-----Original Message-----
From: Paul Miles <paulmiles007@gmail.com>
Sent: Wednesday, November 1, 2023 6:48 PM
To: Department of Planning and Permitting <dpp@honolulu.gov>
Subject: Testimony to the Planning Commission

CAUTION: Email received from an EXTERNAL sender. Please confirm the content is safe prior to opening attachments or links.

Aloha,
I believe that the Ala Wai Small Boat Harbor was mostly overlooked and mischaracterized in the proposed PUC Development Plan.

The Ala Wai Harbor is more than just “transportation infrastructure” or a “port”.

The harbor is better classified as:
Public Park Space, and Resort Space - tying both to Hawaii’s most important natural resource: the Ocean.

Looking at a map one can see how the harbor sits at the fulcrum of both public park space and resort activities in Honolulu. To walk between Honolulu’s premier urban parks, Kapiolani and Ala Moana, one must pass the harbor. The harbor is one of the primary ways visitors access ocean activities during their stay. The harbor is the primary way local fishermen, sailors and many local paddling clubs access the ocean. It should be treated as a treasured public and commercial asset, not neglected as it has been for decades.

I would like to see the harbor re-characterized as public park space, resort/commercial space, and transportation space in order to give it the importance it should have as a vital community asset. The harbor should be a jewel set at the center of commercial and recreational ocean activities on the coastal ring of urban park spaces in Honolulu.

Regards,
Paul Miles
Captain of the Sailing Vessel EFFORTLESS docked in the Ala Wai Small Boat Harbor.

HONOLULU CITY COUNCIL

KE KANIHELA O KE KALANA O HONOLULU

530 S. KING ST. STE. 202, HONOLULU, HI 96813

TOMMY WATERS
CHAIR & PRESIDING OFFICER
LUNA HO'OMALU
HONOLULU CITY COUNCIL
DISTRICT IV
TELEPHONE: (808) 768-5004
FAX: (808) 768-1220
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November 9, 2023

Chair Pane Meatoga III
and Members of the
City and County of Honolulu Planning Commission
Via email: dpp@honolulu.gov

RE: A Bill to Adopt the Revised Primary Urban Center Development Plan for the City and County of Honolulu

Aloha e Chair Meatoga III, Vice Chair Kamo, and Members of the Commission,

I am testifying on the Department of Planning and Permitting's ("DPP") recommended comprehensive update to the Primary Urban Center Development Plan (the "PUC DP"), adopted in 2004.

The PUC DP area spans the region from Waiʻalae-Kahala to Pearl City, mauka to makai, across Oahu's southern shoreline, and is by far the most populous development plan area, accounting for over 40 percent of Oahu's residential population.

The PUC DP is not regulatory, and is intended to provide a guide for the orderly and coordinated public and private sector development within the Primary Urban Center, in a manner that is consistent with applicable General Plan provisions.

With this purpose of a coherent vision to guide new development in the Primary Urban Center in mind, I am proposing several amendments to the DPP's recommended PUC DP, particularly in the East PUC DP area, which includes portions of Council District IV, which I represent.

My proposed amendments are an attempt to moderate the intensity of new development in the eastern fringe of the PUC DP area – in particular, to keep Kaimukī Kaimukī by ensuring that new development projects are compatible in scale, to maintain the neighborhood retail character of the Kapahulu Avenue and Waiʻalae Avenue corridors, and to preserve the unique views in the East PUC DP area.

Specifically, I am proposing to amend the place type for the parcels that compose Kahala Mall from the Town Corridor/Center place type to the Near-Town Corridor-Center Medium place type.

DEPT. OF PLANNING AND PERMITTING
Via Email

HONOLULU CITY COUNCIL

KE KANIHELA O KE KALANA O HONOLULU

530 S. KING ST. STE. 202, HONOLULU, HI 96813

TOMMY WATERS
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I am also proposing to amend the place type for the parcels across from Kahala Mall immediately mauka of Waialae Avenue, the Times Supermarket parcel located immediately makai of Wai'alae Avenue, and the parcel mauka of Wai'alae Avenue east of Kīlauea Street up to Malia Street, from the Near-Town Corridor-Center Medium place type to the Near-Town Corridor-Center Low place type.

I am further proposing to amend the place type for the Kapahulu Avenue corridor mauka of Date Street from the Near-Town Corridor-Center Medium place type to the Near-Town Corridor-Center Low place type, so that the portion of the Kapahulu Avenue corridor mauka of Date Street is consistent with the rest of the Kapahulu Avenue corridor makai of Date Street.

In addition, I am proposing to amend the place type for the area ewa of Kapahulu Avenue, mauka of Date Street, and Diamond Head of Kaimuki High School from the Town Neighborhood-Medium place type to the Town Neighborhood-Low place type, so that the area ewa of the Kapahulu Avenue corridor is consistent with the area Diamond Head of the Kapahulu Avenue corridor.

Finally, I am proposing to add significant panoramic public views from Wilhelmina Rise towards Maunalua Bay, and from Kahala towards Diamond Head, which will preserve key views toward the ocean and the iconic Diamond Head.

I appreciate this opportunity to comment on the DPP's recommended comprehensive update of the City's Primary Urban Center Development Plan.

Mahalo,

Tommy Waters
Chair and Presiding Officer
Honolulu City Council

RECEIVED
Nov. 14, 2023
1:50 AM
Via Email
DEPT. OF PLANNING AND PERMITTING

Planning Commission November 13, 2023
Honolulu, Department of Planning & Permitting

Dear Planning Commission Members:
Re: Primary Urban Center Development Plan and Wai'alae-Kahala

These comments on the draft PUCDP focus on the following:

Chapter 1-Growth and Development,

Land Use Place Types, East PUC

Place Making & Character

Valley/Ridge Neighborhood place type

Major Town Corridor/Center

Chapter 2-Place Making Character - Significant Views

Chapter 3-Wai'alae Avenue Focus Area

Preface:
According to the Oahu General Plan, a development plan's (DP) consistency and integrity is related to the stated **goal of recognizing and maintaining the physical, social, cultural, economic, environmental and design relationships and linkages between all resources** similar to the values of the traditional Native Hawaiian ahupua'a land use management system. Unfortunately, and we believe mistakenly, the PUCDP eastern boundary splits Wai'alae-Kahala between two very different regional development plans, the PUCDP and the EHSCP (Exhibits B & C) thereby excluding recognition and maintenance of important relationships and linkages both within the whole of the WK community and with the other Maunalua Bay communities of East Honolulu.

Growth and Development, Land Use Place Types, East PUC, Chapter 1

Wai'ale-Kahala continues to be in its entirety, a mature, stable, diverse, fully developed, master planned, "*urban fringe*" community "expecting little expansion" and "will not be absorbing the majority of population growth and development",

Consistent with the General Plan policies and objectives, the Wai'alae-Kahala (WK) Neighborhood Board (2/16/2023 Resolution, Exhibit A) is desirous of:

- managing land use and development within WK so that population densities remain consistent with the character, culture, and environmental qualities desired for the community, (GP page 20, Policy 3, a & b); and
- maintaining the characteristics of an *urban fringe* area that is predominantly residential characterized by generally lower-rise, lower-density development which includes significant levels of retail and service commercial uses as well as satellite institutional and public uses geared to serving the needs of households, (GP page 50, Objective E, Policy 1); and
- development compatible with the existing stable, established community, (GP page 51, Objective F, Policy 3); and
- promoting and enhancing the social and physical character of the established neighborhood by encouraging new construction to be compatible with the character and cultural values of the surrounding community (GP page 52, Objective G, Policy 1); and
- having Wai'alae-Kahala in its entirety recognized as a singular, unique, established, mature, stable, master planned *urban fringe* community expecting little expansion; and
- recognizing and maintaining the relationships and linkages within the whole of the WK community and between WK and the other Maunalua Bay communities of East Honolulu, essential to the consistency and integrity of the development plan's stated goal.

Place Making – Character

Wai'alae-Kahala's role, identity and vision in regard to planning and land use management within O'ahu's development pattern and framework island wide include:

- expects limited development and population growth;
- expects maintenance as a predominantly residential area characterized by generally low-rise, low-density development; and;
- expects moderate growth of business, retail and service commercial uses, and satellite institutional and public uses geared to serving the needs of households in the region's neighborhoods.

Wai'alae-Kahala (WK) in its entirety should be designated *Urban Fringe,* using the same definition found in the GP and applied to the other valley/ridge/coastal Maunalua Bay communities.

Valley/Ridge Neighborhood

Vision Map GD East, (pg 16-17) and Place Making & Character, (pg 44 & 48)
This place type designation for all Wai'alae-Kahala's single-family residential neighborhoods is inappropriate. It fails to recognize WK's is a valley/ridge/**coastal** community, unique in the entire PUC. Policy GD-3.3 states, Valley/Ridge Neighborhoods. "….are located on the PUC's slope-and-valley topography areas farthest from the coastal plain and sometimes directly abutting conservation areas." WK has nearly three miles of residential coastline, most of it developed 80 to 100 years ago. Like all the Maunalua Bay communities, the coastal exposure and eco-system brings an array of planning, development, management and preservation issues unique to coastal communities.

"Major"Town Corridor/Center

Vision Map GD East, (pg 16-17) and Place Making & Character, (pg 44 & 55)
The following excerpts from Chapter 1, Growth and Development, indicate the "Major" Town Center designation for Kahala's B-2 zoned commercial center is inconsistent and inappropriate given the GP and PUCDP's own criteria. WK is an existing stable, established community and is not a TOD area.

Chapter 1

> Goal GD-1. Direct Higher Density Growth to Mixed-Use Transit-Oriented Development (TOD) Areas. Pg 10, 18
> Goal GD-3. Plan for Context-Appropriate Infill and Redevelopment in Lower-Density Places , pg 10
> GD-3.3: Maintain the lower intensity character of valley/ridge and near-town neighborhoods. Pg 10, 28
> Key Outcomes pg 11
> The vision for the PUC has the majority of new growth focused in active, transit-rich areas, while the character and scale of other neighborhoods is maintained through smaller improvements and lower-density infill. The majority of growth in the PUC will be guided to align with rail transit service and new investments that improve transportation choices for residents.

Bishop Estate (now Kamehameha Schools) sub-divided WK into leasehold residential parcels between 75 and 100 years ago. By the time the GP was adopted in 1977 the master planned community, both commercial and residential areas, were fully developed. Kamehameha Schools as the primary commercial landowner continues to guide redevelopment and infill adding residential and commercial diversity. Though the residential properties converted to fee-simple gradually in the

1980's, property deeds continue to have restrictive land-use covenants that run with the land which are carry overs from leasehold agreements. These covenants restrict the number of dwellings on most residential property to one single-family dwelling. These covenants supersede zoning.

Though much of the Wai'alae Ave corridor in Kahala has been redeveloped since the 2004 PUCDP review, the character and use has remained consistent. Infill low density townhomes communities since 1977 include the 44 unit Kahala View Estate built in 1979 and the 25 unit Kahala Pacifica built in 1989, both on the east hillside of Wai'alae-Nui Valley, both in the EH DPA. Two significant land-use changes since 1977 added to the diversity of housing. In 2005 the 270 unit Kahala Nui Senior Living Community was completed on 6-1/2 acres of what had been the Star of The Sea School. In 1991 a public storage facility opened on Wai'alae Ave next to the west bound H1 on ramp with the gated Nohona Kahala community of 55 townhouses just mauka on what had been the site of the Wai'alae Drive-In Theater that closed in 1986. Transit capacity is and has been a major concern and has played a major role in ingress/egress design and project density.

Recognition of Relationships and Linkages.

The PUCDP must include recognition that **all** the neighborhoods and surrounding environment that comprises Wai'alae-Kahala compose a singular community, despite the misplaced boundary, related and linked. In addition, WK shares relationships and linkages in the pattern of land-use, development, demographics, topography, coastal orientation and eco-system, issues of transit capacity and environmental stewardship with the Maunalua Bay communities under the East Honolulu Sustainable Communities Plan Area (EHSCP).

Transit

WK is the western bookend of the Maunalua Bay communities; Wai'alae-Kahala, Kalani Iki-Aina Hina, Niu-Kuli'ou'ou and Hawaii Kai. Each of these communities straddling the Kalaniana'ole Highway corridor is similarly characterized by ridge, valley and coastal low rise, low density residential neighborhoods.

WK also serves as the western gateway to the Kalaniana'ole Highway transit corridor thereby making transit capacity along this entire corridor a major factor in determining redevelopment and infill WK and in any of these communities.

Unique in the PUCDPA, related and linked to the EHSCPA

WK is a community similar in demographics, topography, physical development, and closely linked environmentally, economically, socially and culturally with the other Maunalua Bay communities.

WK is a ridge/valley/coastal residential community, unique in the PUC but typical in the Maunalua Bay communities.

WK is a community whose proximity to Maunalua Bay defines much of its character, not true of the PUC but typical of the Maunalua Bay communities

WK is a community that is part of the Maunalua Bay watershed, unique in the PUC but typical in the Maunalua Bay communities.

WK is a community who treasures views of the southeastern flanks of the Ko'olau's, Diamond Head, Koko Head and Maunalua Bay, unique in the PUC but typical in the Maunalua Bay communities.

WK is a community focused on the restoration and protection of Maunalua Bay, its watershed, near shore water, habitats, recreational assets and coastal eco-system while the PUCDP is focused on Māmala Bay.

WK is a community with single-family residential homes that are exposed to sea-level rise, flooding, coastal erosion, shoreline access, armoring, setback issues and management strategies, unique in the PUC but typical in the Maunalua Bay residential neighborhoods.

WK has shared issues of resiliency to hurricanes, coastal erosion, inundation and flooding with Maunalua Bay communities due to shared orientation, coastline exposure, transit connections along the Kalaniana'ole Highway corridor and growth in our elderly population.

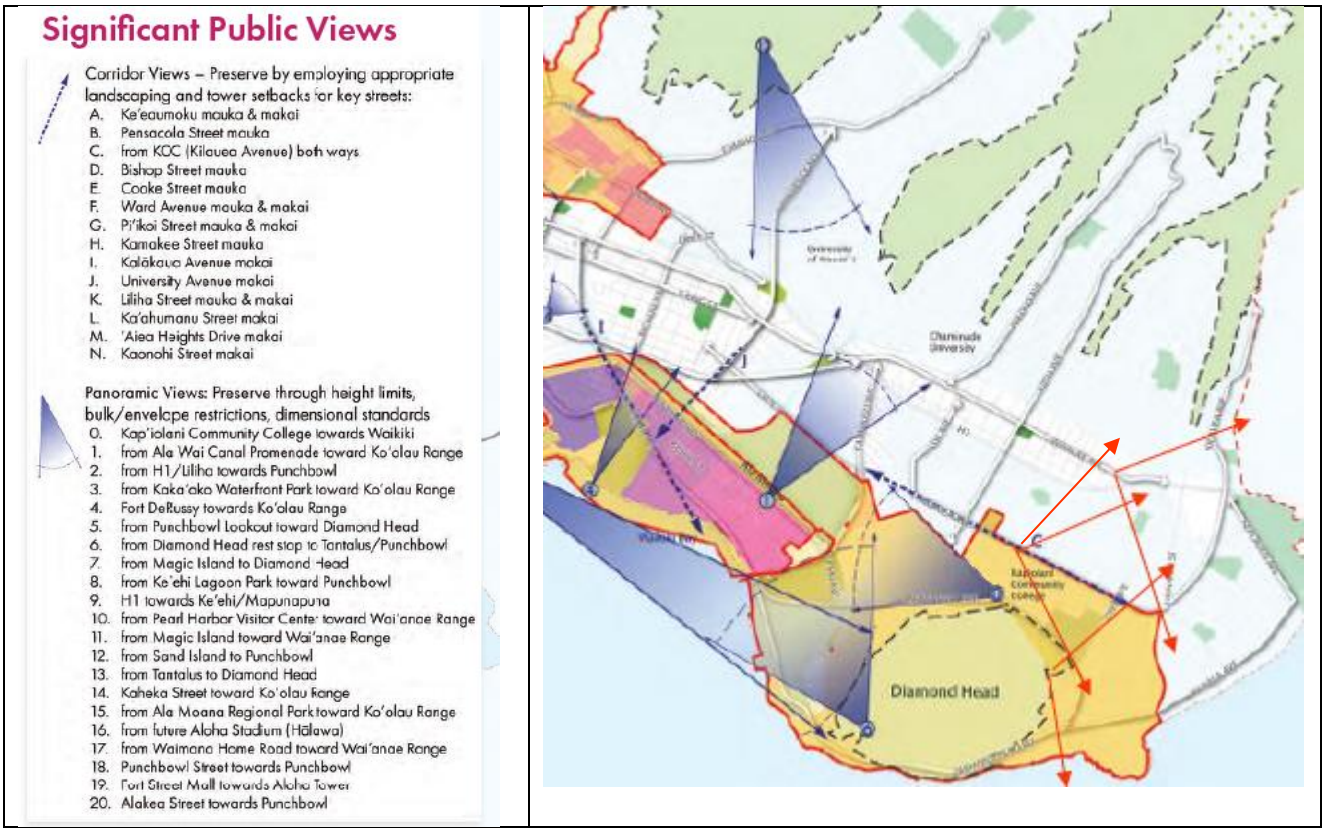
WK is a community whose children are in the Kalani High School district, unique in the PUC but typical for the western half of the Maunalua Bay communities.

WK's parks are all under the C&C East Honolulu Division.

Mayor Blangiardi's townhall meetings group WK with East Honolulu.

Place Making Character - Significant Views, Chapter 2

No valued views from or to Wai'alae-Kahala/East Diamond Head are included, such as views of Diamond Head, Maunalua Bay, Koko Head/Crater, the Koolau's from DH tunnel lookout, Kapiolani Community College, H-1 traveling west approaching Kahala, Wai'alae-Nui Valley and Ridge. This list and map should be amended as illustrated by red arrows.



1. Focus Area – Wai'alae Avenue, Section 3

The PUCDP Plan includes neighborhood-specific "detailed" visioning with a Focus Area titled Wai'alae Avenue. This title should be amended to read Kaimuki and reference to Wai'alae-Kahala's commercial area at the east end of Wai'alae Avenue be removed as these two communities are physically separated and very distinct.

> (The notation under Vision, states, "On the opposite end of Wai'alae Avenue, Kāhala Mall and surrounding commercial properties may evolve over a long period of time to incorporate a mix of medium-scaled uses. Overall, this business district and the corridor itself should remain as a mixed-use shopping, dining, and services hub near residential areas where neighbors can walk to stores and daily errands, interacting with others frequently.")

Furthermore, "mix of medium scaled uses" lacks definition and "may evolve" ignores that it already has evolved significantly in recent years. In addition, it appears that WK is not actually the focus area here.

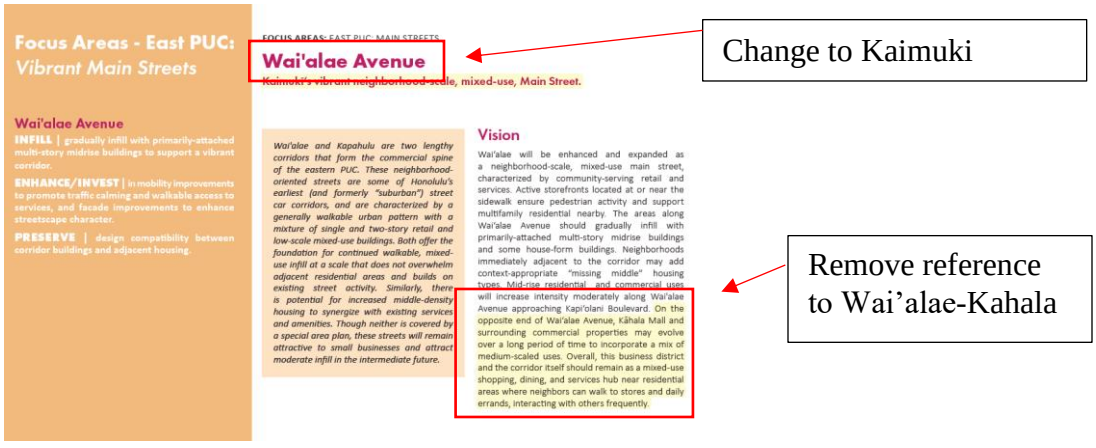
Unlike Kaimuki, Wai'alae-Kahala is a ridge, valley, coastal *unban fringe* community, with diverse residential types and commercial development master planned decades ago by a single landowner (BEKS). Nearly all of Wai'alae-Kahala's commercial

district has been redeveloped in the past couple of decades under the guidance of BEKS who continues to own and control nearly all commercial property not only in WK but in all the Maunalua Bay communities. (Exhibit D – Description of Wai'alae-Kahala's development.)

Unlike Kaimuki, the short span of Wai'alae Avenue in Wai'alae-Kahala is the gateway to the Kalaniana'ole Highway corridor and the eastern ingress/egress to H-1. The transportation capacity of Wai'alae Ave's intersections at Hunakai and Kilauea as well as the H1 on and off ramps, is already strained with the existing traffic from, to and through WK's neighborhoods. (Recently the WK neighborhood board passed a resolution asking the State DOT to conduct a traffic study of the H-1 and Kalaniana'ole Hwy ingress and egress servicing Wai'alae Avenue.) In addition to WK's local traffic, ingress and egress traffic from East Honolulu and town navigates to and through this area to access Kahala's commercial/professional district, Diamond Head, Kapiolani Community College and beyond. Diamond Head and Kahala's streets connect both residents and visitors with Kalaniana'ole Highway forming a primary linkage for vehicles, bicyclists and joggers.

The transit capacity of this gateway and of the Kalaniana'ole corridor must be a major factor in guiding development as well as emergency and resiliency planning not only in WK but for all the Maunalua Bay communities.

More than sixty years ago, when H-1 was built severing Wai'alae Avenue with the viaduct connecting H-1 with Kalaniana'ole Highway, a major physical division was created between Wai'alae-Kahala and the Kaimuki community.



General Miscellaneous comments:
The Waialae-Kahala Neighborhood Profile #18 map, fails to show the Kahala Mall as commercial, fails to show Hunakai Park as open space, fails to show Wilson, Kahala and Variety schools as public space.

The Wai'alae-Kahala Neighborhood Board in February of this year passed a resolution requesting that DPP and Councilmember Tommy Waters consider an amendment to the General Plan that would relocate the PUC boundary that splits WK between two development plans westward. The resolution also requested that Waialae-Kahala be given the same *Urban Fringe* designation as the other Maunalua Bay communities under the EHSCP. (Exhibits A, B, C)

The WK-NB has been informed that, because these requests involve amending the General Plan and EHSCP, both of which have recently been updated, the boundary relocation will have to be an item for future consideration when these plans again come up for review.

This PUCDP update has been a huge undertaking. I applaud the effort. It is an amazing document. Thank you for your consideration of the comments contained herein.

Regards,

Lucinda Pyles

Kahala resident since 1973

Former member of the Wai'alae-Kahala NB3 (through July 2023)

1998-99 team member of Mayor Harris' **21st Century** Oahu: A Shared **Vision for the** Future

Former member of the Kahala Community Association

Enclosures: Exhibits A, B, C, D

EXHIBIT – A

WAI 'ALAE-KĀHALA NEIGHBORHOOD BOARD NO. 3
NEIGHBORHOOD COMMISSION • 925 DILLINGHAM BOULEVARD, SUITE 160 • HONOLULU, HAWAII, 96819
PHONE (808) 768-3710 • FAX (808) 768-3711 • INTERNET http://www.honolulu.gov/nco

February 16, 2023

Resolution requesting the City and County of Honolulu, Department of Planning and Permitting and elected officials initiate and support amending the O'ahu General Plan (GP), in order to identify, protect and preserve the whole of the Wai'alae Nui-Kahala community as a singular Urban Fringe, East Honolulu Sustainable Community.

WHEREAS, Wai'alae-Kahala Neighborhood Board, District 3 represents four sub-districts: #1-Wai'alae-Nui Valley, #2-Wai'alae-Nui Ridge, #3-Kahala, #4-East Diamond Head (Exhibit A); and

WHEREAS the O'ahu General Plan (GP) uses the Wai'alae-Nui Stream as the Primary Urban Center Development Plan's (PUCDP) east boundary thereby placing all of sub-district 2 and a portion of sub-district 3 outside the boundary and under the East Honolulu Sustainable Communities Plan (EHSCP); and

WHEREAS the GP splits a singular mature, stable, community, its ecosystems, schools, commercial corridor, transit corridors, parks and recreation areas, neighborhoods and grassroots representation between two very different regional plans contrary to recognizing the relationships and linkages between all resources within defined boundaries (ahupua'a, EXHBIT D); and

WHEREAS Wai'alae Nui-Kahala District 3 is a mature community expecting little expansion and thereby meets the GP criteria for determination as better suited for a Sustainable Communities Plan; and

WHEREAS Wai'alae Nui-Kahala District 3's development as a desirable place to live was planned and directed by Bishop Estate (AKA Kamehameha Schools), as a singular, diversified "Urban Fringe" community that is desirous of:

- managing land use and development in the *urban-fringe* so that development is contained within growth boundaries and population densities in remain consistent with the character, culture, and environmental qualities desired for the community (GP page 20, Policy 3, a & b);
- maintaining the characteristics of an *urban fringe* area that is predominantly residential characterized by generally lower-rise, lower-density development which includes significant levels of retail and service commercial uses as well as satellite institutional and public uses geared to serving the needs of households (GP page 50, Objective E, Policy 1);
- developments compatible with the existing stable, established community (GP page 51, Objective F, Policy 3);
- promoting and enhancing the social and physical character of the established neighborhood by encouraging new construction to be compatible with the character and cultural values of the surrounding community (GP page 52, Objective G, Policy 1); and

WHEREAS Wai'alae Nui-Kahala District 3 is a mature community expecting little expansion and shares similarity in development, in environmental profile and preservation and sustainability visions and goals with the "Urban Fringe" (Exhibit B) communities of the EHSCP, and is a singular community that shares the care of Maunalua Bay within East Honolulu; now therefore

BE IT RESOLVED that the Wai'alae-Kahala Neighborhood Board believes *District 3*, should not be split between two regional plans with substantially differing visions and purpose and would be better preserved and represented by the EHSCP, rather than the PUC Development Plan (Exhibit C summarizes Wai'alae Nui-Kahala's District 3's existing development, diversity and amenities); and

BE IT FURTHER RESOLVED that the Wai'alae-Kahala Neighborhood Board requests that the Director of the Department of Planning and Permitting, along with District 3's Councilmember Tommy Waters, initiate the process to consider amending the O'ahu General Plan in order to:

- Designate the entirety of Waialae Nui-Kahala District 3 as "Urban Fringe", using the same definition for the term as used to designate all similar communities under the EHSCP; and
- Review concerns regarding the use of the Wai'alae Nui Stream as the eastern boundary for the Primary Urban Center Development Plan; and

BE IT FINALLY RESOLVED that this resolution shall be sent to Mayor Rick Blangiardi, Councilmember Tommy Waters, Director of Planning and Permitting (DPP) Dawn Takeuchi-Apuna, DPP Planning Division Chief Dina Wong, Mayor's Representative Scott Hayashi, Senator Stanley Chang, Representative Bert Kobayashi, Representative Mark Hashem, DLNR Chairperson Dawn N.S. Chang; DLNR/OCCL Administrator Michael Cain and Honolulu Neighborhood Commission boards 1-7.

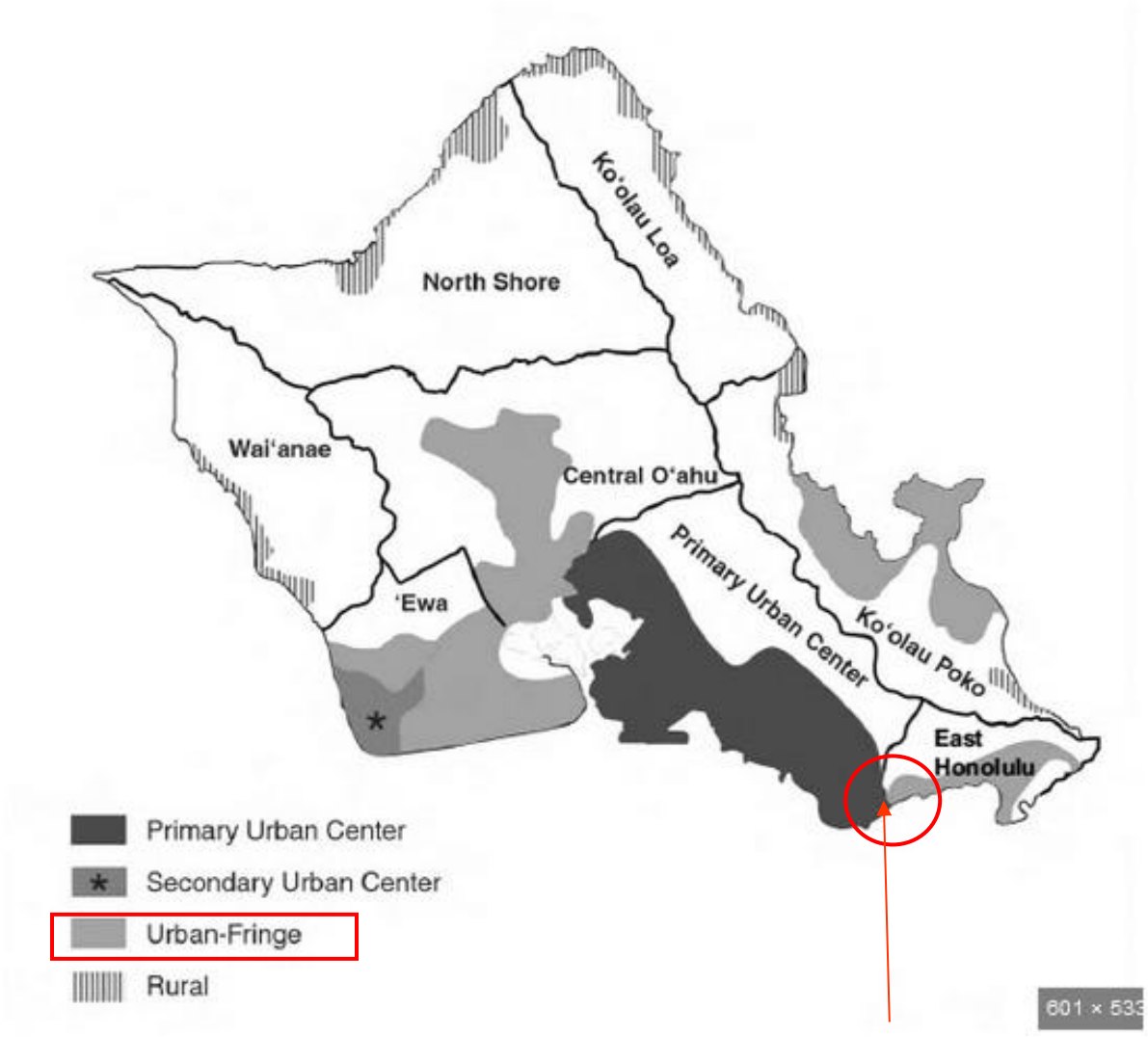
Resolution ADOPTED on February 16, 2023 by a vote of 6-1-0. (AYE: Richard Turbin, Heather Conahan, Peter Dudgeon, Sylvia Himeda, Lucinda Pyles, Brian Wong; NAY: Colin Fujiki; ABSTAIN: None)

Richard Turbin, Board Chair

Enclosures: Exhibits A, B, C, D

EXHIBIT – B
DEVELOPMENT PLAN BOUNDARIES

The O'ahu General Plan has used the Wai'alae-Nui Stream for the PUC's east boundary thereby placing Wai'alae-Nui Ridge, Kahala Nui, Wai'alae Country Club, half Wai'alae Beach Park and The Kahala Beach Apartments and The Kahala Hotel and Resort under the East Honolulu Sustainable Communities Plan (EHSCP).



Wai'alae-Kahala Neighborhood Board District 3

"Urban Fringe"-"Develop and maintain as predominantly residential urban fringe areas characterized by generally lower-rise, lower-density development which may include significant levels of retail and service commercial uses as well as satellite institutional and public uses geared to serving the needs of households. (O'ahu General Plan)

EXHIBIT – C

The Wai'alae-Kahala Neighborhood Board represents District 3 with its 4 sub-districts.

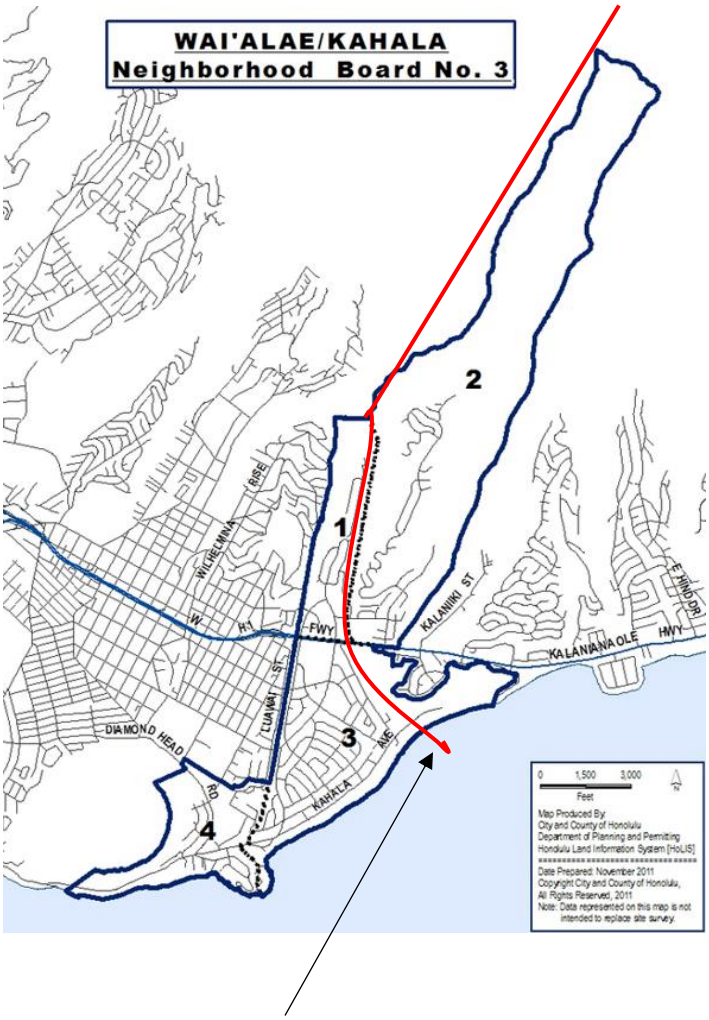
Sub-districts:

#1 is Wai'alae-Nui Valley (includes, multiple types of residential, Wilson School, YMCA, Assagio Commercial Center, Kahala Towers, Kuono Market Place, Zippys and self-storage, etc.).

#2 is *Wai'alae-Nui Ridge (includes single-family residential, gated east hillside townhome communities of Kahala Pacifica and Kahala View Estate, the Kahala Nui Senior Living Community & Star of the Sea School, etc.)

#3 is Kahala
(includes Kahala Mall, Regency Tower, single-family residences, Kahala School, *Wai'alae Beach Park, *The Kahala Hotel, *Kahala Beach Apartments and the *Wai'alae Country Club)

#4 is East Diamond Head (Single-family residential, Black Point to the Diamond Head lighthouse).



*indicates already within EHSCP area

The eastern boundary of the PUCDP established by the O'ahu General Plan splitting Wai'alae-Kahala between two regional development plans, the PUCDP and the EHSCP.

EXHIBIT – D

2023 Wai'alae-Kahala -Development Description

GROWTH AND DEVELOPMENT

Wai'alae-Kahala is a mature, relatively small, *urban fringe* community, master planned with a diverse array of residential, commercial, educational, health and recreational assets and amenities. The district's development history goes back nearly a century. Diversity in housing includes A-1 low and A-2 medium density apartment, condominium, townhouse dwelling options, one of which is a senior living complex, and single-family R5, R75 and R10 parcels. The single-family homes constructed in the 40's, 50's and 60's have been undergoing upgrades or replacement in the past four decades. Since 1979 three townhouse communities and one senior living community have added diversity in Wai'alae Nui Valley. In addition, the commercial properties along the Wai'alae Avenue corridor in Kahala have been redeveloped in the past few decades bringing greater diversity of goods and services without expanding the footprint. For example, the nearly block long newly developed strip mall, Kuono Marketplace on the mauka side of Wai'alae Avenue, just opened last year. Adjacent to Wai'alae-Kahala's Diamond Head boundary there is the new Culinary Institute in its second phase of construction and the new Diamond Head Theater just completed.

COMMERCIAL: Kamehameha Schools is the landowner for most of District 3's commercial property, overseeing the mix of lessees and tenants. The accessible and impressive diversity includes Kahala's commercial corridor with Kahala Mall, Kuono Marketplace and surrounding properties offering a movie theater, numerous restaurants, diverse retail shops and services, three markets, two drug stores, three gas stations, multiple banks, professional buildings, a self-storage facility, a post office and on Kahala Avenue The Kahala Hotel & Resort. The diversity of public and private entities in NHB District 3 provide an array of employment opportunities and convenient access to H1 (west) and Kalaniana'ole Highway (east) allowing relatively easy commutes beyond.

EDUCATION: three pre-schools, two elementary schools and adjacent to the Districts SW boundary there is a middle school, Kapiolani Community College and the Culinary Institute. The YMCA, Kahala and Kilauea Community centers, the Sylvan Learning Center and Diamond Head Theater also offer a variety of classes to children and adults. Kalanai High School serves as the public high school for Wai'alae-Kahala.

HEALTH AND WELL BEING: Two Urgent Care/Primary Care facilities, Queens and Straub, opened recently within Wai'alae-Kahala's commercial core. There are two diagnostic labs also in the commercial core and three professional buildings with several health care providers as tenants. There are at least three fitness facilities and the YMCA which offers fitness programs for all ages as well as five churches and a memorial park. Kahala Mall serves as a community gathering place offering such programs as free early morning exercise classes and Toddler Time, which provides parents, grandparents, aunties/uncles, and caregivers with a friendly, safe environment to bring their keiki for a variety of educational and fun activities. At the District's SW backdoor sits Kapiolani Community College with its weekly Farmer's Market. The commercial core, multiple parks

and rec centers, Diamond Head and Kahala beaches, The Kahala Resort and the Wai'alae Country Club all combine to provide many options for community meeting places.

TRANSIT: Streets are wide and walkable. Joggers and bicyclist are a common site. Convenient bus transit service exists along the Wai'alae Avenue corridor and from the shoreline to the mountain tops. Nearby access exists to major transit corridors such as H1, Wai'alae Ave to the West, *Kalaniana'ole* Highway to the East and Ala Wai Blvd at the SW backdoor.

The ingress and egress for the Wai'alae-Nui Ridge and Valley funnel through the Hunakai-Wai'alae and Kilauea-Wai'alae intersections. Access to the west bound transit corridors from the Diamond Head and Kahala neighborhoods also funnels through the Wai'alae Avenue corridor. West bound egress from Kalaniana'ole Highway empties onto Wai'alae Avenue. Substantial rush hour traffic backs up at the intersections and on the west bound H1 on ramp and the east bound Wai'alae Ave off ramp. Any significant increase in housing intensity would put more pressure on these busy intersections and commonly used arteries.

Bicycle Routes: The Diamond Head Road-Kahala Avenue corridor has narrow lanes in all but one section next to the Red Wing Medal of Honor Park (AKA Triangle Park). Bicycles along this corridor are hazardous, especially in Kahala where beachgoers park on the makai side of the street.

PARKS, RECREATION AND PUBLIC OPEN SPACE: There are five neighborhood parks in NHB District 3, including Wai'alae Beach Park. It should be noted that the C&C's Department of Parks and Recreation, District 1-East Honolulu List includes Wai'alae-Kahala parks, plus Kilauea Community Park sitting at NHB District 3's SW boundary. The East Diamond Head shoreline is a popular surfing spot and the Diamond Head State Monument draws thousands of visitors and locals a year.

The Wai'alae-Kahala also has two and a half miles of shoreline with numerous quarter mile access points. The Diamond Head Road-Kahala Avenue corridor is the only single-family residential neighborhood in the PUC with beach frontage. Black Point is home to a colony of the threatened shearwater seabirds which are found only in the southeastern Hawaiian Islands. A colony of sea turtles is emerging off this coastline. Treasured open space includes views of Maunalua Bay, Diamond Head, and the Ko'olau mountains from Maunalani Circle above Kaimuki to Koko Head and KoKo Crater across Maunalua Bay to Wai'alae-Kahala/Diamond Head.

SHORELINE AND SEA LEVEL: Most of the developed properties subject to sea level rise are along the Kahala shoreline, separated from the East Diamond Head shoreline by Black Point. The Kahala shoreline from the Hunakai beach access (134-A) to Black Point is mostly armored with seawalls.

The Wai'alae-Nui Stream and the East Diamond Head/Kahala shoreline are all part of the water shed, the near shore and directly impacts the marine ecosystems of the 6.2 mile long Maunalua Bay.

DIVERSITY AND EQUITY: In Wai'alae-Kahala one finds a diverse range of housing from old to new, small to large, low to high density. All residents have equal access to the array of commercial, educational, recreational and health, assets.

RECEIVED
Nov. 15, 2023
12:14 PM
Via Email
DEPT. OF PLANNING AND PERMITTING

Honolulu Planning Commission Meeting
November 15, 2023
1:00 PM

TESTIMONY CONCERNING DPP'S PUC-DP REVISIONS

Aloha Honolulu Planning Commission:

This testimony concerns the "Kapahulu Focus Area" presented in the Department of Planning and Permitting's (DPP's) proposed revised Primary Urban Center Development Plan (PUC-DP).

The Diamond Head/Kapahulu/St. Louis Heights Neighborhood Board is the jurisdictional elected community district board that is advisory to City agencies and departments on matters concerning the Board's Kapahulu subdistrict.

Despite this, DPP has failed to return to the Board to present and define their updated revisions, modifications, and nuances relating to the Board's major area of concern specific to the DPP's proposed PUC-DP revisions, i.e., the DPP's proposed redevelopment of Kapahulu as a "Focus Area."

DPP's most recent PUC-DP update, revised as of October 2023, discloses that the well-established, traditional and stable single-family residential neighborhood between Kapahulu Avenue and Sixth Avenue, defined as the "Diamond Head Residential Area" in the City's 2001 Kapahulu Community Plan, continues to be targeted by DPP for "missing middle" higher-density residential redevelopment, essentially doubling the regulatory zoning height limit of 25-30 feet.

Had DPP respected the community-based planning efforts invested in the Kapahulu Community Plan, the updated corrections would rightfully reflect the Kapahulu Community Plan adopted by the City in 2001.

However, DPP continues to fly in the face of the Kapahulu Community Plan by retaining a proposed annihilation of single-family properties between Kapahulu Avenue and Sixth Avenue as illustrated on page 105 of the present proposal by advocating "missing middle" density redevelopment of this area.

The Planning Commission is therefore urged to rectify DPP's miscarriage of the community-based Kapahulu Community Plan and restore the established land use and zoning height limit of this traditional and stable neighborhood for DPP planning policies and purposes.

Michelle S. Matson

Diamond Head/Kapahulu/St. Louis Heights Neighborhood Board
Planning and Zoning Committee Chair

Testifying Individually

Exhibits Attached

EXHIBIT 1

Kapahulu Community Plan

Figure 3-4
Zoning Districts and Height Limits

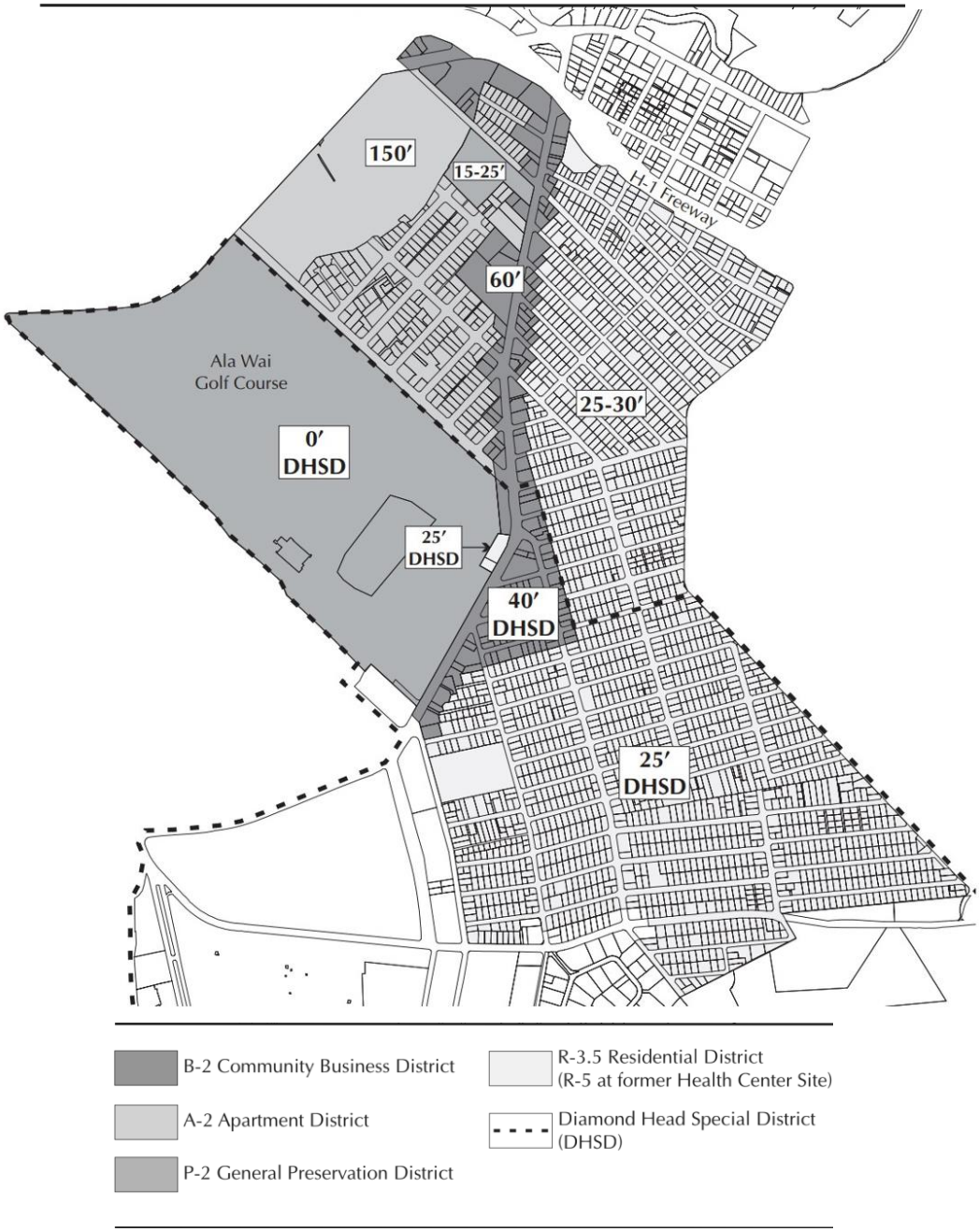
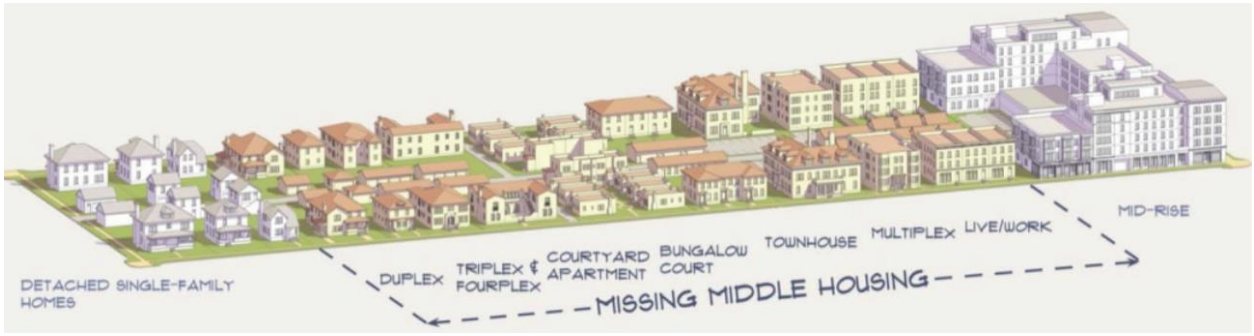


EXHIBIT 2

PUC-DP Proposed Revisions
October 2023 Update

#6 - DPP's Proposed "Medium" Density Redevelopment Remains

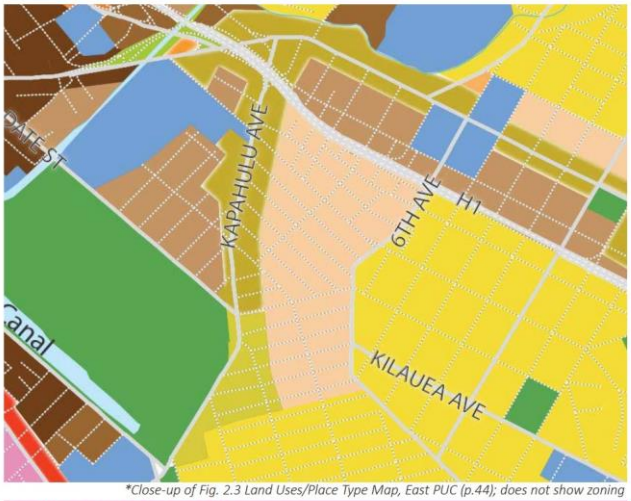
Ref. #	Description of Specific Changes	New Place Type	Old Place Type	Rationale/Requested By
4	Area bounded by Alohea Ave, Kapahulu Ave, Montserrat Ave and Leahi Ave	Near-Town Neighborhood (Bright Yellow)	Town Neighborhood Low	Neighborhood Board 5 density concerns
5	Area bounded by Kapahulu Ave, Campbell, and Kanaina Ave	Near-Town Corridor Center Low (Light Gold)	Near-Town Center	Neighborhood Board 5 density concerns
6	Area bounded by H-1, 6th Ave, Catherine St, and a block inward from Kapahulu	Town Neighborhood Low (Pale Peach)	Town Neighborhood Medium	Neighborhood Board 5 density concerns





Chapter 3. Focus Areas

Focus Area Vicinity Map: Kapahulu Avenue



**Close-up of Fig. 2.3 Land Uses/Place Type Map, East PUC (p.44); does not show zoning*

Key Place Types for Kapahulu Avenue

- NT-CM — **Near Town Corridor/Center-Medium** (low multi-story mixed use fronting on Kapahulu Ave.)
- TN-L — **Town Neighborhood- Low** (lower-density and missing middle residential.)
- TN-M — **Town Neighborhood- Medium** (mid-intensity residential and other missing middle types in neighborhoods adjacent to Kapahulu Avenue.)
- NT-N — **Near Town Neighborhood** (lower-density residential neighborhood.)

From: Robert Matsumoto <rmatsumoto16@gmail.com>
Sent: Saturday, March 16, 2024 11:19 AM
To: Department of Planning and Permitting <dpp@honolulu.gov>
Subject: Primary Urban Center Development Plan - comment

CAUTION: Email received from an EXTERNAL sender. Please confirm the content is safe prior to opening attachments or links.

The development plan should look into moving functions or institutions out of the urban area such as entire departments of the University of Hawaii, the prison, high rise condominiums, extensions of existing private schools or new schools, etc. Anything to make the urban area less dense and congested. Also, work with our Congressional delegation to reduce the military footprint. War fighting technology has made the requirement for large tracks of land unnecessary.

Robert Matsumoto

RECEIVED
March 20, 2024
1:30 PM
Via Hand-Delivery
DEPT. OF PLANNING AND PERMITTING

Testimony in support of the revised PUCDP 2024

I would like to testify and support of this planning document. I think it is well thought out and I agree with most of its goals. No plan is perfect and will have its critics. My grandchildren will be our family 5th six generation in Hawaii. I want Honolulu, and all of Hawaii to be clean green and beautiful and honor and preserve our cultural diversity. This document addresses most of these core values.

I just want the state and its leaders to stay out of county planning and zoning issues. The state seems to be pushing quantity with more, more and more; at the expense of quality of life for our future generations.

Submitted by:
Brenda G. Lam Brenda G. Lam
2512 Manoa Rd.
Honolulu, HI

brendaglam@gmail.com

RECEIVED
March 8, 2024
9:19 PM
Via Email
DEPT. OF PLANNING AND PERMITTING

DIAMOND HEAD/KAPAHULU/ST. LOUIS HEIGHTS NEIGHBORHOOD BOARD NO. 5

c/o NEIGHBORHOOD COMMISSION • 925 DILLINGHAM BLVD SUITE 160 • HONOLULU, HAWAII, 96817
PHONE (808) 768-3710 • FAX (808) 768-3711 • INTERNET: http://www.honolulu.gov/nco

RESOLUTION CONCERNING DEPARTMENT OF PLANNING AND PERMITTING REVISIONS TO THE PRIMARY URBAN DEVELOPMENT CENTER DEVELOPMENT PLAN RELATING TO THE KAPAHULU COMMUNITY

WHEREAS, the Primary Urban Center Development Plan PUC-DP) is intended to be a guiding document consistent with applicable O'ahu General Plan provisions to manage public and private sector development growth and zoning density; and

WHEREAS, the Honolulu Department of Planning is seeking approval of revisions to the PUC DP guidelines to encourage development height and density increases within the established, historic and stable community and residential neighborhoods of Kapahulu; and

WHEREAS, the Kapahulu Community is situated on the fringe of Waikiki between the historic Ala Wai Canal to the south and the neighborhoods of St. Louis Heights along Waialae Avenue to the north; and

WHEREAS, the Kapahulu community is comprised of A) a historic low-density local business area with restaurants and small shops mauka-makai along Kapahulu Avenue from Le'ahi Avenue to Waialae Avenue, B) a historic single-family residential area from Le'ahi Avenue and Monsarrat Avenue within the Diamond Head Special District to Sixth Avenue and Waialae Avenue on the east side of Kapahulu Avenue, and C) a low-density primarily multi-family apartment and single-family residential area from Kapahulu Avenue to the Manoa-Palolo Canal and Waialae Avenue to the west; and

WHEREAS, the single-family residential area between Kapahulu Avenue and Monsarrat Avenue from Le'ahi Avenue to Sixth Avenue has enabled and continues to enable generations of the same families to remain within the established historic and stable Kapahulu Community, thus providing housing for kupuna and their families for decades; and

WHEREAS, protected significant public views extend from Kapahulu Avenue to Diamond Head, and building heights along the Kapahulu Avenue corridor have remained properly zoned to retain and maintain the views of Diamond Head; and

WHEREAS, the Honolulu Department of Planning and Permitting (DPP) is presently proposing and seeking approval for the Kapahulu Community to become a "Focus Area" to enable conversion of Kapahulu's established historic and stable single-family residential area into a "missing middle" density housing area comprised of multi-family residential buildings between five (5+) and six (6+) stories in height, and to convert Kapahulu's established historic small business area along the Kapahulu Avenue corridor to higher-density mixed use buildings sixty (60+) to eighty (80+) feet in height; and

WHEREAS, the City's community-based 2001 Kapahulu Community Plan ensures retention of the one (1) to two (2) story single-family residential area between Kapahulu Avenue and Sixth Avenue with the zoning height limit of twenty-five (25) to thirty (30) feet, and provides for buildings no higher than forty (40) feet along the Kapahulu Avenue corridor from Ala Wai Boulevard and Le'ahi Avenue to Date Street, and no higher than sixty (60) feet from Date Street to Waialae Avenue, while retaining Kapahulu's historic Art Deco architectural design; and

WHEREAS, the DPP's most recently proposed PUC-DP revisions as of October 2023, disclose that Kapahulu's well-established, traditional and stable single-family residential area between Kapahulu Avenue and Sixth Avenue, defined as the "Diamond Head Residential Area" in the City's 2001 Kapahulu Community Plan, continues to be targeted by DPP for "missing middle" higher-density residential redevelopment, essentially increasing the regulatory zoning height limit two-hundred to three-hundred percent (200% to 300%); and

WHEREAS, DPP continues to fly in the face of the Kapahulu Community Plan by retaining a proposed annihilation of single-family properties between Kapahulu Avenue and Sixth Avenue, as illustrated on page 105 of the present proposal, by advocating "missing middle" density redevelopment of this area; and

WHEREAS, the Diamond Head-Kapahulu-St. Louis Heights Neighborhood Board is an elected Community District Board that is advisory to the City on Community concerns relating to matters of Planning and Zoning protections and proposed changes; now therefore

BE IT RESOLVED that the Diamond Head-Kapahulu-St. Louis Heights Neighborhood Board expresses grave concerns that the DPP has neglected to honor and respect the community-based planning efforts invested in the Kapahulu Community Plan, and

BE IT FURTHER RESOLVED that the Diamond Head-Kapahulu-St. Louis Heights Neigborhood Board requests DPP and the Honolulu Planning Commission to revise and correct any proposed revisions to the PUC-DP relating to the Kapahulu Community, to rightfully and respectfully reflect the City's community-based 2001 Kapahulu Community Plan, and by:

A. Retaining the Kapahulu Community's single-family residential zoning height limit of one- to two stories from Kapahulu Avenue to Sixth Avenue; and

B. Ensuring that any new building construction along Kapahulu Avenue remains within the present height limits with any level above two (2) stories set back from the street accordingly; and

C. Protecting the significant views of Diamond Head a) along Kapahulu Avenue, b) within the established Kapahulu single-family residential area, and c) from Kaimuki High School as emphasized in the Kaimuki High School Alma Mater; and

D. Including protection of the Kaimuki High School campus and field open space as an important part of Kapahulu directly serving the Kapahulu Community as shown by Figure 3-4 of the 2001 Kapahulu Community Plan; and

E. Providing for the safety of the Kapahulu Community by undergrounding overhead utility lines throughout Kapahulu, Diamond Head and St. Louis Heights to ensure protection from destruction by uncontrollable wildfires today and in the future; and

F. Effectively implementing improved and technologically up-to-date infrastructure to definitively meet the Kapahulu Community's present and future public utility needs and requirements, including the assurance of sustainable and safe water supply and sewer capacity, roadway and sidewalk capacity, safety and maintenance, and traffic control, parking availability and street transportation efficiency; and

G. Eliminating such inventive and undefined blanket terms such as ""town corridor/center… near-town corridor/center…. near-town center…. near-town corridor center medium…. near-town corridor center low… near-town neighborhood… town neighborhood medium… town neighborhood low…," [1] etc., and properly replacing such vague and open-ended terms with the clarifying terms of "low-density" and "medium density" as a coherent guide specific to Kapahulu; and

[1] Confusion abounds relating to which "town" is being referenced – Kaimuki Town, Waikiki the Resort Town, or Honolulu Downtown??

BE IT FURTHER RESOLVED that the City and the Department of Planning and Permitting should hold the line on the Kapahulu Community's present established, historic and stable zoning height and density limits as sound planning practice for Kapahulu's coherent neighborhoods; and

BE IT FINALLY RESOLVED that this Resolution shall be distributed to the Director, Deputy Director and Planning Division of the of the Department of Planning and Permitting; the Honolulu Planning Commission; the Honolulu City Council; the Mayor and Managing Director of the City and County of Honolulu; the Kaimuki Neighborhood Board, Waialae-Kahala Neighborhood Board, McCully-Moʻiliʻili Neighborhood Board and Manoa Neighborhood Board; and all interested and affected Kapahulu Community residents and businesses.

The motion WAS **ADOPTED; 8-1-1** (Aye: Allen, Decker, Hasina, Matson, Murchie, Velasco, B. Wong, Welch; Nay: Beutel; Abstain: Knight).



_____

Winston Welch, Neighborhood Board #5 Chair, December 14th, 2023

EXHIBIT 1

Community-Based Kapahulu Master Plan

Figure 3-4
Zoning Districts and Height Limits

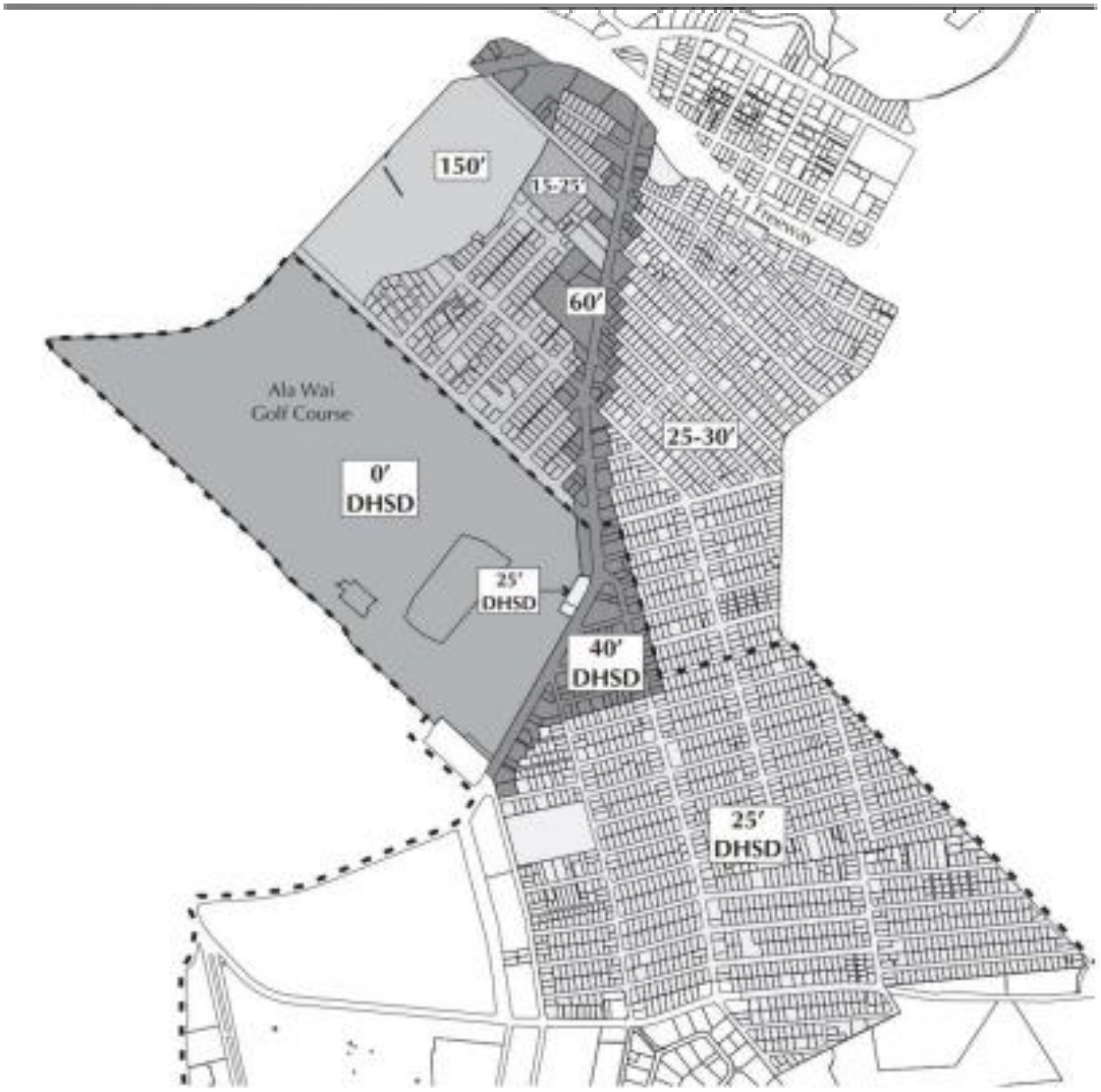


EXHIBIT 2

PUC-DP Proposed Revisions
October 2023 Update

#6 - DPP's Proposed "Medium" Density Redevelopment Remains

Ref. #	Description of Specific Changes	New Place Type	Old Place Type	Rationale/Requested By
4	Area bounded by Alohea Ave, Kapahulu Ave, Montserrat Ave and Leahi Ave	Near-Town Neighborhood (Bright Yellow)	Town Neighborhood Low	Neighborhood Board 5 density concerns
5	Area bounded by Kapahulu Ave, Campbell, and Kanaina Ave	Near-Town Corridor Center Low (Light Gold)	Near-Town Center	Neighborhood Board 5 density concerns
6	Area bounded by H-1, 6th Ave, Catherine St, and a block inward from Kapahuli	Town Neighborhood Low (Pale Peach)	Town Neighborhood Medium	Neighborhood Board 5 density concerns



Focus Area Vicinity Map: Kapahulu Avenue



*Close up of Fig. 2.3 Land Use/Place Type Map, East PDC (p.44); does not show zoning

Key Place Types for Kapahulu Avenue

- **Near Town Corridor/Center-Medium** (low- multi-story mixed use fronting on Kapahulu Ave.)
- **Town Neighborhood- Low** (lower-density and missing middle residential.)
- **Town Neighborhood- Medium** (mid-intensity residential and other missing middle types in neighborhoods adjacent to Kapahulu Avenue.)
- **Near Town Neighborhood** (lower-density residential neighborhood.)



DEPARTMENT OF PLANNING AND PERMITTING
KA ʻOIHANA HOʻOLĀLĀ A ME NĀ PALAPALA ʻAE
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 7TH FLOOR • HONOLULU, HAWAIʻI 96813
PHONE: (808) 768-8000 • FAX: (808) 768-6041 • WEBSITE: honolulu.gov/dpp

RICK BLANGIARDI
MAYOR
MEIA

DAWN TAKEUCHI APUNA
DIRECTOR
PO'O

JIRO A. SUMADA
DEPUTY DIRECTOR
HOPE PO'O

RECEIVED
24 MAR 15 P4:12
DEPT OF PLANNING AND PERMITTING
CITY & COUNTY OF HONOLULU

March 15, 2024

MEMORANDUM

TO: Pane Meatoga III, Chair
and Members of the Planning Commission

FROM: Dawn Takeuchi Apuna, Director
Department of Planning and Permitting

SUBJECT: Continued Hearing on A Bill To Adopt The Primary Urban Center Development Plan

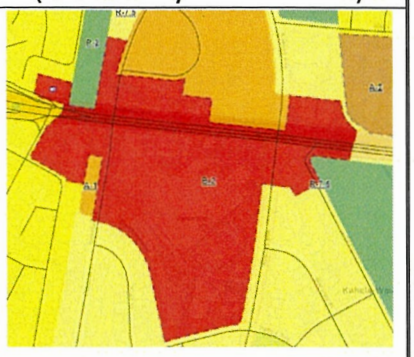
Transmitted for appropriate action is the Department of Planning and Permitting's (Department's) response at the request of the Honolulu Planning Commission, regarding previously received public testimony for the November 15, 2023 Public Hearing on A Bill To Adopt The Primary Urban Center Development Plan.

Specifically, the Department submits its recommendations regarding proposed map changes in the eastern portion of the Primary Urban Center (i.e., Waiʻalae-Kāhala, Kapahulu, and Diamond Head) submitted via public testimony from City Council Chair Waters and ongoing concerns about development expressed by members of Neighborhood Board No. 5: Diamond Head/Kapahulu/St. Louis Heights.

Attachments

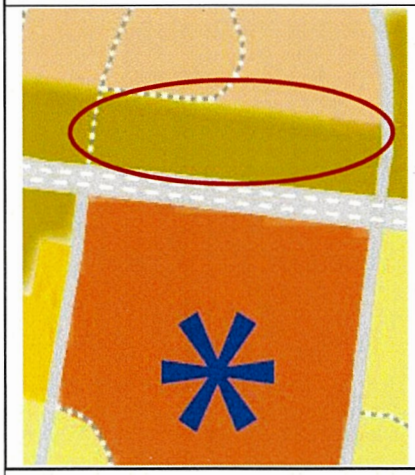
Attachment 1

During the November 15, 2023 Public Hearing of the Honolulu Planning Commission (PC) for the Proposed Primary Urban Center Development Plan (Proposed Plan), the PC requested that the Department of Planning and Permitting (DPP) respond to specific land use map change requests submitted as testimony to the PC from City Council Chair Tommy Waters. The following represent the DPP's recommendations on these requests, as well as one additional change in response to testimony from Neighborhood Board No. 5: Diamond Head/Kapahulu/St. Louis Heights.

<table>
<tr><td colspan="3">1. Kāhala Mall parcels</td></tr>
<tr><td>Proposed Plan</td><td>Requested Change (Council Chair Testimony)</td><td>Zoning</td></tr>
<tr><td>Town Corridor/Center
(Generally 6-12 stories)</td><td></td><td>Predominately B-2 Business zoning at 60 feet heights
(Generally 4-6 stories)</td></tr>
<tr><td></td><td>From: Town Corridor/Center
(Generally 6-12 stories)
To: Near-Town Corridor/Center Medium
(Generally 3-6 stories)</td><td></td></tr>
<tr><td colspan="3">DPP Recommendation: Neutral- Near-Town Corridor/Center Medium aligns to the existing pattern and (conservatively) to zoning.

Comments: The Proposed Plan map recommendation is based on policy support for flexible redevelopment of aging malls, and is more intensive than current zoning. While the Near-Town Corridor/Center Medium would not depart from existing entitlements, the DPP maintains its position to support 6-12 stories.</td></tr>
</table>

2. Parcels across from Kāhala Mall, immediately mauka of Wai'alae Avenue *(Inclusive of Kāhala Towers)*

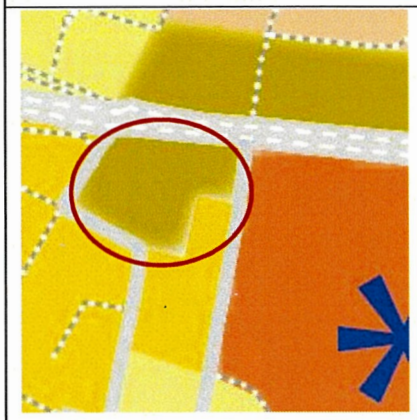
Proposed Plan	**Requested Change (Council Chair Testimony)**	**Zoning**
Near-Town Corridor/Center Medium (Generally 3-6 stories)		B-2 Business zoning (60 feet height limit), A-1 Apartment zoning (30 feet limit)
	From: **Near-Town Corridor/Center Medium** (Generally 3-6 stories) To: **Near-Town Corridor/Center Low** (Generally 1-3 stories)	

DPP recommendation: Oppose- Near-Town Corridor/Center Low does not align with existing zoning entitlements.

Comments: The intensity shown in the Proposed Plan is generally consistent with the existing entitlements in the B-2 zone and generally does not support further intensification of the A-1 portion.

Notes:
1) The *as-built* B-2 pattern is in line with the Near Town Corridor/Center Low.
2) The existing A-1 parcels on the Koko Head side of the block (Kāhala Towers) were built in 1966- 68, with the tallest at 27 stories. This is non-conforming to the current A-1 with a 30 feet limit.

3. Times Supermarket parcel located immediately makai of Wai'alae Avenue

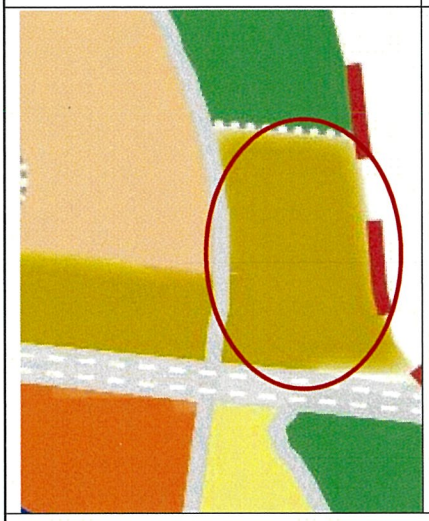
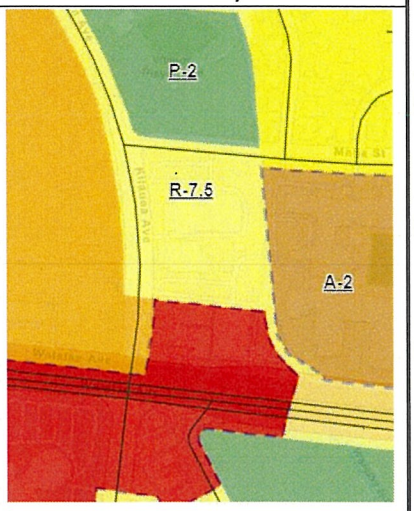
Proposed Plan	**Requested Change (Council Chair Testimony)**	**Zoning**
Near-Town Corridor/Center Medium (Generally 3-6 stories)		B-2 Business zoning (60 feet height limit) (Generally 4-6 stories)
	From: **Near-Town Corridor/Center Medium** (Generally 3-6 stories)  To: **Near-Town Corridor/Center Low** (Generally 1-3 stories) 	

DPP recommendation: Oppose- Near-Town Corridor/Center Low does not align with existing zoning entitlements.

Comments: The intensity shown in the Proposed Plan generally supports the existing entitlements in this B-2 zone (60 feet limit) if or when redeveloped.

Note: As with the B-2 parcels on the mauka side of Wai'alae the *as-built* condition is in line with Near Town Corridor/Center Low.

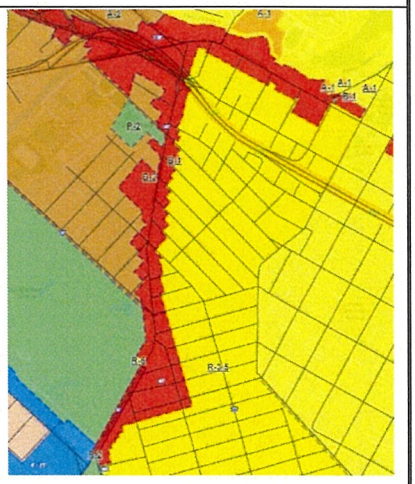
4. Parcel(s) mauka of Wai'alae Avenue, east of Kilauea Street up to Malia Street

Proposed Plan	Requested Change (Council Chair Testimony)	Zoning
Near-Town Corridor/Center Medium (Generally 3-6 stories)		B-2 Business zoning (60 feet height limit) , R-7.5 Residential zoning (max height 30 feet)(Adjacent A-2 zoning is 150 feet)
	From: **Near-Town Corridor/Center Medium** (Generally 3-6 stories) To: **Near-Town Corridor/Center Low** (Generally 1-3 stories)	

DPP recommendation: Oppose- Near-Town Corridor/Center Low does not align with existing B-2 zoning entitlements.

Comments: The intensity shown in the Proposed Plan is generally consistent with the existing entitlements in this B-2 zone (60 feet limit) if or when redeveloped, and continued mixed-use activity in the subject R-7.5 area, (e.g., existing church and YMCA). This area is also adjacent to the Star of the Sea campus which is located on property zoned A-2 with a 150 feet height limit.

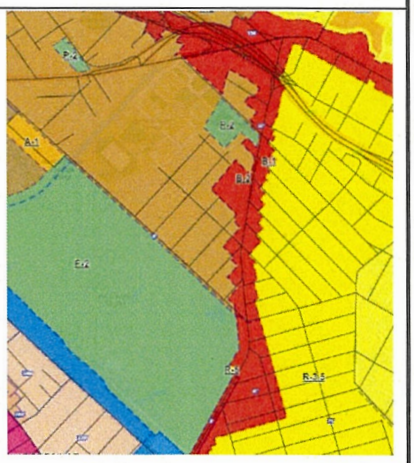
5. Kapahulu Avenue corridor mauka of Date Street

Proposed Plan	**Requested Change (Council Chair Testimony)**	**Zoning**
Near-Town Corridor/Center Medium (Generally 3-6 stories)		B-2 Business zoning (60 feet height limit) (Generally 4-6 stories)
	From: **Near-Town Corridor/Center Medium** (Generally 3-6 stories) To: **Near-Town Corridor/Center Low** (Generally 1-3 stories) (for consistency with the portion makai of Date Street)	

DPP recommendation: Oppose- The B-2 portion of Kapahulu below Date Street has a 40 feet height limit due to its inclusion in the Diamond Head Special District. The remaining portion of Kapahulu (above Date Street) is B-2 with a 60 feet height limit.

Comments: The Proposed Plan supports additional (but proportionate) density on and around established commercial corridors. The proposed place type is in line with existing entitlements and the requested change is below current entitlements.

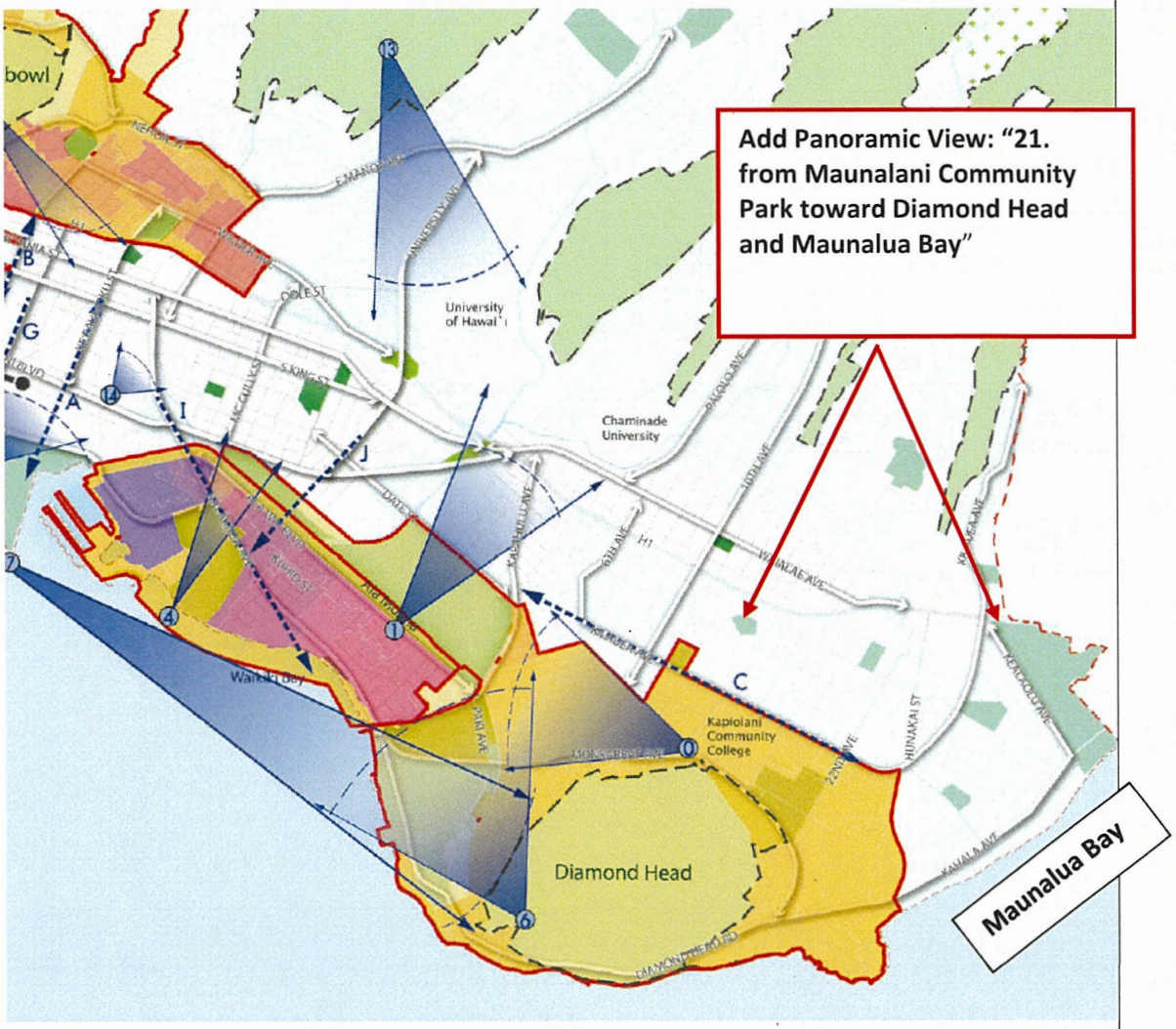
6. The area ewa of Kapahulu Avenue, mauka of Date Street, and diamond head of Kaimukī High School

Proposed Plan	Requested Change (Council Chair Testimony)	Zoning
Town Neighborhood Medium (Generally 2-6 stories)		A-2 Apartment (150 feet height limit per zoning map)
	From: **Town Neighborhood Medium** (Generally 2-6 stories) To: **Town Neighborhood Low** (Generally 2-4 stories) (for consistency on both sides of Kapahulu Ave)	

DPP recommendation: Oppose- The Proposed Plan designation of Town Neighborhood Medium is on the lower end or slightly below existing entitlements, shown in such a way to reinforce the protection of significant public views.

Comments: The zoning for these parcels is A-2 and the height designation is 150 feet. The Proposed Plan designation of Town Neighborhood Medium supports redevelopment of the parcels (conservatively) within current entitlements but not above them. In addition, a draft of the Honolulu Public Views Study (February 2024) analyzed stream corridors with important public views of valued landforms, including from the Ala Wai Canal. Mauka views of the Koʻolau Range from the Ala Wai Canal are usually experienced in motion, as people walk, run, bike, or drive, creating an experience of a largely continuous view of the mountains. The study concluded that this view is considered threatened and in need of additional protection.

7. Significant Public Views: Add significant panoramic public views from Wilhelmina Rise towards Maunalua Bay

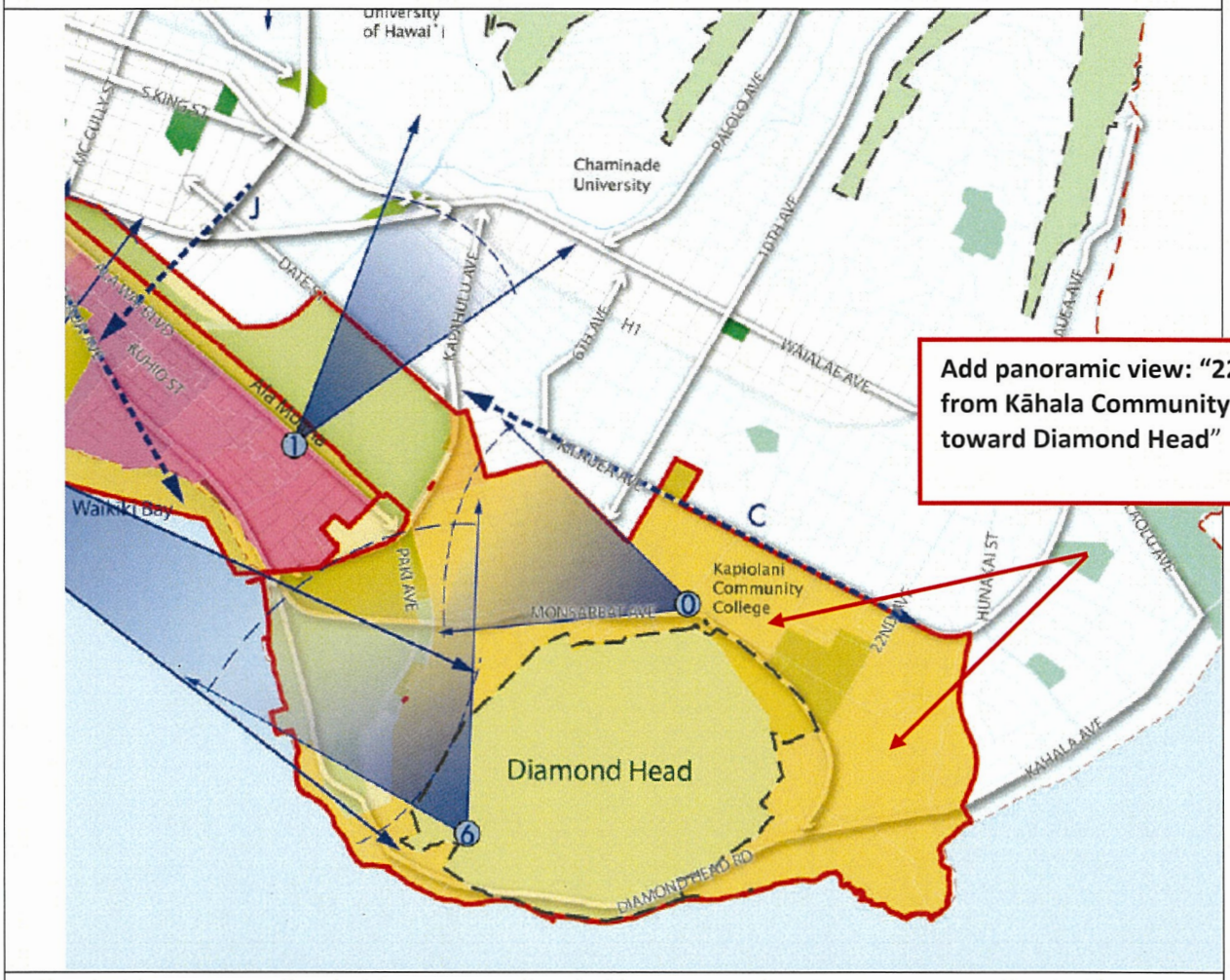


DPP recommendation: Support

The DPP supports adding a panoramic view as follows:

a) Add Maunalani Community Park to the views map (note: very small public parks are not all pictured on the map)
b) Add a view cone from Maunalani Community Park with a sweep from Diamond Head to Maunalua Bay on Fig. 2.5: Significant Public Views, East (page 75)
c) Label Maunalua Bay on views map
d) Add Panoramic View: "21. from Maunalani Community Park toward Diamond Head and Maunalua Bay" to the map legend on page 74

8. Significant Public Views: Add significant panoramic public views from Kāhala towards Diamond Head

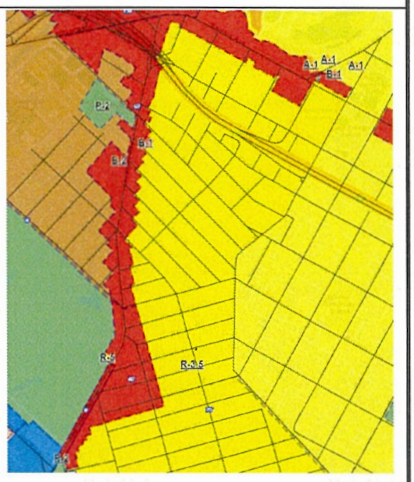


DPP recommendation: Support

The DPP notes that Diamond Head is not visible from all points in the Kāhala neighborhood and supports adding a panoramic view as follows:

a) Add a view cone from the center of Kāhala Community Park with a sweep across Diamond Head
b) Add Panoramic View: "22. from Kāhala Community Park toward Diamond Head" to the map legend on page 74

DPP-1. The area diamond head of Kapahulu Avenue, mauka of Brokaw Street, and makai of the H-1

Proposed Plan	DPP Proposed Change	Zoning
Town Neighborhood Low (Generally 2-4 stories)		R-3.5 (Generally 1-2 stories)
	From: **Town Neighborhood Low** (Generally 2-4 stories) To: **Near Town Neighborhood** (Generally 1-3 stories)	

Comments: The Proposed Plan map recommendation was based on policy support for appropriate levels of densification immediately surrounding existing commercial corridors. In consideration of comments received from Neighborhood Board No. 5: Diamond Head/Kapahulu/St. Louis Heights during public engagement, as comment to the Public Review Draft, and testimony to the Planning Commission, and recognizing the condition of existing infrastructure (sidewalks, street parking), the DPP proposes to change the subject area from Town Neighborhood Low to the Near-Town Neighborhood designation. Near-Town Neighborhood most closely mirrors the current zoning, while supporting affordability, and multi-generational family and low-density multi-family units.

Attachment 2

Below is the Department of Planning and Permitting's (DPP's) response to a Resolution from Neighborhood Board No. 5, Diamond Head/ Kapahulu/ St. Louis Heights, dated December 14, 2023, and received in its final format by the City and County of Honolulu Planning Commission (PC) on March 8, 2024, as public testimony on the update to the Primary Urban Center Development Plan (PUC DP).

While the DPP does not typically respond directly to public testimony to the Planning Commission, given the detailed nature of the comments and given the PC encouraged the DPP to review similar public testimony regarding the Kapahulu Community Plan from the November 15, 2023 public hearing, the DPP offers the following comments on the subject Resolution:

1. While many neighborhoods contain buildings or resources that are historic in nature, the Kapahulu neighborhood is not a designated historic area or itself a Special District. It is adjacent to the Diamond Head Special District that maintains important public views to Lē'ahi Crater (Diamond Head). The foot of the Kapahulu commercial corridor (below Mo'oheau Avenue) does fall within the Diamond Head Special District and has a height restriction of 40 feet. The remainder of the Kapahulu commercial corridor has a zoning height of 60 feet.

2. The Kapahulu Community Plan was funded in the FY2000 budget under the Jeremy Harris Administration as part of an islandwide "visioning process". The Kapahulu Community Plan was produced by the Department of Design and Construction in concert with a stakeholder Advisory Committee to identify Capital Improvement Projects for the neighborhood, along with other recommendations.

   The DPP's understanding is that the Kapahulu Community Plan, now almost 25 years old, provided recommendations to be taken up during the then PUC DP update. Page 4-23 of the 2001 Kapahulu Community Plan states: "…Furthermore, the recommended regulatory measures would be deferred until the Primary Urban Center Development Plan is adopted". The visioning process that created the Kapahulu Community Plan has not been repeated or updated under another City Administration. However, community members may always raise previous planning efforts for reference and commentary.

3. The DPP maintains the Charter-mandated and City Council adopted Development Plans and Sustainable Community Plans (DPs and SCPs) for the City to include needed updates that reflect changes in population, infrastructure needs and conditions, community concerns, a balanced transportation system, and environmental stewardship. In addition, the City must balance new development needs in such a way as to provide resilience to the relatively newer threats from climate change and sea level rise. The Proposed PUC DP reflects the City's policies that move away from urban sprawl-type development and recommend that the bulk of new density be in areas directed for growth most

notably, those covered by the adopted Transit Oriented Development Neighborhood Plans. However, when or if smaller scale development occurs within established neighborhoods, the Proposed PUC DP policies encourage modest growth around transit-served commercial corridors at a scale and intensity proportionate to the place. The DPP has responded to Neighborhood Board No. 5 concerns about development capacities in the Kapahulu neighborhood with map changes from the Public Review Draft to the Proposed Plan (See pages 95-98 of the 2023 PUC DP Review Report), and with an additional proposed change submitted via this testimony (See Attachment 1).

4. The subject Neighborhood Board Resolution makes specific revision requests (A through G) to the Proposed PUC DP. As a general note, the DP Land Use Maps do not dictate the specific provisions of zoning requirements but instead illustrate relative development types and intensities. Below are the DPP's responses to these specific requests:

   a. The DPP supports a Land Use Map change from Town Neighborhood-Low (peach) to Near-Town Neighborhood (bright yellow) for the residential area on the Diamond Head side of Kapahulu to 6th Avenue and bounded by Brokaw Street (makai) and the H-1 (mauka). The Near-Town Neighborhood Place Type describing residential neighborhoods adjacent to mixed-use areas most closely corresponds to the existing R-3.5 zoning (See Attachment 1). The DP Land Use Map is general and does not supersede existing zoning provisions such as heights or setbacks.

   b. The Kapahulu commercial corridor is already shown on the Proposed Plan Land Use Map in a manner consistent with current zoning heights. The foot of the Kapahulu commercial corridor (below Mo'oheau Avenue) falls within the Diamond Head Special District and has a height restriction of 40 feet. The Near-Town Corridor Low designation (light gold) is described as "~ 1 to 3 stories". The remainder of the Kapahulu commercial corridor has a current zoning height of 60 feet. It is shown as the Near-Town Corridor Medium designation (dark gold), which is described as "~3-6 stories, occasionally 7 or 8 at key intersections". It is important to note that the Place Types descriptors are generalized for the whole of the PUC and are just that: an illustration of a type of development use and intensity within a range. There is nothing in the Plan to say that each lot must therefore be zoned to span the full range of described height, especially in instances where there are other competing factors, such as the preservation of views. The DPP does not object to the addition of language recommending setbacks over two stories on Kapahulu Avenue in order to maintain a cohesive pedestrian experience. The most appropriate place to insert this language would be in the respective Chapter 3 Focus Areas Chapter section on page 106, under "Guidance, Land Use and Development, *Promote gradual, context-sensitive mixed-use infill.*"

c. Significant public views of Diamond Head are protected via the Diamond Head Special District. 1) Zoning heights along the portion of the Kapahulu commercial corridor that fall within the special district are lower than outside (40 feet vs 60 feet maximum). 2) The area previously described under item "a" has a 25' height limit under current zoning and DPP recommends the Land Use Map designation show the Place Type that most closely corresponds to current zoning (Near Town Neighborhood). These low heights adequately protect the residential neighborhood. 3) The DPP does not support the proposed significant view from Kaimukī High School. Other public views protected in the PUC DP originate from parks, stream corridors, and public streets (see below comment).

d. The Kaimukī High School site is within an A-2 zoning district with allowable heights to 150 feet. The A-2 zoning district also existed during the last PUC DP update, as shown in Figure 3-4 of the Kapahulu Community Plan. The Proposed PUC DP Land Use Map shows Kaimukī High School (and all other schools shown) with an "Institutional Areas and Campuses" designation (blue). The DPP does not dispute that community members make use of school campuses as a public resource.

e. Undergrounding overhead utility lines has long been a desire for many older neighborhoods. However, these projects are costly and may require supplemental financing and cost sharing. The Proposed PUC DP encourages the undergrounding of utilities on Waiʻalae Avenue (page 100) and Kapahulu Avenue (page 107) corridors.

f. Providing adequate infrastructure and improvements, assuring safe water supply, monitoring sewer capacity, and advocating for roadway and transportation efficiencies and improvements for the whole of the PUC are key features in the Proposed Plan. In addition to the Development Plans, the City has multiple planning efforts in aid of these outcomes, including the Watershed Management Plans, Bicycle and Pedestrian Master Plans, Complete Streets planning, storm water planning efforts, and others. For specific sites, infrastructure adequacy is determined at the time of project permitting.

g. Pursuant to Section 6-1509 of the City Charter, the Development Plan maps "shall not be detailed in the manner of zoning maps, shall describe the desired urban character and the significant natural, scenic and cultural resources for the several parts of the city to a degree which is sufficient to serve as a policy guide for more detailed zoning maps and regulations and public and private sector development decisions." Therefore, the DP and SCP maps must provide sufficient guidance without precluding the level of detail that is found in zoning and other regulations. The PUC DP update process developed the Place Types (Land Use) map for two primary purposes; to provide further differentiation from the zoning map; and to

acknowledge the growing land use trend towards reintegrating commercial and residential uses in certain situations. The Place Types categories describe both form and function in a broader way than specific zoning. The Place Types provide more flexibility for land use decisions while retaining adequate definition and guidance for specific planning or rulemaking. The DPP finds the Place Types to be a better tool for discussing land uses in the PUC than the traditional map categories that can become too proscriptive, are easily confused with zoning, and do not include adequate mixed uses.