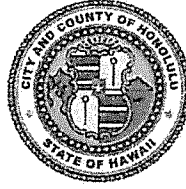


DEPARTMENT OF PLANNING AND PERMITTING  
**CITY AND COUNTY OF HONOLULU**

650 SOUTH KING STREET, 7<sup>TH</sup> FLOOR • HONOLULU, HAWAII 96813  
PHONE: (808) 768-8000 • FAX: (808) 768-6041  
DEPT. WEB SITE: [www.honolulu.gov/dpp](http://www.honolulu.gov/dpp)

RICK BLANGIARDI  
MAYOR



DAWN TAKEUCHI APUNA  
DIRECTOR DESIGNATE

JIRO A. SUMADA  
DEPUTY DIRECTOR

January 24, 2023

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: Resolution 22-291, Committee Draft (CD) 1, the Keawalau Affordable  
Housing Community 201H Project (2022/GEN-11)

The Department of Planning and Permitting (DPP) provides the following comments on  
Resolution 22-291, CD 1, which further conditions the project to:

- (1) Reduce the height of the two Makai block residential tower heights to 176 feet (from 191 feet) for the East tower and 171 feet (from 181 feet) for the West tower by reducing the floor-to-ceiling heights of the units; and
- (2) Add an additional 200 parking spaces by adding up to two levels, which will increase the maximum height of the Makai block parking structure to 77.5 feet (from 68 feet).

Reduction in Tower Heights

While the reduction in tower heights is intended to reduce the visual prominence of the towers, the reduction of 15 feet from the East tower and 10 feet from the West tower provides negligible difference in visual impact. However, the reductions taken from the unit ceiling heights to achieve the reductions in tower heights are likely to negatively influence the quality of living of the residents occupying the towers. Various studies indicate that higher ceilings are visually more appealing because they create a more spacious, less confined, and cramped feeling of the residential unit. Moreover, the additional space and airier feeling of a higher ceiling would help counterbalance living within the high-density project. We therefore recommend removing the condition to reduce the height of the two towers.

Increase in Parking

Ironically, while the residential tower heights are lowered, the parking structure height is to be increased to accommodate two more floors of parking for 200 additional parking spaces.

The Honorable Tommy Waters  
Chair and Presiding Officer  
January 24, 2023  
Page 2

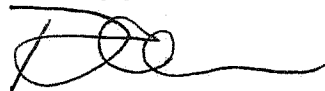
A basic principle of transit-oriented development (TOD) is to eliminate or significantly reduce our reliance on automobiles by locating residential and commercial uses adjacent to transit stations. At the same time, less automobiles helps to improve affordability by removing their associated costs from household budgets (e.g., reoccurring fees and maintenance, as well as parking stall construction costs that are passed on, directly or indirectly, to building occupants). This project is ideally located directly adjacent to the Pouhala rail station as well as a bus transit station. The TOD area requires zero parking spaces for the area, yet the developer has agreed to provide a substantial 563 parking spaces, which would provide approximately 1.25 spaces per unit.

The addition of 200 parking spaces to the current 563 spaces is excessive. The developer has shared that each of the 200 additional parking spaces will cost approximately \$50,000 per stall, for a total of \$10 million added to the cost of the project (off-setting the requested exemptions). The *Costs of Parking in Hawaii*, which was prepared for Ulupono Initiative in 2020, pointed out that capital and operating costs of parking are ultimately carried by the landlord. "Since these are ongoing expenses to the landlord, some, or all of the carrying costs are generally passed on to the renter" (each podium parking stall equating to \$42,000 in their study amounted to an additional \$410 in monthly rent, although costs in the subject project would likely have to be absorbed elsewhere due to rent limits on affordable units). For an affordable project, this additional parking cost of \$10 million would be better saved, or could potentially be used towards another affordable housing project. We therefore recommend deleting the condition requiring 200 additional parking spaces.

Finally, the DPP strongly believes that the Keawalau Affordable Housing Community 201H Project is a great project that will provide much needed affordable housing to our senior community and will help to achieve our TOD goals.

Thank you for this opportunity to provide these comments.

Very truly yours,



Dawn Takeuchi Apuna  
Director Designate

APPROVED:



Michael D. Formby  
Managing Director