development of sugarcane cultivation (Coles et al. 1997).

Streams

Stream flow contributes 31 million gallons per day (mgd) of freshwater into Pearl Harbor during dry periods and 87 mgd during wet periods (DoN 2011). Approximately 40 percent of the stream runoff entering Pearl Harbor enters Middle Loch, another 40 percent enters West Loch, and 20 percent enters East Loch, where the project is sited. Seven perennial (Waikele, Waiawa, Waiau, Waimalu, Kalauao, Halawa, Kapakahi) and two intermittent (Honouliuli, Aiea) streams flow into Pearl Harbor and drain about two-thirds of the watershed area. In the Central Oahu Watershed, only the streams with headwaters in the Ko'olau Range or fed by basal springs are perennial. The National Wetland Database lists 12.3 miles of intermittent, 5 miles of non- perennial, and 10.5 miles of perennial streams in the watershed. These perennial and intermittent streams drain agricultural and urban lands before passing through highly urbanized lands near the harbor. Stream water is fresh up until a short distance upstream from the mouth of the streams where they enter the saline waters of the estuary. High flood peaks and low base flow above the areas of spring influence Pearl Harbor streams (DoN 2011). Additional intermittent freshwater input comes from point and nonpoint wastewater sources through controlled stormwater infrastructure and uncontrolled urban/terrestrial runoff, respectively. Natural streams in Hawaii are typically short and steep with limited watershed areas (HBWS 2007). This physical aspect combined with intermittent and often intense rainfall patterns tend to make the streams very flash-flood prone. Streams in Hawaii exceed their average flow only about 10 percent of the time. Native Hawaiian stream fauna in perennial interrupted streams rely on the flash flood nature of the flows to migrate up and down the stream for spawning purposes.

Groundwater

Groundwater is water that flows or seeps downward and saturates soil or rock, supplying springs and wells. Groundwater is used for water consumption, agricultural irrigation, and industrial applications. Groundwater properties are often described in terms of depth to aquifer, aquifer or well capacity, water quality, and surrounding geologic composition. Sole-source aquifer designation provides limited protection of groundwater resources that serve as drinking water supplies. Groundwater provides essentially all municipal, military, and diversified agricultural uses in Central O'ahu (HBWS 2007).

Although they are surrounded by seawater, the Hawaiian Islands are underlain by large quantities of fresh groundwater, which are the result of the large mountainous island land masses causing orographic rainfall (rain that is produced from the lifting of moist air over a mountain). The rainfall recharges Oahu at an average rate of 23.3 inches per year, with the spatial distribution of recharge mimicking the spatial distribution of the precipitation. The permeable soils and rocks that compose the uplands allow easy infiltration of the abundant rainfall to accumulate as fresh groundwater. These geologic conditions allow for the subsurface movement of water with low-permeability geologic features impounding large amounts of water in the thick groundwater reservoirs.

Five large springs heavily influence the stream flows into Pearl Harbor: Kalauao, Waiau, Waimanu, Waiawa, and Waikele. These springs are located along the shoreline and are considered the largest and most significant spring complex in the Hawaiian Islands. The largest spring is the Waimanu-Waiau Spring, which drains into East Loch and has a median flow of 32 mgd. The springs issue from points along the edge of the upper confining member of the aquifer and represent overflow of the artesian basin rather than artesian springs.

Groundwater that accumulates in high rainfall regions in higher elevations of Central Oahu is considered superb in quality and needs no treatment before being used as drinking water (HBWS 2007). The quality of groundwater as it reaches urbanized areas is affected by the introduction of dissolved matter generated by surface activities and the intrusion of saltwater into basal lenses due to freshwater withdrawal. Historically, the infiltration of rainfall and irrigation return water replenished groundwater reserves, but brought with it the additional fertilizers, salts, pesticides, and residues resistant to breakdown in the soil column. (HBWS 2007). In areas once fed primarily by irrigation, such as areas above the Ewa caprock Aquifer System Area, the lost input of freshwater has contributed to reduced sustainable yield and increased saltwater intrusion.

Pearl Harbor receives freshwater input from the Waimalu, Waipahu-Waiawa, and Pearl Harbor aquifer systems. The aquifers of Oahu contain two flow regimes: shallow freshwater and deep saltwater. The freshwater floats on underlying saltwater in a condition of buoyant displacement (Hunt 1996). The freshwater in the basalt aquifer floats on top of the denser saltwater at depths of up to 900 feet. The

movement of groundwater is controlled by bedrock fractures and local hydrologic conditions that influence the supply and distribution of water. In the Ko'olau Range, the hydraulic gradient in the basin was found to be from 1.2 to 3 feet per mile. The Pearl Harbor area is underlain by two aquifers: a sedimentary caprock aquifer and a basaltic aquifer. Sedimentary caprock is typically composed of fine-grained sediment and lies atop an unconfined aquifer in which water moves downward to the zone of saturation (i.e., water table). The caprock is underlain by an impermeable stratum that overlies and confines the basaltic aquifer. Contaminants have a potential migration pathway, because overlying basalts and soils are highly permeable, except in areas overlain by sedimentary caprock (Grovhoug 1992). Groundwater also saturates sediments on coastal plains, particularly layers of limestone.

The thickness of the unconsolidated caprock aquifer is unknown at the Loko I'a Pā'aiau site. It is anticipated that the capstone aquifer in the Loko I'a Pā'aiau and adjacent area is saturated with freshwater from precipitation and potentially with groundwater discharging from the underlying basalt. The water table is anticipated to be 6 to 18 inches below land surface (NRCS 2023). Most of the groundwater in the capstone aquifer at the I'a Pā'aiau site is discharging to Pearl Harbor; however, this subsea discharge could be affected by nearby pumping wells.

Near the Loko I'a Pā'aiau site are several up-gradient supply wells. An agricultural supply well is just north of the area, less than a mile away. Northwest of the area, multiple municipal wells are located along Kalauao Stream. A few of these wells are about a mile away, while most on Kalauao Stream are about 1.5 miles. Some of these wells withdraw up to 13.4 mgd of groundwater.

These areas are near to the project site.

Besides the obvious environmental challenges that should be remedied by robust investigation, above and beyond a Phase 1 study, given the SMA status, the project also fails to demonstrate that it will be a truly affordable housing one, **in perpetuity**.

With an amendment that allows it to enter market-rate status five years earlier than required, in 3 generations, the problem that this project purports to address today will no longer be affordable, just as today's keiki reach kupuna age. By then, most of us will be long gone. What kind of ancestors will they think of us then?

When Kalanimanu'ia chose this shoreline upon which to center her fishponds and government, she left a legacy of peace and abundance. The SMA identification is not something that is "nice to have." It is a connection from past to present to future that deserves to be honored. It is a traditional ecological resilience response to the rising waters. It is a way for us to feed ourselves again and release our dependence on foreign imports.

Please do not extinguish our Queen's last light. We have the capacity to create powerful mo'olelo together again, in true lōkahi and aloha, while providing a safe and affordable home for our residents in areas free of flood, inundation and ecological and environmental harm.

Let us, instead, strive to be the benevolent ancestors of the future, whose descendants will be cared for forever.

Me ke aloha pumehana,

Kehaulani Lum
President
Ali'i Pauahi Hawaiian Civic Club

'AIEA COMMUNITY ASSOCIATION

January 26, 2025

The Honorable Tommy Waters
Chair and Presiding Officers and
Councilmembers of The City and County of Honolulu
530 South King Street, Room 202
Honolulu, Hawai'i 96813

Re: In opposition of the proposed Special Management Area (SMA) Major Permit for Lipoa Development LLC referred to as Hale O Lipoa Affordable Multi Family Rental Housing Project.

Dear Chair Waters and Councilmembers:

On behalf of the 'Aiea Community Association (ACA) and the Friends of the Pearl Harbor Historic Trail, we would like to express our opposition to this proposed SMA Major Permit request.

Nearly 30 years ago, the City and County of Honolulu through its administration, Department of Design and Construction and the Department of Planning and Permitting engaged the 'Aiea community to develop the following vehicles to serve as guidelines for future development of 'Aiea: The Pearl Harbor Historic Trail Master Plan (2001, Resolution 03-188), The 'Aiea-Pearl City Livable Communities Plan, (2004, Resolution 05-48 CD1) The 'Aiea Town Center Master Plan (2002) and the 'Aiea-Pearl City Neighborhood TOD Plan (2009-2023).These plans were developed through numerous community outreach meetings. They represent the essence of our 'Aiea community's vision well beyond our lifetime. They are to serve as a historical guide for future development.

The Pearl Harbor Historic Trail (PHHT) was identified and highlighted in the 'Aiea and Pearl City Livable Communities Plan. It was also the vision of Empower O'ahu as an economic engine when the City applied for a HUD Empowerment Zones and Enterprise Communities designation in 2000. The PHHT stretches 18.6 miles from Halawa Landing to Nanakuli links the communities along the west side of O'ahu. The PHHT represents the efforts of a community-based plan to reclaim the shoreline and generate economic pathways into our communities. The Trail is the Pearl Harbor shoreline opportunity to expand recreational opportunities for our communities. It also identifies and attempts to protect the historic and cultural sites of our 'Aiea.

Special Area Plans give communities the opportunity to define the identity, function, organization, and character of their specific neighborhoods in accordance with the general planning framework provided by their area's Development Plan or Sustainable Communities Plan. The proposed Hale O Lipoa does not meet the criteria to demolish 6 - 2 story buildings to replace them with 1- 8 story building with inadequate parking going from 48 units to 153 units on 42,000 square feet of land. The proposed development will consist of 1-to-3-bedroom units with the majority being 2 bedrooms. Currently, they are proposing 147 parking spaces with overflow parking on the streets. The Aiea Neighborhood Board has expressed concern about the

over the lack of even 1 to 1 parking spaces to units. The ANB had further concerns and asked Mr. Keegan Flaherty to return for further dialogue. Mr. Flaherty was invited to the ACA meeting the following week and was not present,

Although an EA was done, such a large and long-term project should require an Environment Impact Statement to fully flush out any environment, cultural and historical issues. For example, it has been presented that the project is not increasing the footprint of the existing buildings. It does however, quadrupling its height. Mr. Flaherty presented that site is 4.5 feet above sea level and they anticipate having to go 50 – 100 feet below grade with their concrete piling to support the height increase. The TOD plan for the area calls for "Medium-density housing makai of Kamehameha Highway, potentially above proposed bus transfer facility." Medium density was defined by DPP as 60 feet.

As a participant of those many hours of community outreach, it was understood that we were not proposing the demolishing of building or areas that did not meet the above-mentioned plans, rather when the opportunity presented itself for redevelopment, especially along the shoreline areas, that the adopted City plans would be the DPP's historical guide of prior work and vision. Deference would be given to creating access and views to water. In addition, the Pearl Harbor Historic Trail emphasizes the important role that water has played in this area, from the ancient Hawaiian fishponds to sugar plantation irrigation to today's military presence in Pearl Harbor. This principle links the station area neighborhoods to nearby streams, springs, wetlands, and shoreline. The Plan promotes creating new public spaces and revitalized neighborhoods along the waterfront as development occurs, enhancing view corridors from mauka areas, and improving the Pearl Harbor Historic Trail.

Specifically, the plans speak to publicly accessible open space with new developments on parcels of 20,000 square feet or larger providing publicly accessible open spaces or contribute an equivalent value toward public park improvements within the station area. We ask that the Council honors the integrity of our 'Aiea community's plans as we have always respected the process from which they were developed.

We invite you to come to the Pearl Harbor shoreline and listen with your natural ears and hear the water that flows beneath these lands. Precious water that our wells have shared with all of Honolulu.

Claire J. Tamamoto

Claire J. Tamamoto
'Aiea Community Association, President
Friends of the Pearl Harbor Historic Trail

Alison Ka`ōlinokaimana Yasuoka-Arakaki
Jason T. Arakaki
Resolution 25-026 : AUTHORIZING EXEMPTIONS FROM CERTAIN REQUIREMENTS RELATING TO THE HALE O LĪPOA AFFORDABLE RENTAL HOUSING DEVELOPMENT PROJECT IN ʻAIEA, OʻAHU.
Position: Oppose

Aloha Chair Waters, Vice Chair Weyer, Floor Leader Cordero, and Members of the Council,

We, Alison Ka`ōlinokaimana Yasuoka-Arakaki & Jason T. Arakaki, strongly oppose the building of Hale o Līpoa altogether. We therefore **oppose any and all exemptions** for this flawed proposed project. The resolution lists some twenty-five (25) exemptions including everything from not having to pay application and permitting fees to zoning for perimeter and maximum height to development standards.

Exhibit A:
(WHEREAS, the City Council ("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 subdivision, development and improvement of land, and the construction of units thereon pursuant to HRS § 46-15.1 and 201 H-38; and)

Page 2 of the Resolution states that "the granting of the exemptions is necessary for the timely and successful implementation of the project." Aren't fees and permits and requirements put in place for a reason?

Proposed affordable housing is not an excuse to authorize exemptions that are meant to protect and preserve the sanctity of the ʻāina and safety of residents.

Other issues with bills like these that uses affordable housing to by-pass much needed guard rails that ensure the protection of communities from overdevelopment, and that protect our historical and cultural sites with required archaeological studies that ensure the preservation of the `āina's unique, and necessary geologic features, and

We must learn from the mistakes of the past.

I was raised in the Waikīkī ahupua`a. Important geologic features–like underground karst were damaged so that important, life-giving pūnāwai, lost its source of water. According to this study by, WILLIAM R. HALLIDAY, on the Mo`ili`ili karst "...karstic dissolution cav- erns, resurgences, and spring-fed ponds have been known from early times." This is one reason why it

is important not to skip over the studies that would examine the pre-existing geologic features and infrastructure of a place prior to construction permits being distributed.

We must learn from the past so that we do make the same mistakes.
At the time, no geologic studies were done, and this was the ending result:

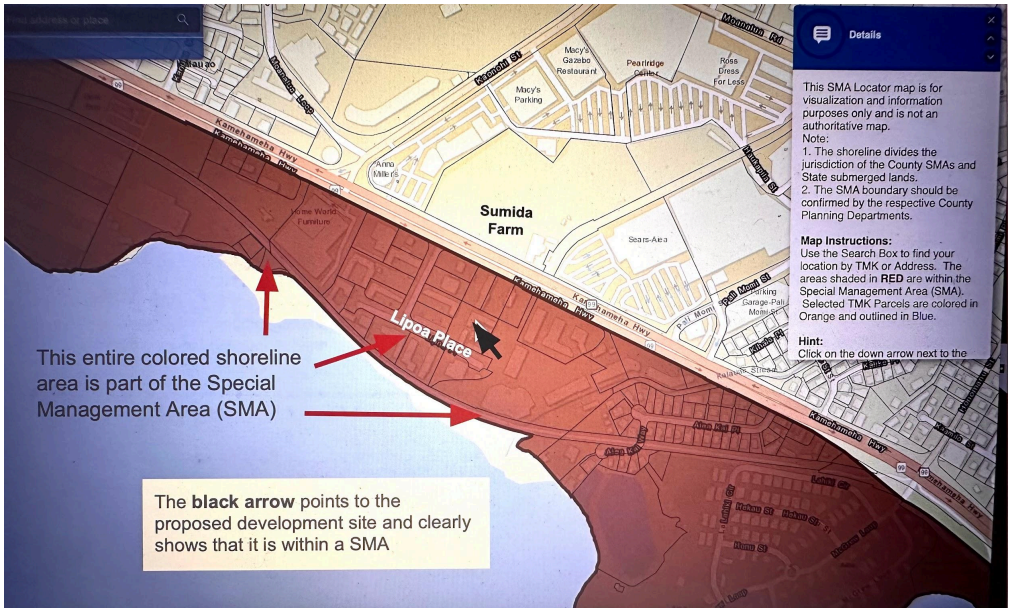
In the autumn of 1934 the karst and its drainage were altered profoundly. Five hundred meters downslope from the King-University intersection, construction activities struck a karstic master conduit -7 m msl. The excavation was 18 m2 and ~8 m deep (Lao n.d.). A "gushing flow" quickly filled it. A telephone pole lowered into the hole found a bottom at -10 m msl (Kunesh 1934). The flow was not recognized as karstic, and was attributed to "a lamina of shallow secondary artesian water" (Honolulu Board of Water Supply 1933-34). For more than four months, an average of 3.8 x 107 L was pumped daily before the hole could be sealed and construction resumed: a total of more than 3.8 x 109 L.

Upslope, the results of this dewatering were dramatic. The Hausten pond disappeared without warning, draining in less than 24 hours. What was described as "a huge outlet" appeared in its bottom, -2 m msl (Kunesh 1934; Wentworth 1953). Some of the famous fish were stranded. Others disap- peared into the conduit system. New sinkholes developed. "People living in the vicinity made their way into the caves through holes in their yards and speared fish by the hundreds" (Williams 1935). Several houses "lurched" and settled. Sidewalks cracked and water and gas mains ruptured. Some trees sank almost 1 m (Kunesh 1934; Lao n.d). No accurate determination of the total economic loss is known, but it must have been considerable.

We must learn from these mistakes and ensure that they do not happen again. There are other nearby sites like the Ka`ōnohi Lo`i Kalo that could be impacted by construction that occurs, and/or a loss of the necessary resources to continue its legacy. What we need to understand is that impact on sites like this, impacts cultural practice, `āina, and the lives of all who visit and learn from the site. It's positive, life-giving reach is far and wide. Rather than take chances on development of a site that will put stress on the existing resources for the communities that already exist in these areas, and could cause irreparable damage.

Let's Examine the Issues with This Proposed Līloa Place Development Project:

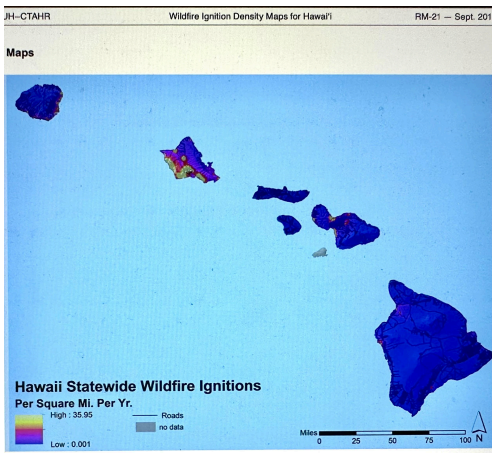
1. Blatant Disregard for Special Management System
A Special Management Area (SMA) "...was established in 1975 under Hawaii Revised Statues, Chapter 205A, Coastal Zone Management. The law states that it's in the public interest to protect and preserve natural resources and public access to the coastal zone through appropriate controls on development." This image shows that the proposed development lies within the SMA.

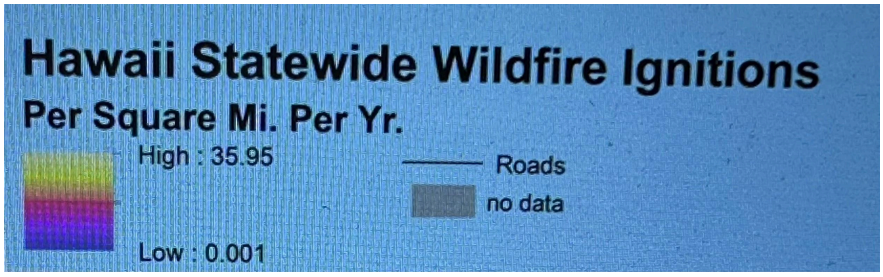


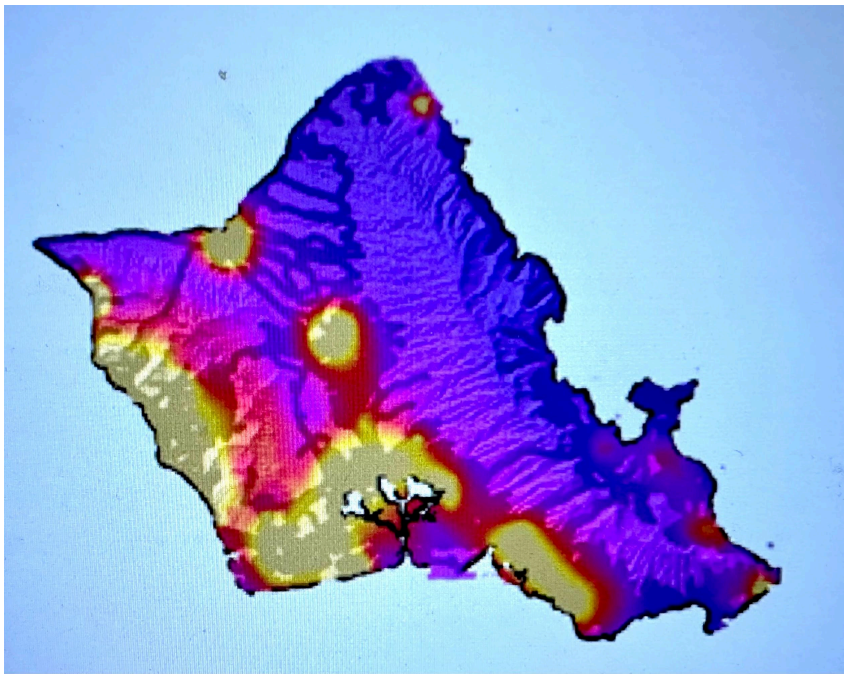
It is obvious that in years past, historically, the SMA was disregarded. However, we live in a time where there is heightened awareness of the importance of actually seeing that these SMA spaces are protected. Rather than grant permits to the developers that would again not adhere to the integrity born within the designated SMA areas, the members of this council can take a different trajectory, and a necessary one. Many within the development industry, and realty industry use `ōlelo Hawai`i, or attempt to add rhetoric to their proposals to make it appear that they are being place conscious and that they are utilizing concepts of mālama `āina within their development proposals, however, as past testimony shows, those who are truly practitioners of aloha and mālama `āina, are having their testimony disregarded, and their voices silenced.

2. Wildfire Ignition Density Maps for Hawai`i (Year 2016)

**Note that climate change has increased these indicators

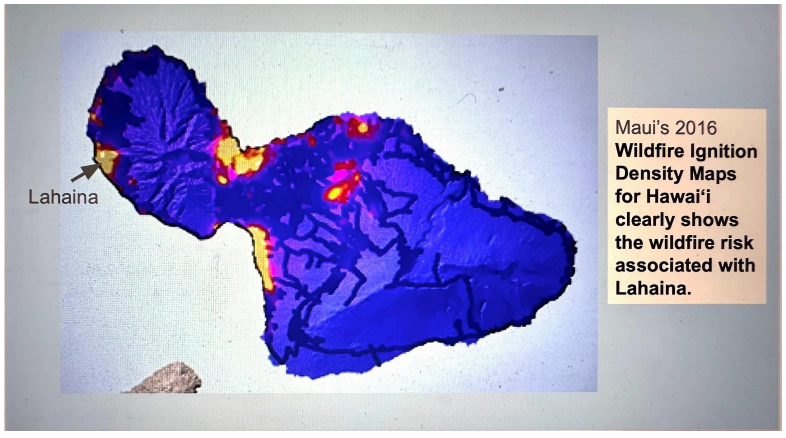






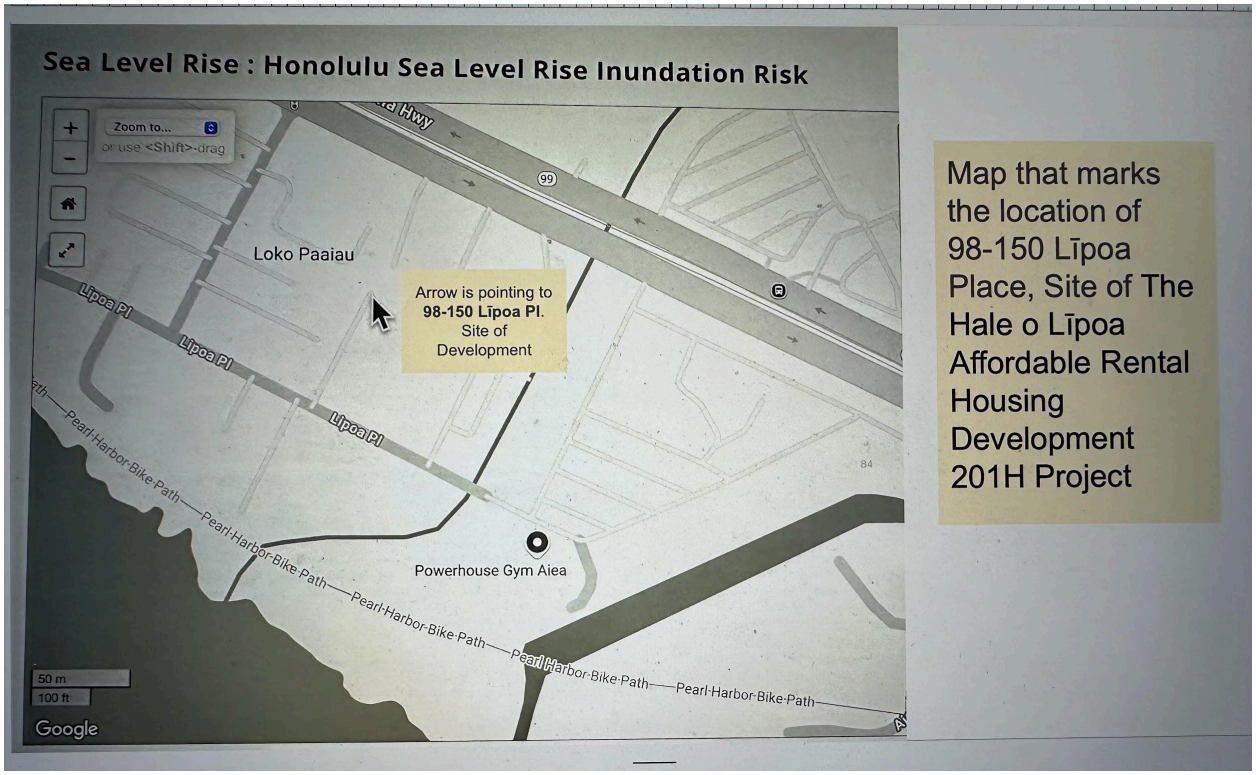
Why we cannot ignore these wildfire maps?

From these 2016 maps, we can look at the island of Maui.

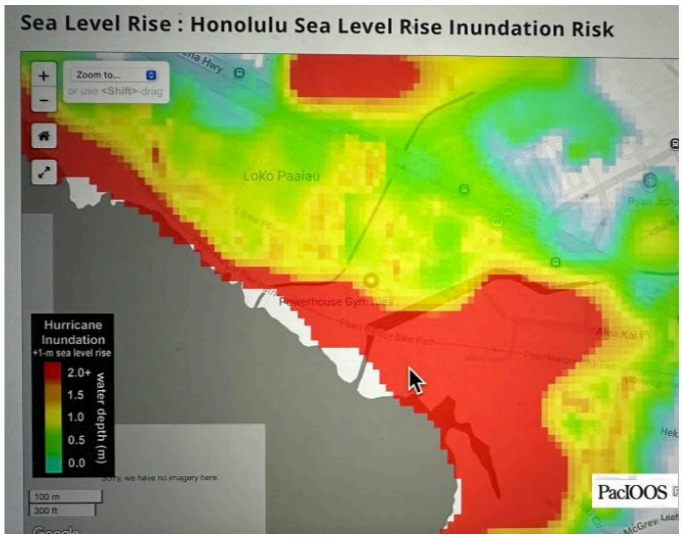


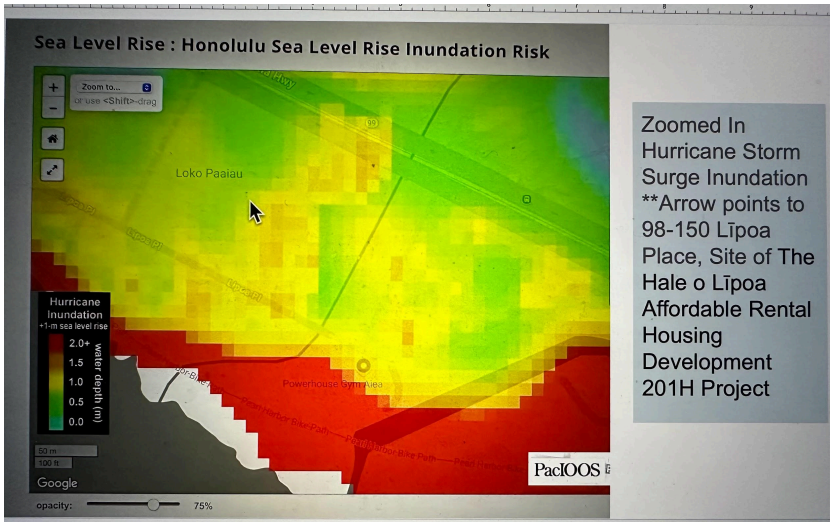
Prior to the Lahaina Fires of 2023, this 2016 map shows the high level of wildfire ignition density.

3. Hurricane Storm Inundation

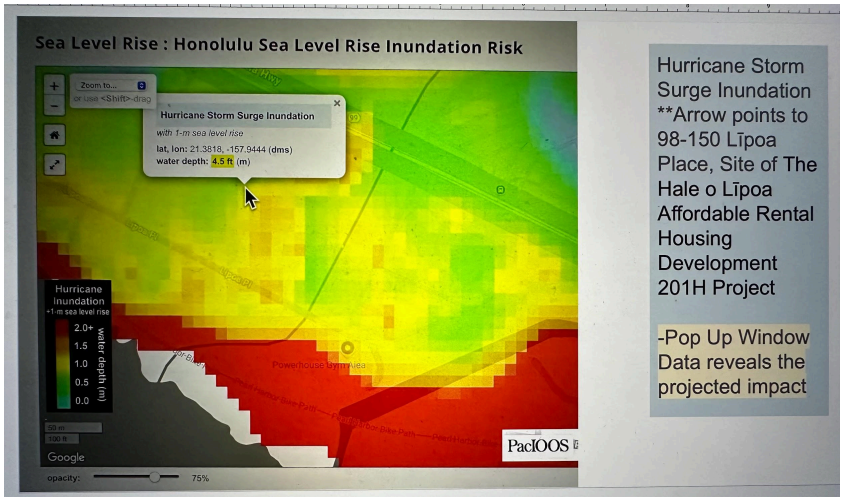


Hurricane Storm Surge Inundation Focusing on Projected Development Site





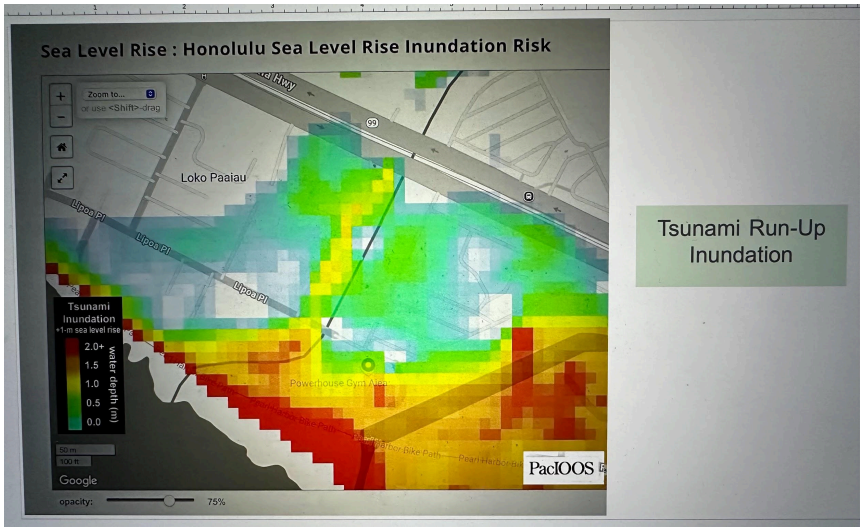
Zoomed In Hurricane Storm Surge Inundation **Arrow points to 98-150 Līpoa Place, Site of The Hale o Līpoa Affordable Rental Housing Development 201H Project



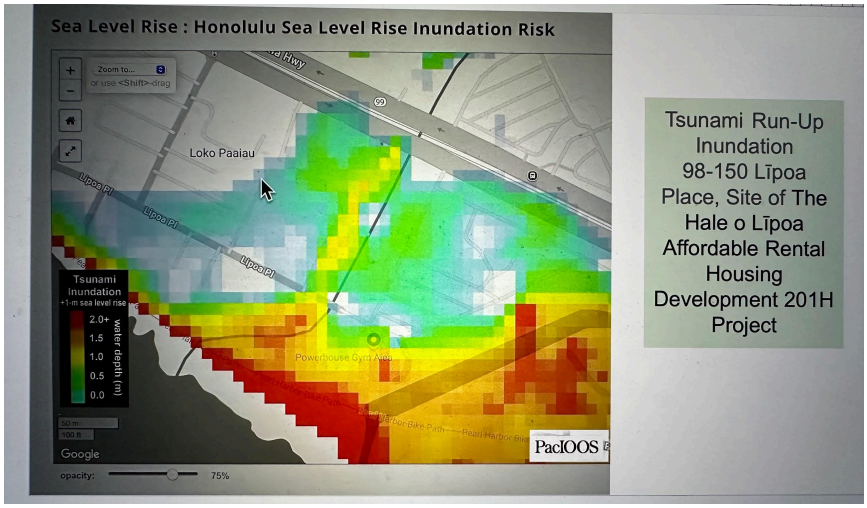
Hurricane Storm Surge Inundation **Arrow points to 98-150 Līpoa Place, Site of The Hale o Līpoa Affordable Rental Housing Development 201H Project

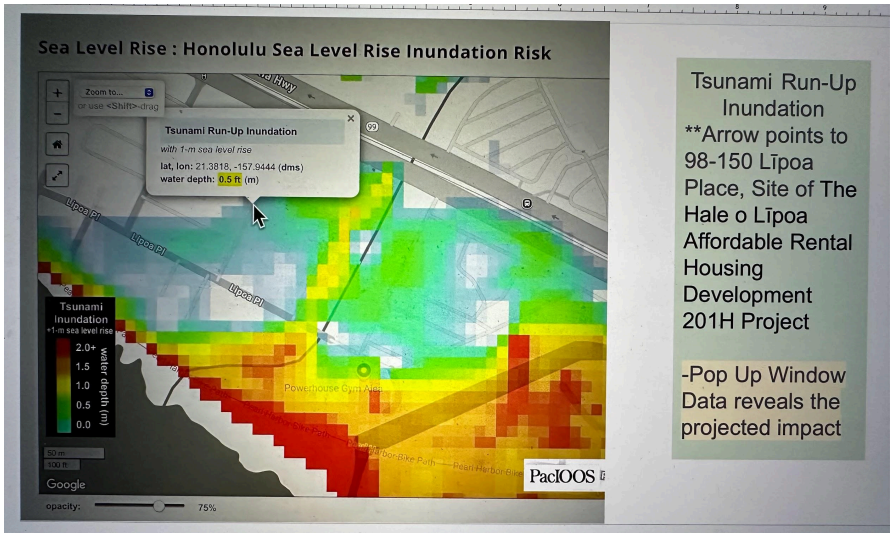
-Pop Up Window Data reveals the projected impact

4. Tsunami Run-Up Inundation Projections For Development Site and Surrounding Area



Tsunami Run-Up Inundation





5. Housing Labeled Affordable is Not Within the Targeted Buyers Reach

We can not deny that the cost of home insurance is on the rise because of all of the catastrophic events connected to climate change that have devastated homes. Because of this, home insurance rates have either skyrocketed or, some insurers are also choosing not to insure those who they are deeming to be in high-risk zones. The images shared on wildfire and hurricane storm inundation, reveal that the site of the proposed project development will stand in high-risk areas.

6. Affordable Housing Not Within Reach Because of High Home Insurance Costs

None of us are safe from these home insurance price hikes. Those who are seeking affordable housing, are doing so because other attempts to secure housing have proved to be out of their price range. When considering a rent or mortgage, one must consider all costs that will be incurred. Banks will do their due diligence if loans are sought. They will not only consider that

a person qualifies for affordable housing, but they also ensure that home insurance coverage will also be within the qualifiers means. For banks, home insurance is not a luxury, it is a must have. We can not ignore this fact in the name of affordable housing. The 51 % of residents for whom these units are supposedly being built for, may not be able to afford the high insurance costs that will be tied to properties that are at high flood, tsunami, hurricane, or wildfire risk. This area has high risk from at least 3 of these four variables–as noted above. We must not pretend to be unaware of the possibility for future catastrophic events.

7. Aaron Mattis shares this additional environmental concern for this project: it is located in close proximity to a business that uses a large quantity of petroleum projects. It further describes the presence of asbestos and lead paint and recommends a hazardous materials survey prior to demolition. As a matter of caution, given that the site sits over the Waimalu Aquifer, an important water source, approval of the permit before this is done is reckless.

Due diligence must always be considered with any project in development. With the global catastrophic events happening connected to climate change, the City Council can not turn a blind eye, in the name of affordable housing.

Additionally, these lands have cultural and historic significance.

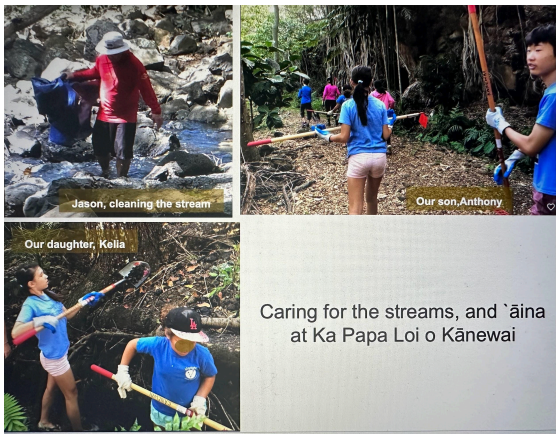
A Better Re-Solution

I humbly ask the members of this council, to oppose this resolution and listen to the voices of those who want to make pono-right, the wrongs of the past when loko i`a, and lo`i kalo were filled in because a lack of understanding of the true waiwai–abundance that lay in the wetland itself. Now more than ever, with climate change having devastating effects across the globe, our islands need to heed the warnings of what lays ahead and proactively, and pre-emptively find ways to revitalize, reclaim, restore our resources so that we will not only talk about food sustainability, and Hawai`i's food security–and instead actively work to make these concepts a reality. What we need to understand on deep levels that connect various fields together–science, medical, psychological, sociological, economic, and agricultural… is that food sustainability and food security supports peace, supports a total sense of well being. In places globally, where resources of water, food are not secure, the levels of in-fighting increases as people "fight" to obtain the necessary resources to support their families. Ka Mō`ī Wahine of this place, Kalanimanui`a understood this and how important it was to utilize the environmental ecosystems that already existed in pono ways that honored the idea: He ali`i ke āina, he kaua ke kanaka, whereby the land was always treated with the utmost respect. She functioned with the deep understanding that inā mālama ka `āina, e mālama ka `āina iā `oe–that if you care for the `āina , then it will care for you. The life-giving waters used for the lo`i, flowed through the system to grow kalo, but was never removed from it. Instead there was a ho`i wai–a returning of the wai back to the system, whereby the kalo cleaned the water through bioremediation, and nutrients

added through detritus decomposition, that in turn would feed into the loko i`a-fishpond, which would ultimately flow out and feed the sea.

It was not a fluke that indigenous Hawaiians prior to the arrival of foreigners existed for about 2,000 years. It is because they understood the need for functioning with pono, that includes balance, with adhering to the laws that managed the abundance of their place. They also understood that it was important to not place man's needs over the `āina. This development project is clearly the putting of man's needs before the protection and preservation of the resources of the `āina.

Some of you may wonder, "Is it even possible to restore the āina, and fishpond, Loko `Opu of this place?" Look at the countless number of sites across the island where community members come together to give of their time to restore loi kalo, to restore loko i`a, to restore māla. I am not Kanaka Maoli, but my family also comes from a legacy of farmers, and from a legacy that valued hard work. My entire family, including my four children have worked at various restoration sites across O`ahu. And we will continue to be here for `āina.



Decades ago, the `āina along our shores of Puuloa were mismanaged because the abundance that were present in these wetlands were not recognized. Because of this, the fishpond, Loko `Ōpu was filled in, and the access to the abundance was cut off, not just to the people of `Āiea, but to the many native organisms that also call fishponds and the wetland ecosystems that they are a part of home.

Who will take responsibility when inundation occurs due to tsunami, storm/hurricane flooding, and sea level rise?

We must bring forth reconciliation, restoration, and healing to the ‘āina that was unjustly filled-in and developed upon.

We must put a halt to the continued development that paves over the historical and cultural stories that exist in this place with a history connected to ka Mō`ī Wahine Kalanimanui`a. The

stories will continue to carry on, but even deeper connections and meaning are built when we work together as a collective to restore these biocultural, life-giving spaces.

Do you all want to go down in history as being the council member's who disregarded the voices of the community, the voices of the kama'āina, and the voices of Kanaka Maoli who are standing up, providing testimony, coming forward in the protection and preservation of these lands?

For all these reasons we humbly ask that you oppose authorizing exemptions for requirements associated with and related to the Hale o Līpoa Affordable Rental Housing Development Project in `Aiea, O`ahu (Res 25-26), as well as oppose the associated resolution 25-23 CD1 related to granting a SMA Major permit to 98-150 Līpoa Place.

Mahalo nui loa for reflecting upon, evaluating, and for seriously considering our testimony,
Alison Ka`ōlinokaimana Yasuoka-Arakaki
Jason T. Arakaki
Residents of Waimalu, `Aiea
January 29, 2025

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