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DEPARTMENT OF HOUSING AND LAND MANAGEMENT
KA ʻOIHANA HOʻOLĀLĀ KŪKULU HALE A ME KA HOʻOKELE ʻĀINA
CITY AND COUNTY OF HONOLULU

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March 2, 2026

The Honorable Andria Tupola, Chair
and Members
Committee on Housing, Homelessness & Parks
Honolulu City Council
530 South King Street, Room 202
Honolulu, Hawai'i 96813

Dear Chair Tupola and Councilmembers:

SUBJECT: Comments on Bill 11 (2026), Relating to Affordable Housing Incentives

The Department of Housing and Land Management (DHLM) appreciates the opportunity to testify on Bill 11 (2026) and respectfully provides the following comments. While we share the Council's commitment to transparency, we must express concerns regarding the Department's current capacity to produce the report as drafted in Bill 11 (2026).

Bill 11 would require DHLM to publish a public report twice a year listing all affordable housing projects that have received City incentives, including, identifying the administering City agency; the legal basis for the incentive; the basic unit counts (total units and "affordable" units), and—if known—any State or federal support. It would also require a notation of any differences between the City's cost of an incentive and its value to the developer.

Under its current capacity, DHLM is unable to reliably produce the proposed semi-annual report as the required information is spread across multiple departments and systems, and does not have the access to the standardized data feeds needed to compile a complete and consistent report. Bill 11 would also require retroactive estimates of the value of non-monetary incentives—such as regulatory adjustments (height/density/parking), code alternatives, expedited review, TOD bonuses, and other benefits—which are difficult as the City may not have the historical data to determine the valuation. DHLM welcomes collaboration with the departments in compiling the data, however, much of the information would need to be manually gathered and reconciled.

DHLM is committed to strengthening the City's ability to assess whether housing incentives are delivering positive outcomes. For example, we are currently examining the structure of Bill 7 (ROH Chapter 32) incentives to confirm they are achieving the outcomes the City intends.

Rather than proceeding with reporting requirements that the department does not have the current capacity to fulfill, DHLM respectfully requests the opportunity to work collaboratively with the Council to identify specific goals, determine what data is readily available, and moving forward develop a viable strategy in gathering effective data that provides meaningful transparency and benefits.

Mahalo for the Council's continued leadership in advancing housing solutions for O'ahu. If you have any questions, please feel free to contact Gavin Thornton, Director of Housing Policy, at (808) 768-4277.

Sincerely,

Kevin D. Auger
Director

APPROVED:

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