

DEPARTMENT OF PLANNING AND PERMITTING
KA 'OIHANA HO'OLĀLĀ A ME NĀ PALAPALA 'AE
CITY AND COUNTY OF HONOLULU

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September 2, 2025

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

Dear Chair Waters and Councilmembers:

SUBJECT: Bill 56 (2025) Relating to Special Management Areas (SMA)
Letter of Opposition

The Department of Planning and Permitting (DPP) opposes Bill 56 (2025), which would impose a new procedural requirement on applicants for SMA Minor Permits to present the project to the neighborhood board of the district where the project is related.

By definition, SMA Minor Permit means an action that has no substantial adverse environmental or ecological effect, taking into account potential cumulative effects (Hawaii Revised Statutes §205A-22). Per Revised Ordinances of Honolulu §25-5.2(d), if the Director of the DPP determines the development is likely to have adverse effects, the Director shall deny the application and the applicant may seek an SMA Major Permit.

The cost of the project is also limited¹, and must include all related installation, materials, labor, grading, and infrastructure costs. In short, SMA Minor Permit projects are minor both in value and in impact. Furthermore, projects must meet all zoning use and development standards and must obtain all necessary permits and approvals. If a presentation to the neighborhood board is required for another land use permit, it would need to be completed before that permit could be issued.

¹ Act 125 (2025), signed into law on May 29, 2025, raised the valuation for certain SMA Minor Projects to \$750,000. The \$500,000 limit continues if the development is situated on a shoreline parcel or a parcel that is impacted by waves, storm surges, high tide, or shoreline erosion.

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The SMA Minor Permit processing timeline includes a 10-day period for the DPP to determine whether the permit is complete for processing, and then a 45-day permit processing timeline. The requirement to present to a neighborhood board prior to submitting the application could add 60 days to this processing timeline, which more than doubles the time an applicant would need to obtain the permit. Additional procedural requirements create unnecessary and unwarranted delays and costs for applicants with minor projects.

Finally, we would like to note that in 2024, the DPP received 132 SMA Permit applications. Of those, 80 permits were SMA Minor Permit applications. Many of the applications were for additions to existing dwellings, rooftop telecommunications facilities, and new dwelling units. We believe requiring these projects to be presented to the neighborhood boards would create unnecessary hardships for the applicants and unnecessary work for the neighborhood boards.

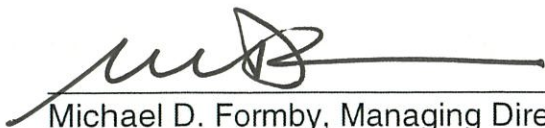
Should you have any questions, please contact me at (808) 768-8000.

Very truly yours,



Dawn Takeuchi Apuna
Director

APPROVED:



Michael D. Formby, Managing Director
Office of the Managing Director

*Strongly agree. The
administration opposes further
regulatory requirements on
SMA minor permits*