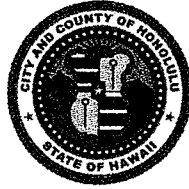


'22OCT04 AM 10:11 CITY CLERK
OFFICE OF CLIMATE CHANGE, SUSTAINABILITY AND RESILIENCY
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 11th FLOOR • HONOLULU, HAWAII 96813
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RICK BLANGIARDI
MAYOR

MATTHEW GONSER, AICP, CFM
EXECUTIVE DIRECTOR &
CHIEF RESILIENCE OFFICER

October 3, 2022

The Honorable Tommy Waters
Chair and Presiding Officer
and Members
Honolulu City Council
530 South King Street, Room 202
Honolulu, Hawaii 96813

Dear Chair Waters and Councilmembers:

SUBJECT: Bill 46 (2022), CD2 Relating to Height Limits for Rooftop Structures

The Office of Climate Change, Sustainability and Resiliency (CCSR) supports Bill 46 (2022), CD2, which expands existing height limits to allow solar panels above existing rooftop equipment and ensures area beneath rooftop solar panels does not count towards floor area to encourage the creation of more rooftop gathering spaces. CCSR additionally supports Councilmember Elefante's Proposed FD1.

Hawaiian Electric's Power Supply Improvement Plan assumes a need for three and half times more distributed solar photovoltaic (PV) power than currently exists, which means the vast majority of our rooftops will need solar PV in order to meet our energy equity and climate goals¹. Rooftop solar has been, and continues to be, one of the most effective tools for lowering residential energy costs. However, through past policy discussions, CCSR has heard from building industry stakeholders that current height limits can severely impede their ability to utilize existing rooftop spaces for solar and bring the benefit of costs savings to residents.

Bill 46, CD2 is consistent with objectives of the O'ahu General Plan, as well as both the City's O'ahu Resilience Strategy and Climate Action Plan, which further define the importance of rooftop spaces in meeting our sustainability and community resilience goals^{2,3}. These amendments will encourage the installation of more, much needed

1 Hawaiian Electric. 2016 Power Supply Improvement Plan: <https://www.hawaiianelectric.com/clean-energy-hawaii/integrated-grid-planning/power-supply-improvement-plan>.

2 City and County of Honolulu Climate Action Plan, Strategy 7: Expand Renewable Energy Planning and Expedite Permitting: <https://www.resilientoahu.org/s/2020-2025-Climate-Action-Plan.pdf#page=78>.

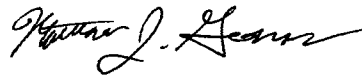
3 City and County of Honolulu O'ahu Resilience Strategy, Action 32: Deploy Sustainable Roof Systems to Manage

The Honorable Tommy Waters
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Page 2

rooftop solar PV, and make resulting costs savings available to a wider portion of O'ahu's population, particularly those in older buildings that may not have previously considered rooftop solar prior to design and construction.

Thank you for the opportunity to provide these comments in support of Councilmember Elefante's Proposed FD1 to Bill 46 (2022), CD2. Should you have any questions, please feel free to contact me at (808) 768-2277 or via e-mail at resilientoahu@honolulu.gov.

Sincerely,



Digitally signed by Gonser, Matthew
Date: 2022.10.03 10:28:10 -10'00'

Matthew Gonser
Executive Director and
Chief Resilience Officer

APPROVED:



Michael D. Formby
Managing Director