

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

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

RICK BLANGIARDI
MAYOR
MEIA



DAWN TAKEUCHI APUNA
DIRECTOR
PO'O

BRYAN GALLAGHER, P.E.
DEPUTY DIRECTOR
HOPE PO'O

REGINA MALEPEAI
2ND DEPUTY DIRECTOR
HOPE PO'O KUALUA

January 8, 2026

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: Supplemental Transmittal of Proposed Amendment to Chapter 21,
Revised Ordinances of Honolulu ("ROH"), 2021 the Land Use
Ordinance, Resolution No. 25-105, Relating to Development
Standards for the Apartment and Apartment Mixed-Use Districts

Enclosed for your consideration is a revised report from the Department of
Planning and Permitting (DPP) intended to correct Department Communication No. 10
(26). The DPP and Planning Commission inadvertently attached a word version of the
draft bill associated with Resolution No. 25-105 instead of the approved version of the
draft bill by the Council.

The Honorable Tommy Waters
Chair and Presiding Officer
and Members
January 8, 2026
Page 2

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

Very truly yours,



Dawn Takeuchi Apuna
Director

Enclosures: Corrected Report

APPROVED BY:



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

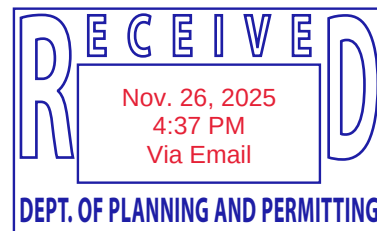
Authorization Dawn Takeuchi Apuna, Director

Advertisement Nov. 28, 2025

Public Hearing Dec. 10, 2025

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

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



RICK BLANGIARDI
MAYOR
MEIA



DAWN TAKEUCHI APUNA
DIRECTOR
PO'O

BRYAN GALLAGHER, P.E.
DEPUTY DIRECTOR
HOPE PO'O

REGINA MALEPEAI
2ND DEPUTY DIRECTOR
HOPE PO'O KUALUA

November 28, 2025

MEMORANDUM

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

FROM: Dawn Takeuchi Apuna, Director 
Department of Planning and Permitting ("DPP")

SUBJECT: Resolution No. 25-105 ("Resolution")
Proposing an Amendment to Chapter 21, Revised Ordinances of Honolulu
("ROH") 2021 the Land Use Ordinance ("LUO")
Relating to Development Standards for the Apartment and Apartment
Mixed-Use Districts

Transmitted for action is the DPP's report and recommendation for the proposed amendments to the LUO. On March 14, 2025, the City Council adopted the Resolution and draft Bill (attached as Bill A), which proposes to amend the LUO by changing Table 2-3.3 relating to the Development Standards for the Apartment and Apartment Mixed-use Districts. Bill A would reduce the minimum lot area, reduce the minimum lot dimensions, simplify and increase the maximum floor area ratio ("FAR") regulations, and make other technical and minor changes to the Apartment and Apartment Mixed-use District Development Standards, Table 21-3.3.

The DPP generally supports the proposal ("Bill A"), with slight adjustments and additions, as identified in DPP's proposed Bill B (attached). Bill B also reduces the minimum lot area and lot dimensions of the Districts in Table 21-3.3, as intended by Bill A, but to a lesser extent than is proposed in Bill A. Bill B further amends the commercial FAR maximum to incentivize mixed-use development, and simplifies the maximum building area standard to encourage efficient development.

The DPP recommends the Planning Commission support Bill B, as discussed in the attached Report.

Attachment: Report, Resolution, Bill A, and Bill B

**LAND USE ORDINANCE AMENDMENT – A COUNCIL-INITIATED PROPOSAL
RELATING TO DEVELOPMENT STANDARDS IN THE APARTMENT AND
APARTMENT MIXED-USE DISTRICTS**

Staff Report

November 26, 2025

I. BACKGROUND

On May 14, 2025, the City Council adopted Resolution No. 25-105, relating to Development Standards for the Apartment and Apartment Mixed-Use Districts (Districts), initiating amendments to Revised Ordinances of Honolulu (ROH) Chapter 21, also known as the Land Use Ordinance (LUO).

The proposed amendment would modify Table 21-3.3 of the LUO, as shown in the attached draft Bill (Bill A). In summary, Bill A would reduce the minimum lot area, reduce the minimum lot dimensions, simplify the regulations relating to maximum floor area ratio (FAR), increase the maximum FAR, and make other technical and minor changes to the District Development Standards, Table 21-3.3.

The Department of Planning and Permitting (DPP) generally supports the proposal (Bill A), with slight adjustments and additions, as identified in Bill B. Bill B also reduces the minimum lot area and lot dimensions of the Districts in Table 21-3.3, as intended by the Bill A, but to a lesser extent than is proposed in Bill A. Bill B further amends the commercial FAR maximum to incentivize mixed-use development, and simplifies the maximum building area standard to encourage efficient development.

Summary Table of Existing, Proposed, and DPP Recommendation			
Development Standard Feet (ft.)	Existing A/AMX (1/2/3)	Council Bill (Bill A)	DPP Bill (Bill B)
Min. Lot Dimension	70 ft. /70 ft./70 ft.	45 ft. /50 ft./50 ft.	60 ft. /60 ft./ 60 ft.
Min. Lot Size	7.5k/10k/20k	5k/5k/None	5k/5k/5k
Max FAR	0.3-0.9 / 0.4-1.9 /0.6-2.9	2/3/4	2/3/4
Others: Commercial FAR	0.3/0.4/0.6	No Change	Commercial FAR Separate (i.e., bonus to AMX)
Other: Building area	40-60 percent, based lot size	No Change	60 percent Standard

II. BRIEF REGULATORY HISTORY

Prior to 1969, zoning regulations were spread throughout several sections of the ROH, including an early “zoning” section that established districts and allowable uses, building code, fire code, subdivision code, and others. There was not a single table regulating development in the Apartment Districts like Table 21-3.3; rather, there was a web of overlapping standards found in different codes. In 1969, the Comprehensive Zoning Code (CZC) was adopted, and included a complex Land Use Intensity (LUI) scale for development in the Apartment Districts. The LUI was based on lot area, and involved a series of ratings that addressed floor area, open space, living space, and recreation space for all dwellings. The highest LUI allowance for an Apartment District equated to a FAR of 4.0. In 1978, the CZC was significantly amended to update and simplify the development standards related to density. In general, the maximum allowable density was reduced compared to the previous standards up to that point. Then, in 1986, the LUO was adopted. The LUO introduced a modest increase in FAR compared to the 1978 CZC, and simplified the other development standards for the districts. Although the LUO has continuously been updated since 1978, Table 21-3.3 has remained largely unchanged.

III. ANALYSIS OF REGULATIONS, AND POLICIES

Applicable Areas: To arrive at a realistic picture of the geographic effect of Bills A and B, we first found all lots in the impacted zoning districts (7,729), and eliminated lots that are not likely to be subdivided or redeveloped. The lots eliminated from the analysis were: Roadway lots, public utilities, federal lands, lots smaller than 10,000 square feet (sq. ft.), lots narrower than 45 sq. ft., land valued at less than \$10,000 (likely roadway or utility lots), and lands with a tax code of “preservation” or “public use.” The remaining “underutilized” lots with low building-to-land values were then evaluated because lots with higher building values are not likely to be subdivided or redeveloped. The result was 308 lots that we considered “developable lots,” with a reasonable chance of subdivision and redevelopment in the relatively near future. These 308 lots are mostly in the A-2 District, and mostly in the Primary Urban Center, as shown below:

Zoning Lots with High Development Potential in the Apartment and Apartment Mixed Use Districts									
Zoning	Total	Primary Urban Center	'Ewa	Central O'ahu	East Honolulu	Ko'olau Poko	Ko'olau Loa	North Shore	Wai'anae
A-1	59	20	23	11	0	1	1	3	0
A-2	207	81	53	58	4	9	0	0	2
A-3	6	6	0	0	0	0	0	0	0
AMX-1	3	0	3	0	0	0	0	0	0
AMX-2	33	7	24	2	0	0	0	0	0
AMX-3	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Total	<u>308</u>	114	103	71	4	10	1	3	2

The effect of Bills A and B will be geographically limited, with the Primary Urban Center and 'Ewa Development Plan (EDP) Areas containing over two-thirds of the "developable lots." When including Central O'ahu, which includes Wahiawā, Mililani, Koa Ridge, Waipi'o and areas around the Skyline in Transit Oriented Development (TOD) Plan areas, nearly 95 percent of all "developable lots" are contained in these areas. The remaining five percent of the "developable lots" are then within the urban growth boundaries of the more rural Sustainable Communities Plan areas. These are areas already zoned for multi-unit dwellings and in areas that were previously deemed appropriate for more urban development. In these areas, the site-specific height standards, along with the unchanged yard and height setback standards, will control building massing and limit inappropriate development in these areas. Considering these limitations, the more rural plan areas are not expected to be impacted in a meaningful way by this proposal.

We found that Bills A and B could result in an approximate doubling of the number of "developable lots" resulting from future subdivisions when compared to the existing standards, as shown on the table below. Coupled with the adjustments to the maximum FAR, the Bills will contribute significantly to opportunities to develop housing in these Districts.

Potential Increase in the number of Subdivided Lots in the Apartment and Apartment Mixed Use Districts, Bill A and Bill B						
Zoning	Number of Lots Existing	Possible Number of Lots No Change	Possible Number of Lots Bill A	Difference Bill A	Possible Number of Lots Bill B	Difference Bill B
A-1	59	2,343	3,528	+1,185	3,528	+1,185
A-2	207	3,007	6,058	+3,051	6,054	+3,047
A-3	6	68	426	+358	211	+143
AMX-1	3	131	196	+65	196	+65
AMX-2	33	894	1,798	+904	1,798	+904
AMX-3	n/a	n/a	n/a	n/a	n/a	n/a
Total	308	6,443	12,006	+5,563	11,787	+5,344

ROH Chapter 21, the LUO: The LUO is the zoning code for the City and County of Honolulu, as required by Section 6-1514 of the City Charter. Each zoning district is specified on adopted zoning maps. The individual district development standards, like Table 21-3.3, are found in the LUO. The LUO encourages development in accordance with the Council-adopted land use policies, including the City's General Plan, the Development Plans, the Sustainable Communities Plans, and, where applicable, other adopted plans. The plans are developed by the community through an ongoing outreach process facilitated, typically, by the DPP and other City and County agencies. The plans are then adopted by the City Council.

As noted in the Resolution, the Districts are mapped and located in areas that have been identified through extensive community planning and engagement as appropriate for construction of additional housing. A vast majority of these zoning districts are located in the Primary Urban Center Development Plan (PUCDP) Area, the EDP Area, and along the Skyline route within TOD Neighborhood Plan areas. Considering the targeted zoning districts for this amendment, and the general alignment with the land use policies of the City, discussed below, the proposed Bills support the purpose and intent of the LUO.

Apartment and Apartment Mixed-Use Zoning Districts: The purpose and intent of the Districts is to allow for a range of densities and a variety of living environments, ranging from common-wall housing (i.e., duplex and row-houses) to high-rise apartments. In the Apartment Mixed-Use Districts, complementary uses and certain

commercial uses are allowed with limitations on FAR. These mixed-use Districts are meant to support daily or weekly commercial services and needs of a neighborhood within the neighborhood. In effect, the Apartment Districts are single-use districts providing housing, and the Apartment Mixed-use Districts are more complete neighborhoods that can conserve transportation energy, lessen automobile dependency, create diverse neighborhoods, and optimize the use of land, urban services, and infrastructure. Both are meant to be primarily neighborhoods of residential uses. The proposed Bills do not change the permitted uses in each district, and will support additional, primarily residential, development. Therefore, the proposed Bills support the purpose and intent of the Districts.

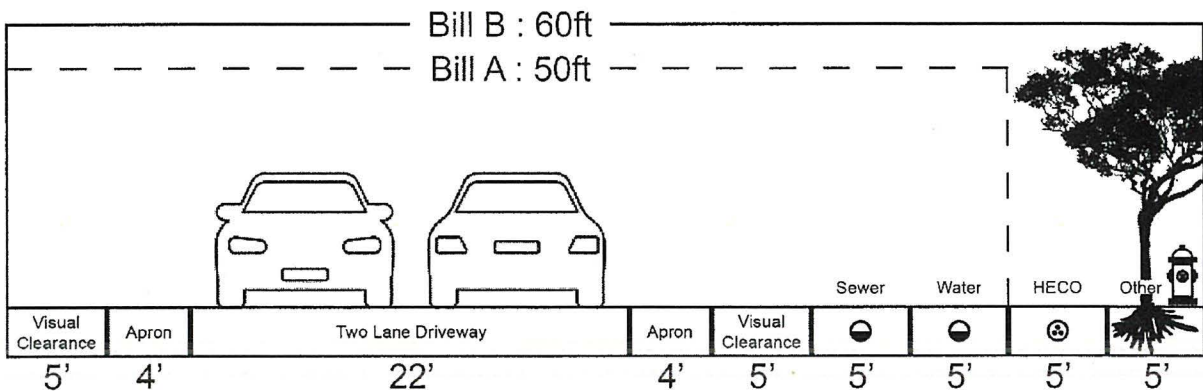
Table 21-3.3 District Development Standards: Table 21-3.3, the subject of the Bills, should support the purpose and intent of the Districts by setting development standards to allow types of living environments listed in the LUO (i.e., duplex to high-rise) and supported by the land use policies of the City. Bill A is specifically proposing modifications to the minimum lot area, minimum lot dimensions, and maximum FAR of these Districts. In addition to these standards in Table 21-3.3, Bill B is also proposing changes to maximum building area and maximum commercial use density.

Minimum lot area is a function of subdivision lot density, and is meant to ensure that each lot is large enough to be minimally developed with all the necessary features to support land use policies of the City (e.g., safe, affordable, efficient). Buildings that meet the building code, housing code, and fire code all take up lot area. On-site open space provisions, or parking spaces and maneuvering areas, also take up lot area. The minimum lot area assures that at least a base amount of space will be provided on each lot without creating inefficient development patterns or development that does not support the adopted land use policies. Generally, on a larger lot, the space can be used more efficiently with less area dedicated to duplicate provisions across multiple smaller lots. In short, there is an efficiency of scale that allows larger lots to be built at higher densities. On the other end of the spectrum, smaller lot sizes can allow more lots that are then available to more people to develop at more modest intensities and with more unique or site-specific features and flavors. There is a middle ground to be found so that inefficient development patterns do not take hold, while also creating opportunities for greater participation in land ownership and development. Considering the minimum needs to develop lots efficiently, we believe 5,000 sq. ft. of lot area should be the minimum across each of the Districts in Table 21-3.3. Bill A does not propose a minimum lot size for the A-3 High-density Apartments and AMX-3 High-density Apartment Mixed-use Districts. Smaller lots will result in very low densities or difficult to develop lots. Bill B proposes a standard 5,000 sq. ft. lot minimum for each of the subject Districts.

Lot dimension standards preserve orderly subdivision of land, which in turn assures that each lot is able to access adequate infrastructure through its frontage and be developed in a way that is supportive of the Council-adopted land use policies. Adequate infrastructure within the subdivision lot means transportation networks (walkways, driveways, vehicle maneuvering areas for deliveries and private vehicles) and utility

connections (water [and often backflow preventer], sewer, stormwater, electricity [and often ground-mounted transformer]). On the public side in the right-of-way, infrastructure includes bus stops, street trees, pedestrian lighting and streetlights, sidewalks, stormwater catchments, fire hydrants, street signs, sidewalk ramps, driveway aprons, street parking, bike lanes, vehicle travel lanes, and more. All these elements of a development plan have spatial needs, and many of those spatial needs are mapped along the frontage of a subdivision lot, which is usually the lot's minimum dimension. Competition for space can result in undesirable or undevelopable lots if insufficient frontage is provided. Often, the features that support multi-modal transportation and green infrastructure lose out to driveways, which is inconsistent with many vital Council-adopted land use policies. The minimum dimensions should comfortably accommodate these features necessary not only to develop individual lots, but also blocks and neighborhoods that support the community's vision. Because this dimension can have an outsized impact on the features made available to our communities, the minimum lot size and dimensions are thus a critical factor in ensuring our neighborhoods are developed appropriately. Bill A, which suggests 45- and 50-foot minimum dimensions for the Districts, would not provide enough space to accommodate development that supports the land use policies of the City. Bill B recommends a standard 60-ft. minimum dimension, which is a reduction from the current standard (70 ft.), but is not so narrow as to result in undesirable development.

Figure 1. Simplified Property Frontage and Typical Features



As shown above in Figure 1, a two-way driveway that supports a higher-density development is about 20 to 22 ft. in width, depending on the type of vehicle and turning radius needing to safely enter and exit the roadway. Each flair of the driveway apron is four ft., from which there is a five-foot visual clearance so vehicles can see pedestrians, bicyclists, and other vehicles. Thus, about 40 ft. of a frontage is likely to be developed with a driveway and clearances. In the remaining area, sewer, water, and electrical lines all need to cross into the property, each requiring their own space. On a 50-ft. frontage, that would leave no room for on-street parking (18-ft.) fronting this newly subdivided lot. In the sidewalk area, there would be no street trees (five ft., plus clearances), stormwater catchment, bus stop, or any other public features. This has been our experience in other Districts with narrower 50-ft. frontages, including lower density developments like those in the Residential and certain Apartment Districts that

are building lower densities and single-family homes. This is also our experience in higher density developments, like Chapter 32 Projects or those in the BMX-3 Community Business Mixed-use and BMX-4 Industrial Business Mixed-use Districts. For these reasons, the DPP recommends a 60-ft. minimum lot dimension, as specified in Bill B.

FAR is a tool that can serve multiple purposes. On the individual lot level, FAR helps to address building bulk, size, and density. It can impact how big or small buildings feel to the public, how much light and wind makes it down to the street, and how many neighbors a person might have. If the FAR is set too low, the population density needed to support the visions of the Council-adopted land use policies will not materialize. After all, efficient bus routes and neighborhoods with a suite of services need people living in close proximity to support those services. Set the FAR too high, and access to light and air, or community-defining views of our natural environment, like Lē'ahi, would be compromised. If the FAR is too low, not enough housing opportunities exist, and low-density development could shift pressures to develop inefficient green-field development in more rural areas. Beyond the scale of the individual lot, FAR allowances inform other City and State agencies when they develop functional plans for larger island-wide infrastructure systems, like transit, sewer, water, solid waste, parks, or even schools. By anticipating the maximum floor area of a neighborhood, a functional plan prepared by an infrastructure agency can plot regional population growth to anticipate capacity needs of the future. The DPP sought input from various infrastructure agencies regarding the draft Bill. The infrastructure agencies did not identify any inconsistencies between this Bill and their functional plans. Although alterations to the FAR may have down-stream impacts on the planning efforts of these agencies in the long run, in the near-term, individual development projects will be reviewed to confirm adequate infrastructure exists for the project at the time the permit is issued. We feel that the additional FAR is appropriate, and the complementary standards of yards, heights, and height setbacks, which are not being adjusted, provide adequate checks against inappropriate development that may become possible with the additional FAR.

Furthermore, we find support in the Council-adopted land use policies and in the text of the LUO for additional allowances in the AMX Districts to incentivize efficient mixed-use development. We therefore also recommend that the maximum commercial FAR be applied as an additional allowance, not as part of the overall FAR maximum, as shown in Bill B. This relatively minor addition of FAR (0.3 – 0.6) will eliminate competition between residential and potential neighborhood-centric commercial uses, and support the type of mixed-use neighborhoods that optimize the use of land, urban services, and infrastructure.

Maximum building area is the maximum percentage of a lot that can be covered by a structure over 30-inches in height. A limitation on building area is meant to keep places visually open and free from structures to provide a break from the built environment and, create opportunities for green space; however, it is important to distinguish landscaped open space, like those in required yards, from places that do not count as

building area but are also not landscaped. Parking lots are not building area and tend to make up a large proportion of the area outside of the required yards that is not building area. The proposed Bill A is not suggesting any changes to building area in Table 21-3.3.

The present building area maximum is a range, from 60 percent to 40 percent, depending on lot size. Smaller lots have higher building area maximums, and larger lots have lower building area maximums. In our experience, this fine-grained approach is unnecessary and can be simplified. The public is not benefitting from lower-maximum building area required of larger lots as they are usually far away from a public space, and are usually parking lots. Therefore, we recommend that the standard maximum building area for all of the Districts in Table 21-3.3 be set at 60 percent, as shown in Bill B. This will simplify the regulations and create a single and scalable standard that follows the lot size linearly. We also feel that by setting the standard at the higher end of the existing spectrum, the relaxed regulations may result in more creative or efficient development patterns that meet our growing needs on limited land. For example, we may achieve more landscaped open space if Projects opt for efficient structured parking (building area) instead of open parking lots (not building area) because of this new allowance.

Other standards that are not being changed in the Bills are also contained in Table 21-3.3, and are complementary regulations that impact building location, bulk, size, and density. Required yards, height setbacks, and maximum building height are not being adjusted by the Bills. As a suite of standards, Table 21-3.3 has a coordinated effect on the urban design of our community. Like a belt and suspenders, these complementary regulations are redundant in some situations, but vital in others to limit inappropriate development. We do not recommend changing any of these other standards at this time.

Adopted Plans and Policies: A summary and analysis of relevant plans and policies is provided below. Modifications to the LUO should be supported by the O'ahu General Plan, the Development Plans, the Sustainable Communities Plans, and, as applicable, adopted neighborhood plans and other official plans and policies of the City (e.g., TOD Neighborhood Plans, Climate Ready O'ahu). Generally, the DPP finds strong support among these plans and policies for the Bills.

O'ahu General Plan (OGP): The OGP sets forth the City's objectives and broad policies for the long-range development of the island. The following sections of the OGP are relevant to the proposal:

- Section IV, Objective A: To ensure a balanced mix of housing opportunities and choices for all residents at prices they can afford.
- Section IV, Objective C: To provide residents with a choice of living environments that are reasonably close to employment, schools, recreation, and commercial centers, and that are adequately served by transportation networks and public utilities.

- Section VII, Objective A: To coordinate changes in the physical environment of O'ahu to ensure that all new developments are timely, well-designed, and appropriate for the areas in which they will be located.
- Section VII, Objectives C and D: To develop an urban corridor from Wai'alae-Kahala to Pearl City, and a secondary urban center in 'Ewa.
- Section VII, Objective F: To create and maintain attractive, meaningful, and stimulating environments throughout O'ahu.
- Section VII, Objective G: To promote and enhance the social and physical character of O'ahu's older towns and neighborhoods.

Policies in the OGP repeatedly emphasized that desirable housing must be supported by adequate infrastructure, well-integrated with transportation systems, surrounding land uses, and the natural environment while also ensuring access to schools, services, amenities, and job opportunities. The proposed changes only impact existing Apartment and Apartment Mixed-use Districts, which are intentionally already well-integrated into urban districts. The proposal will increase opportunities for development that supports the above objectives; however, the lack of a minimum lot size in the high density Districts and the reduced minimum lot dimensions of Bill A may result in undesirable outcomes counter to the above objectives. Bill B addresses this by setting a 60-ft minimum lot dimension and a standard 5,000 sq. ft. lot size.

Development Plans (DPs) and Sustainable Communities Plans (SCPs): The DPs, consisting of the Primary Urban Center and EDPs, conceptualize schemes for implementing the objectives and policies of the OGP, with the explicit intent of focusing a majority of the development into these primary and secondary urban areas of O'ahu. The SCPs, consisting of East Honolulu, Ko'olau Poko, Ko'olau Loa, North Shore, Waianae, and Central O'ahu, generally create a vision that focuses modest development into identified urban growth boundaries while preserving regional character. With over two-thirds of "developable lots" located in the development plan areas, we find strong support for the Bill in the DPs.

The PUCDP calls for directing higher density growth to mixed-use neighborhoods and bus-transit corridors, as well as increasing opportunities for middle-density multi-unit housing in appropriate areas. The existing zoning district maps already follow these corridors. As such, additional development potential will reinforce this desirable pattern of development.

Although the EDP area is identified as the secondary urban center where growth should be directed, the area is generally constrained by relatively low heights in the Apartment and Apartment Mixed-Use District areas. The changes proposed in the bills are not likely to alter the envisioned development patterns expressed by the communities in 'Ewa. Furthermore, many of the "developable lots" identified in this region are likely in areas that have Urban Design Plans, that are being developed as part of a "master planned" community, or are located in TOD areas where the vision of the adopted TOD neighborhood plans includes higher densities than the EDP area considers. Additional private association restrictions enforce a more granular vision for each community, and

may further restrict density. The Bills do not alter the maximum heights, yards, or height setbacks in these Districts in the EDP Area, and will not alter that local associations' abilities to enforce private design restrictions.

Other than areas within the Central O'ahu SCP area (which includes large areas in Mililani and Koa Ridge, TOD areas, as well as historically more urban areas in Wahiawā, Waipi'o, Waikele, and Waipahu), only five percent of "developable lots" are located in the more rural SCP Areas. No impact is expected on rural areas, since Apartment and Apartment Mixed-use districts are limited to existing urban growth boundaries and towns. Impacts on these town center areas are expected to be limited by other factors, like height limits and infrastructure access, which will continue to control development and retain desirable character.

TOD: Eight TOD Neighborhood Plans have been developed by the City (and one by the State) to provide a vision and direction for communities along the Skyline route. Each neighborhood TOD Plan serves as the basis for the creation of the TOD special district and the TOD development regulations. TOD development regulations are meant to focus development energy in mixed-use and newly transit rich communities around Skyline and reoriented Bus services. In the TOD neighborhood areas, the primary residential districts are or will be the AMX-2 Medium and AMX-3 High-density Apartment Mixed-Use Districts. The height, along with any bonus height available, are closely studied in each plan. The modest increase in density is generally supported by the TOD Plans. Additionally, the TOD Plans imagine a vibrant multi-modal supportive streetscape, including a well-designed streetscape and frontage area. As previously indicated, the minimum lot dimension of 50 ft. may preclude development of such pedestrian-oriented areas. The minimum lot sizes and dimensions proposed in Bill B are more capable of accommodating a suite of streetscape amenities to support TOD.

Climate Ready O'ahu: Climate Ready O'ahu is a science-based, community-driven strategy for O'ahu to adapt to the impacts of climate change, and lays out a detailed list of strategies, policies, and actions that the City can take to prepare, protect, and safeguard community members, 'āina, and infrastructure from climate hazards today and for generations to come. Dense development is efficient and offers strategically located opportunities to provide affordable housing while preserving valuable agricultural lands and environmental resources elsewhere. However, urban areas are also first to feel the effects of climate change through heat and flooding at higher rates. In our experience, narrow lots are challenged to site all expected infrastructure across their frontages, usually resulting in loss of green infrastructure and a focus on automobile access. Street trees are critical infrastructure that support stormwater infiltration, recharge aquifers, reduce electricity consumption, combat rising temperatures, and support comfortable outdoor environments for people looking to walk, wheel, or ride transit. The minimum lot dimensions proposed in Bill B support the strategy of providing green infrastructure and shade by preserving space for green infrastructure.

IV. RECOMMENDATION

The DPP supports the intent of the proposed amendment because it encourages reasonably dense development in appropriate areas as a means to alleviate pressures on housing supply. However, we recommend a few adjustments, as discussed above.

Therefore, we recommend adopting the attached revised draft Bill B, which makes the following changes to the Council's proposed Bill A:

1. Standard 5,000 sq. ft. lot area across all Districts.
2. Standard 60-foot minimum lot dimension across all Districts.
3. Distinguish Commercial and Residential FAR maximums, and reorganize the Table 21-3.3 for legibility.
4. Standard maximum building area of 60 percent across all lot sizes and Districts.

Bill B will create significant opportunities for housing and community development in areas envisioned to be developed at these intensities, as supported by the adopted land use policies of the City Council.



HONOLULU CITY COUNCIL
KE KANIHELA O KE KALANA O HONOLULU
CITY AND COUNTY OF HONOLULU

No. 25 - 10.5

RESOLUTION

PROPOSING AN AMENDMENT TO CHAPTER 21, REVISED ORDINANCES OF HONOLULU 2021 (THE LAND USE ORDINANCE), RELATING TO THE DEVELOPMENT STANDARDS FOR THE APARTMENT AND APARTMENT MIXED-USE DISTRICTS.

WHEREAS, a lack of affordable housing has become one of the most significant and challenging social problems in the City and County of Honolulu ("City"); and

WHEREAS, the disruptive social and economic effects resulting from the lack of affordable housing are becoming more pronounced, including: an alarming increase in the City's homeless population; an increased strain on the resources of social service agencies, relief and support non-profit entities, and churches; and a growing population that struggles to cover basic, cost-of-living expenses; and

WHEREAS, according to the 2019 Hawai'i Housing Planning Study published by the Hawai'i Housing Finance and Development Corporation (the "2019 HHFDC Housing Planning Study"), O'ahu needs an additional 22,168 housing units over a five-year period to meet the projected demand for housing, with 12,046 (54 percent) of those units needed for low-income households earning 80 percent or less of the area median income, as determined by the U.S. Department of Housing and Urban Development; and

WHEREAS, in March of 2024, the City Council ("Council") considered Resolution 24-65, which contemplated the impacts of House Bill 1630, H.D. 1 and Senate Bill 3202, S.D. 2 (hereinafter together "the State bills"), both of which relate to "urban development"; and

WHEREAS, the intention of the State bills appears to be to create opportunities for the provision of additional residential housing on residentially zoned property by requiring the counties to allow, subject to certain exceptions, additional accessory dwelling units on residentially zoned properties and to allow further subdivision of such properties; and

WHEREAS, the State bills, although well-meaning, were met with stark community opposition, driven in part by concerns about the proliferation of undesirable "monster homes" in residential neighborhoods on O'ahu; and



HONOLULU CITY COUNCIL
KE KANIHELA O KE KALANA O HONOLULU
CITY AND COUNTY OF HONOLULU

No. 25 - 105

RESOLUTION

WHEREAS, certain versions of the State bills would have allowed significantly more density in neighborhoods that have historically been reserved for single-family dwellings—a potentially catastrophic change that could reduce the availability of on-street parking; increase traffic congestion; and overburden public sewer, water, and other infrastructure—without allowing adequate time or means for the City to mitigate these impacts; and

WHEREAS, recognizing these community concerns, on March 25, 2024, the Council passed Resolution 24-65, CD1, which, among other things:

1. Expressed the Council's opposition to the enactment of the State bills, including, among other things, the substantial impact of the bills on the City's existing zoning districts and corresponding development standards for structures therein, and the character and nature of the neighborhoods and communities throughout the City; and
2. Acknowledged that the Council agrees with the purported intent of the State bills and that it supports some of the policy ideas considered in the State bills, as reflected in the policies recently adopted and actively being considered by the Council, while noting that these policies should be considered in accordance with the City's planning process, which provides City residents and businesses with ample opportunity for engagement and input; and

WHEREAS, the Council believes that, while there may be a need for increased density to address the City's existing housing crisis, increasing density in residential districts must be considered carefully to ensure the higher density is consistent with the O'ahu General Plan and the City's Development Plans and Sustainable Communities Plans (collectively, the "City plans"); and

WHEREAS, the City plans, which incorporate extensive input from affected communities as well as from federal, State, and local officials, further indicate the need for reasonable and sustainable growth; and

WHEREAS, for example, in Section IV, Objective A of the O'ahu General Plan, Policy 12 indicates that the City will seek to "[p]romote higher-density, mixed-use development *where appropriate* . . . to increase the supply of affordable and market housing in convenient proximity to jobs, schools, shops, and public transit" (emphasis added); and



HONOLULU CITY COUNCIL
KE KANIHELA O KE KALANA O HONOLULU
CITY AND COUNTY OF HONOLULU

No. 25 - 105

RESOLUTION

WHEREAS, consistent with this objective, the City's Land Use Ordinance ("LUO") presently allows the construction of a one-family detached dwelling unit in addition to an accessory dwelling unit or an 'ohana unit (for a total of two dwelling units on one lot), two-family detached dwellings (for a total of two dwelling units on one lot), or many dwelling units dependent on the size of the lot, in the City's residential zoning districts; and

WHEREAS, Ordinance 25-2, enacted on January 3, 2025, and which takes effect on September 30, 2025, amends the LUO to allow even higher density in those districts by allowing the construction of both an accessory dwelling unit and an 'ohana unit that are accessory to a one-family detached dwelling unit (for a total of three dwelling units on a single lot); and

WHEREAS, Senate Bill 3202, S.D. 2, H.D. 1, C.D. 1, was enacted as Act 39, Session Laws of Hawaii 2024 ("Act 39"), which took effect on May 28, 2024; and

WHEREAS, Act 39 includes a requirement that the City adopt or amend an ordinance that defines reasonable standards that would add development potential in the City's existing apartment districts or apartment mixed-use districts for 22,168 housing units (which is the City's projected five-year demand for housing units for ownership or rental from 2020 through 2025, as stated in the 2019 HHFDC Housing Planning Study); and

WHEREAS, the apartment zoning districts of the City allow for a range of living environments, primarily in the form of multi-family dwellings such as common wall housing, walkup apartments, and high-rise apartments; and

WHEREAS, the City's apartment mixed-use zoning districts allow, in addition to multi-family dwellings, some commercial uses that support the service needs of the neighborhood, lessen automobile dependency, create more diverse neighborhoods, and optimize the use of land and urban services and facilities; and

WHEREAS, the development standards for the City's apartment and apartment mixed-use zoning districts are contained in Table 21-3.3 of the LUO, Chapter 21, Revised Ordinances of Honolulu 2021 ("ROH"); and

WHEREAS, the Council finds that, by reevaluating the development standards of the City's apartment and apartment mixed-use zoning districts, thousands of affordable and market rate housing units could be built, which would be a significant step forward in addressing the City's housing crisis and in meeting the requirements of Act 39; and



HONOLULU CITY COUNCIL
KE KANIHELA O KE KALANA O HONOLULU
CITY AND COUNTY OF HONOLULU

No. 25 - 10.5

RESOLUTION

WHEREAS, the Council further finds that these units would be built in districts that, through extensive community planning and engagement, have been deemed appropriate for the construction of additional housing, as set forth in the City plans—unlike the mandates imposed by the State bills, which are contrary to the objectives of the City plans to direct growth to preserve and protect residential districts from higher-density development; and

WHEREAS, Section 6-1513, Revised Charter of the City and County of Honolulu 1973 (Amended 2017 Edition), as amended ("Charter"), provides that "[a]ny revision of or amendment to the zoning ordinances may be proposed by the council and shall be processed in the same manner as if proposed by the director [of planning and permitting]"; and

WHEREAS, the term "zoning ordinances," as used in Charter Section 6-1513, includes both amendments to the LUO and to ordinances designating particular parcels of property in terms of the LUO; and

WHEREAS, ROH Chapter 2, Article 24, Part A, establishes procedures and deadlines for the processing of Council proposals to revise or amend the general plan, a development plan, a zoning ordinance, and the subdivision ordinance, and clarifies the responsibility of the Director of Planning and Permitting to assist the Council in adequately preparing its proposals for processing; now, therefore,

BE IT RESOLVED by the Council of the City and County of Honolulu that the Director of Planning and Permitting and the Planning Commission are directed, pursuant to Section 6-1513, Revised Charter of the City and County of Honolulu 1973 (Amended 2017 Edition), as amended, and Chapter 2, Article 24, Part A, Revised Ordinances of Honolulu 2021 ("ROH"), to process the proposed amendment to ROH Chapter 21 (the "Land Use Ordinance"), attached hereto as Exhibit A, in the same manner as if the proposal had been proposed by the Director of Planning and Permitting; and

BE IT FURTHER RESOLVED that the Director of Planning and Permitting is directed to inform the Council upon the transmittal of the Director of Planning and Permitting's report and the proposed Land Use Ordinance amendment to the Planning Commission; and



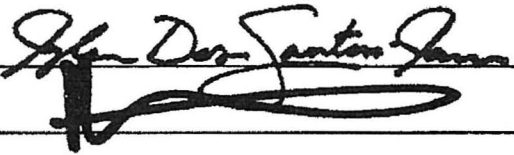
HONOLULU CITY COUNCIL
KE KANIHELA O KE KALANA O HONOLULU
CITY AND COUNTY OF HONOLULU

No. 25 - 10.5

RESOLUTION

BE IT FINALLY RESOLVED that, pursuant to ROH Chapter 2, Article 24, Part A, the City Clerk shall transmit copies of this resolution and the exhibit attached hereto to the Director of Planning and Permitting and the Planning Commission of the City and County of Honolulu, and shall advise them in writing of the date by which the Director of Planning and Permitting's report and accompanying proposed ordinance are required to be submitted to the Planning Commission.

INTRODUCED BY:



DATE OF INTRODUCTION:

APR 2 2025

Honolulu, Hawai'i

Councilmembers

Bill A



HONOLULU CITY COUNCIL
KE KANIHELA O KE KALANA O HONOLULU
 CITY AND COUNTY OF HONOLULU

ORDINANCE _____

BILL _____

A BILL FOR AN ORDINANCE

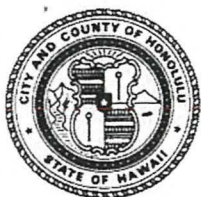
RELATING TO DEVELOPMENT STANDARDS IN THE APARTMENT AND APARTMENT MIXED-USE DISTRICTS.

BE IT ORDAINED by the People of the City and County of Honolulu:

SECTION 1. Purpose. The purpose of this ordinance is to amend the development standards for the apartment and apartment mixed-use districts.

SECTION 2. Table 21-3.3, Revised Ordinances of Honolulu 2021, is amended to read as follows:

Table 21-3.3							
Apartment and Apartment Mixed-Use Districts Development Standards							
Development Standard		District					
		A-1	A-2	A-3	AMX-1	AMX-2	AMX-3
Minimum lot area (square feet) ¹		[7,500] 5,000	[10,000] 5,000	[15,000] none	[7,500 ²] 5,000	[10,000 ²] 5,000	[15,000 ²] none
Minimum lot width and depth (feet) ¹		[70] 45	[70] 50	[70] 50	[70] 45	[70] 50	[70] 50
Yards (feet):	Front	10	10	10	10	10	10
	Side and rear ^{[3]2}	5 ^[4-13] or 10	5 ^[4-13] or 10	5 ^[4-13] or 10	5 ^[4-13] or 10	5 ^[4-13] or 10	5 ^[4-13] or 10
Maximum commercial use density (FAR)		n/a			0.3 see § 21-3.90-1(c)	0.4 see § 21-3.90-1(c)	0.6 see § 21-3.90-1(c)
Maximum building area		Lot area (sq. ft.)			Requirement		
		Less than 7,500			60% of zoning lot		
		[7,500—20,000] 7,500-20,000			50% of zoning lot		
		Over 20,000			40% of zoning lot		
Maximum height (feet) ^{[5]4}		30	per zoning map		30	per zoning map	
Height setbacks		none	per § 21-3.80-1(c)		none	per § 21-3.90-1(c)	
[Maximum density (FAR) for A-1 and AMX-1 districts based on zoning lot size]		[Lot area (sq. ft.)]		[FAR calculation]			
		[Less than 10,000]		[FAR = (.00003 x lot area) + 0.3]			
		[10,000—40,000]		[FAR = (.00001 x lot area) + 0.5]			
		[Over 40,000]		[FAR = 0.9]			



HONOLULU CITY COUNCIL

KE KANIHELA O KE KALANA O HONOLULU

CITY AND COUNTY OF HONOLULU

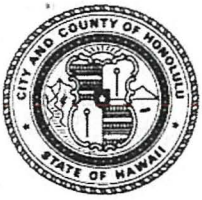
ORDINANCE _____

BILL _____

A BILL FOR AN ORDINANCE

Table 21-3.3						
Apartment and Apartment Mixed-Use Districts Development Standards						
Development Standard	District					
	A-1	A-2	A-3	AMX-1	AMX-2	AMX-3
[Maximum density (FAR) for A-2 and AMX-2 districts based on zoning lot size]	[Lot area (sq. ft.)]		[FAR calculation]			
	[Less than 10,000]		[FAR = (.00009 x lot area) + 0.4]			
	[10,000—40,000]		[FAR = (.00002 x lot area) + 1.1]			
	[Over 40,000]		[FAR = 1.9]			
[Maximum density (FAR) for A-3 and AMX-3 districts based on zoning lot size]	[Lot area (sq. ft.)]		[FAR calculation]			
	[Less than 10,000]		[FAR = (.00014 x lot area) + 0.6]			
	[10,000—20,000]		[FAR = (.00004 x lot area) + 1.6]			
	[20,000—40,000]		[FAR = (.00002 x lot area) + 2.0]			
[Over 40,000]			[FAR = 2.8]			
Maximum density (FAR)	2.0	3.0	4.0	2.0	3.0	4.0
¹ There [shall be] is no minimum lot area, width, or depth for off-site parking facilities. ² There shall be no minimum lot area for off-site parking facilities. ³ Five feet for detached dwellings and duplexes and 10 feet for other uses. ⁴ For duplex lots, 5 feet for any portion of any structure not located on the common property line; the required side yard is zero feet for that portion of the lot containing the common wall. ⁵ Heights for detached dwellings and duplexes [shall] must comply with residential height and height setback requirements. n/a = Not applicable						

SECTION 3. Ordinance material to be repealed is bracketed and stricken. New material is underscored. When revising, compiling, or printing this ordinance for inclusion in the Revised Ordinances of Honolulu, the Revisor of Ordinances need not include the brackets, the bracketed and stricken material, or the underscoring.



HONOLULU CITY COUNCIL
KE KANIHELA O KE KALANA O HONOLULU
CITY AND COUNTY OF HONOLULU

ORDINANCE _____

BILL _____

A BILL FOR AN ORDINANCE

SECTION 4. This ordinance takes effect upon its approval.

INTRODUCED BY:

DATE OF INTRODUCTION:

Honolulu, Hawai'i

Councilmembers

APPROVED AS TO FORM AND LEGALITY:

Deputy Corporation Counsel

APPROVED this _____ day of _____, 20____.

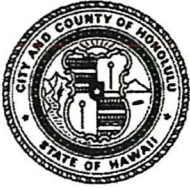
RICK BLANGIARDI, Mayor
City and County of Honolulu

Report Title:

Zoning; Land Use Ordinance ("LUO"); Development Standards; Apartment District; Apartment Mixed-Use District; Act 39, Session Laws of Hawaii 2024; Ordinance 25-2; Urban Development; Housing Demand; Planning Commission; Department of Planning and Permitting ("DPP")

The summary description of legislation appearing on this page is for informational purposes only and is not legislation or evidence of legislative intent.

Bill B



HONOLULU CITY COUNCIL
KE KANIHELA O KE KALANA O HONOLULU
 CITY AND COUNTY OF HONOLULU

ORDINANCE _____

BILL _____

A BILL FOR AN ORDINANCE

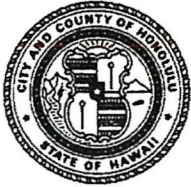
RELATING TO DEVELOPMENT STANDARDS IN THE APARTMENT AND APARTMENT MIXED-USE DISTRICTS.

BE IT ORDAINED by the People of the City and County of Honolulu:

SECTION 1. Purpose. The purpose of this ordinance is to amend the development standards for the apartment and apartment mixed-use districts.

SECTION 2. Table 21-3.3, Revised Ordinances of Honolulu 2021, is amended to read as follows:

Table 21-3.3							
Apartment and Apartment Mixed-Use Districts Development Standards							
Development Standard		District					
		A-1	A-2	A-3	AMX-1	AMX-2	AMX-3
Minimum lot area (square feet [sq. ft.]) ¹		[7,500] 5,000	[10,000] 5,000	[15,000] 5,000	[7,500 ²] 5,000	[10,000 ²] 5,000	[15,000 ²] 5,000
Minimum lot width and depth (ft.) ¹		[70] 60	[70] 60	[70] 60	[70] 60	[70] 60	[70] 60
Yards (ft.):	Front	10	10	10	10	10	10
	Side and rear ^{3,2}	5[-4-13] or 10	5[-4-13] or 10	5[-4-13] or 10	5[-4-13] or 10	5[-4-13] or 10	5[-4-13] or 10
Maximum non-commercial use density (Floor Area Ratio [FAR])		2.0	3.0	4.0	2.0	3.0	4.0
Maximum commercial use density (FAR)		n/a			0.3 see § 21-3.90-1(c)	0.4 see § 21-3.90-1(c)	0.6 see § 21-3.90-1(c)
Maximum building area		[Lot area (sq. ft.)]			[Requirement]		
		[Less than 7,500]			60% of zoning lot		
		[7,500—20,000]			[50% of zoning lot]		
		[Over 20,000]			[40% of zoning lot]		
Maximum height (ft.) ^{5,4}		30	per zoning map		30	per zoning map	
Height setbacks		none	per § 21-3.80-1(c)		none	per § 21-3.90-1(c)	
[Maximum density (FAR) for A-1 and AMX-1 districts based on zoning lot size]		[Lot area (sq. ft.)]		[FAR calculation]			
		[Less than 10,000]		[FAR = (.00003 x lot area) + 0.3]			
		[10,000—40,000]		[FAR = (.00001 x lot area) + 0.5]			
		[Over 40,000]		[FAR = 0.9]			



HONOLULU CITY COUNCIL
KE KANIHELA O KE KALANA O HONOLULU
 CITY AND COUNTY OF HONOLULU

ORDINANCE _____

BILL _____

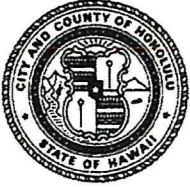
A BILL FOR AN ORDINANCE

Table 21-3.3						
Apartment and Apartment Mixed-Use Districts Development Standards						
Development Standard	District					
	A-1	A-2	A-3	AMX-1	AMX-2	AMX-3
[Maximum density (FAR) for A-2 and AMX-2 districts based on zoning lot-size]	[Lot area (sq. ft.)]		[FAR calculation]			
	[Less than 10,000]		[FAR = (.00009 x lot area) + 0.4]			
	[10,000—40,000]		[FAR = (.00002 x lot area) + 1.1]			
	[Over 40,000]		[FAR = 1.9]			
[Maximum density (FAR) for A-3 and AMX-3 districts based on zoning lot-size]	[Lot area (sq. ft.)]		[FAR calculation]			
	[Less than 10,000]		[FAR = (.00014 x lot area) + 0.6]			
	[10,000—20,000]		[FAR = (.00004 x lot area) + 1.6]			
	[20,000—40,000]		[FAR = (.00002 x lot area) + 2.0]			
	[Over 40,000]		[FAR = 2.8]			
¹ There ~~[shall be]~~ <u>is</u> no minimum lot area, width, or depth for off-site parking facilities.						
~~² There shall be no minimum lot area for off-site parking facilities.]~~						
³ 2 Five ft. for detached dwellings and duplexes and 10 ft. for other uses.						
~~⁴ 3~~ For duplex lots, five ft. for any portion of any structure not located on the common property line; the required side yard is zero ft. for that portion of the lot containing the common wall.						
⁶ 4 Heights for detached dwellings and duplexes ~~[shall]~~ <u>must</u> comply with residential height and height setback requirements.						
n/a = Not applicable						

SECTION 3. Section 21-3.90-1 Apartment mixed-use district uses and development standards, is amended to read as follows:

§ 21-3.90-1 Apartment mixed-use district uses and development standards.

- (a) Within the apartment mixed-use districts, all uses and structures are as set forth in Table 21-5.1.
- (b) Within the apartment mixed-use districts, development standards are as set forth in Table 21-3.3.
- (c) Additional development standards.
 - (1) Except for necessary access drives and walkways, all yards must be landscaped.



HONOLULU CITY COUNCIL
KE KANIHELA O KE KALANA O HONOLULU
CITY AND COUNTY OF HONOLULU

ORDINANCE _____

BILL _____

A BILL FOR AN ORDINANCE

- (2) Height setbacks. In the AMX-2 and AMX-3 districts, for any portion of a structure over 40 ft. in height, additional side and rear setbacks must be provided as follows:
 - (A) For each 10 ft. of additional height or portion thereof, an additional 1-ft. setback must be provided; and
 - (B) The additional setback must be a continuous plane from the top of the structure to the height of 40 ft. above grade (see Figure 21-3.3).
- (3) Commercial use density and location.
 - (A) The floor area of any use marked with a superscript¹ under Table 21-5.1, either occurring as a single use on a zoning lot or in combination with other uses, must not exceed the FAR as provided under Table 21-3.3, and such floor area will not be counted as part of the ~~[total]~~ maximum non-commercial use FAR allowed.
 - (B) Where commercial uses are integrated with dwelling uses, pedestrian access to the dwellings must be physically, mechanically, or technologically independent from other uses and must be designed to enhance privacy for residents and their guests. No floor above the ground floor may be used for both dwelling and commercial purposes.

SECTION 4. Ordinance material to be repealed is bracketed and stricken. New material is underscored. When revising, compiling, or printing this ordinance for inclusion in the Revised Ordinances of Honolulu, the Revisor of Ordinances need not include the brackets, the bracketed and stricken material, or the underscoring.



HONOLULU CITY COUNCIL
KE KANIHELA O KE KALANA O HONOLULU
CITY AND COUNTY OF HONOLULU

ORDINANCE _____

BILL _____

A BILL FOR AN ORDINANCE

SECTION 4. This ordinance takes effect upon its approval.

INTRODUCED BY:

DATE OF INTRODUCTION:

Honolulu, Hawai'i

Councilmembers

APPROVED AS TO FORM AND LEGALITY:

Deputy Corporation Counsel

APPROVED this _____ day of _____, 20____.

RICK BLANGIARDI, Mayor
City and County of Honolulu