'26MAY11 AM 7:52 CITY CLERK

PLANNING COMMISSION
KOMIKINA HOʻOLĀLĀ
CITY AND COUNTY OF HONOLULU

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

RICK BLANGIARDI
MAYOR
MEIA

PANE MEATOGA, Chair *LĀLĀ*
JOY KIMURA, Vice Chair *HOPE LĀLĀ*
RYAN KAMO
NATHANIEL KINNEY
HILARIE ALOMAR
MELISSA MAY
KAI NANI KRAUT
ELENA BRYANT
JASON WOO

May 6, 2026

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

Dear Chair Waters and Councilmembers:

SUBJECT: East Kapolei Neighborhood Transit-Oriented Development (TOD) Land Use Ordinance (LUO) Amendment to TOD Special District

The Planning Commission (PC) held a public hearing on April 29, 2026 on the above subject matter. One public and two written testimonies were received, all in support. The public hearing was closed on April 29, 2026.

Commissioners questioned how the infrastructure, particularly power lines, roads, and crosswalks; real property applications; and height setbacks that were raised at the community meeting affected the proposal. Additional questions were raised about water infrastructure and how infrastructure affects the TOD implementation process.

The PC voted unanimously 7:0 to approve the recommendations of the Director of the Department of Planning and Permitting (DPP) regarding the amendments to LUO Article 9 (Revised Ordinances of Honolulu Chapter 21) TOD Special District that incorporate the Kualakaʻi (East Kapolei), Keoneʻae (University of Hawaiʻi-West Oʻahu), and Honouliuli (Hoʻopili) Skyline station areas and certain updates.

Attached are the PC written testimonies and the report of the Director of the DPP pertaining to LUO amendment to the TOD Special District.

DEPT. COM. 318(26)

Should you have any questions, please contact me at (808) 768-8007.

Sincerely,

Pane Meatoga III
Chair

Attachments

ACKNOWLEDGED:

Dawn Takeuchi Apuna, Directorr
Department of Planning and Permitting

ACKNOWLEDGED:

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

ACKNOWLEDGED:

Rick Blangiardi, Mayor

Written Testimonies to the Planning Commission

RECEIVED
April 27, 2026
12:48 PM
Via Email
DEPT. OF PLANNING AND PERMITTING

D·R·HORTON®
America's Builder
HAWAII

April 27, 2026

Mr. Pane Meatoga III, Chairperson
City and County of Honolulu Planning Commission
Ms. Dawn Takeuchi Apuna, Director
City and County of Honolulu Department of Planning and Permitting
650 South King Street, 7th Floor
Honolulu, HI 96813

Subject: East Kapolei Neighborhood Transit-Oriented Development (TOD)
Land Use Ordinance (LUO) Amendment to TOD Special District State Land Use District Boundary Amendment (SLUDBA) Zone Change

Dear Chair Meatoga, III,

Mahalo for the opportunity to provide our strong support of the City's proposed amendments to the East Kapolei Neighborhood TOD Special District (EKTOD), SLUDBA and Zone Change. Over the past several years, we have participated in meetings and discussions held by the Department of Planning and Permitting that were valuable to the process for all stakeholders. We would like to commend Tim Streitz, Acting TOD Administrator for the Transit-Oriented Development Division, for his thoughtful approach, evaluation and drafting of these documents.

D.R. Horton Hawaii is humbled and proud to be one of Hawaii's largest homebuilders, serving local families for more than 53 years. We specialize in providing affordable and workforce housing opportunities across Oahu and have been a strong supporter of both the City's Skyline and vision for transit-oriented development along its alignment. As a major greenfield landowner within the proposed EKTOD Special District, D.R. Horton Hawaii began planning Hoʻopili, our large master-planned community in and around the Honouliuli (Hoʻopili) and Keoneʻae (UH-West Oahu) station areas well before construction of Skyline began. We have been actively building Hoʻopili as construction of the full Skyline system continues, with almost 3,500 families calling Hoʻopili home today. As we continue to build out Hoʻopili, we look forward to the enhanced mixed use development opportunities that the EKTOD will bring.

Thank you for the opportunity to provide comments. It is much appreciated. Please feel free to contact me at lstokuhara@drhorton.com or 808-583-7789 should you have any questions.

Sincerely,

Lee Tokuhara
Vice President of Government Affairs & Community Relations
D.R. Horton Hawaii

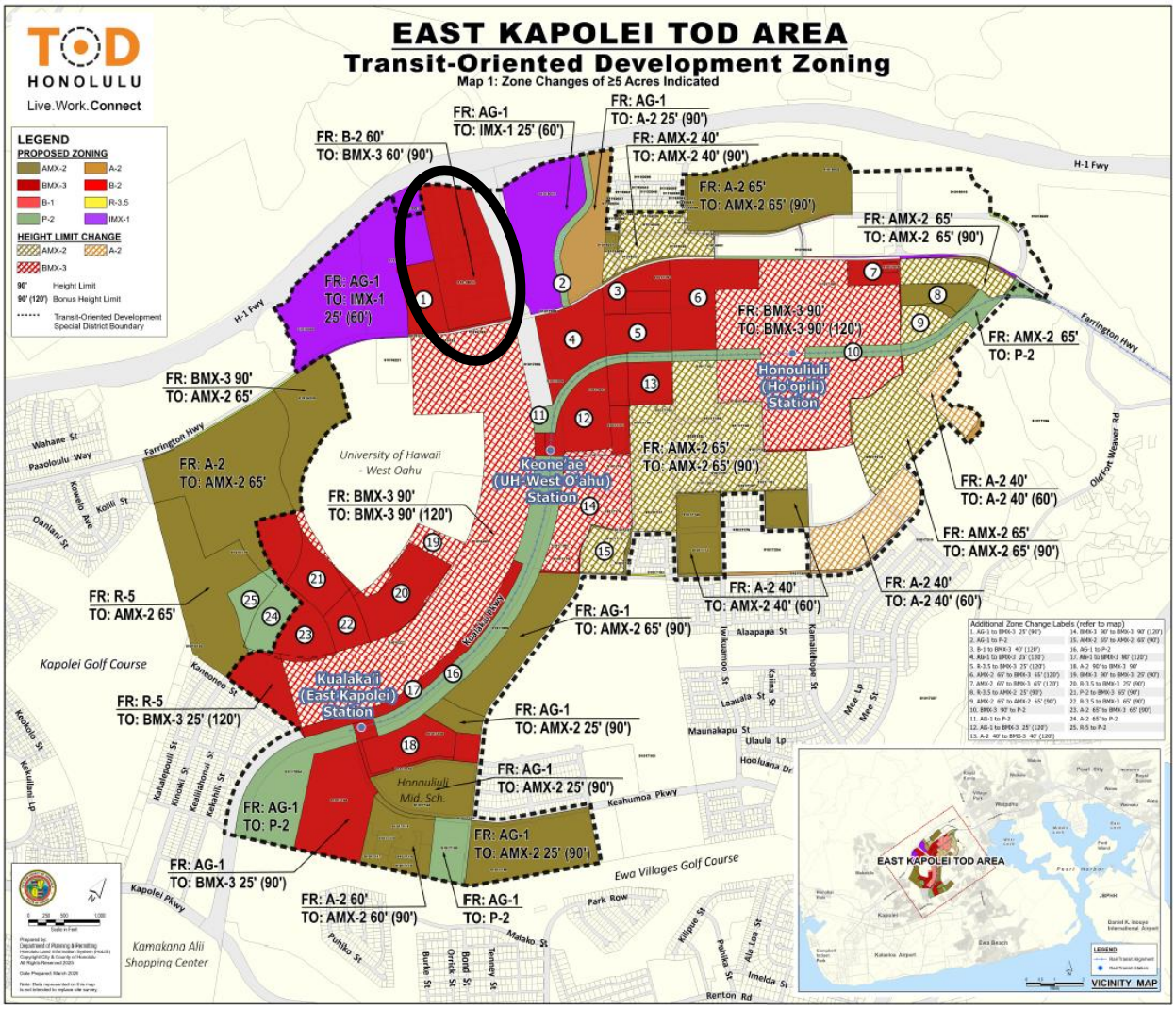


EXHIBIT 1 - Ho'opili Gateway Site

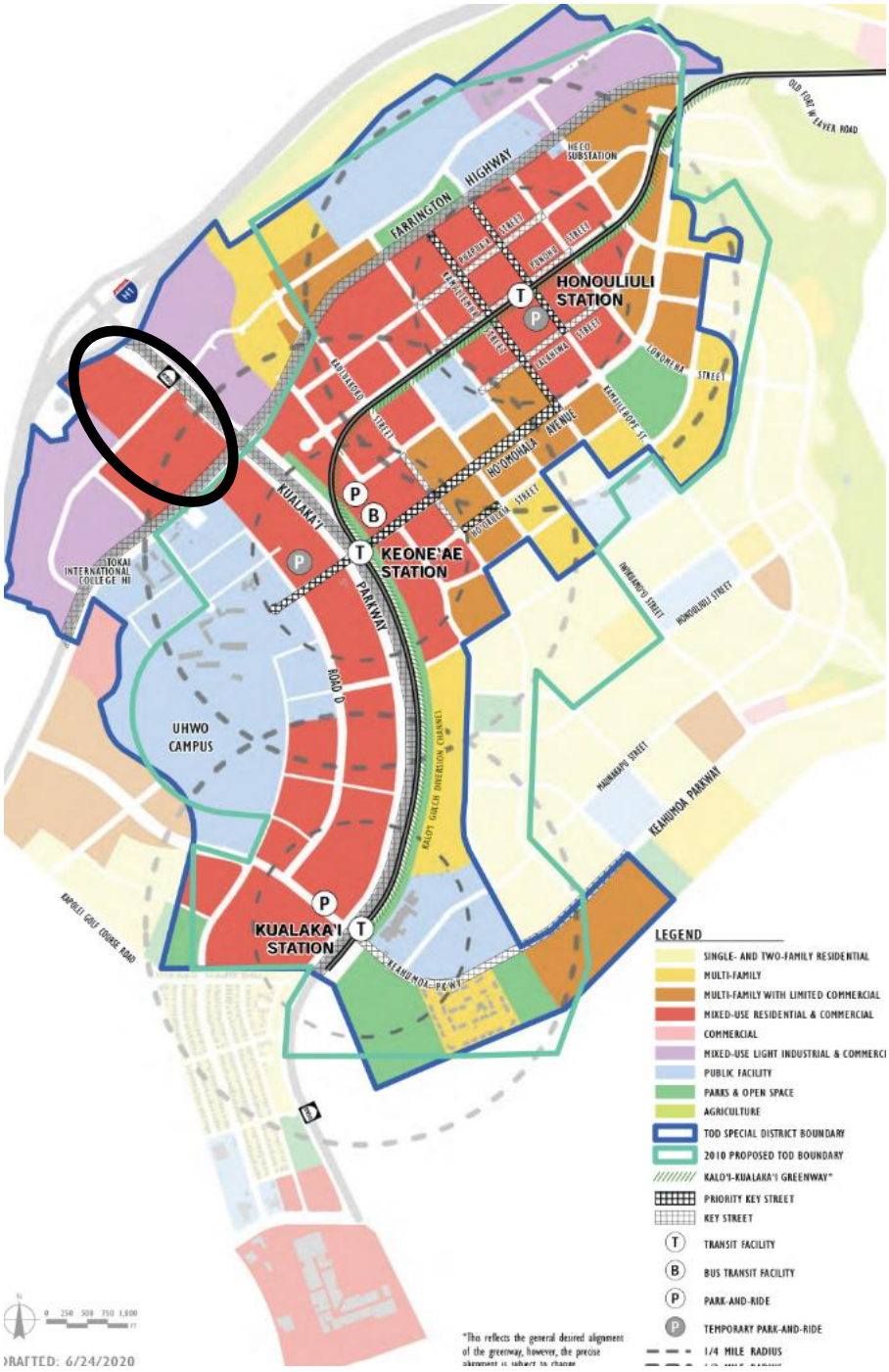


EXHIBIT 2 – Kualaka‘i Parkway and Farrington Highway Key Street Designation (Ho'opili Gateway circled)

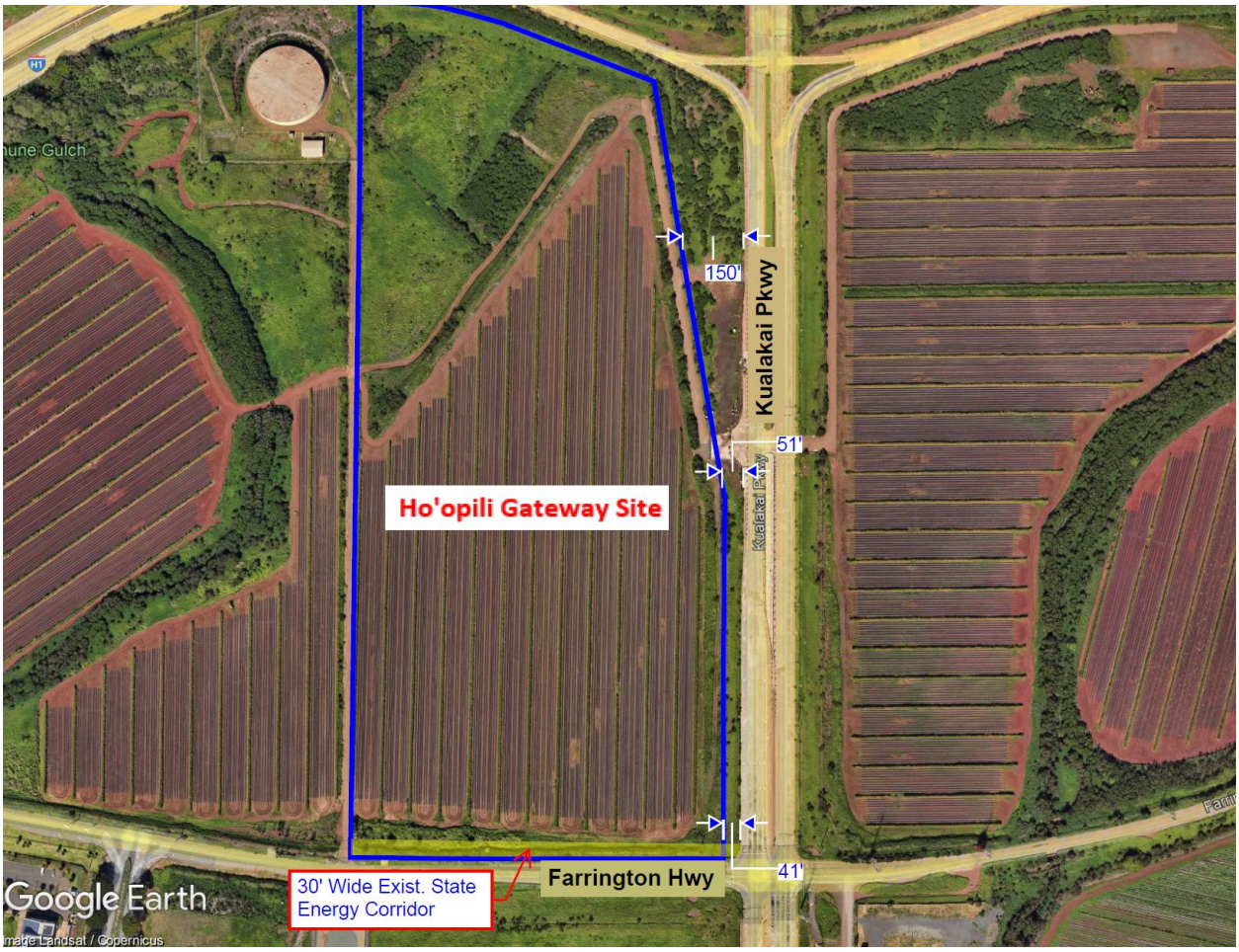


EXHIBIT 3 - Relationship between Kualakaʻi Parkway, Farrington Highway and the Ho'opili Gateway site

STATE OF HAWAIʻI
OFFICE OF PLANNING & SUSTAINABLE DEVELOPMENT

235 South Beretania Street, 6th Floor, Honolulu, Hawaiʻi 96813
Mailing Address: P.O. Box 2359, Honolulu, Hawaiʻi 96804

Telephone: (808) 587-2846
Fax: (808) 587-2824
Web: https://planning.hawaii.gov/

RECEIVED
April 29, 2026
12:21 PM
Via Email
DEPT. OF PLANNING AND PERMITTING

JOSH GREEN, M.D.
GOVERNOR

KEITH A. REGAN
ACTING LT. GOVERNOR

MARY ALICE EVANS
DIRECTOR

Coastal Zone Management Program

Environmental Review Program

Land Use Commission

Land Use Division

Special Plans Branch

State Transit-Oriented Development

Statewide Geographic Information System

Statewide Sustainability Branch

DTS 202604241336NA
Transmitted via email

April 29, 2026

Mr. Pane Meatoga, III, Chair
Honolulu Planning Commission
City and County of Honolulu
650 South King Street, 7th Floor
Honolulu, Hawaiʻi 96813

Dear Chair Meatoga:

Subject: Written Testimony in Support of Agenda Items IV.1 through 3, Honolulu Planning Commission Agenda dated April 29, 2026—related to Transit-Oriented Development (TOD) Zone Changes, TOD Special District, and State Land Use District Boundary Amendments to Implement the East Kapolei Neighborhood TOD Plan

The Office of Planning and Sustainable Development (OPSD), as co-chair and administrator of the Hawaiʻi Interagency Council for Transit-Oriented Development (TOD Council), **strongly supports** these City proposals that advance the implementation of the *East Kapolei Neighborhood TOD Plan* (TOD Plan) adopted by the Honolulu City Council in December 2020. The proposed zoning and TOD Special District standards are needed to implement the TOD Plan vision of pedestrian-friendly and compact, mixed-use development in areas surrounding the three East Kapolei rail stations—the Honouliuli (Hoʻopili), Keoneʻae (University of Hawaiʻi-West Oʻahu), and Kualakaʻi (East Kapolei) stations.

The East Kapolei area is one of three State TOD Priority Areas prioritized for State investment in the *State of Hawai'i Strategic Plan for Transit-Oriented Development* (TOD Strategic Plan) prepared for and issued by the TOD Council in 2017. East Kapolei was identified as such due to the presence of approximately 1,000 acres of State-owned land situated near the three East Kapolei transit stations. The realization of TOD on the State's East Kapolei lands aligns with State policy to support Kapolei's development as Oʻahu's second city. More importantly, TOD enables the State to achieve multiple objectives: expanding and enhancing programs and facilities at the University of Hawaiʻi-West Oʻahu (UH-WO); providing needed housing; promoting economic development and business opportunities; generating revenue for State programs; promoting transit ridership and alternative travel modes to automobiles; increasing sustainability and resilience by contributing to the

creation of walkable, mixed-use neighborhoods and directing growth away from O'ahu's limited productive agricultural lands.

Additional Comments on Agenda Items

Agenda Item IV.1, Proposed State Land Use District Boundary Amendment (SLUDBA). OPSD supports the concurrent processing of the City and County of Honolulu Department of Planning and Permitting's (DPP) proposed State land use district boundary amendments pursuant to Hawai'i Revised Statutes §205-3.1. We support the reclassification of the affected parcel areas contained in the proposed SLUDBA, and concur with the City's rationale that this action would allow the larger parcel to be redeveloped in its entirety without additional regulatory impediments due to an Agricultural District land use designation. This action would provide project developers the flexibility to provide more vibrant urban places and incorporate pedestrian, bike, and other amenities on the edges of many of the affected parcels.

Agenda Item IV.2, Proposed Zone Changes. OPSD strongly supports the City proposal to proactively rezone lands on an area-wide basis to align with the City TOD Plan land use designations. This action is absolutely essential to the successful implementation of TOD as it eliminates entitlement delays for both public and private landowners and developers, thereby compressing the timeframe and reducing the cost of development for individual developers.

OPSD generally supports the zoning districts proposed for State lands and believes the proposed rezoning will contribute significantly to defining the anticipated buildout and achieving the urban form and functions envisioned in the TOD Plan. OPSD also appreciates and supports the proposed zone changes for State lands that are outside the proposed TOD Special District boundary, which will facilitate coherent and cohesive development of these parcels as they relate to the communities being developed on parcels within the TOD Special District.

We understand the TOD Plan's intent to step down heights in relation to distance from the rail stations. However, OPSD recommends the Planning Commission consider the University of Hawai'i West O'ahu's position—stated in comments submitted to DPP in May 2025 and contained in the DPP memo to the Planning Commission dated April 15, 2026—that a consistent base height of 90 feet for all BMX-3 zoned area is preferred as this would allow more flexibility and encourage greater opportunity to achieve TOD potential for the area. We also recommend consideration be given to increasing the base height for all A-2, BMX-, and AMX-zoned State lands to a minimum of 65 feet with allowance for bonus heights to increase the long-term potential building height envelopes and eliminate the need to rezone again in the future to accommodate changes in project plans. As a whole, blanket increases in base heights for all zones in the TOD area provides greater flexibility to public and private landowners in project development and may be critical to achieving the densities and floor areas for projects to be financially viable.

We strongly recommend the Department of Land and Natural Resources' (DLNR) lands at the Keone'ae Station, identified as Zone Change 12 on "Map 1: Zone Changes of ≥5 Acres

Indicated," be zoned as BMX-3 90' (120') due to its proximity to the station and its high TOD value and potential. We recommend the DLNR parcel at Map 1 Item 4 be given the same treatment. The higher by right heights would provide DLNR the most flexibility in creating a transformative TOD center on these lands—that could combine with anticipated TOD on UHWO University District Lands to create a vibrant mixed-use urban center around the Keone'ae Station. Similarly, the Department of Hawaiian Home Lands' parcel adjacent to Kualaka'i Station and the stormwater detention basin parcel could be BMX-3 90' (120') to capitalize on its proximity to the station.

In addition, adoption of the area-wide TOD zoning directly supports two projects the State is undertaking to enhance City efforts to facilitate development in the East Kapolei TOD area. The TOD zoning provides essential information on the potential buildout of the area, which is needed for the Hawai'i Community Development Authority's (HCDA) East Kapolei Infrastructure Implementation Master Plan (EKIIMP). The EKIIMP will identify the backbone and regional infrastructure needed to support planned development in much of the East Kapolei TOD Plan area. See the attached map of the EKIIMP area. The adopted zoning informs this effort by allowing an assessment of the full buildout potential for the Plan area as to the potential impact it may have on existing and planned infrastructure capacity. The EKIIMP is slated for completion in June 2026.

The second project is the preparation of a Programmatic Environmental Impact Statement for the EKIIMP area, which will be conducted by HCDA with funds appropriated to OPSD. This project will commence later this year. It will identify the impacts of planned buildout and associated mitigation recommendations and provide a foundational resource for environmental disclosure documents, which will help developers in meeting their environmental review requirements under HRS Chapter 343 for individual projects in this area. This is another component in the overall strategy of facilitating the development process and reducing the cost of pre-development work for developers in planned TOD areas.

Agenda Item IV.3, Amendments to Article 9, TOD Special District, Revised Ordinances of Honolulu Chapter 21. OPSD strongly supports the amendment to Article 9 of the Land Use Ordinance (LUO) to add the East Kapolei Special District and the additional design objectives specific to the East Kapolei Neighborhood TOD Plan. We especially support the amendments to Table 21-9.8, TOD Special District Project Classification, that will facilitate permitting of projects in adopted TOD Districts—in particular, the new provision for exempting Plan Review Uses (PRU) from a TOD Special District Permit if they are subject to an approved PRU. This new provision will ease the permitting process for facility and mixed-use development on the UHWO campus and its TOD-focused University District Lands.

Key Street Designations. OPSD notes that Kualaka'i Parkway and Farrington Highway west of Kualaka'i Parkway are no longer proposed for designation as Key Streets. We suggest that consideration be given to retaining these roadways as Key Streets. Removing this designation will diminish and discourage efforts to create an area-wide pedestrian network and environment along all major roads that enhances the street-level experience and promotes access

and connectivity for all users. Allowing projects to turn away from these roadways will make it much more difficult to transform them into great urban boulevards in the future.

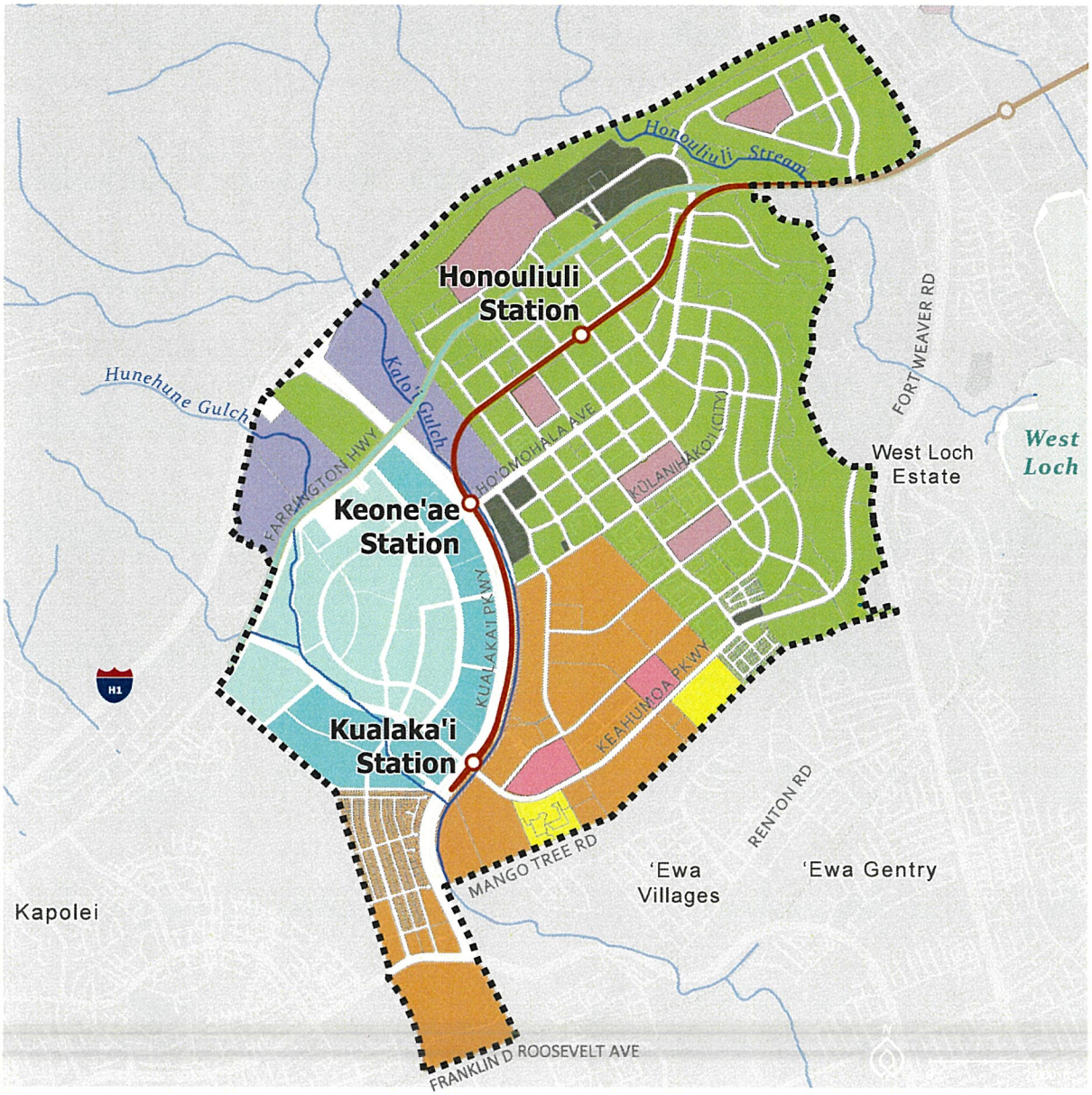
Thank you for the opportunity to provide testimony in support of these measures. They are critical to advancing both the State and City's vision for development of transit-oriented and pedestrian-focused communities in East Kapolei, in addition to achieving the potential to increase housing around rail, increasing rail ridership, and directing future growth to TOD areas on O'ahu.

Mahalo,

Mary Alice Evans

Mary Alice Evans
Director

Attachment



- Rail Transit Stations
- Honolulu Rail Transit Project Corridor
- Farrington Hwy Widening
- Streams
- Planned or Existing Schools
- East Kapolei Master Plan Area

East Kapolei Major Landowner

- DHHL
- DLNR
- DR Horton
- HHFDC
- UHWO - Campus Area
- UHWO - University District Lands (UDL)
- Other

FIGURE 1-2

Major Landowners

Site and Infrastructure Assessment
East Kapolei Infrastructure Master Plan
Honolulu, Hawai'i

Map Credit: State of Hawai'i, City and County of Honolulu, Esri, TomTom, Garmin, FAO, NOAA, USGS, EPA, USFWS, Esri, CGIAR, USGS, Esri, TomTom, Garmin, SafeGraph, METI/NASA, USGS, EPA, USDA, USFWS

Report of the Director of the DPP

Authorization Dawn Takeuchi Apuna Director
Advertisement April 17, 2026
Public Hearing April 29, 2026

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

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

REGINA MALEPEAI
2ND DEPUTY DIRECTOR
HOPE PO'O KUALUA

April 15, 2026

RECEIVED
2026 APR 15 P4:33
DEPT OF PLANNING AND PERMITTING
CITY & COUNTY OF HONOLULU

MEMORANDUM

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

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

SUBJECT: East Kapolei Neighborhood Transit-Oriented Development (TOD) Land Use Ordinance (LUO) Amendment to TOD Special District

In accordance with enabling Ordinance 09-4, relating to TOD, we are pleased to transmit three related bills to implement the adopted East Kapolei Neighborhood TOD Plan. These bills cover three additional rail transit station areas—Kualakaʻi (East Kapolei), Keoneʻae (University of Hawaiʻi-West Oʻahu), and Honouliuli (Hoʻopili) Skyline stations—and propose the following:

- State Land Use District Boundary Amendment (SLUDBA) to Schofield Barracks and ʻEwa Quadrangles, approximately 14.8 acres (15 acres or less for City processing);
- Zone changes to Zoning Map Nos. 12 and 13, approximately 1,381 acres; and
- Amendments to LUO Article 9 (Revised Ordinances of Honolulu [ROH] Chapter 21) TOD Special District that incorporate the additional station areas and certain updates.

Each proposed bill is accompanied by a staff report and recommendations. This memorandum frames the amendments within the larger context of the City's TOD efforts. Ordinance 09-4 states, in part, that "… *a general land use scheme must be created that provides for a deliberate, inclusive process to plan for TOD so that well-defined, meaningful, and appropriate regulatory and incentive programs can be adopted for each area around a transit station or type of station.*" The DPP has followed such a process to develop the neighborhood TOD plans and is recommending approval of the proposed SLUDBA, zone changes, and LUO amendments.

Land Use Planning

The neighborhood TOD plans identify opportunities for new development, orderly growth, and improved accessibility around the rail transit stations. Each plan covers one to three station areas, and addresses land use, circulation, urban design, housing, community facilities, parking, pedestrian amenities, historic and cultural enhancements, and infrastructure. The neighborhood TOD plans are aligned with the O'ahu General Plan and regional development plans. All of the neighborhood TOD plans have been adopted by the City Council.

The DPP has analyzed all TOD properties along the entire rail transit corridor for sea level rise impacts. If over half of a property is impacted by 3.2 feet of projected sea level rise, it is being excluded from the proposals, even if recommended in the neighborhood's TOD plan, since policies and regulations are still being developed to more fully address impacts. The East Kapolei TOD neighborhood is not impacted.

Regulations and Community Benefits

The proposed LUO amendments, zoning map changes, and SLUDBA will help direct and manage growth around the rail transit stations. One of the most important changes involves rezoning from single to mixed uses with density and height bonuses. The City-initiated zone changes will expand the types of allowable uses and are intended to stimulate appropriate development activity around the stations. Where necessary, reclassifying land to the State Land Use Urban District will support these zone changes.

The proposed TOD zoning for East Kapolei generally provides additional development rights to incentivize TOD and achieve desired community benefits. Any height increase over the current limits will be a bonus height. Bonus height and density are regulated through the TOD Special District within the LUO and require the provision of community benefits (e.g., affordable housing and streetscape improvements), which help further implement the neighborhood TOD plans.

The TOD Special District is designed to supplement or modify the underlying zoning district regulations to promote TOD (e.g., front yard requirements are relaxed to allow outdoor dining), while providing opportunities for review and comment on major projects. It also specifies site layout and ground-floor building design requirements to promote walkable, active streetscapes, and usable public space. These development standards are intended to improve the pedestrian experience around the rail transit stations, especially along designated "key streets," which are expected to handle the most pedestrian and business activity.

An island-wide affordable housing requirement (AHR), pursuant to ROH Chapter 29, imposes higher percentages of affordable housing on for-sale residential projects

seeking TOD bonuses, among other factors. Whereas prior zone change applicants executed unilateral agreements to provide affordable housing, the AHR will apply to projects in these City-initiated TOD zone change areas that meet the applicability criteria stated in ROH Chapter 29. As mentioned, projects can also provide additional affordable housing as a community benefit to receive bonus height and/or density through TOD permits. Various ordinances have created financial and other incentives to develop affordable housing.

The TOD Special District and zoning were already adopted for the two Waipahu station areas through Ordinances 17-54 and 17-56, respectively; the three 'Aiea-Pearl City station areas through Ordinances 22-29 and 22-30, respectively; and the Hālawa station area through ordinances 23-32 and 23-33, respectively. Through this and future submittals, zoning and the TOD Special District will be expanded to incorporate additional station areas, based on the recommendations of the adopted neighborhood TOD plans. Upcoming TOD neighborhood submittals will continue to focus on the rail transit station areas with passenger service.

Participatory Process

The neighborhood TOD plans were developed with extensive community engagement. Further engagement occurred for the LUO, zone change, and SLUDBA proposals. The 'Ewa and Makakilo-Kapolei-Honoka'i Hale Neighborhood Boards did not take a position on the proposals. The TOD website (www.honolulu.gov/tod) provides additional opportunities to obtain information and provide input on TOD items, such as projects and proposed regulations.

Recommendation

The DPP has found the LUO, zone change, and SLUDBA proposals to be consistent with State and City land use plans and policies. Therefore, the DPP recommends approval. Please review the subject report and recommendation and then forward them, together with your findings and recommendation through the Mayor, to the City Council.

Thank you for your continued support of these efforts.

Enclosure

cc: Mayor Rick Blangiardi
Michael D. Formby, Managing Director
Council Chair Tommy Waters

LAND USE ORDINANCE AMENDMENT RELATING TO THE TRANSIT-ORIENTED DEVELOPMENT SPECIAL DISTRICT

I. Introduction

The Transit-Oriented Development Special District (TOD SD), adopted under Ordinance No. 17-54, established the overall regulatory framework for the entire Skyline rail corridor. That ordinance also established development standards to facilitate transit-enhanced neighborhoods around the Hō'ae'ae (West Loch) and Pouhala (Waipahu Transit Center) rail stations. Ordinance No. 22-29 expanded the TOD SD by adding three rail station areas: Hālaulani (Leeward Community College), Waiawa (Pearl Highlands), and Kalauao (Pearlridge). Ordinance No. 22-29 also added new regulations, which identified important view corridors, established tower separation and building orientation standards, and clarified TOD SD permit requirements for height and density bonuses. Ordinance 23-32 expanded the TOD SD by adding the Hālawa (Aloha Stadium) station area, and it further clarified TOD SD permit requirements for height bonuses as well as minor additions.

The current proposal will expand the TOD SD by adding the Kualaka'i (East Kapolei), Keone'ae (University of Hawai'i-West O'ahu [UHWO]), and Honouliuli (Ho'opili) station areas, based on recommendations in the East Kapolei Neighborhood TOD Plan (TOD Plan). Adjustments to existing regulations are also proposed, which will apply to the entire TOD SD along with certain considerations applicable only to the East Kapolei TOD neighborhood. Specifically, the proposed amendments to the Land Use Ordinance (LUO) will:

- Add a new exhibit to show the new station areas and key streets;
- Add a section about the primary design objectives of the area covered under the TOD Plan;
- Add a height exemption for safety nets and poles that are accessory to recreation facilities; and
- Update the required permits in the TOD SD Project Classification table.

II. East Kapolei Neighborhood TOD Plan

On December 9, 2020, the City Council adopted the TOD Plan under Resolution No. 20-222, CD1. The TOD Plan area includes the Kualaka'i (East Kapolei), Keone'ae (UHWO), and Honouliuli (Ho'opili) station areas. The proposed LUO amendment will expand the TOD SD to include these station areas. Separate bills for State Land Use boundary amendments to the Urban District as well as zoning map amendments to establish mixed-use zoning districts and height limits in these new station areas are being transmitted to the City Council via the Planning Commission in concert with these LUO amendments.

The LUO will summarize the primary design objectives and priorities of the TOD Plan area, as follows:

- Create a greenway corridor that includes a multi-use path and other amenities for active and passive use along the rail guideway, while accommodating opportunities for other forms of recreation and entertainment activities in the neighborhood;
- Configure buildings and open spaces to provide neighborhood focal points and view corridors of distinct landmarks, such as the Waiʻanae and Koʻolau mountain ranges and the university campus library tower, while respecting the prevailing trade-wind pattern;
- Establish a local, mixed-use community throughout the Honouliuli (Hoʻopili) station area that is organized in a compact street grid layout with a medium- to high-density town center around the rail station;
- Promote an active "festival street" lined with commercial uses and closed to vehicles during events for at least one block near the Honouliuli (Hoʻopili) station and one block of Hoʻokulaia Street;
- Promote the vision of the Keoneʻae (UHWO) station area as a campus gateway that includes a university village and main street-style atmosphere focused primarily on the university side of Kualakaʻi Parkway;
- Create a greenway that includes a multi-use path along the former Kaloʻi Gulch to connect the university campus and non-campus lands, including adjacent park and open space; and
- Cultivate community uses and active streetscapes in the Kualakaʻi (East Kapolei) station area that provide distinctive, vibrant public spaces at the ground level.

III. Public Meeting and Request for Comments

On April 16, 2025, the Department of Planning and Permitting (DPP) presented the TOD SD, zone change, and State Land Use District Boundary Amendment (SLUDBA) proposals during a community meeting at Honouliuli Middle School. Property owners impacted by the proposed changes and those within 300 feet of the proposed changes were notified of the meeting by mail. In addition, requests for comments were mailed to agencies and community organizations. The DPP received the following written comments specifically related to the proposed LUO amendments of the TOD SD (**Attachment 1**):

- The State Office of Planning and Sustainable Development recommended extending the key street designation of Road D to Farrington Highway, and Puapuaʻa and Punohu Streets to Kauluakoko Street.

  DPP response: The key street designation for Road D was extended one block toward Farrington Highway. This extension follows an existing roadway along the block adjacent to the Keoneʻae (UHWO) rail station and the planned extent of Road D. The other street designations were not extended, based on

the TOD Plan recommendations and proximity of those blocks to the surrounding rail stations.

- The UHWO mentioned that the TOD SD appeared consistent with prior discussions and coordination efforts, but noted concerns about the key street designation along Kualaka'i Parkway and Farrington Highway.

  DPP response: The key street designation for Kualaka'i Parkway was removed, in consideration of existing conditions and the ability for UHWO to more specifically address development fronting the roadway through their urban design plan (required by Ordinance 8-30), which is being updated. The Farrington Highway designation was not removed, as the roadway widening project under construction will add bicycle and pedestrian facilities with minimal vehicle lanes. The TOD SD also allows for additional building setback along highways.

- D.R. Horton, a major landowner and developer in the area, proposed an amendment to LUO Section 21-4.60(c)(5) that would exempt safety nets and poles from zoning district height limits, in order to accommodate a compact golf entertainment venue. Another amendment was proposed to LUO Table 21-9.8 (TOD SD Project Classification) that would exempt sites of one acre or more not located on key streets and not seeking bonuses from a TOD SD permit. D.R. Horton also proposed removal of the key street designations along portions of Kualaka'i Parkway and Farrington Highway.

  DPP response: A golf entertainment venue is compatible with the TOD Plan because it will promote transit ridership to a unique recreation facility that has a higher density than a traditional driving range. Furthermore, this type of venue typically provides golf clubs and other equipment to patrons on site, making it more convenient to visit utilizing transit. The DPP does not support a general/islandwide height exemption for safety nets and poles, but a limited height exemption specific to the East Kapolei TOD neighborhood that will require a TOD SD permit is compatible with the TOD Plan, and the 'Ewa Development Plan. Therefore, a height exemption up to 200 feet was incorporated to accommodate safety nets and poles that are accessory to recreation facilities (see Section IV of this report).

  To streamline permitting without compromising necessary project reviews, TOD SD permit requirements on sites of one acre or more were modified because all *major modification, major additions, or new construction* can be effectively evaluated through a minor, rather than a major, TOD SD permit, while other projects can be exempted (see Section V of this report). Additionally, the key street designation was removed for Kualaka'i Parkway, but maintained for Farrington Highway, as noted above.

See the associated East Kapolei TOD zone change and SLUDBA reports for additional comments and responses regarding the other proposals.

IV. Use Regulations

Changes are proposed to update the TOD SD use regulations (LUO Section 21-9.100-7), based on landowner/developer request, compatibility with the TOD Plan, and our experience implementing the LUO. New use regulations for recreation facilities will exempt accessory safety nets and poles from zoning district height limits up to 200 feet from existing grade within the East Kapolei TOD neighborhood. A minimum distance of 2,000 feet from rail stations will preserve land closest to the stations for the highest development densities and residential mixed uses. Based on intended use and design, this exemption is similar to, but more restrictive than, other types of zoning district height limit exemptions listed in LUO Section 21-4.60(c). Furthermore, impacts to the TOD SD and surrounding area can be evaluated through a TOD SD permit.

V. TOD SD Project Classifications

Changes are proposed to update LUO Table 21-9.8 (TOD SD Project Classification), based on TOD Plan recommendations, proposal comments, and our experience implementing the TOD SD regulations. The required TOD SD permit is being modified for sites of one acre or more in size: *minor additions to existing structures or construction of new accessory structures* will be exempt (currently a minor TOD SD permit if located on a key street); and *major modification, major additions, or new construction* will be minor (currently a major TOD SD permit if located on a key street). In addition, a new classification will allow projects covered by a plan review use to be exempt from TOD SD permits. These permit requirement modifications allow for streamlining of permit reviews, while ensuring that TOD SD objectives, principles, and designs are still achieved through appropriate mechanisms. The changes would apply to all TOD SD areas.

VI. Conclusion

The expansion of the TOD SD into the area covered under the TOD Plan builds upon and improves the existing TOD SD. Once this draft bill is passed:

- Three new station areas will be added to the TOD SD (identifying additional key streets may be necessary in the future as large properties develop with new roads);
- The primary design objectives for the station areas will be spelled out;
- Use regulations will apply to accessory safety nets and poles; and
- The TOD SD permit project classifications will be updated.

We recommend passage of the draft bill (**Attachment 2**).

Attachments

ATTACHMENT 1

RESPONSES TO PROPOSAL

This page intentionally blank.

STATE OF HAWAI'I
OFFICE OF PLANNING & SUSTAINABLE DEVELOPMENT

235 South Beretania Street, 6th Floor, Honolulu, Hawai'i 96813
Mailing Address: P.O. Box 2359, Honolulu, Hawai'i 96804

Telephone: (808) 587-2846
Fax: (808) 587-2824
Web: https://planning.hawaii.gov/

RECEIVED
June 6, 2025
1:35 PM
via Email
DEPT. OF PLANNING AND PERMITTING

JOSH GREEN, M.D.
GOVERNOR

SYLVIA LUKE
LT. GOVERNOR

MARY ALICE EVANS
DIRECTOR

Coastal Zone Management Program

Environmental Review Program

Land Use Commission

Land Use Division

Special Plans Branch

State Transit-Oriented Development

Statewide Geographic Information System

Statewide Sustainability Branch

DTS 202504041528NA
Refer to: 2024/GEN-19

June 5, 2025

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

FROM: Mary Alice Evans, Director
Office of Planning and Sustainable Development

Mary Alice Evans

SUBJECT: East Kapolei Neighborhood Transit-Oriented Development (TOD) Zone Changes, TOD Special District, and State Land Use District Boundary Amendment [2024/GEN-19]

The Office of Planning and Sustainable Development (OPSD) received your April 1, 2025 letter requesting comments on the City and County of Honolulu (City) proposals to further implement the City's East Kapolei Neighborhood TOD Plan, including TOD zone changes, adoption of the East Kapolei TOD Special District, and numerous minor State land use district boundary amendments (DBA) totaling approximately 14.8 acres. The DBA would be processed concurrently with the zone changes pursuant to Hawai'i Revised Statutes §205-3.1(c). The adoption of the TOD Special District sets forth the permitting process and TOD development standards for the development of lands around the three rail stations in East Kapolei.

OPSD appreciates the opportunity to review the proposals. We offer the following comments and recommendations.

1. **OPSD strongly supports these City proposals that advance the implementation of the *East Kapolei Neighborhood TOD Plan* (TOD Plan)** adopted by the Honolulu City Council in December 2020. The proposed zoning and TOD Special District standards are needed to implement the TOD Plan vision of pedestrian-friendly and compact, mixed-use development in areas surrounding the three East Kapolei rail stations—the Honouliuli (Ho'opili), Keone'ae (University of Hawai'i-West O'ahu), and Kualaka'i (East Kapolei) stations.

   The East Kapolei area is one of three State TOD Priority Areas prioritized for State investment in the *State of Hawai'i Strategic Plan for Transit-Oriented Development* (TOD Strategic Plan) prepared for

and issued by the Hawai'i Interagency Council for Transit-Oriented Development (TOD Council) in 2017. East Kapolei was identified as such due to the presence of approximately 1,000 acres of State-owned land situated near the three East Kapolei transit stations. The realization of TOD on the State's East Kapolei lands aligns with State policy to support Kapolei's development as Oahu's second city. More importantly, TOD enables the State to achieve multiple objectives: expanding and enhancing programs and facilities at the University of Hawai'i-West O'ahu (UH-WO); providing needed housing; promoting economic development and business opportunities; generating revenue for State programs; promoting transit ridership and alternative travel modes to automobiles; increasing sustainability and resilience by contributing to the creation of walkable, mixed-use neighborhoods and directing growth away from Oahu's limited productive agricultural lands.

2. **Proposed Zone Changes and TOD Special District.** OPSD strongly supports the City proposal to proactively rezone lands to align with the City TOD Plan land use designations. This step is absolutely essential to the successful implementation of TOD as it eliminates entitlement barriers for both public and private landowners and developers, thereby compressing the timeframe and reducing the cost of development.

   OPSD supports the zoning districts proposed for State lands and offers specific comments later. The zone changes are consistent with the land use designations in the East Kapolei TOD Plan and will contribute significantly to defining the anticipated buildout and achieving the urban form and functions envisioned in the TOD Plan. OPSD also appreciates and supports the proposed zone changes for State lands that are outside the proposed TOD Special District boundary, which will facilitate coherent and cohesive development of these parcels with respect to parcels within the TOD Special District.

   Furthermore, the State is undertaking two regional projects that support City efforts to reduce development costs and facilitate buildout in the East Kapolei TOD area. The first is the Hawai'i Community Development Authority's preparation of the East Kapolei Infrastructure Implementation Master Plan (EKIIMP), which will identify the backbone and regional infrastructure needed to support planned development in much of the East Kapolei TOD Plan area. See attached map of the EKIIMP area. The adopted zoning informs this effort by allowing an assessment of the full buildout potential for the Plan area as to the potential impact it may have on existing and planned infrastructure capacity.

   The second project, to be funded by an appropriation in the FY2026 Executive Budget bill, would fund the preparation of a Programmatic Environmental Impact

Statement for the EKIIMP area, which will identify the impacts of planned buildout and associated mitigation recommendations and help developers address the environmental review requirements for projects within this area.

We understand that the Department of Planning and Permitting (DPP) has been collaborating closely with landowners in the East Kapolei area to develop the TOD zoning proposals. OPSD offers the following comments regarding proposed zone changes as they relate to State lands.

a. **Proposed height limits for mixed-use zones.** We understand the TOD Plan's intent to step down heights in relation to distance from the rail stations. However, OPSD recommends consideration be given to increasing the base height for all A-2, BMX-, and AMX-zoned State lands to a minimum of 65 feet with allowance for bonus heights to increase the long-term potential building height envelopes and eliminate the need to rezone again in the future to accommodate changes in project plans. This provides greater flexibility to State landowners in project development and may be critical to achieving the required densities and floor areas for projects to be financially viable. For example, the Department of Land and Natural Resources' lands at the Keone'ae Station would then be BMX-3 90' (120') due to their proximity to the station and major roadways (Map 1 items 4 and 12). Similarly, the Department of Hawaiian Home Lands' parcel adjacent to Kualaka'i Station and the stormwater detention basin parcel could be BMX-3 90' (120') as well.

b. **Proposed zoning for UH-WO properties.** OPSD recommends further consultation with UH-WO regarding changes being proposed to its Long Range Development Plan. The proposed AMX zoning for the northwest portion of the UH-WO lands may not align well with current ideas being floated for these lands.

c. **Proposed P2 zoning for multi-use pathway corridor.** OPSD is concerned that P-2 zoning might discourage commercial users or vendors, such as food trucks or kiosks, or other similar activities within the corridor. We recommend that consideration be given to providing a streamlined process for permitting such uses or activities that could contribute to activating the greenway and promoting place-making along the corridor.

d. **TOD Special District Key Streets.** OPSD recommends consideration be given to extending the designation of Road D, Puapua'a Street, and

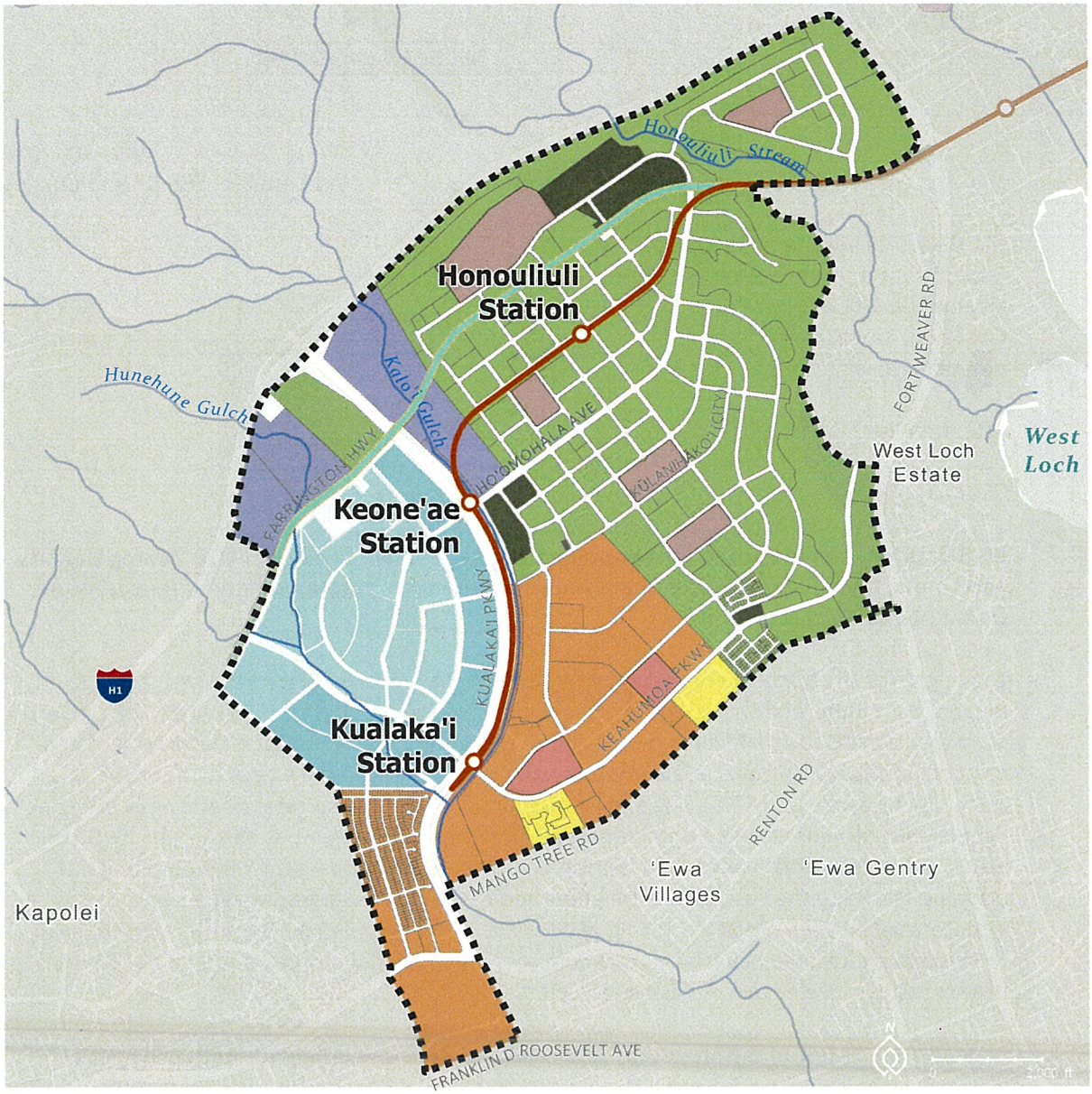
Punohu Street: Road D to Farrington Highway, and Puapua'a and Punohu to Kauluakoko Street. This would ensure that streetscape treatments along these streets are inviting and provide a more complete, cohesive, and attractive pedestrian network in these neighborhoods.

3. **Proposed State Land Use District Boundary Amendment (DBA).** OPSD recommends that the State Land Use District boundary amendments prioritize lands with potential for urban use or activities, for which a State Agricultural District classification might require cumbersome permitting requirements or potentially prohibit activities within those rights-of-way. For this reason, OPSD recommends that the DBA be limited to that portion of Tax Map Key (TMK) No. 9-1-17: 096 from Farrington Highway to Ho'omohala Avenue. This would ensure that the right-of-way and frontage along Kualaka'i Parkway makai of the Farrington Highway and Kualaka'i Parkway intersection, including the lands surrounding the Keone'ae Station were wholly within the State Urban District. This would remove any regulatory barriers for urban-like uses such as urban plazas, structures spanning Kualaka'i Parkway, or other commercial activities within the multi-use path corridor, such as food trucks, which could activate this corridor and create a more vibrant edge for these TOD neighborhoods.

   Most of the TMK slivers along streets and roads included in this DBA proposal are remnant parcels created by mapping of parcel boundaries that are not coincident. It may be possible to resolve these errant district classifications through a boundary interpretation from the State Land Use Commission (LUC). OPSD recommends consultation with LUC staff to determine whether this might be an alternative mechanism for rectifying the district classifications.

Thank you again for the opportunity to review the proposed zone changes, Special District boundary, and DBA. If you have any questions, please contact Seiji Ogawa, seiji.ogawa@hawaii.gov, or Ruby Edwards, ruby.m.edwards@hawaii.gov. If you respond to this comment letter, please include DTS 202504041528NA in the subject line.

Attachment



- Rail Transit Stations
- Honolulu Rail Transit Project Corridor
- Farrington Hwy Widening
- Streams
- Planned or Existing Schools
- East Kapolei Master Plan Area

East Kapolei Major Landowner

- DHHL
- DLNR
- DR Horton
- HHFDC
- UHWO - Campus Area
- UHWO - University District Lands (UDL)
- Other

FIGURE 1-2

Major Landowners

Site and Infrastructure Assessment
East Kapolei Infrastructure Master Plan
Honolulu, Hawai'i

Map Credit: State of Hawai'i, City and County of Honolulu, Esri, TomTom, Garmin, FAO, NOAA, USGS, EPA, USFWS, Esri, CGIAR, USGS, Esri, TomTom, Garmin, SafeGraph, METI/NASA, USGS, EPA, USDA, USFWS

UNIVERSITY of HAWAI'I®
WEST O'AHU
Ke Kulanui o Hawai'i–O'ahu Komohana

Office of the Chancellor

RECEIVED
May 30, 2025
10:18 AM
via Email
DEPT. OF PLANNING AND PERMITTING

May 30, 2025
Via email to: tod@honolulu.gov

Ms. Dawn Takeuchi Apuna, Director
Department of Planning and Permitting
City and County of Honolulu
650 South King Street, 7th Floor
Honolulu, Hawaii 96813

Attention: Mr. Timothy Streitz

Dear Ms. Apuna:

RE: Comments on Proposed East Kapolei TOD Area – State Land Use, TOD Zoning Heights and Limits, and Special District Regulations as Related to the University of Hawai'i-West O'ahu Ma kai Property

Thank you for the opportunity to comment on the draft proposed State Land Use, Zoning Heights and Limits, and Special District Regulations for the East Kapolei TOD Area. The University of Hawaii-West Oahu (UHWO) and University of Hawai'i Office of Strategic Development and Partnerships (UHOSDP) appreciate the opportunity to work with the City and County of Honolulu, Department of Planning and Permitting (DPP) in developing and refining of our Long Range Development Plan and Urban Design Plan for the UHWO campus and University District Lands. We believe that many of the items we've discussed regarding the relationship of our planning efforts to the East Kapolei Neighborhood TOD Plan and associated zoning are incorporated into the proposed zoning and Special District regulations. However, we do have some detailed follow-up comments and concerns regarding the proposed zoning and Special District maps provided on your website.

Based on our review of the proposed State Land Use, Zoning and Height Limits, and Special District Regulations provided on DPP's website for the East Kapolei TOD Neighborhood, we offer the following comments and proposed revisions for consideration:

1. **State Land Use District Boundary Amendments.** We understand that the City is looking to process a State Land Use District Boundary Amendment for an area under 15 acres. The proposed amendments are primarily focused on the right-of-ways along Farrington Highway and Kualaka'i Parkway. The changes are required to allow the full extent of City zoning in the area. At this time, the UHWO/UHOSDP have no comments or objections related to these changes.

91-1001 Farrington Highway
Kapolei, Hawai'i 96707
Telephone: (808) 689-2770
Fax: (808) 689-2771
An Equal Opportunity Institution

2. **Map 1: TOD Proposed Zone Changes of Greater Than 5 acres.** We offer the following comments and revisions related to Map 1. (Note: The parcels described in the text below relate to the map numbers identified on Map 1 from the DPP website).

   a. ***Area along Kualaka'i Parkway from BMX-3 90' to BMX-3 90' (120'), and Area adjacent to Kapolei Golf Course and along Farrington Highway from R-5 and A-2 to AMX-2, 65'.*** These changes are consistent with our previous discussions with DPP. We support these changes and have no further comments at this time.

   b. ***Areas adjacent to Farrington Highway from BMX-3 (90') to AMX-2 (65').*** We understand this area is proposed to be downzoned from BMX-3 to AMX-2 as it falls outside of the proposed TOD Special District boundary. The downzoning to AMX-2 would make it consistent with other areas on the UHWO property that are not within the TOD Special District area. We also note that the area currently is planned to be a part of the expansion of the UHWO campus, which in the future, may be incorporated into the Plan Review Use (PRU) permit for the campus. Our understanding is that if this area is incorporated into the PRU, the PRU requirements, including, but not limited, to height limits, density and land uses, will take precedence over the underlying AMX-2 zoning. As such, the zone change from BMX-3 to AMX-2 should have no impact to height limits, density and land uses, etc. should we incorporate the project into the PRU in the future. We would appreciate DPP's confirmation that zone change from BMX-3 to AMX-2 would not in any way affect future PRU requirements for this area.

   c. ***Parcel 17: from AG-1 to BMX-3 90' (120').*** We believe this area is outside of the UHWO property and is a part of the right-of-way for Kualaka'i Parkway. If so, we have no further comments at this time.

   d. ***Area adjacent to the DHHL Kanehili Subdivision from R-5 to BMX-3 25' (120'), Parcel 19: BMX-3 90' to BMX-3 25' (90'), Parcel 20: R-3.5 to BMX-3 25' (90'), Parcel 21: P-2 to BMX-3 65' (90'), Parcel 22: R-3.5 to BMX-3 65' (90'), Parcel 23: A-2 65' to BMX-3 65' (90').*** For the parcels listed above, we note that the base height elevations for these parcels proposed as BMX-3 are lower than the typical 90' base height of the existing BMX-3 zoning in the area. Also, in the case of Parcel 19, the permitted base height limit is proposed to be lowered from 90' to 25'. For the properties identified above, we understand that the lower base height limits are proposed by DPP as a trade-off for upzoning of other areas on the UHWO property. The underlying base heights were either lowered, as is in the case of BMX-3 zoned areas; or were influenced by the previous permitted zoning district heights for R-3.5, R-5, and A-2, zoning districts. While we understand DPP's rationale for this, we still believe that having a consistent minimum base height limit of 90' for all BMX-3 zoned areas is preferrable. We believe a consistent 90' base height limit for BMX-3 areas allows for more flexibility, and would help to encourage greater opportunity for TOD.

   e. ***Parcel 24: A-2 65' to P-2, Parcel 25: R-5 to P-2.*** These changes are consistent with our previous discussions with DPP and the City, Department of Parks and Recreation for a park to be located in this area. We support these changes and have no further comments to offer at this time.

3. **Map 2: TOD Proposed Zone Changes of Less than 5 Acres.** We offer the following comments and revisions to Map 2. (Note: The parcels described in the text below relate to the map numbers identified on Map 2 from the DPP website).

   a. ***Parcel 77: AG-1 to AMX-2 65', Parcel 78: A-2 65' to AG-1, Parcel 79: BMX-3 90' to AG-1***. Please confirm that the proposed changes for these parcels are to reflect the current plans for the Farrington widening project. For parcels 78 and 79, our concern is that the downzoning will not result in slivers of lands within UHWO property, not part of the Farrington Highway Road widening project that would be zoned AG-1.

   b. ***Parcel 80: BMX-3 90' to IMX-1 25' (60')*** Please confirm that the proposed changes are outside of the UHWO property and proposed to accommodate the adjacent DLNR lands or Farrington Highway widening.

   c. ***Parcel 81: AG-1 to BMX-3 60' (90').*** Please confirm that the proposed changes are outside of the UHWO property or are associated with land required for the Farrington Highway widening project. If on UHWO lands, we would prefer a base height limit of 90' as consistent with the existing BMX-3 height limit approved under the current zoning for other parcels in the area.

   d. ***Parcel 82: BMX-3 90 ' to BMX 65' (90'), Parcel 88: A-2 65' to BMX-3 25' (120')***. This is similar to the situation described under Item 2.d. above. For the properties identified above, we understand that the lower base height limits are proposed by DPP as a trade-off for upzoning of other areas on the UHWO property. The underlying base heights were either lowered, as is in the case of BMX-3 zoned areas; or were influenced by the previous permitted zoning district heights for the A-2, zoning district. While we understand DPP's rationale for this, we still believe that having a consistent minimum base height limit of 90' for all BMX-3 zoned areas is preferrable. We believe a consistent 90' base height limit for BMX-3 areas allows for more flexibility, and would help to encourage greater opportunity for TOD.

   e. ***Parcel 83: P-2 to BMX-3 90', Parcel 84: R3.5 to BMX-3 90', Parcel 85: R3.5 to BMX-3 90' (120'), Parcel 86: A-2 65' to AMX-2 65, Parcel 89: A-2 65' to BMX-3 90' (120').*** We support these changes with no further comments at this time.

   f. ***Parcel 87: R-5 to P-2***. This appears to be a small sliver within the area proposed as a park, as such we support these changes with no further comments at this time.

   g. ***Parcel 90 AG-1 to BMX-3 25' (120')*** Parcel 90 appears to be outside of the UHWO property boundary. Please confirm that the parcel is outside of the UHWO property boundary. If so, we have no further comments to offer at this time.

4. **East Kapolei TOD Neighborhood Special District Map**

   a. ***TOD Special District Boundary.*** The TOD Special District Boundary within the UHWO property appears consistent with what we had discussed and coordinated on with DPP in our previous meetings and discussions.

   b. ***Kualaka'i Parkway Key Street and Farrington Highway Key Streets.*** We believe that development within the UHWO UDL can support the designation of Ho'omohala Road (Road B), proposed Road D (ma uka to ma kai connection on UHWO lands between Ho'omahala Avenue and the Keahumoa Parkway extension), and proposed Keahumoa

Parkway extension as "Key Streets" identified on the East Kapolei TOD Special District Boundary Map on your website. However, while we support the City's desire to create a pedestrian-friendly and active streetscape along Kualaka'i Parkway and Farrington Highway, we believe that the higher speeds and volume of traffic along the two roadways along with possible noise mitigation requirements, could create a challenge in complying with the TOD Special District "Key Streets" requirements along these roadways. We look forward to continuing to work with DPP on how best to address this matter as we move forward in completing our Long Range Development Plan, Urban Design Plan, and Roadway Master Plan for the UHWO property.

Thank you for the opportunity to provide our comments on the proposed East Kapolei TOD area State Land Use, TOD Zoning Heights and Limits, and Special District Regulations. We appreciate the time spent with DPP in coordinating our planning efforts for the area. Should you have any questions, please feel free to contact Fenita Long, Director of Planning and Facilities at (808) 689-2546, or Grant Murakami at PBR HAWAII and Associates, Inc. at (808) 521-5631.

Sincerely,

Maenette Benham
Chancellor

Cc: PBR HAWAII and Associates, Inc.
UH Office of Strategic Development and Partnerships

Attachment

D·R·HORTON®
America's Builder
HAWAII

RECEIVED
May 30, 2025
9:08 AM via
Email
DEPT. OF PLANNING AND PERMITTING

May 30, 2025

Mr. Tim Streitz
Transit-Oriented Development Division, Acting TOD Administrator
Dept. of Planning & Permitting
City & County of Honolulu
650 S. King St., 7th Floor
Honolulu, HI 96813

Subject: East Kapolei TOD Special District Regulations & Zoning

Dear Tim,

Mahalo for the opportunity to provide comments to the City's proposed East Kapolei TOD Special District (EKTOD) Regulations & Zoning.

D.R. Horton Hawaii is humbled and proud to be one of Hawaii's largest homebuilders, serving local families for more than 50 years. We specialize in providing affordable and workforce housing **opportunities across Oahu and have been a strong supporter of both the HART Skyline and the City's vision for transit-oriented development along it's a**lignment. As a major greenfield landowner within the proposed EKTOD Special District, D.R. Horton Hawaii continues to actively develop Ho'opili, a large master-planned community in and around the Honouliuli (Ho'opili) and Keone'ae (UH-West Oahu) station areas.

As the only greenfield land area for new TOD development along the 18.9 mile Skyline corridor, the proposed EKTOD Special District presents both unique opportunities and challenges that differ from other brownfield TOD redevelopment special districts. We respectfully offer the following comments with proposed amendments that we believe would create value opportunities, streamline approval redundancy and eliminate impractical requirements within the EKTOD Special District to better support **the City's TOD Special District Objectives.**

Comment #1: Unique Opportunity for Golf Entertainment Venue

As greenfield land area, the proposed EKTOD Special District provides a unique opportunity for Oahu, and the state of Hawaii, to develop its very first golf entertainment venue. A typical golf entertainment venue consists of an integrated driving range, food and entertainment facility designed in a compact, land use efficient manner. The benefits of such a venue are:

- Efficient land utilization: while a comparable traditional driving range utilizes between 15 to 25 acres of land, a golf entertainment venue utilizes just 8 to 10 acres of land (45% to 60% land reduction).

- Job creation: it is estimated to create 275-300 construction jobs and another 400-500 direct and indirect jobs for permanent ongoing operations.
- Premier practice facility: for West side golf teams and youth organizations.
- Premier destination: for corporate, charity and group entertainment island wide.
- Increased rail ridership: as a premier destination and practice facility with direct walking/bicycle access to the Keone'ae (UH-West Oahu) station, a venue such as this has the potential to drive Skyline ridership from end to end.

Furthermore, such a golf entertainment venue fulfills the City's TOD Special District Design Guideline Objectives, in particular:

- ✓ Objective (1): *"Promote an appropriate density and mixture of activity around the rail transit stations in order to **maximize the potential for transit ridership** and promote alternative modes of transportation."*
- ✓ Objective (2): *"Allow for **more intense and efficient use of land** for the mutual reinforcement of public investments and private development."*
- ✓ Objective (8): *"Contribute positively to **economic enhancement**, particularly with regard to providing a broad mix of uses, diverse housing and **diverse employment opportunities**."*

A conceptual location for a golf entertainment venue within the proposed EKTOD Special District is identified on the attached Exhibit 1 on a site called Ho'opili Gateway. Ho'opili Gateway is ideally situated one block from the Keone'ae (UH-West Oahu) Skyline station which is currently in service. This site is proposed to be zoned BMX-3 with a 90-foot height limit upon adoption of the EKTOD Special District. **While a golf entertainment venue's main building facility can be constructed within this 90-foot** height limit, the compact land efficient design of the driving range necessitates a safety net system that is approximately 200 feet in height. Since safety poles and nets are appurtenant to the main building facility with an approximate 93% transparency, we view them to be similar in nature and intent to spires, flagpoles and smokestacks. Thus, we propose the following amendment to reasonably accommodate the increase in height needed to construct the safety poles and nets:

Proposed Amendment: Land Use Ordinance (LUO) Sec. 21-4.60(c)(5) Heights
*"Spires, flagpoles, **safety poles, nets** and smokestacks, not to exceed 350 feet from existing grade."*

Comment #2: Unique Challenge to TOD Special District Permitting and Master Planned Communities

Unlike most brownfield TOD redevelopment districts, the proposed EKTOD Special District is comprised of two large master planned communities, Ho'opili and UH West Oahu. Both Ho'opili and UH West Oahu are required via entitlements to meet the design requirements of a City approved Urban Design Plan specific to each master planned community. The Ho'opili Urban Design Plan (UDP) has been approved as the overarching document shaping community planning, urban design and general architectural fabric amongst other requirements. It also requires each development site within Ho'opili to undergo a multi-stepped approval process of design and construction plans to ensure compliance with the approved UDP.

Current TOD Special District permitting requirements are defined in part and applicability to greenfield development as follows:

- No Special District Permit Required: sites less than 1 acre in size that meet development standards enumerated in the Land Use Ordinance (LUO).
- Minor Special District Permit Required: new construction on sites 1 acre or more in size not located along Key Streets.
- Major Special District Permit Required: new construction on sites 1 acre or more seeking bonus incentives in height and/or density.

The current Urban Design Plan and permitting process for sites within Ho'opili are already lengthy. In an effort to avoid additional layers of approval redundancy that cover very similar design intents, we propose the following amendment:

Proposed amendment: Expand No Special District Permit Required to include:
*"Sites **1 acre or more** in size that meet development standards enumerated in the Land Use Ordinance (LUO), **are not located on a Key Street and are not seeking any TOD bonus incentives."***

Comment #3: Unique Challenges to Key Street Designations Mauka of Farrington Highway

The Current proposed EKTOD Special District designates both Kualakai Parkway and Farrington Highway as Key Streets as indicated on attached map Exhibit 2. Exhibit 3 illustrates the relationship between Kualakai Parkway, Farrington Highway and the Ho'opili Gateway site. Of note:

- There are no sidewalks/multimodal pathways along the western nor eastern edges of Kualakai Parkway mauka of Farrington Highway.
- There is a 41 foot to 150 foot wide natural buffer area between the western roadway curb of Kualakai Parkway and the site boundary of Ho'opili Gateway. This natural buffer area is owned by the State of Hawaii Department of Transportation (HDOT). It is our understanding that maintenance of this area by HDOT is limited and any improvements such as sidewalks, benches, trees, landscaping is prohibited.
- There is a 30 foot wide existing State of Hawaii Energy Corridor that runs along the entire mauka side of Farrington Highway. It is our understanding that maintenance of this area by HDOT and other utilities within the Energy Corridor is limited and any improvements such as sidewalks, benches, trees and landscaping is prohibited.

Thus, due to the impracticality of constructing Key Street requirements and the inability to physically fulfill the design intent of Key Streets, we proposed the following amendment:

Proposed Amendment: Delete the Key Street designation on:

- ✓ the section of Kualakai Parkway mauka of Farrington Highway due to lack of pedestrian access
- ✓ the mauka side of Farrington Highway due to limitations within the Energy Corridor

Thank you for the opportunity to provide comments. It is much appreciated. Please feel free to contact me at ttonaki@drhorton.com or 808-782-4109 should you have any questions.

Sincerely,

Tracy Tonaki
President
D.R. Horton Hawaii

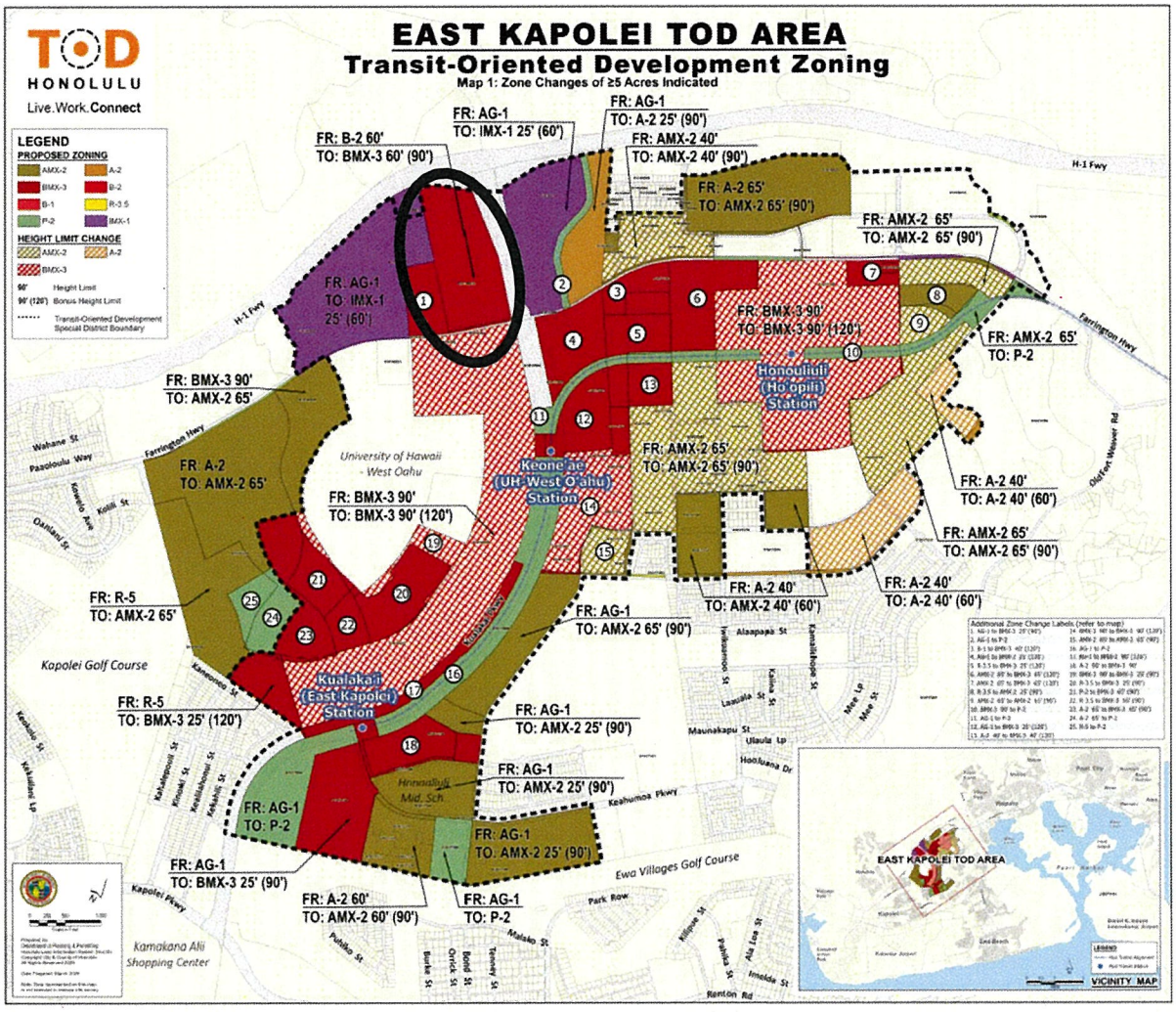


EXHIBIT 1 - Ho'opili Gateway Site

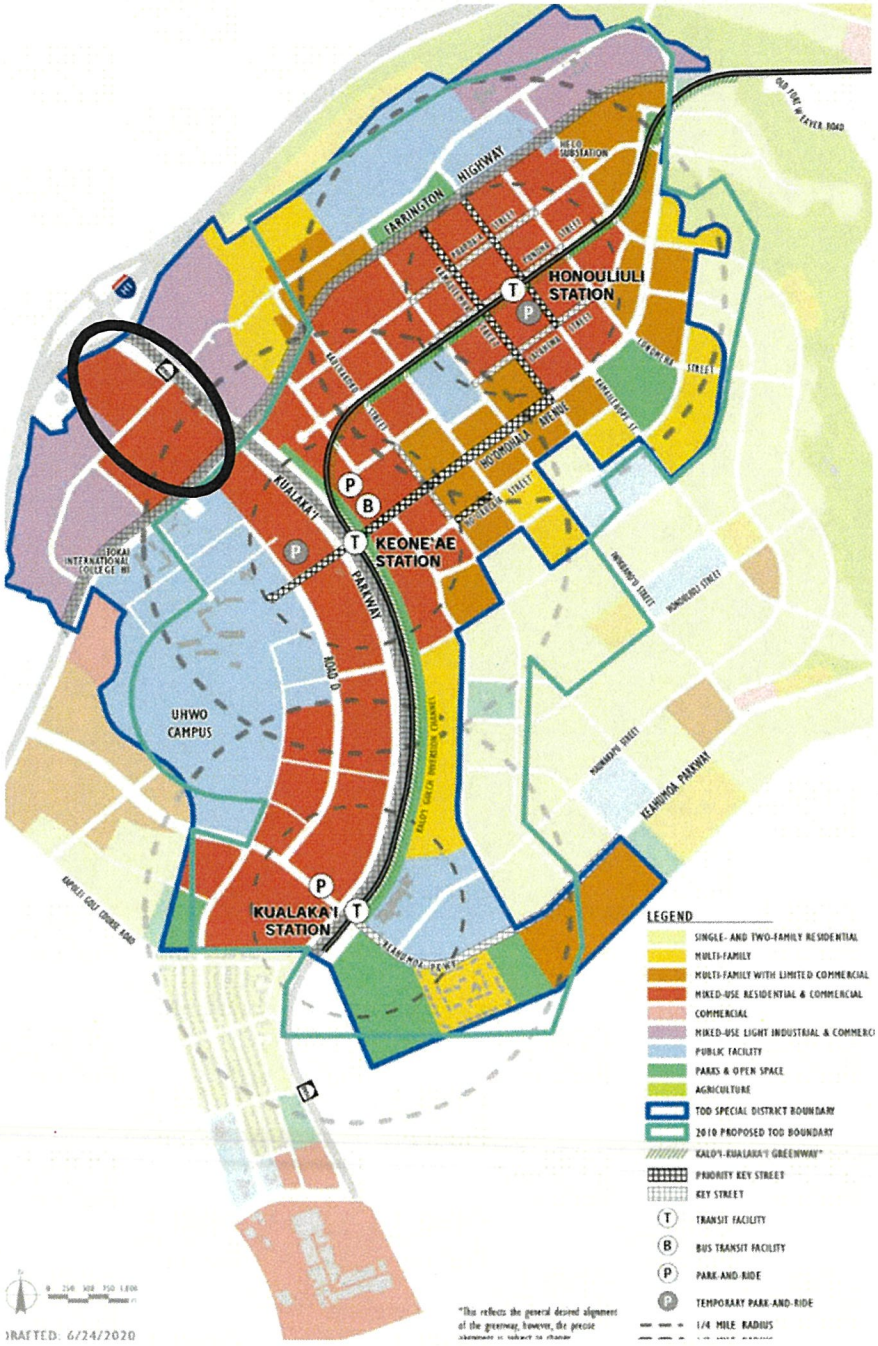


EXHIBIT 2 – Kualakai Parkway and Farrington Highway Key Street Designation (Ho'opili Gateway circled)

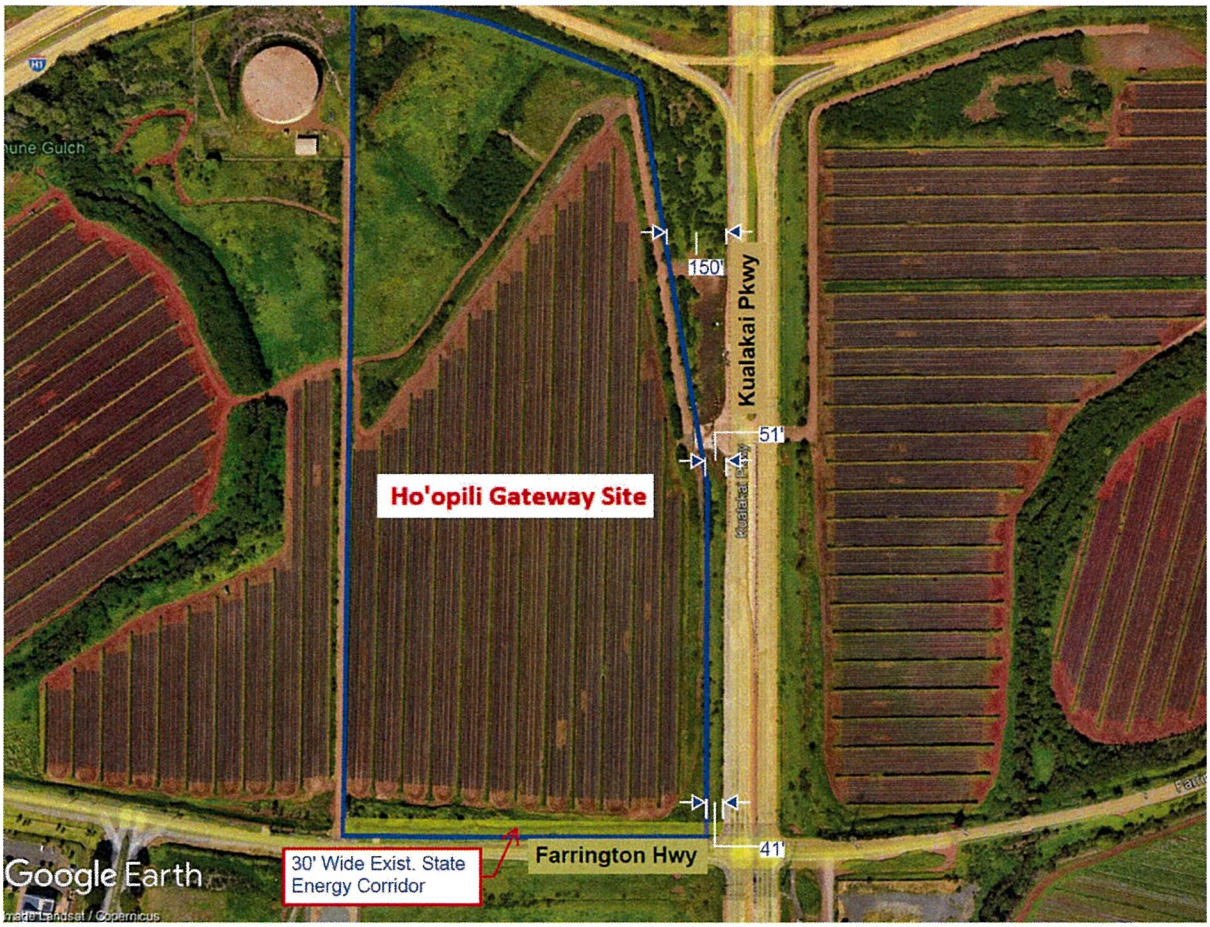


EXHIBIT 3 - Relationship between Kualakai Parkway, Farrington Highway and the Ho'opili Gateway site

ATTACHMENT 2

BILL FOR AN ORDINANCE

This page intentionally blank.

HONOLULU CITY COUNCIL

KE KANIHELA O KE KALANA O HONOLULU

CITY AND COUNTY OF HONOLULU

ORDINANCE _____

BILL _____

A BILL FOR AN ORDINANCE

RELATING TO THE TRANSIT-ORIENTED DEVELOPMENT SPECIAL DISTRICT.

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

SECTION 1. Purpose. The purpose of this ordinance is to expand the transit-oriented development ("TOD") special district to include three additional Skyline rail transit station areas and to incorporate land use standards and guidelines for those areas based on the recommendations in the East Kapolei Neighborhood TOD Plan.

SECTION 2. Section 21-9.100-2, Revised Ordinances of Honolulu 2021, is amended to read as follows:

"**§ 21-9.100-2 Neighborhood TOD plans.**

(a) For each TOD station area or combination of station areas, the department shall prepare a neighborhood TOD plan, which serves as the basis for the creation of or amendment to the TOD special district and the TOD development regulations applicable thereto. Each neighborhood TOD plan must address, at minimum, the following:

(1) The general objectives for a specific TOD station area in terms of overall economic revitalization, neighborhood character, and unique community historic and other design themes. Objectives must summarize the desired neighborhood mix of land uses, general land use intensities, circulation strategies, general urban design forms, and cultural and historic resources that form the context for TOD;

(2) Parcels recommended to be included in the TOD special district, taking into account natural topographic barriers, extent of market interest in redevelopment, and the benefits of transit, including the potential to increase rail and bus transit ridership;

(3) Recommended zoning controls, including architectural and community design principles, open space requirements, parking standards, and other modifications to existing zoning requirements, or the establishment of new zoning districts or special district precincts, as appropriate, including density incentives. Prohibition of specific uses must be considered. Form-based zoning may be considered;

(4) Preservation of existing affordable housing and potential opportunities for new affordable housing, with supportive services as appropriate;

(5) Preservation of existing healthcare services. For the purposes of this subdivision, "healthcare services" means the furnishing of medicine, medical or surgical treatment, nursing, hospital service, dental service, optometrical service, complementary health services, or any other necessary services of like character intended to prevent, alleviate, cure, or heal human illness, physical disability, or injury;

(6) Preservation and protection of Native Hawaiian cultural and historic resources, including cultural, historic, and pre-contact sites and monuments;

(7) Mitigating gentrification of the community;

(8) Consideration of flood hazards, including coastal hazards such as sea level rise, which may affect neighborhood infrastructure and land; and

(9) The general direction on implementation of the recommendations, including the phasing, timing, and approximate cost of each recommendation, as appropriate, and new financing opportunities that may be pursued.

(b) The process of creating neighborhood TOD plans must be inclusive, open to residents, businesses, landowners, community organizations, government agencies, and others.

(c) The process must consider population, economic, and market analyses, and infrastructure analyses, including capacities of water, wastewater, and roadway systems. Where appropriate, public-private partnership opportunities must be explored.

(d) The neighborhood TOD plan must be consistent with the applicable regional development plan.

(e) To the extent practical, the neighborhood TOD plan must be consistent with any applicable special area plan or community master plan, or make recommendations for revisions to these plans.

(f) The neighborhood TOD plan must be submitted to the council and approval of the plan must be by council resolution, with or without amendments.

(g) The primary design objectives of the Waipahu Neighborhood TOD Plan are as follows:

(1) Maintain Waipahu's heritage as a former sugar plantation town in the Pouhala (Waipahu Transit Center) station area;

(2) Maintain the area's low-rise character and wide range of uses;

(3) Retain the area's historic low-rise character, while providing new retail, office, and residential opportunities in a walkable, mixed-use setting in the areas along Waipahu Depot Street and Farrington Highway;

(4) Concentrate development in the Hō'ae'ae (West Loch) station area in the area adjacent to the rail station along Farrington Highway and Leo'ole Street; and

(5) Encourage a higher-density commercial center with mixed-use buildings along Farrington Highway, while Leo'ole and Leokū Streets serve as pedestrian-oriented streets with active ground floor activities and pedestrian access to the Pearl Harbor Historic Trail.

(h) The primary design objectives of the 'Aiea-Pearl City Neighborhood TOD Plan are as follows:

(1) Develop the Kalauao (Pearlridge) station area as a major urban center and regional destination with opportunities for new high-density residential and commercial development that enhance access and views to the area's natural features;

(2) Preserve views of Pearl Harbor from Kaonohi Street;

(3) Create additional housing units, improved access and amenities along the Pearl Harbor Historic Trail, and new waterfront open spaces in the area makai of Kamehameha Highway;

(4) Transform the existing parking lots and low-density commercial uses near the Waiawa (Pearl Highlands) station area into a walkable, pedestrian-

oriented environment by allowing new high-density development;

(5) Promote the area as an attractive place to live and work by emphasizing and improving amenities like the Pearl Harbor Historic Trail, the University of Hawai'i Urban Garden Center, and the wide variety of local shopping and dining;

(6) Improve access to regional transportation options, especially pedestrian and bicycle access to the Pearl Harbor Historic Trail from public streets; and

(7) Promote the vision of the Hālaulani (Leeward Community College) station area as a college-oriented neighborhood.

(i) The primary design objectives of the Hālawa Area Neighborhood TOD Plan are as follows:

(1) Develop a TOD-oriented sports and entertainment district tied to a stadium in the Hālawa (Aloha Stadium) station area;

(2) Establish a gateway corridor connecting the rail station and stadium; and

(3) Concentrate an eclectic mix of street-level retail with consistent frontage along Salt Lake Boulevard.

(j) The primary design objectives of the East Kapolei Neighborhood TOD Plan are as follows:

(1) Create a greenway corridor that includes a multi-use path and other amenities for active and passive use along the rail guideway, while accommodating opportunities for other forms of recreation and entertainment activities in the neighborhood;

(2) Configure buildings and open spaces to provide neighborhood focal points and view corridors of distinct landmarks, such as the Wai'anae and Ko'olau mountain ranges and the university campus library tower, while respecting the prevailing trade-wind pattern;

(3) Establish a local, mixed-use community throughout the Honouliuli (Ho'opili) station area that is organized in a compact street grid layout with a medium- to high-density town center around the rail station;

(4) Promote an active "festival street" lined with commercial uses and closed to vehicles during events for at least one block near the Honouliuli (Ho'opili) station and one block of Ho'okulaia Street;

(5) Promote the vision of the Keone'ae (University of Hawai'i-West O'ahu) station area as a campus gateway that includes a university village and main street-style atmosphere focused primarily on the university side of Kualaka'i Parkway;

(6) Create a greenway that includes a multi-use path along the former Kalo'i Gulch to connect the university campus and non-campus lands, including adjacent park and open space; and

(7) Cultivate community uses and active streetscapes in the Kualaka'i (East Kapolei) station area that provide distinctive, vibrant public spaces at the ground level."

SECTION 3. Section 21-9.100-7, Revised Ordinance of Honolulu 2021, is amended to read as follows:

"**§ 21-9.100-7 Use regulations.**

Permitted uses and structures are as enumerated in Table 21-5.1, except as provided below:

(a) In the business mixed-use district, the ground floor of buildings facing a key street, public open space, or transit station must be designed and used for active ground floor activities, as defined in § 21-9.100(c), for at least 80 percent of the ground-floor building frontage. On corner lots, this requirement must be met on each key-street- facing facade.

(b) In the apartment mixed-use district the ground floor of the building frontage facing any key street, public open space, or transit station must be designed and used as residential dwelling units or active ground floor activities, as defined in § 21-9.100(c). On corner lots, this requirement must be met on each key-street-facing facade.

(c) Up to 10 dwelling units may be permitted per zoning lot above the ground floor in the IMX-1 industrial commercial mixed-use district, subject to a special district permit.

(d) Safety nets and poles that are accessory to recreation facilities are exempt from the zoning district height limits in the TOD station areas corresponding to Exhibit 21-9.25; provided that:

(1) The height does not exceed 200 feet from existing grade; and

(2) The project site is located 2,000 feet or farther from a rail station.

SECTION 4. Section 21-9.100-11, Revised Ordinances of Honolulu 2021, is amended to read as follows:

"**§ 21-9.100-11 TOD special district–project classification.**

Refer to Table 21-9.8 to determine whether specific categories of projects will be classified as major, minor, or exempt. For the purposes of this section, in addition to § 21-9.20-2(c), the term "exempt" means projects that are in full compliance with the standards and objectives of [a] the TOD special district.

Table 21-9.8
TOD Special District Project Classification

Activity/Use	Required Permit	Special Conditions
Major modification, major additions, or new construction on sites 1 acre or more in size	[~~M/~~]m	[~~Projects on key streets are major. All others will be minor.~~]
Minor additions to existing structures or construction of new accessory structures on sites 1 acre or more in size	[~~m/~~]E	[~~Projects on key streets are minor. All others will be exempt.~~]
Major modification, additions, or new construction on sites less than 1 acre in size	E	
Interior or exterior repairs, alterations, or renovations to all structures	E	

Table 21-9.8 TOD Special District Project Classification		
Activity/Use	Required Permit	Special Conditions
Modifications to FAR	M/m	See § 21-9.100-8(a)(1)(A). PD-T approval may be required prior to obtaining a major permit.
Modifications to height	M/m	See § 21-9.100-8(a)(1)(D). PD-T approval may be required prior to obtaining a major permit.
Modification to the following standards: • Yards and setbacks • Street facade and building placement • Building orientation and entrances • Building transparency • [~~Number of parking stalls~~] • Location of above ground surface parking • Location of service area and loading spaces • Bicycle parking • The commercial use density and location provisions in the apartment mixed-use districts • Additional commercial density in the apartment mixed-use districts • Reconfiguration of sidewalk area	m	

Table 21-9.8 TOD Special District Project Classification		
Activity/Use	Required Permit	Special Conditions
Demolition of structures	E	
Residential units in the IMX-1 district	m	
Streetscape improvements, including street furniture, light fixtures, sidewalk paving, bus shelters and other elements in public rights-of-way when part of the development of a zoning lot	m/E	If the director has determined that the project may result in substantial impacts to [~~a~~] the TOD special district, a minor permit is required; otherwise exempt. Where addressed as part of another permit, a minor permit is not required.
Major above-grade infrastructure improvements not covered elsewhere, including new roadways, road widenings, new substations, new parks, and significant improvements to existing parks	m/E	If the director has determined that the project may result in substantial impacts to [~~a~~] the TOD special district, a minor permit is required; otherwise exempt.
Minor above-grade infrastructure improvements not covered elsewhere; all below-grade infrastructure improvements; and all emergency and routine repair and maintenance work	E	
Plan review uses (PRU)	E	Projects are exempt if subject to a PRU approved pursuant to § 21-2.120-2.
A special district permit is not required for activities and uses classified as exempt, as well as other project types that do not fall into one of the categories listed above. These activities and uses, however, must still conform to the applicable objectives and standards of the special district. This conformance will be determined at the building permit application stage. Pursuant to §§ 21-2.110-2, 21-9.100-8(a)(1)(A), and 21-9.100-8(a)(1)(D), PD-T approval may be required prior to obtaining a major		

Table 21-9.8 TOD Special District Project Classification		
Activity/Use	Required Permit	Special Conditions
special district permit. If a PD-T or major special district permit is otherwise required, a separate minor special district permit is not required.		
Legend: Project classification: M = Major; m = Minor; E = Exempt		

"

SECTION 5. Section 21-9.100-12, Revised Ordinances of Honolulu 2021, is amended as follows:

"**§ 21-9.100-12 TOO special district boundaries.**

(a) The Hōae'ae (West Loch) station area TOD special district boundaries are designated on Exhibit 21-9.19, set forth at the end of this article.

(b) The Pouhala (Waipahu Transit Center) station area TOD special district boundaries are designated on Exhibit 21-9.20, set forth at the end of this article.

(c) The Hālaulani (Leeward Community College) station area TOD special district boundaries are designated on Exhibit 21-9.21, set forth at the end of this article.

(d) The Waiawa (Pearl Highlands) station area TOD special district boundaries are designated on Exhibit 21-9.22, set forth at the end of this article.

(e) The Kalauao (Pearlridge) station area TOD special district boundaries are designated on Exhibit 21-9.23, set forth at the end of this article.

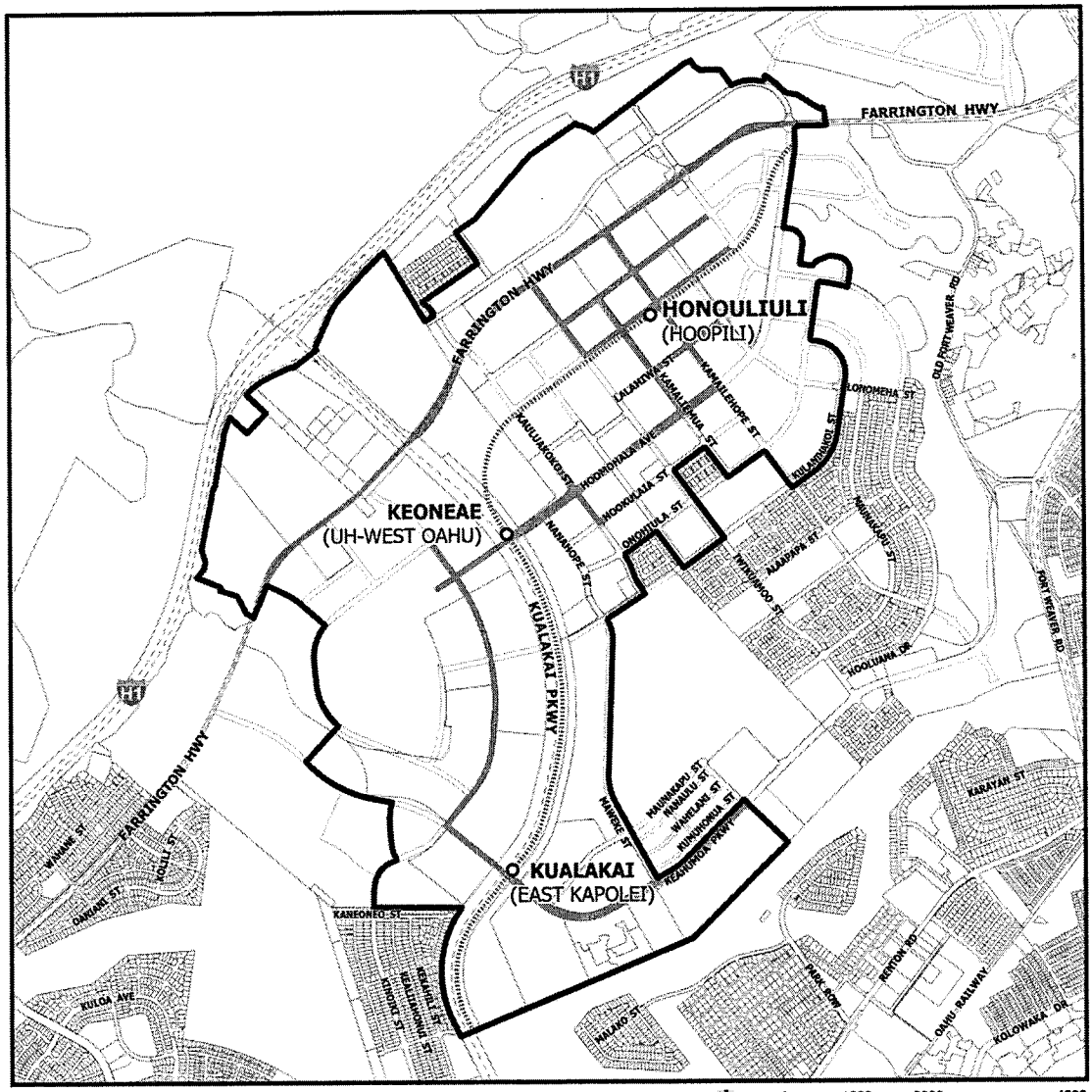
(f) The Hālawa (Aloha Stadium) station area TOD special district boundaries are designated on Exhibit 21-9.24, set forth at the end of this article.

(g) The Kualaka'i (East Kapolei) station area, Keone'ae (University of Hawai'i-West O'ahu) station area, and Honouliuli (Ho'opili) station area TOD special district boundaries are designated on Exhibit 21-9.25, set forth at the end of this article."

SECTION 6. Chapter 21, Article 9, Revised Ordinances of Honolulu 2021 ("Special District Regulations"), is amended by adding a new Exhibit 21-9.25 to read as follows:

A BILL FOR AN ORDINANCE

"EXHIBIT 21-9.25
Kualaka'i (East Kapolei), Keone'ae (University of Hawai'i-West O'ahu), and Honouliuli (Ho'opili) Station Areas



East Kapolei TOD Neighborhood

LEGEND

- TOD Special District Boundary
- Key Street
- Bike-Walk Greenway
- ○ Rail Station

"

A BILL FOR AN ORDINANCE

SECTION 7. 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 material that has been bracketed and stricken, or the underscoring.

SECTION 8. 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:
Land Use Ordinance ("LUO") Amendment; Transit-Oriented Development ("TOD") Special District; East Kapolei Neighborhood TOD Plan; Department of Planning and Permitting ("DPP")

Description:
Amends the LUO by expanding the TOD Special District boundaries to the East Kapolei Neighborhood TOD Plan area, adding primary design objectives and use regulations, and modifying the TOD Special District Project Classification table.

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