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

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July 24, 2026

2026-PDP-1 (LP)

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

Dear Chair Waters and Councilmembers:

SUBJECT:	Application for an Interim Planned Development-Transit (IPD-T) Permit - File Number 2026-PDP-1
Project:	1588 Ala Moana
Landowner:	GGP Ala Moana LLC
Applicant:	BSC Acquisitions II, LLC
Agent:	R.M. Towill Corporation (Isaiah Sato)
Location:	1450 Ala Moana Boulevard – Ala Moana
Tax Map Keys:	2-3-038: 014 (por.)
Acceptance Date:	April 8, 2026

Enclosed for your consideration is the Department of Planning and Permitting's (DPP's) Report and Recommendations and Draft Resolution for the IPD-T Permit application for a new mixed-use development in the Ala Moana area.

The proposed Project is within the BMX-3 Community Business Mixed-Use District and less than one-half mile from the Kālia (Ala Moana) Skyline Station. The Applicant is proposing to demolish an existing parking garage and construct a new 38-story, (418-foot [ft.]-tall) hotel with 294 hotel units and a 17-story (200-ft.-tall) tower which includes a total of 214 dwelling units (136 market-rate dwelling units and 69 affordable rental dwelling units). The towers will be on top of a five-story podium which will include residential units, ground-floor commercial uses, a residential and hotel lobby, a porte-cochère, and parking.

DEPT. COM. 504(26)

The DPP recommends that the Project be approved, with conditions related to design changes for consistency with the Ala Moana Neighborhood Transit-Oriented Development Plan. Specifically, the DPP recommends conditions to increase the level of community benefits, including more affordable housing, increased support for multi-modal transportation, and street trees, so that it is commensurate with the requested height and density bonuses.

There were approximately 82 members of the public who attended the public hearing on May 8, 2026, at the Frank F. Fasi Municipal Building, Sixth Floor Conference Room at 10:00 a.m. 26 oral testimonies were provided at the public hearing. Five letters of support and one letter with comments were submitted to the DPP prior to the public hearing.

Pursuant to the Revised Ordinances of Honolulu Section 2.110-2, the City Council must act within 60 calendar days after receipt of our Report and Recommendations, or the application is deemed denied. The City Council may extend this period of time upon receipt of a request from the Applicant for an extension.

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

Very truly yours,

Dawn Takeuchi Apuna
Director

Enclosures: DPP's Report and Recommendation
Exhibits A, B, C-1 through C-12, and D
Draft Resolution

APPROVED BY:

Krishna F. Jayaram, Managing Director Designate
Office of the Managing Director

DEPARTMENT OF PLANNING AND PERMITTING
OF THE CITY AND COUNTY OF HONOLULU

STATE OF HAWAI'I

IN THE MATTER OF THE APPLICATION

BY

GGP ALA MOANA LLC

FOR AN

INTERIM PLANNED DEVELOPMENT-
TRANSIT PERMIT

File Number 2026-PDP-1 (LP)

FINDINGS OF FACT, CONCLUSIONS OF LAW, AND RECOMMENDATION

I. APPLICATION

A. Basic Information:

APPLICANT:	BSC Acquisitions II, LLC
OWNER:	GGP Ala Moana LLC
AGENT:	R. M. Towill Corporation (Isaiah Sato)
LOCATION:	1450 Ala Moana Boulevard - Ala Moana (Exhibit A)
TAX MAP KEY (TMK):	2-3-038: 014 (por.)
LOT AREA:	Joint Development: 2,713,046 square (sq.) feet (ft.) Project Area: 187,174 sq. ft.
STATE LAND USE DISTRICT:	Urban
DEVELOPMENT PLAN AREA:	Primary Urban Center
EXISTING ZONING:	BMX-3 Community Business Mixed-Use District (BMX-3 District) (Exhibit B)
EXISTING USE:	Ala Moana Shopping Center parking structure
SURROUNDING LAND USES:	Offices, retail establishments, eating and drinking establishments, hotel, multi-family dwelling units, Ala Moana Regional Park (AMRP).

B. Proposal: The Applicant seeks an Interim Planned Development-Transit (IPD-T) Permit to allow a mixed-use development in the Ala Moana neighborhood (Project). The Applicant is proposing a 38-story, 400 ft. tall hotel tower with 294 hotel units and a 17-story, 200 ft. tall residential tower which includes a total of 205 dwelling units (136 market-rate dwelling units and 69 affordable rental dwelling units). The buildings will be on top of a five-story podium which will include the affordable rental dwelling units, ground-floor commercial uses, a residential and hotel lobby, a porte-cochère, back of house uses, and parking (see Exhibits C-1 through C-12).

The existing three-story parking structure at Ala Moana Shopping Center (Mall) will be demolished to allow for the redevelopment. The Project proposes a floor area ratio (FAR) of 6.2 for the Project Area, or about 1,155,846 sq. ft. of floor area. The Project fronts Ala Moana Boulevard and Atkinson Drive. Pedestrian access to the site is proposed along Ala Moana Boulevard, and includes an internal walkway connecting the Mall to the Ala Moana Boulevard and Atkinson Drive intersection. Vehicular access is proposed along Ala Moana Boulevard and Atkinson Drive.

C. IPD-T Requests: The Applicant seeks bonuses to the height limit and FAR, modification of the height setback requirements, modification of the specific use standards limiting hotel density, and modification from the Transit Oriented Development (TOD) Special District (SD) standards through this IPD-T Permit. The Applicant is also seeking flexibility from the standards of the Ala Moana Neighborhood TOD Plan (TOD Plan) related to the maximum building setback along Ala Moana Boulevard, tower separation, tower width, tower orientation, and protected views. The details and acceptability of the Applicant's requests and the community benefits will be analyzed later in this Report.

D. Other Permits and/or Approvals Required: The following approvals will be required by the City and County of Honolulu:

- Major SD Permit;
- Revised Ordinances of Honolulu (ROH) Chapter 29, Affordable Housing, and the Affordable Housing Rules;
- Flood Certification;
- Sidewalk, Surface Encroachment, or Driveway Variances;
- Sewer Connection Application;
- Park Dedication;
- Construction Plan Approval and Permits;
- Demolition and Building Permits;
- Drain Connection Permits;
- Street Tree Permits;
- Street Usage Permits; and
- National Pollutant Discharge Elimination System Permit.

Other permits and approvals may be required upon review of more detailed plans. Approvals required by the State may include an Archaeological Inventory Survey plan, Construction Noise Permit, approvals to complete work in the State right-of-way (ROW), and Clean Air Permit.

E. Applicant's Justification: The Applicant provided justification statements, which are part of the file.

II. ENVIRONMENTAL DISCLOSURE AND APPLICATION PROCEDURES

This section summarizes the Project's compliance with the disclosure and application requirements.

A. Environmental Review Requirements: The Project is not subject to an assessment under Hawai'i Revised Statutes (HRS) Chapter 343 and the State Environmental Impact Statement Law, because it does not meet any of the triggers that require the preparation of an environmental document.

B. Pre-Application Meeting: Pursuant to ROH § 21-2.40-2(b)(1), *before the Applicant submits an application for a major permit, the Department of Planning and Permitting (DPP) will hold a pre-application meeting with the Applicant to conduct an informal review of the project, unless such a meeting is determined to be unnecessary.* Prior to submitting the application, the Applicant met with the DPP.

C. IPD-T Application Requirements: The Project submitted all listed requirements under ROH § 21-9.100-5(h) as part of their application.

D. Ala Moana/Kaka'ako Neighborhood Board (NB) No. 11: Pursuant to ROH § 21-2.40-2(b)(2), *before submitting an application for a major permit, the Applicant shall first present the Project to the NB of the district where the project will be located. Further, the Applicant is required to provide written notice of the presentation to owners of all properties adjoining the proposed project.* On October 28, 2025, the Applicant presented the Project to the NB. Written notice was provided to adjoining property owners, informing them of the presentation. Proof of mailing the notice was provided to the DPP via a signed affidavit. These materials were submitted as part of the application.

Pursuant to ROH § 21-2.40-2(c)(1), *if the Applicant has presented the project to the appropriate neighborhood board or community association pursuant to ROH § 21-2.40-2 (b)(2), the application shall be accompanied by a description of all issues or causes of concern relating to the proposed project that were identified during the presentation and a statement describing any measures taken by the Applicant to mitigate the issues or concerns.* The Board members asked about a Biki (bicycle share) station location, entry location, hotel operation, pricing and

unit mix, sidewalk access, and trees. The NB did not take a position on the Project at the time. The NB, upon receiving the notices and requests for comment, reminded members and the public to provide comments. One member raised concerns of impacts to viewsheds, trees, and AMRP. The measures taken by the Applicant to mitigate these issues are discussed later in this report.

E. Pending Permit Sign: Pursuant to ROH § 21-2.40-2(c)(2), *an Applicant for a major permit that does not require the approval of the City Council is required to erect a "notice of pending permit" sign that meets specific standards on the affected lots.* The Applicant provided proof that this requirement was met.

F. Notification of Application: Pursuant to ROH § 21-2.40-2(c)(3), *an Applicant for a major permit shall make a good faith effort to notify all owners of property within 300 ft. of the affected property's boundaries of the Applicant's proposed use of the property within 10 working days after the Director's acceptance of a completed application.* The Applicant provided proof that this requirement was met.

G. Agency Comments: Pursuant to ROH § 21-2.40-2(c)(4), *the Director of the DPP shall submit a written request for comments and recommendations on the application to pertinent governmental agencies.* The DPP requested comments from the City and County of Honolulu Board of Water Supply, Honolulu Fire Department, and Department of Transportation Services (DTS). Comments were also requested from the Office of Hawaiian Affairs and State Department of Transportation (SDOT). Relevant agency comments are contained in the Findings and Analysis section of this Report.

H. Public Hearing: *Pursuant to ROH § 21-2.40-2(c)(6), the Director shall hold a public hearing no earlier than 45 days after the Director's acceptance of the completed application.* A public hearing was held on May 8, 2026, at the Frank F. Fasi Municipal Building, Sixth Floor Conference Room. The Applicant's agent, DPP staff, Department of Information Technology staff, and approximately 36 members of the public attended in-person and 46 members of the public attended virtually. The DPP received 26 oral testimonies in support of the Project, two oral testimonies in opposition, and one comment. Concerns were raised about traffic, wind, and flooding. The DPP received four letters from the public in support of the Project and one letter with comments about multimodal transportation safety at the Ala Moana Boulevard and Atkinson Drive intersection.

III. EXISTING CONDITIONS AND PLANS

This section summarizes the existing conditions for the site and surrounding area.

A. Description of the Site and Surroundings: The 187,174 sq. ft. rectangular Project Area is located within the BMX-3 District. The site is level and developed with a three-story parking structure for the Mall. A sewer easement and waterline easement cross through the property from the north to the south.

The site is bounded by Ala Moana Boulevard (State owned roadway) and Atkinson Drive (City owned roadway). Directly to the south is AMRP and Magic Island. Directly to the north and west is the Mall. Directly to the east is Ala Moana Hotel. Aside from the park, the surrounding neighborhood consists of dense mixed-uses, including Ala Moana Hotel, the Hawai'i Convention Center, offices, restaurants, and multi-unit buildings. The surrounding areas are within the BMX-3 District and A-2 Medium Density Apartment District (Exhibit B).

The Project Area is part of a joint development encompassing the larger Mall and associated private roads identified as TMKs 2-3-38: 003, 008, 010, 011, 012, 013, and 014 (Parcel 14); 2-3-39: 001; and 2-3-40: 021, 022, and 023 (Exhibit A). Conditional Use Permit No. 2005/CUP-23 was approved for a joint development for parcels located at 1450 Ala Moana Boulevard for a total lot area of 2,713,046 sq. ft. or 62.28 acres.

For the purposes of this Report, calculations and application of development standards will be solely based on the Project Area (187,174 sq. ft. of Parcel 14).

B. Plans and Policies: The site is within the Primary Urban Center (PUC) and Ala Moana Neighborhood TOD Plan area. The following plans provide policies and guidelines for development at the site:

1. O'ahu General Plan (GP): The GP sets forth the long-range objectives and policies for general welfare and together with the regional Development Plans (DP), provides a direction and framework to guide the programs and activities of the City and County of Honolulu. The GP supports major redevelopment projects that locate major housing and economic activities in existing urban areas. The following policies from the GP are relevant for this Project:

    - Protect O'ahu's scenic views, especially those seen from highly developed and heavily traveled area;
    - Increase tree canopy and ensure its integration into new developments, and protect significant trees on public and private lands;
    - Design public street networks to be safe and accessible for users of all ages and abilities, to accommodate multiple modes of travel to

be visually attractive and to support sustainable ecological processes, such as stormwater infiltration;
- Enhance pedestrian-friendly and bicycle-friendly travel via public and private programs and improvements;
- Support the development of transportation plans, programs, and facilities that are based on Complete Streets features;
- Facilitate and encourage compact, higher-density development in urban areas designated for such uses; and
- Facilitate transit-oriented development in rail transit station areas to create live/work/play multi-modal communities that reduce travel and traffic congestion.

2. PUC DP: The PUC DP vision emphasizes retaining the qualities that attract both residents and visitors while encouraging growth and redevelopment to accommodate the projected increase in jobs and residential population. The following policies are relevant to this Project:

   - Support complete neighborhoods;
   - Provide high-quality outdoor spaces;
   - Direct higher density growth to mixed-use TOD Areas;
   - Preserve significant mauka-makai public views and views of natural landmarks;
   - Actively pursue Honolulu's tree canopy goals, especially in interior neighborhoods lacking trees; and
   - Support vibrant commercial/mixed use corridors and neighborhood centers in the PUC.

3. Ala Moana Neighborhood TOD Plan: The TOD Plan guides the pattern of development within the vicinity of the Kālia (Ala Moana) Skyline Station. Projects seeking an IPD-T must be consistent with the TOD Plan including the following relevant policies:

   - Make Ala Moana walkable;
   - Introduce bicycle friendly streets;
   - Intensify land use surrounding the station;
   - Diversify housing options;
   - Integrate neighborhood shopping and services;
   - Enhance streetscapes;
   - Protect mauka-makai and identified views; and
   - Create an active street environment.

The Project's consistency with these plans is discussed in the next section of this Report.

IV. FINDINGS AND ANALYSIS

The proposed development was analyzed by the Director of the DPP in accordance with ROH § 21-9.100-5, 21-9.100-6, 21-9.100-8(a)(1), and 21-9.100-9(b) relating to the TOD and IPD-T Permit objectives, review criteria, and regulations, as detailed below and discussed later in this Section.

Review Criteria - ROH § 21-9.100-5(c)(3)

1. The IPD-T option offers developers opportunities to increase development potential; provided that the project demonstrates and provides community benefits and equitable contributions that benefit the general public, the transit system, and TOD.
2. Significant flexibility and the possibility of increased development potential are available to eligible IPD-T projects. The degree of flexibility must be commensurate with the contributions that a project may provide towards the enhancement of highly effective transit-enhanced neighborhoods, particularly as these contributions relate to the success of TOD. The highest degree of flexibility may be authorized by an IPD-T permit for those projects that demonstrate the standards set forth in ROH §§ 21-9.100-8(a)(1)(E) and 21-9.100-9(b). When an Applicant seeks to exceed the base height or density through an IPD-T permit, the conclusions set forth in ROH § 21-9.100-8(a)(1)(F) must be reached.
3. Unless otherwise specified in this section, IPD-T projects must be generally consistent with:
   a. The approved neighborhood TOD plan for the affected area; or
   b. If the neighborhood TOD plan has not yet been approved, the draft neighborhood TOD plan at the time the application for the principal project is submitted to the department and accepted as complete.

IPD-T Guidelines for review and approval of the conceptual plan for a project - ROH § 21-9.100-5(k)

Before or concurrently with its approval of a conceptual plan for an IPD-T project, the council shall find that the project concept, as a unified plan, is in the general interest of the public, and that:

1. Requested project boundaries and requested flexibility with respect to development standards and use regulations are consistent with the objectives of TOD and the provisions enumerated in ROH § 21-9.100-4 and this section as applicable;
2. Requested flexibility with respect to development standards and use regulations is commensurate with the public amenities and community benefits proposed; and

3. The public amenities proposed will produce timely, demonstrable benefits to the community, support transit ridership, and implement the vision established in ROH § 21-9.100-4 and this section as applicable.

TOD SD Objectives – ROH § 21-9.100-6

1. Promote an appropriate mixture and density of activity around the rail transit stations in order to maximize the potential for transit ridership and promote alternative modes of transportation to the automobile;
2. Allow for more intense and efficient use of land for the mutual reinforcement of public investments and private development;
3. Support transit by ensuring connectivity and convenient access, while limiting conflicts among vehicles, pedestrians, bicycles, and transit operations;
4. Establish standards for buildings and sites that provide quality urban design that attracts and encourages pedestrian activity;
5. Provide a high level of streetscape amenities that create a comfortable environment for pedestrians, bicyclists, and other uses, such as walkways, street furniture, street trees, and human-scale architectural features;
6. Promote an appropriate mix of housing types, including affordable housing and rental housing;
7. Promote quality publicly accessible and usable spaces and gathering places; and
8. Contribute positively to the economic enhancement of the affected area and the city, particularly with regard to providing a broad mix of uses, diverse housing, and diverse employment opportunities.

TOD SD Permit Flexibility Criteria - ROH § 21-9.100-8(a)(1)(E)

Where a TOD SD permit is sought to achieve height or density bonuses, the degree of flexibility requested must be commensurate to the community benefits the development will provide for the enhancement of the surrounding area. The highest degree of flexibility may be authorized for those projects that demonstrate:

1. The provision of measures or facilities, or both, to promote a highly functioning, safe, interconnected, multimodal circulation system, supporting easy access to, and effective use of the transit system on a pedestrian scale;
2. The provision of open space, particularly usable, safe, and highly accessible public accommodations, gathering spaces, or parks, either onsite, within the TOD station area, or at a public park or gathering space within 400 feet of the same TOD station area boundary; and
3. An appropriate mix of housing and unit types, particularly affordable for-sale or rental housing, or both, located on the project site or within the same rail station area as the project site. Affordable housing provided as a community benefit under this paragraph must be in addition to the affordable housing requirements of Chapter 29, which are based on a percentage of the total number of dwelling

units in the principal project, and include higher percentages for IPD-T, PD-T, and TOD SD projects seeking bonus height or density, or both.

The above notwithstanding, the completed project must be able to contribute positively to the economic enhancement of the affected area and the city, particularly with regard to providing a broad mix of uses, diverse housing, and diverse employment opportunities, including but not limited to whether the construction workforce employed on all phases of the project will be paid no less than the prevailing minimum wages established for public works projects pursuant to HRS Chapter 104.

TOD SD Conclusion Criteria - ROH § 21-9.100-8(a)(1)(F)

When an Applicant seeks to exceed the base height or density limit through a SD permit, the following conclusions must be made:

1. Additional project elements that provide community benefits beyond what would otherwise be required have been incorporated into the project plan, as described in ROH § 21-9.100-9(e);
2. The increase in height or FAR is reasonably related to the level of community benefits provided;
3. The additional height or FAR will not be detrimental to the quality of the neighborhood character or urban design, and will not negatively impact any adopted public views; and
4. The provision of community benefits in conjunction with the increase in height or FAR will further the goals and objectives of the TOD SD and the applicable neighborhood TOD plan.

TOD SD Permits - ROH § 21-9.100-9(b)

Where a TOD SD permit is sought because the lot is an acre or more in size, or when height or density bonuses are sought, the proposed development must have a cohesive overall design that meets the goals and objectives of the TOD SD, pursuant to ROH §§ 21-9.100-4 and 21-9.100-6, and is generally consistent with the neighborhood TOD plan for the area. The project plan must show how the development positively contributes to the neighborhood transportation network, including pedestrian paths and connectivity. The application must also show how the proposed development generates active uses and streetscapes, and contributes to neighborhood vitality.

A. IPD-T Permit flexibility, ROH § 21-9.100-5(a): *Qualifying projects must demonstrably exhibit those kinds of attributes that are capable of promoting highly effective transit-enhanced neighborhoods, including diverse employment opportunities, an appropriate mix of housing types, support for multimodal circulation, and well-designed publicly accessible and usable spaces. Flexibility may be provided for project uses, density, height and height setbacks, yards, open space, landscaping, streetscape improvements, parking and loading, and*

signage when timely, demonstrable contributions are incorporated into the project benefitting the community, supporting transit ridership, and implementing the vision established in ROH § 21-9.100-4. Through the IPD-T Permit, the Applicant is seeking significant bonuses and design flexibility. The Project exceeds the height limit, encroaches into the height setback, exceeds the maximum density (overall and for hotel uses), lacks a mauka-makai orientation design, and does not comply with the separation requirements or with maximum tower width standards. The IPD-T permit allows for the requested flexibility so long as timely, demonstrable contributions are incorporated into the Project. The sufficiency of the proposed contributions will be discussed in the community benefits section of the Report.

B. Eligible Zoning Lots, ROH § 21-9.100-5(b): *IPD-T projects may be permitted on zoning lots that meet the following applicable standards: 1) The zoning lot must be located within the proposed TOD SD as shown in the maps and figures for the applicable neighborhood TOD plan; 2) for public housing projects, a portion of a zoning lot must be within one mile of a rail station; 3) the minimum project size is 20,000 sq. ft.; 4) must be entirely within the state-designated urban district; 5) all eligible zoning lots must be within the apartment, apartment mixed-use, business, business mixed-use, resort, industrial, or industrial-commercial mixed use districts; and 6) within a neighborhood TOD Plan.* The Project meets the eligibility standards and qualifies for an IPD-T Permit.

C. Review Criteria, ROH § 21-9.100-5(c): The applicable criteria are as follows:

1. *Significant flexibility and the possibility of increased development potential are available to eligible IPD-T projects. The degree of flexibility must be commensurate with the contributions that a project may provide towards the enhancement of highly effective transit-enhanced neighborhoods, particularly as these contributions relate to the success of TOD. The highest degree of flexibility may be authorized by an IPD-T permit for those projects that demonstrate the standards set forth in ROH §§ 21-9.100-8(a)(1)(E) and 21-9.100-9(b). When an Applicant seeks to exceed the base height or density through an IPD-T permit, the conclusions set forth in ROH § 21-9.100-8(a)(1)(F) must be reached.* As discussed later in the report, the Project will meet this review criteria standard if the recommended community benefits are provided.

2. *Unless otherwise specified in this section, IPD-T projects must be generally consistent with the approved neighborhood TOD plan for the affected area.* The applicable TOD Plan is the Ala Moana Neighborhood TOD Plan. The Project does not comply with the general intent of the TOD Plan. The purpose of the TOD Plan is to make the most of the new transit system for the benefit of the community, emphasizing TOD Projects that will support transit ridership, improve pedestrian access, and fund

neighborhood-wide improvements. The Project does not provide sufficient transit connection or meaningful multimodal improvements, particularly when considering the specificity of the TOD Plan for recommending improvements at the intersection of Ala Moana Boulevard and Atkinson Drive. The Project also does not generally support the urban design guidance of the TOD Plan, and does not provide features or sufficient related community benefits meant to mitigate the impacts resulting from this deviation.

As proposed the Project does not support the following TOD Plan policies and recommendations related to urban design and multimodal improvements:

- Intensify the land use surrounding the station by creating connections to transit and maintain makua-makai views (Land Use Policy No. 1);
- Strengthen regional draws of AMRP by creating a network of open spaces by linking smaller open spaces to the park with bicycle and pedestrian connections (Land Use Policy No. 4);
- Make Ala Moana walkable by improving intersection geometry and promote safe pedestrian routes (Circulation Policy No. 5);
- Introduce bicycle friendly streets by creating a robust bicycle network (Circulation Policy No. 4);
- Enhance streetscapes by providing shade along streets, adequate sidewalk width for pedestrians, appropriate amount of street seating and landscaping (Open Space Policy No. 4);
- Take advantage of the shopping center's transit station adjacency by enhancing multimodal linkages, developing multimodal bus/rail transit centers (Ala Moana Center Subdistrict); and
- Upgrade pedestrian circulation, services, and amenities around the Convention Center (Convention Center Subdistrict).
- Tower orientation and design standards (discussed later in this Report).

a. Viewshed Impacts: Given the requested additional height and the request for waivers relating to tower orientation, width, separation, and height setback requirements, impacts to public views will be significant. The panoramic views from AMRP toward the Ko'olau Range are identified as important viewsheds in the PUC DP, the TOD Plan, and Honolulu Public Views Study. The AMRP welcomes four million park-users annually, making it the most frequented publicly maintained recreational resource in the State. The tower will be visible from all of AMRP, and block the mauka view identified for protection. This impact is a direct result of the requested flexibility from the design standards related to tower design. Sufficient and relevant community benefits should be

required to support these requests and their impacts. The appropriateness of this design and the scale of the proposed community benefits that offset this impact (i.e., street tree funding) will be discussed later in this Report.

b. Multimodal Transportation Improvements: Pedestrian accessibility and circulation are key elements to successful TOD design within this area. The Ala Moana Boulevard frontage is a highly utilized sidewalk providing an access point to the beach park, and the site is adjacent to a busy bus stop. The Applicant is proposing minimal streetscape improvements as part of the Project. This includes an eight-ft.-wide replacement sidewalk, street trees, and ground floor bicycle parking.

The Project lacks a significant transit connection or proposed improvement for a TOD area. The TOD Plan calls for improvements to the Ala Moana Boulevard and Atkinson Drive intersection. The DTS and DPP support Section 4.3, option 1, of the TOD Plan, which includes an additional crosswalk (all way crossing or a fourth crosswalk), signalized timing modification, and removal of channelized right turn lanes at the Atkinson Drive and Ala Moana Boulevard intersection. Impact from the additional density of this Project must be mitigated with improvements within the Ala Moana area, and pedestrian access across the TOD Plan area needs to be supported. Considering the Project's proximity to this intersection with a clear vision provided in the TOD Plan, the Applicant should be required to implement these intersection or provide funding for Complete Streets improvements in the area.

The TOD Plan recommends wider sidewalks and a full tree canopy to increase pedestrian comfort. SDOT's Pedestrian Toolbox guidelines recommend 10-ft. to 15-ft. wide sidewalks for the urban center to accommodate high pedestrian flows. As a recommended condition of approval, the Project should be required to provide a 10-ft.-wide sidewalk along Ala Moana Boulevard and Atkinson Drive. Furthermore, considering the size of the existing trees being removed, and the need for extra-large canopy trees to be of an appropriate scale for the Project and Ala Moana Boulevard, suspended paver systems or other advanced street tree planting systems must be implemented in order to provide sufficient uncompacted soil for root growth to support the trees. This is also recommended as a condition of approval.

An improved pedestrian entrance and internal access to the Mall located on Ala Moana Boulevard is proposed as part of the Project (Exhibit C-8). The access connects to the Mall through an interior

parking lot. The Applicant should be required to provide pedestrian safety measures such as a raised crosswalk at the access point to the Mall. The Applicant should be required to show compliance with Complete Streets policies and ensure that all access driveways, sidewalks, crossings, and internal pedestrian paths are designed with pedestrian and bicycle safety measures in place. This is recommended as a condition of approval.

A surface encroachment authorization may be required for any nonstandard improvements within the City ROW (planters, landscaping, or street furniture). A sidewalk variance may be required to permit any nonstandard sidewalk finish proposed in the City ROW. However, the materials used for the sidewalks within the property should be consistent across the entire frontage, including across any driveways, to signal pedestrian priority, with preference for the City's standard brushed concrete material and finish. As recommended by the TOD Plan, the colors selected for any materials should match the City's concrete sidewalk to avoid incongruous patchwork effects and to allow for easy repairs throughout the area. Details of material, color, and finish for the sidewalks should be submitted for review as part of the SD Major Permit. These are recommended as conditions of approval.

As stated in the community benefits section of the Report, additional multimodal improvements and neighborhood-wide scenic and recreational improvements must be provided to be consistent with the TOD Plan and this review criteria.

D. Use Regulations, ROH § 21-9.100-5(d): The following applicable use regulations are as follows:

1. *Permitted uses and structures for all zoning districts other than the BMX-4 central business mixed-use zoning district may be any of those uses permitted in the BMX-3 District; provided that lodging uses are not permitted on any zoning lot unless they are otherwise in compliance with the standards enumerated by ROH § 21-5.70-3(b), or on a zoning lot within the Convention Center Subdistrict of the Ala Moana neighborhood TOD plan.* The Project meets the use regulation standard. The hotel, commercial, and multi-unit uses are permitted in the BMX-3 District. The Applicant is seeking flexibility from the specific use standards of ROH § 21-5.70-3(b), which limits floor area for hotels in the BMX-3 District to a FAR of 2.0. The Applicant is proposing a FAR of 2.2 dedicated to hotel uses. This request is allowed, subject to an analysis of the sufficiency of the community benefits. This will be discussed in greater detail later in this Report.

2. *Ground floors and pedestrian-accessible spaces should be used to the extent feasible for active uses, including but not limited to outdoor dining, retail, gathering places, and pedestrian-oriented commercial activity. These spaces should also provide public accommodations, including but not limited to benches and publicly accessible seating, shaded areas through either trees or built structures, publicly accessible restrooms, trash and recycling receptacles, facilities for recharging electronic devices, publicly accessible telecommunications facilities, and Wi-Fi service.* The Project will meet this use standard. The Project provides a publicly accessible walkway through the site to the Mall. Additional information will be provided as more detailed drawings are prepared for future permits, all of which will be reviewed for ongoing consistency with this standard.

   Under TOD Plan § 3.5.4, ground floors and pedestrian-accessible spaces should be utilized to the extent feasible for active uses. The Project meets this standard along Ala Moana Boulevard as the ground floor will contain commercial uses and residential units. However, the Applicant is seeking design flexibility from this requirement along Atkinson Drive. The proposed ground floor uses along Atkinson Drive include the hotel's back-of-house activities and equipment rooms. These are not active uses.

   Since Atkinson Drive is a minor arterial street and is not expected to be a key street, it is reasonable for this portion of the structure to not have active ground floor uses. The area will also be screened with landscaping to help improve the pedestrian experience. Enhanced landscaping and pedestrian-oriented improvements within the setback should be required as a condition of approval.

E. Site Development and Designs Standards, ROH § 21-9.100-5(e): *The standards set forth in this subsection are general requirements for IPD-T projects. When, in the subdivisions below, the standards are stated to be subject to modification or reduction, the modification or reduction must be for the purpose of accomplishing a project design consistent with the goals and objectives of ROH § 21-9.100-4 and this subsection.* In addition, pursuant to subsection (b), the modification or reduction in the following standards must be commensurate with the contributions and community benefits provided in the project plan, and the project must be generally consistent with the draft or approved neighborhood TOD plan for the area, unless otherwise specified in this subsection. This Report will analyze the applicable development and design standards.

   1. Maximum Density, ROH § 21-9.100-5(e)(1): The standard is as follows:

      a. *The maximum FAR may be up to twice that allowed by the underlying zoning district or 7.5, whichever is lower; provided that where a draft or approved neighborhood TOD plan identifies*

greater density for the site, a project on that site may seek the specified density contained in the plan;

b. *For public housing projects as defined in subsection (a), the FAR may not exceed 7.5; provided that if the maximum FAR under the draft or approved neighborhood TOD plan is greater than 7.5, then the FAR specified in the plan will prevail; and*

c. *For lots in the B-2, BMX-3, BMX-4, and IMX-1 districts, the maximum increase will apply in addition to any eligible density bonuses for the underlying zoning district; that is, the FAR may be doubled after any FAR bonuses for public open space or arcade space are added to the base FAR.*

Pursuant to ROH § 21-3.120(b), the BMX-3 District allows a FAR of 2.5 (467,935 sq. ft.). The TOD Plan allows for a FAR of 7.0 (1,310,218 sq. ft.) of floor area on the Project Area, provided there are commensurate community benefits. Through the IPD-T Permit, the Applicant is proposing a 6.17 FAR (1,155,846 sq. ft.). The increased FAR would result in a bonus of 687,911 sq. ft. of floor area. The appropriateness of this requested bonus in relationship to the community benefits will be discussed later in this Report.

The Project Area is part of a joint development and will comply with the FAR for both the Project Area and the larger joint development area if this Permit is approved. FAR calculations for the site and the joint development should be shown on future submittals, this is a recommended condition of approval.

2. Maximum Height, ROH § 21-9.100-5(e)(2): The standard is as follows:

a. *For project sites where there is no draft neighborhood TOD plan, the maximum building height may be up to twice that allowed by the underlying zoning district, or 450 feet, whichever is lower;*

b. *Where there is a draft or approved neighborhood TOD plan, the maximum height may not exceed the maximum height specified in the plan; provided that where existing height limits exceed those in the plan, the existing height limit will prevail; and*

c. *For public housing projects as defined in this section, the maximum building height may be up to 400 feet, unless the maximum height specified in the draft or approved neighborhood TOD plan is higher, in which case the maximum height specified in the plan will prevail.*

Pursuant to ROH § 21-3.120-2(b), Table 21-3.4 and the zoning map, the height limit is 100 ft. TOD Plan § 5.3.3, Figure 6-4 allows for a maximum height limit of 400 ft. with an approved IPD-T Permit on the Diamond Head portion of the side, and 200 ft. on the 'Ewa portion of the site. Through the

IPD-T Permit, the Applicant seeks to exceed the height limit by 300 ft. for the full allowance of 400 ft. and 200 ft., respectively. The IPD-T provisions allow for this increased height if commensurate community benefits are provided to obtain the bonus. If the Project is approved as proposed, the bonus height will result in approximately 27 additional floors, containing approximately 655,460 sq. ft. of floor area above the height limit. The appropriateness of this request in relationship to the proposed community benefits will be discussed later in this Report.

Please note, plans should measure height at existing or finished grade, whichever is lower, not from the slab. Revised and more detailed plans will be reviewed in future submittals. Rooftop structures must conform to ROH § 21-4.60(c). Also, if Bill 34 (2026) is adopted, flood compliance will include a design flood elevation which includes a 1'-0" additional freeboard elevation above the Base Flood Elevation. Flood compliance will be reviewed at building permit submittal.

3. Buildable Area, ROH § 21-9.100-5(e)(4): *Yards and the maximum building area must be as specified by the approved conceptual project plan; provided that building placement will not cause adverse noise, privacy, or wind effects to adjacent uses, and street character will not be adversely affected.* As discussed in the Report, the building area and building placement will not have adverse impacts to the neighborhood.

4. Landscaping and Screening, ROH § 21-9.100-5(e)(6): *Must be as specified in the approved conceptual project plan and project landscaping must include adjacent rights-of-way. Streetscape landscaping, including street trees or planting strips, or both, should be provided near the edge of the street, rather than adjacent to the building, unless infeasible.* The Project has submitted landscaping plans and meets this requirement. More specific plans will be required and reviewed against this criteria as the Project develops more detailed plans.

5. Parking and Loading, ROH § 21-9.100-5(e)(7): The standard is as follows:

   a. *The number of parking and loading spaces must be provided in accordance with Article 6;*
   b. *Service areas and loading spaces must be located at the side or rear of the site, unless the size and configuration of the lot renders this infeasible;*
   c. *Vehicular access must be provided from an existing access or driveway, or from a secondary street whenever possible and placed in the location least likely to impede pedestrian circulation; and*
   d. *The provision of car-sharing programs and electric vehicle charging stations is encouraged.*

Pursuant to ROH § 21-6.20(a), there is no minimum parking requirement for this site. The Applicant proposes a total of 1,229 parking spaces (439 residential parking spaces, 192 hotel parking spaces, and 598 Mall parking spaces).

The TOD Plan recommends establishing minimum and maximum parking requirements to reduce the reliance on single-occupancy vehicles and encourages the use of multi-modal transportation. The TOD Plan recommends that projects seeking entitlement bonuses should limit parking provisions to a maximum of ROH Chapter 21 requirements for commercial uses and a maximum of 1.25 spaces per residential unit. The table below lists the parking maximum:

Use	Parking requirement	Parking maximum	Project
Hotel (411,803 sq. ft.)	1 per 1,000 sq. ft. of floor area	411.803	192
Commercial [Mall] (49,619 sq. ft.)	1 per 500 sq. ft. of floor area	99.238	598
Residential (205 units)	1 per 1.25 units	256.25	439
Total		767.291 or 767	1,229

As proposed, the maximum number of parking spaces allowed by the TOD Plan is 767. The Project exceeds the parking maximum by 462 parking spaces. However, the 598 commercial parking spaces are for the overall Mall usage, not just for the new development. The Developer is required by the Mall to partially replace the 1,152 existing parking spaces. If the spaces being dedicated to the Mall are subtracted out, the proposed parking total for the Project is 631 (1,229-598 = 631), which is below the 767 parking space maximum.

The Applicant did not indicate if the residential or hotel parking spaces will be unbundled. In order to facilitate efficient use and equitable access to the parking spaces, residential and hotel parking should be unbundled as a condition of approval.

The Project appears to comply with the loading requirements of the Land Use Ordinance (LUO), and is not seeking any flexibility. Nevertheless, considering the amount of loading available at the Mall, the DPP would support a reduction of the loading requirement for the Project of up to 50 percent. Although not sought, we recommend approving this flexibility in advance of the preparation of detailed plans. Compliance with the loading requirements, as modified, will be reviewed during the building permit phase. Additionally, all loading and trash pick-up operations should be

done on site. The loading area must be designed for vehicles to enter and exit front first and have adequate turn-around areas. These are recommended conditions of approval.

6. Bicycle parking, ROH § 21-9.100-5(e)(8): *Must be accommodated on the project site in accordance with Article 6.* The Project appears to comply with the bicycle parking requirements of the LUO, and is not seeking any flexibility through this permit. Compliance with the standard will be reviewed during the SD building permit phases.

7. Signs, ROH § 21-9.100-5(e)(9): *All projects must include appropriate measures to accommodate TOD-related way-finding signage that will be considered "public signs" for purposes of Article 7.* No signage plan was provided as part of the application but there are proposed commercial retail on site. Zoning Adjustment No. 2014/ZA-13 was approved on August 25, 2014 for a Sign Master Plan for the Mall which provided greater flexibility and sign area. The Applicant may need to submit a minor modification of the Zoning Adjustment if additional signs are proposed. No additional conditions of approval are necessary.

F. TOD Use Regulations, ROH § 21-9.100-7: *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 ROH § 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.* The Applicant is seeking deviation from this standard, as discussed previously, to allow screened back of house functions that do not activate the street. This is addressed elsewhere in this Report, where landscaping and pedestrian-oriented improvements are recommended. Compliance will be reviewed at the SD Permit or future submittals.

G. BMX-3 District Use and Hotel Use Regulations, ROH §§ 21-3.120-2(a), Table 21-5.1 and 21-5.70-3(b): The hotel, multi-unit building, and commercial uses proposed for the Project are permitted in the underlying zoning district, and supported by the TOD Plan. The Applicant is seeking flexibility from the specific use standards which limits floor area for hotels in the BMX-3 District to a FAR of 2.0. The Applicant is proposing a FAR of 2.2 dedicated to hotel uses on the Project Area. This use standard is meant to preserve development opportunities for housing and other uses. The proposed affordable housing community benefits, which go above the minimum ROH Chapter 29 requirement, address this requested deviation. As discussed below, it is recommended that the proposed units designated as satisfying the community benefits be required as a condition of approval.

H. LUO and TOD Plan Development Standards, ROH §§ 21-3.120(b) through (c) and TOD Plan § 5.3.4, Table 5-1 and Figure 5.5: Flexibility may be granted for

density, height, height setbacks, yards, open space, landscaping, streetscape improvements, parking and loading, use, and signage under the IPD-T Permit if the application demonstrates that the modifications accomplish a Project design consistent with the goals and objectives of the TOD, and the requests are commensurate with the contributions provided in the Project. The degree to which the Applicant complies with the ROH Chapter 21, BMX-3 District standards, and the relevant design standards from the TOD Plan are shown in the table below.

Description	BMX-3 Standards	TOD Plan Standards	Project
Required Front Yard or Build-to-line	10 ft. for dwellings and Five ft. for other uses.	10 ft. along Ala Moana Boulevard. Five ft. along Atkinson Drive.	Up to 30 ft. along Ala Moana Boulevard. Up to 19 ft. along Atkinson Drive.
Maximum Density (FAR)	2.5 (base) (467,935 sq. ft.)	7.0 (1,310,218 sq. ft.)	6.17 (1,155,846 sq. ft.)
Maximum Building Height	100 ft.	400 ft.	400 ft.
Height Setback	One-ft. per 10 ft. in height over 40 ft.	One-ft. per 10 ft. in height over 40 ft.	Encroaches 33 ft. along Atkinson Drive (100% encroachment).
Required Yard Landscaping	Except for necessary access drives and walkways, all yards must be landscaped.	Screen facilities with walls or landscaping; provide appropriate amount of landscaping.	Does not comply, not sufficient.
Tower Separation	N/A	100 ft. when on the same site.	Zero ft. (Entire length of tower is 955 ft.)
Tower Width	N/A	100 ft.	189 ft.
Podium Height	N/A	65 ft.	64 ft.

1. Yards and Build-to Lines: The site has two front yards along Ala Moana Boulevard and Atkinson Drive, and no side or rear yards. The LUO

requires a five ft. front yard in the in BMX-3 District. The site complies with the BMX-3 standard. However, the TOD Plan and the SD promote a continuous building frontage to create an engaging ground-level pedestrian environment. The Project does not comply with the TOD Plan as the buildings are beyond the proposed 10 ft. build-to-line on Ala Moana Boulevard and five ft. build-to-line on Atkinson Drive. The development is pushed farther back in order to provide landscaping to mitigate noise impacts to ground floor dwelling units and to provide visual buffer from the back of house and inactive facades. This specific circumstance warrants flexibility from the 10 ft. build-to-line on Ala Moana Boulevard and five ft. build-to-line on Atkinson Drive, provided sufficient pedestrian oriented improvements and street trees are implemented within these setback areas, which is recommended as a condition of approval.

2. Height Setback: The height setback standard is measured 40 ft. vertically at the buildable area boundary, then forms a setback at a rate of one ft. per 10 ft. of additional height. Based on the BMX-3 District standards and from the TOD build-to line, the hotel tower encroaches approximately 33 ft. into the Atkinson Drive height setback starting at the 22nd floor, or about 243 ft. vertically (Exhibit C-5). The purpose of the height setback is to allow the development of a dense and interactive urban environment at the pedestrian level, while allowing for greater building separation at higher levels for light, air circulation, and to protect view corridors.

   The IPD-T provisions allow the height setback to be modified from the ROH Chapter 21 standards where adjacent uses and street character will not be adversely affected. The Applicant requests flexibility on the height setback requirement to add 15 floors to the building without stepping back. The encroachments help support certain goals and objectives of the TOD Plan, such as additional density to support transit ridership; however, the 100 percent encroachment into the setback, when taken into consideration with the other requested flexibilities related to tower design, contributes to the impact on a protected viewshed. The appropriateness of this request when weighed against the proposed community benefits will be discussed below.

3. Landscaping: The LUO requires all yards to be landscaped, except for necessary driveways and walkways. The TOD Plan allows for flexibility to ensure high-quality pedestrian amenities. The required yards for the Project are proposed as a combination of hardscape and landscaped areas for multimodal users. A majority of the hardscapes will be used for signage, bicycle parking, sidewalks, and entrances to the buildings. The Project, while not fully landscaped, is generally consistent with the TOD Plan. The adequacy of the Project's Street Tree Plan and pedestrian amenities along the street frontage will later be confirmed during the review of more detailed plans submitted with the SD Major Permit or

Street Tree Permit. No separate conditions of approval are necessary as this is a standard requirement.

I. TOD Plan Design Standards, TOD Plan §5.9

1. Podium Height, TOD Plan § 5.9.2: The TOD Plan recommends that the podium be a maximum of 65 ft. tall when measured from grade. The Applicant is proposes a podium height of 64 ft.

2. Tower Separation, TOD Plan § 5.9.3: The TOD Plan and TOD SD recommend a minimum separation between tall buildings of 100 ft. or more on the same site, or a tower set back at least 50 ft. from the common boundary line. The Project requests flexibility for the tower separation standard. There is no separation between the two towers, and the Project appears as one extremely wide tower. The length of the entire Project tower is 955 ft. and would require five 100 ft. setbacks to meet this and the tower width standard. A result of this deviation is a significant impact on a viewshed identified for protection. As described in the community benefit section, street tree funding would help to mitigate the towers' impact on the viewsheds by creating new scenic resources and support for dispersed recreational opportunities throughout the TOD Plan area. The appropriateness of this request and the scale of this proposed community benefit will be discussed later in this Report.

3. Tower Width, TOD Plan § 5.9.3: In order to support a mauka-makai orientation and make effective the above-discussed tower separation standard, the TOD Plan recommends that the maximum width of a tower be 100 ft. as measured in an east-west direction. The Project requests flexibility on the tower width requirement. The tower width is 955.5 ft. and exceeds the requirement by 855.5 ft. As described in the community benefit section of this Report, street tree funding would help to mitigate the towers' impact on the viewshed by increasing access to natural views and creating new scenic vistas and replacement recreational resources throughout the TOD Plan area. The appropriateness of this requested flexibility in relationship to the proposed community benefits will be discussed later in this Report.

4. Mauka-Makai Orientation, TOD Plan §§ 5.9.5: The TOD Plan and the SD contain tower design standards to protect mauka-makai views and identified scenic resources that define our communities. This is accomplished by siting development in a mauka-makai orientation, adhering to massing standards that maximize views of shorelines and mountains, and following tower spacing standards. The TOD Plan and SD require that tall structures over 100 ft. in height, or 40 ft. in height, respectively, be sited in a mauka-makai orientation.

The towers are not sited in a mauka-makai orientation. According to the Applicant, in order to accommodate the orientation requirement and the total number of units proposed, additional towers with a height of over 100 ft. would be needed and would have a greater impact on the viewshed. Although it may be true that additional individual towers and height would be needed, alternative designs would meet the intended goals of preserving the views better than the proposal. Additionally, the review criteria for IPD-T Projects and vision of the TOD Plan specify that height and density bonuses should not be to the detriment of neighborhood character, urban design, or protected views. The Applicant identifies the community benefits proposed for street tree funding as a way to mitigate impacts on the viewshed by improving access to green scenic views across the TOD neighborhood. This is an appropriate tool to mitigate this impact. The appropriateness of the scale of this proposed community benefit will be discussed later in this Report.

J. Application Requirements and Other Considerations, ROH § 21-9.100-5(h) and TOD Plan §3.6:

1. Infrastructure: With the exception of traffic, the infrastructure agencies did not provide substantive comments on the Project. Therefore, except as discussed below, no specific conditions are necessary to confirm sufficient infrastructure is available, subject to future review and approval of detailed applications.

   A Traffic Impact Report (TIR) was prepared by Wilson Okamoto Corporation in August of 2025 and updated in October of 2025 to assess the traffic impacts of the proposed Project. According to the updated TIR, traffic operation in the area is expected to remain similar with or without the Project. Additionally, the Project is not expected to significantly impact traffic operations at nearby roads and intersections provided that the recommendations and strategies of the updated TIR are implemented. However, in addition to the recommendations of the updated TIR, the DPP recommends the following conditions to help ensure traffic and pedestrian impacts are minimized and multi-modal maneuverability is considered.

   a) Transportation Planning: The Applicant should be required to create a timeline with anticipated dates for obtaining major building permits for demolition and construction work, including the date of occupancy. This timeline should also identify when a construction management plan (CMP), traffic management plan (TMP), and updates to or validation of the findings of the TIR will be submitted to the DPP Traffic Review Branch (TRB) for review and approval. Standard traffic conditions are recommended.

b) Driveway Design: The Project includes three driveways: Two on Ala Moana Boulevard for the residential tower and one on Atkinson Drive for the hotel tower. The driveways along Ala Moana Boulevard will be right-in only driveways for the Project Area, although a left- and right- out exit is available just beyond the Project Area. Entry from this driveway will lead to the parking garage. The driveway along Atkinson Drive will be a right-in and right-out driveway and lead to the porte cochère. Vehicular access on Atkinson Drive should be limited to right-in and right-out only. The driveways should be designed to prevent any overflow into the City ROW and should be wide enough to allow a moving vehicle to safely pass a stationary vehicle. These are recommended as conditions of approval.

3. Shadow Study: The Applicant provided a shadow study indicating that the structure will cast shadows on surrounding buildings as well as adjacent roads. The shadows of the towers will not adversely impact any significant public open spaces, parks, or plazas. The shadows resulting from the Project are unlikely to generate significant adverse impacts pursuant to ROH § 21-9.100-5(h)(9) and therefore no related conditions of approval are necessary.

4. Wind Study: Based on a preliminary wind study, dated October 10, 2025, conducted by RWDI USA LLC, a reduction of wind speed will occur along Ala Moana Boulevard. Wind conditions at grade level are not expected to increase, and will be a comfortable level for pedestrians at the main entrance and outdoor amenities area. Higher winds are anticipated at the port-cochere, reception, and living area. Uncomfortable wind conditions are expected in the gap between the proposed hotel tower and existing neighboring buildings, and along the sidewalks and parking lot entrance on Atkinson Drive. Street trees near the parking lot and windscreens or other in-situ solutions should be considered. A wind tunnel test is recommended to be conducted at a later date to quantify the wind conditions and evaluate the effectiveness of the wind mitigation strategies. The Applicant should conduct a wind tunnel test and implement recommended wind mitigation strategies to ensure that pedestrian spaces around the Project remain comfortable to comply with ROH § 21-9.100-5(h)(9). This should be a condition of approval.

K. Affordable Housing, ROH § 21-9.100-5(f): *All projects proposing the construction or conversion of 10 or more for-sale dwelling units must satisfy the requirements of Chapter 29, as the same may be amended or superseded.* The Applicant proposes to provide a total of 205 dwelling units. The Project will provide a total of 69 affordable rental dwelling units, 31 of which will be provided in accordance with ROH Chapter 29. The remaining 38 units are proposed as a community benefit. The units will be affordable up to 80 percent of the area mean income

(AMI) for a period of 30 years. Compliance with ROH Chapter 29 and the 2019 Rules to Implement City's Affordable Housing Requirements (DPP's Affordable Housing Rules) will be confirmed prior to issuance of any building permits.

L. Community Benefits, ROH § 21-9.100-5(g): The requirements are as follows:

1. *Community benefits must be proposed in the IPD-T project application to justify height and density bonuses, or to mitigate the impacts related to the modification of TOD SD development standards.*
2. *Where community benefits are proposed, they must meet the standards set forth in ROH § 21-9.100-9(e).*
3. *For projects that include a hotel component, the community benefits proposed in the IPD-T project application must include one or both of the following:*
   a. *Affordable housing provided in addition to any affordable housing requirements applicable to the project under ROH Chapter 29. The affordable housing proposed as community benefits must meet the following minimum requirements:*
      i. *For-sale affordable dwelling units must be sold to households earning 120 percent and below of the area median income (AMI). At least one-half of those units must be sold to households earning 100 percent and below of the AMI;*
      ii. *For-rental affordable dwelling units must be rented to households earning 80 percent and below of the AMI;*
      iii. *The affordable dwelling units must remain affordable for a period of at least 30 years;*
      iv. *The affordable dwelling units must be marketed as provided in ROH § 29-1.6 for affordable units required by ROH Chapter 29; and*
      v. *Application of the department's affordable housing requirement rules, including the room factor calculation, is required. If, after applying the room factor, additional affordable dwelling units are required, the additional required affordable dwelling units may not be created by dividing previously proposed affordable dwelling units into more dwelling units; or*
   b. *City multimodal transportation system improvements.*

The Project proposes the following community benefits:

1. Affordable Housing: 38 rental dwelling units (for households earning up to 80 percent of the AMI for a period of 30 years) are proposed as a community benefit. This is 18 percent of the Project's total dwelling units, excluding hotel units. As proposed, the Project appears to meet the requirements of ROH Chapter 29. Compliance with ROH Chapter 29 will be confirmed prior to the issuance of a building permit. Additionally,

affordable housing must comply with the DPP's Affordable Housing Rules. The diversity of unit types and adequate dispersal throughout the Project will be reviewed in accordance with the Affordable Housing Rules. These rules should also be applied to the units being provided as a community benefit. This is recommended as a condition of approval. Furthermore, the DPP is supportive of creating flexibility in how these units are provided, as discussed below.

ROH § 21-9.100-5(g), which requires IPD-T Projects that include a hotel component to provide either a particular recipe of affordable housing types (i.e., rental units at 80 percent AMI for 30 years), or City multimodal transportation improvements as community benefits. Community benefits related to trees, intersection improvements, and bus stop improvements may in part meet the definition of "city multimodal transportation system improvements." The Applicant also proposes on-site affordable housing. Although the DPP does not recommend reducing the number of affordable housing units, the DPP would support some flexibility in providing these community benefit affordable rental housing units at a higher AMI limit (i.e. up to 120 percent of the AMI, instead of 80 percent of the AMI) for a longer affordability period (i.e. 60 years instead of 30 years). If the affordability period is extended from 30 years to 60 years, the DPP would support increasing the AMI for the rental units from an 80 percent of the AMI limit up to 120 percent of the AMI. The DPP recommends incorporating this flexibility into the conditions of approval because of the community benefits being recommended by the DPP allow this flexibility, and utilizing this flexibility may help the Project meet other standards while extending the impact of the affordable housing benefit.

Furthermore, in the event that the Council requires additional affordable housing units, the DPP recommends authorizing additional density beyond the request, up to the maximum, in order to accommodate the additional units. This is discussed in the next Section of this Report.

2. Gray Water Reuse System: The Project proposes a recycled gray water system for the cooling tower in order to reduce potable water demand by 10.8 million gallons annually. The cost for the gray water system is $2.5 million. The value of this system to the public should take into consideration the eventual cost savings anticipated by the Applicant, which is not disclosed.

3. Street Tree Funds: The Applicant proposed, after the acceptance of the Application, an additional community benefit of $50,000 for street tree improvements.

The proposed community benefits are not commensurate with the magnitude of the requested flexibilities, nor do they sufficiently mitigate the impacts resulting

from the requested flexibility. The Project is seeking 300 ft. more height than the zoning allows, and a 148 percent increase in density, or a total of 687,911 sq. ft. of bonus floor area. Significant community benefits are necessary in order to be considered commensurate with the value of the requested bonuses and impacts resulting from the requested flexibility. As such, the DPP recommends the following additional community benefits:

1. Additional Tree Funds: As previously discussed, the Applicant is seeking significant deviations from the TOD Plan and SD design standards that result in a significant impact to the protected views presently enjoyed by all who visit AMRP. The Applicant is also seeking modifications to the tower design standards of orientation, maximum width, tower separation, and height setback, which are intended to preserve such community-defining views and scenic resources. These impacts must be mitigated through commensurate community benefits.

   Street tree implementation throughout the TOD Plan area by way of a monetary contribution of $1.5 million to the City for street trees and urban forestry in the TOD Plan area is recommended in order mitigate significant impacts to scenic resources resulting from the requested flexibility and bonuses. Additional trees would support the City's goal to increase tree canopy to 35 percent by the year 2035, and help to replace a scenic resource currently enjoyed by approximately four million people annually. The TOD Plan encourages street trees to support public open space and improve the streetscape. There is an insufficient amount of parks within the plan area to meet the needs of the community due to existing and envisioned density of the area, and this Project negatively impacts the scenic resources of the primary park in the community. Implementing more public green infrastructure would create a park-like streetscape with dispersed scenic resources and recreational opportunities, such as walking and running in tree-lined and shaded sidewalks. This will mitigate the proposed impacts that result from the Project and the specific flexibility and bonuses sought.

2. Bus Stop: The Project lacks sufficient multimodal connections for the vast amount of bonus density and design flexibility requested. The Project does not propose a high level of infrastructure to support multimodal transportation beyond what is minimally required. This includes a pedestrian access, ground floor bicycle parking, eight ft. wide replacement sidewalks, and street trees along Ala Moana Boulevard, all of which are standard requirements or expectations of any development. The DTS recommends bus stop improvements in the vicinity of the site including seating, shelters, and lighting. A new bus stop should be created and maintained by the Applicant along the Ala Moana Boulevard and Atkinson Drive intersection at no cost to the City, if an appropriate location can be found. This is recommended conditions of approval.

3. Biki: According to the TOD Plan, there is a need for a comprehensive and continuous bicycle network due to the lack of bicycle lanes and facilities in the area. Additionally, a member of the NB asked about access to a Biki station at the site. Considering the lack of Biki facilities at this area of the Mall, and the general lack of bicycle facilities in the area, a Biki station near the site should be considered, and is recommended as a condition of approval.

4. Intersection Improvements or Complete Streets Fund: The Applicant should provide multimodal transportation improvements at the Ala Moana Boulevard and Atkinson Drive intersection as envisioned by the TOD Plan, or provide a monetary contribution of $5 million for a Complete Streets improvements in the area, in order to adequately support the extent of their height and density bonuses and support the TOD Plan vision for the immediate area. DTS notes Atkinson Drive is a high injury corridor, so DTS supports Complete Street implementation and reconfiguration of the Ala Moana Boulevard and Atkinson Drive intersection. TOD Plan § 4.3 supports reconfiguring the intersection to improve multimodal user safety by implementing bicycle lanes, eliminating free right hand turns, adding a fourth crosswalk, and shortening pedestrian distances through a scramble intersection or a four-way pedestrian bridge.

   The recommended $5 million is based on the cost of a similar pedestrian improvement in Kaka'ako along Ala Moana Boulevard between Kamake`e Street and Ward Avenue. That Project involved a single $25 million bridge, which is also envisioned for this intersection. If the DTS or SDOT applied for federal funding to pay for 80 percent of the bridge, the remaining and 20 percent, or $5 million, would be paid by the City or State. Multimodal intersection improvements would be a community benefit that supports the TOD Plan objectives to make Ala Moana a more walkable and bicycle friendly environment.

The quality and amount of community benefits for height and density bonuses must incentivize TOD development, meet community goals and objectives, and mitigate development impacts to the surrounding area. As proposed, the community benefits are not commensurate with the requested bonuses and flexibility from the TOD Plan. With the recommended adjustments of the Applicant's proposed community benefits package, the Project will result in the provision of benefits to the community commensurate with the requested bonuses, flexibilities, and impacts on the surrounding community.

M. Standards for Review, ROH §§ 21-9.100-8(a)(1)(E) and 21-9.100-5(c)(3): The highest degree of flexibility may be authorized by this permit for those projects which demonstrate:

1. **The ability to positively contribute to the economic enhancement of the affected area, particularly with regards to providing a broad mix of uses and diverse employment opportunities.** The construction of this mixed-use Project will provide the benefit of an increased number of dwelling units in the area to support and enhance nearby existing office, retail, resort, convention, and restaurant amenities. The Project will also provide diverse employment opportunities in trades, retail and commercial uses, management, and hotel operations. The Project meets this standard of review.

2. **The provision of measures and facilities to promote a highly functioning, safe, inter-connected, multi-modal circulation system, supporting easy access to, and effective use of the transit system on a pedestrian scale.** The Applicant is proposing limited features that promote multi-modal circulation in the area, such as ground-floor bicycle parking and a new pedestrian-focused entry into the Mall. As discussed in the community benefit section, the Applicant should implement or provide funding for street trees, multimodal transportation improvements beyond their Project Area, bus stop improvements, and a Biki station. With these community benefits, the Project will meet this standard of review.

3. **The provisions of usable, safe, and highly accessible public accommodations, gathering spaces, pedestrian ways, bicycle facilities, and parks.** Pedestrian access to the Mall is provided through the Project Area from Ala Moana Boulevard, and 10 ft. wide sidewalks are recommended as a condition of approval. As discussed in the community benefit section, the Applicant should provide funding for street trees and improve or fund improvements to the adjacent intersection or complete streets throughout the TOD Plan area in order to provide usable, safe, and highly accessible pedestrian access ways. The Plan-wide street tree implementation and intersection improvements will extend the effect beyond the site and into the neighborhood. With the proposed conditions, the Project will meet this standard of review.

4. **An appropriate mix of housing and unit types, particularly affordable and/or rental housing; with qualifying affordable housing being located on the project site or within at least one-half-mile of the same identified transit station as the project site.** The Applicant is proposing 205 dwelling units, of which 69 units will be designated as affordable rental dwelling units. Affordable rental dwelling units will be provided on site. 31 units will meet the requirement of ROH Chapter 29, and the remaining 38 units will be to meet the community benefit requirements. This level of affordable rental is sufficient to meet this standard of review considering the requested flexibility, particularly when considering the requested flexibility to exceed an FAR of 2.0 for the hotel use. If additional units are required by the Council, the DPP recommends allowing

additional FAR, up to 7.0, to accommodate the new units. This will ensure an appropriate mix of unit types instead of a reduction in unit size to accommodate the additional units. Furthermore, as previously discussed, the DPP supports expanding the affordability range, up to 120 percent of the AMI (instead of 80 percent), as a tradeoff for extended periods of affordability (i.e. 60 years instead of 30 years). These additional flexibilities will further support a broad mix of housing and unit types, and may extend the benefits to more family groups over longer periods of time without exceeding area market rents.

5. **General consistency with the Ala Moana Neighborhood TOD Plan.** The intent of the TOD Plan is to make the most of the system for the benefit of the community, emphasizing TOD that will support transit ridership, improve pedestrian access, and fund neighborhood improvements. The Project will increase the activity along the street within the area, create jobs within the rail corridor, and generally support rail ridership due to its density and proximity to the future rail station. However, the impact to the mauka-makai viewshed and lack of multimodal transportation connection does not comply with the TOD Plan, as discussed extensively throughout this Report. If the Project is modified as required under the recommended conditions of approval, the Project will meet this standard of review by contributing significantly to the execution of the TOD Plan vision.

The Project and requested flexibility with respect to development standards will be generally consistent with the objectives of the TOD SD and the provisions enumerated in ROH §§ 21-9.100-4 and 21-9.100-5 with the recommended community benefits and conditions of approval. The DPP recommends approval of the conceptual Project plan, subject to the recommended conditions of approval.

IV. CONCLUSIONS OF LAW

Based on the foregoing findings, the Director of the DPP has made the following conclusions pursuant to ROH § 21-9.100-5(k), subject to the recommended conditions of approval:

A. The project concept, as a unified plan, is in the general interest of the public;

B. Requested project boundaries and requested flexibility with respect to development standards and use regulations are consistent with the objectives of TOD;

C. Requested flexibility with respect to development standards and use regulations is commensurate with the public amenities and community benefits proposed; and

D. The public amenities proposed will produce timely, demonstrable benefits to the community, support transit ridership, and implement the vision established.

V. RECOMMENDATIONS

Based on the Analysis and Conclusions of Law, the Director of the DPP hereby recommends the IPD-T Permit application for the 1588 Ala Moana Development Project, as conceptually shown in Exhibits A, B, C-1 through C-12, and D, as modified, be **APPROVED**, subject to the following conditions:

A. After City Council approval of the IPD-T Permit for the Project, the Applicant must submit to the DPP for review and approval, an application for an SD Major Permit, including detailed plans and drawings of the Project.

B. The Project is allowed the following bonuses and design flexibility:

1. The maximum FAR for the Project is 6.2 for the Project Area. Additional floor area, up to a maximum FAR of 7.0, may be authorized to accommodate more or larger affordable housing units;

2. The maximum FAR dedicated to Hotel uses is a FAR of 2.2 for the Project Area;

3. The maximum height of the Project is 400 ft. Rooftop structures must conform to ROH § 21-4.60(c);

4. The hotel tower may encroach approximately 33 ft. into the Atkinson Drive height setback, as shown in the plans;

5. The buildings are not required to be placed in a mauka-makai orientation;

6. The tower width is 955.5 ft. instead of 100 feet;

7. Tower separation is not required;

8. Active ground floor uses are not required along Atkinson Drive, but appropriate landscape screening and pedestrian oriented design is required; and

9. The loading requirement is reduced by up to 50 percent.

C. The following community benefits must be provided prior to the issuance of any certificate of occupancy, or as otherwise specified below:

1. Improvements to the Ala Moana Boulevard and Atkinson Drive intersection, as envisioned in the TOD Plan, or, if the SDOT does not support similar improvements by the time any certificates of occupancy are issued, a monetary contribution of $5 million to the City for Complete Streets improvements within the Ala Moana TOD Plan area. If a monetary contribution is provided, the timing may be phased to approximately equal annual contributions beginning with the first payment being made concurrently with the issuance of any certificate of occupancy, and over a five year period afterwards (i.e., $1 million annually).
2. A monetary contribution of $1.5 million to the City for additional street tree implementation within the Ala Moana TOD Plan area. The timing may be phased to approximately equal annual contributions beginning with the first payment being made concurrently with the issuance of any certificate of occupancy, and over a five year period afterwards (i.e., $300,000 annually).

3. A total of 38 affordable housing rental units as a community benefit for residents earning up to 80 percent of the AMI limit for an affordable period of 30 years, or up to 120 percent AMI limit for an affordability period of 60 years. The affordable housing units must comply with the DPP's Affordable Housing Rules.

4. Incorporation of a gray water reuse system.

5. A new bus stop located along the Project's frontage. If a location is identified, the Project is responsible for any existing or future bus stop improvements at no cost to the City. This includes responsibility for litter removal, cleaning and maintenance of bus shelter, benches, and floor area. If a location is not identified by the DTS, this community benefit will be deemed satisfied.

6. A Biki Station located near the site or near a bus stop. If a location is identified, the Project is responsible for implementation. If a location is not identified, this community benefit will be deemed satisfied.

D. Updated plans for the SD Permit must show:

1. 10 ft. wide sidewalk along Ala Moana Boulevard and Atkinson Drive;

2. Zoning data table indicating compliance for the Project Area and for the joint development;

3. Pedestrian oriented improvements and street trees in the setback area between the building and the build-to line along both frontages;

4. Details of the design for the pedestrian corridor showing design consistent with Complete Streets concepts and with the existing or proposed pedestrian design scheme across the Mall to support consistency in design language and safety;

5. Height measured from existing grade or finished grade whichever is lower; and

6. Details of material, color, and finish for the sidewalks.

E. Prior to the issuance of a certificate of occupancy, the Applicant must coordinate with the DPP, SDOT, DTS, and Department of Parks and Recreation to:

1. Provide all required community benefits;

2. Ensure that all access driveways are designed with pedestrian and bicycle safety measures in place;

3. Confirm compliance with Complete Streets policies by the DTS including review of the access driveways, sidewalks, crossings, and internal pedestrian paths;

4. Confirm approval of plans by the SDOT; and

5. Obtain approval of Street Tree Plans incorporating suspended paver system or other advanced planting systems that provide sufficient un-compacted soil volumes for root growth to support extra-large street trees.

F. Prior to applying for a foundation permit, the Applicant must submit an updated wind study wind tunnel test to quantify the wind conditions and evaluate the effectiveness of any wind mitigation strategies for public areas. The Applicant must implement the recommended wind mitigation strategies.

G. Prior to the issuance of a building permit, the Applicant must submit to the DPP TRB for review and approval:

1. A timeline with anticipated dates for obtaining major building permits for demolition and construction work, including the date of occupancy. This will also identify when a CMP, TMP, and updates or validation of the findings of the TIR will be submitted.

2. The CMP should:

a. Identify the type, frequency, and routing of heavy trucks and construction-related vehicles, and provide remedial measures, as necessary;

b. Identify and limit vehicular activity related to construction outside the peak periods of traffic, utilizing alternate routes for heavy trucks, and provisions for on-site or off-site staging areas for construction workers and vehicles;

c. Include preliminary or conceptual traffic control plans; and

d. Include the condition of roadways prior to the start of construction activities so that the existing roadway can be restored to its original or improved condition upon completion.

3. The TMP must be prepared for the Project and must include Traffic Demand Management (TDM) strategies to limit vehicular trips for daily activities by residents. TDM strategies could include carpooling and ride sharing programs, transit, bicycle and pedestrian incentives and other similar TDM measures. The TMP should address where pick-up/drop-off would occur and how delivery trucks would access/egress the site and how it will be managed. A post TMP will be required after full build-out, to validate the relative effectiveness of the various TDM strategies identified in the initial report. The TMP should include how loading areas will be accessed and coordinated with Ala Moana Center.

4. A post TIR must be prepared and submitted to the DPP approximately six to nine months after the issuance of the Certificate of Occupancy to validate the traffic projections, distribution, and assignment contained in the initial TIR. If additional traffic mitigation measures or modifications are necessary to support related traffic impacts directly attributable to this development, the Applicant will be required to implement these measures. If the findings of the post TIR are inconclusive, a follow up study may be required within a year of this prior study, as necessary. The Applicant must coordinate with the DPP and DTS to ensure that the design of these intersections meet Complete Streets standards and serves all users.

H. All residential and hotel parking spaces must be unbundled.

I. Vehicular access on Atkinson Drive is limited to right-in and right-out only.

J. All loading and trash pick-up operations must be done on-site. These areas must be designed such that vehicles enter and exit front first.

K. Adequate on-site turn-around areas must be designed to ensure that the layout of parking spaces in the loading/delivery area does not interfere with turning maneuvers for large vehicles.

L. The Applicant is responsible for the coordination with applicable public agencies and compliance with applicable regulations for the construction of the proposed Project.

M. Approval of this IPD-T Permit does not constitute compliance with other ROH Chapter 21 or governmental agencies' requirements, including building permit approval(s). They are subject to separate review and approval. The Applicant should be responsible for ensuring that the final plans for the Project approved under this permit comply with all applicable ROH Chapter 21 and other governmental provisions and requirements.

N. The Applicant must obtain a building permit for the Project within five years of the date of City Council approval of the IPD-T Permit for the Project. Failure to obtain a building permit within this period will render this approval null and void, provided that this period may be extended as follows:

1. The Director of the DPP may extend this period if the Applicant demonstrates good cause, but the period should not be extended beyond one year from the initial deadline without the approval of the City Council, which may grant or deny the approval in its complete discretion.

2. If the Applicant requests an extension beyond one year from the initial deadline and the Director of the DPP finds that the Applicant has demonstrated good cause for the extension, the Director must prepare and submit to the City Council a report on the proposed extension, which must include the Director's report and recommendations thereon, and a proposed resolution approving the extension. The City Council may approve the proposed extension, or an extension for a shorter or longer period, or deny the proposed extension, by adoption of a committee report or resolution.

3. If the City Council fails to take final action on the proposed extension within the first to occur of:

    a. Sixty days after receipt of the Director of the DPP's report, or

    b. The Applicant's then-existing deadline for obtaining a building permit;

    the extension should be deemed denied.

O. Any request to extend the deadline of an approved building permit for the Project, must be transmitted to the DPP, Land Use Permits Division for review and approval. This is to ensure that the proposed development is still a catalytic Project within the rail corridor, the community benefits remain commensurate with the bonuses allowed, and the Project meets the standards of review pursuant to ROH § 21-9.100-5(k).

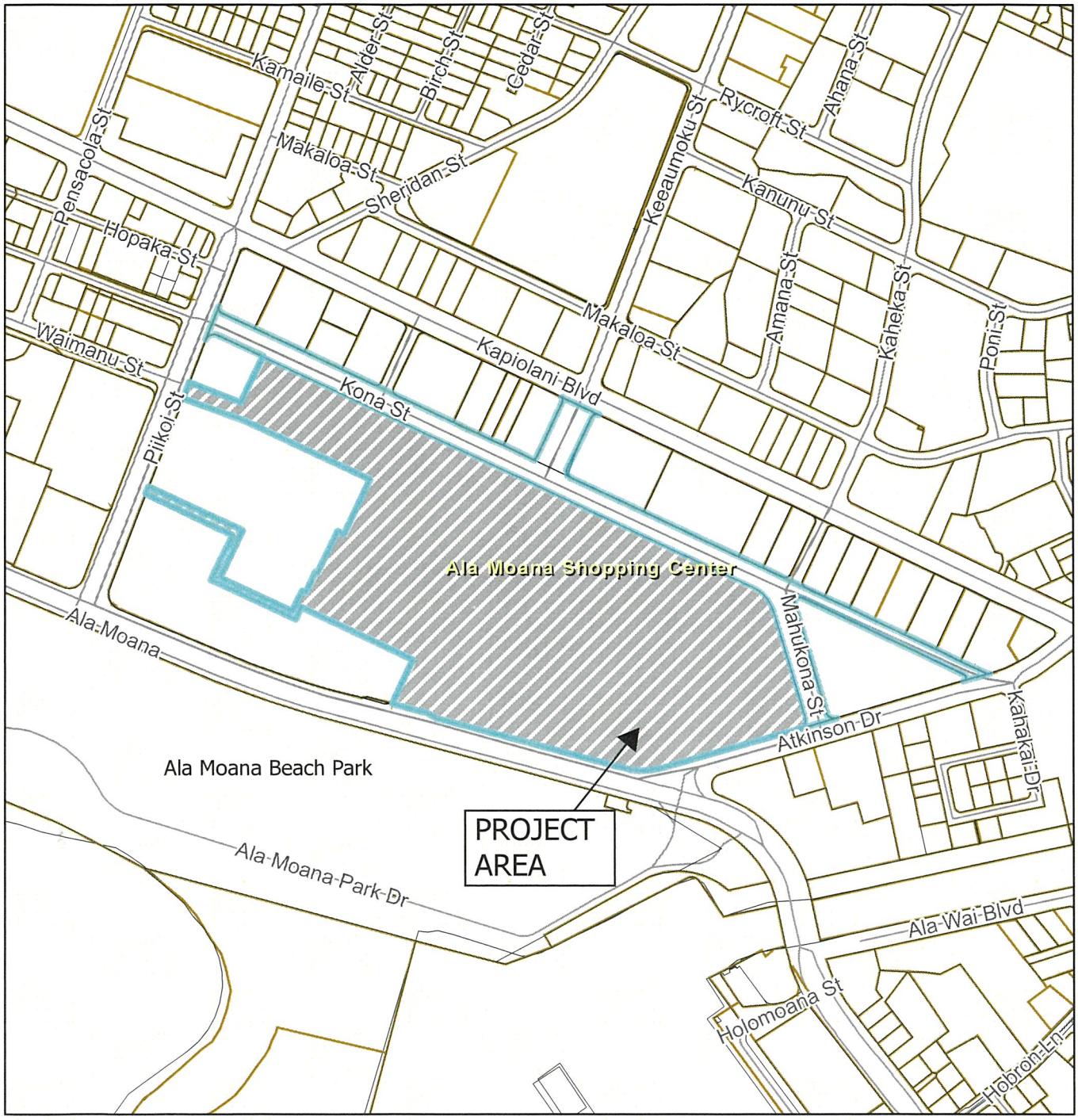
P. Except as modified herein, the Project must conform to the conceptual plan approved and all conditions established herein. Any changes to the conceptual plan (except as modified herein) will require a new application and approval by the City Council. The Director of the DPP may approve changes to the Project that do not significantly alter the size or nature of the Project if the changes remain in conformance with the conceptual plan and conditions set forth herein. Any alteration or change in the size or nature of the Project which significantly alters the proposed development should require a new application.

Dated at Honolulu, Hawai'i, this 24th day of July, 2026.

Department of Planning and Permitting
City and County of Honolulu
State of Hawai'i

By _____
Dawn Takeuchi Apuna
Director

Enclosure: Exhibits A, B, C-1 through C-12, and D



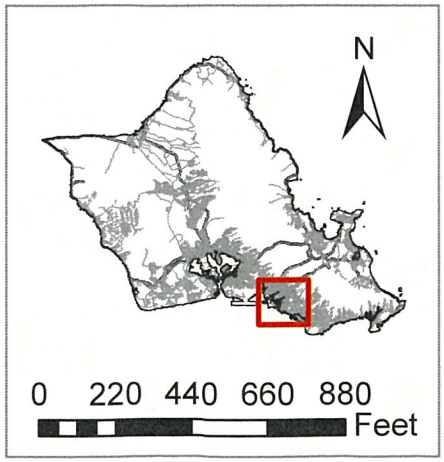


EXHIBIT A
LOCATION MAP

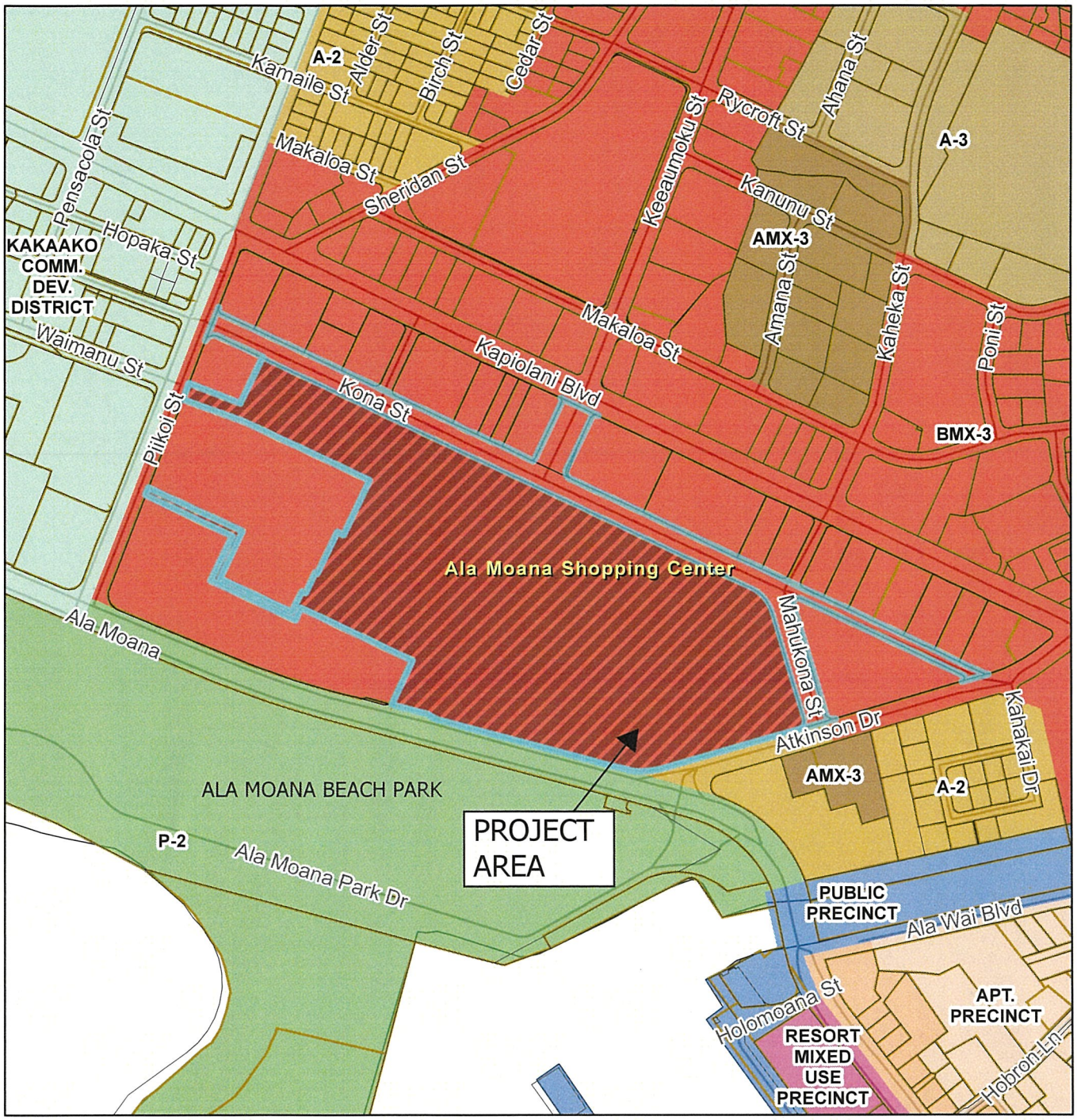
FILE NO. 2026-PDP-1

TAX MAP KEY 2-3-038: 014 (POR.)

1450 ALA MOANA BLVD - ALA MOANA

April 2026

Department of Planning and Permitting
Land Use Permits Division
City and County of Honolulu



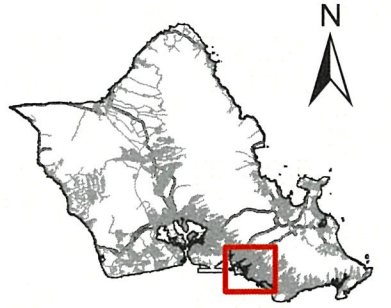


EXHIBIT B
ZONING MAP

FILE NO. 2026-PDP-1

TAX MAP KEY 2-3-038: 014 (POR.)

1450 ALA MOANA BLVD - ALA MOANA

May 2026

Department of Planning and Permitting
Land Use Permits Division
City and County of Honolulu

1588 ALA MOANA
PROJECT ZONING INFORMATION

Item	Section/Source	Info/Code Requirement	Proposed
Parcel Info	Assesor's Record	1588 Ala Moana Blvd Lot 24 (Currently a combined lot with Ala Moana Center. Subdivision application to DPP to be submitted this year)	n/a
Lot Area	Proposed Lot Split	187,174 sf	n/a
Zoning District / TOD Subdistrict	TOD Figure 5-2 TOD Figure 3-5	TOD Subdistrict A & B: BMX-3 Community Business Mixed Use District TOD Subdistrict A: Ala Moana Center TOD Subdistrict B: Convention Center	n/a
Height Limit	TOD Figure 5-4	TOD Subdistrict A: Base Height = 100'; Proposed with community benefits = 200' TOD Subdistrict B: Base Height = 100'; Proposed with community benefits = 400'	200' / 400' per TOD map
Height Setbacks	TOD Table 5-1 LUO 21-3.120-2(c)	Above 1st floor: none required Above 40': 1':10'	Above 40': 1':10' (Request Exception)
Yard Setbacks	TOD Table 5-1, Figure 5-5 LUO Table 21-3.4	Sideyard Setback: none required Rear yard setback: 10' Front yard setback: Ala Moana Blvd.: Setback Type 2 = 10' Atkinson Dr: Setback type 3A = 5'	Sideyard: n/a (per JDA w/ AMC) Rear yard: n/a (per JDA w/ AMC) Front yard: Ala Moana Blvd: 10' Atkinson Dr: 10'
Floor Area	TOD Figure 5-3 LUO Table 21-3.4	1,310,218 sf max. (187,174 x 7)	1,155,846 sf
Floor Area Ratio	TOD Figure 5-3 LUO 21-9.100-5.(e)(1)(C)	7.0	6.2 (1,155,846 sf / 187,174 sf)
Bonus Floor Area		LUO Base Floor Area: 2.5 x 187,174 sf = 655,109 sf LUO Max. Floor Area: 7 x 187,174 sf = 1,310,218 sf	1,155,846 sf - 655,109 sf = 500,737 sf
Street-Level Transparency	TOD Table 5-1 LUO 21-9.100-8(a)(5)(A)	TOD = 75% LUO = 60%	Ala Moana Blvd = 75.2% Atkinson Dr = 58.3% Total = 66.8% (Request Exemption)
Street Façade & Building Placement / Building Frontage	LUO 21-9.100-8(a)(3)(D)(iii) TOD Sec. 5.3.4	Ground floor building façade must be placed within the maximum front setback (10'-0") for at least 65% of the linear street frontage Frontage to meet building build-to-line Ala Moana Blvd: 50% frontage at 10'-0" Atkinson Dr: 70% frontage at 5'-0"	Varies from 10'-0" to 37'-0" (Request Exemption)
Active Ground Floor Uses	LUO 21-9.100-7	80%	Ala Moana Blvd: 88.8% Atkinson Dr: 68.2% Total: 80.7%
Tower Width & Tower Separation	TOD 5.3.4 TOD 5.9.3	Tower Width: 100' Mauka/Makai orientation Tower Separation: 100' tower separation / 50' setback from common boundary	Tower Width: 574' / 240' (Request Exemption) Tower Separation: > 100' to adjacent towers

EXHIBIT C-1

Unit Mix	Type	Count	Avg Size
Residential - Market	1BR	9	1,090
	2BR	63	1,926
	3BR	46	2,346
	4BR	7	3,410
	5BR	10	3,862
	6BR	1	5,520
Total:		**136**	
Residential - Affordable	1BR/1BA	4	613
	2BR/1BA	57	629
	2BR/2BA	8	776
Total:		**69**	
Condo-Hotel	1BR	24	975
	2BR	60	1,580
Total:		**84**	
Hotel	SUITE	105	560
	EXEC SUITE	45	697
	1BR SUITE	45	807
	2BR SUITE	15	900
Total:		**210**	

1588 ALA MOANA
PROPOSED ENVELOPE

EXHIBIT C-2

LUO ZONING ENVELOPE

100′ MAX. HEIGHT (LUO ZONING MAP HEIGHT LIMIT)	NONCOMPLIANT (request exemption)
18′ PROTUBERANCES (SEC. 21-4.60(c)(1))	COMPLIANT
1′:10′ HEIGHT SETBACK ABOVE 40′ (SEC. 21-3.120-2(c)(2))	NONCOMPLIANT (request exemption)
SIDEYARD SETBACK - 10′ (LUO TABLE 21-3.4)	N/A
REAR YARD SETBACK - 10′ (LUO TABLE 21-3.4)	N/A
FRONT YARD SETBACK - 10′ (LUO TABLE 21-3.4)	COMPLIANT

TOD ZONING ENVELOPE

200′ MAX. HEIGHT (SUBDISTRICT A) (TOD FIGURE 5-4)	COMPLIANT
400′ MAX. HEIGHT (SUBDISTRICT B) (TOD FIGURE 5-4)	COMPLIANT
18′ PROTUBERANCES (TOD 5.3.3)	COMPLIANT
1′:10′ HEIGHT SETBACK ABOVE 40′ (TOD TABLE 5-1)	NONCOMPLIANT (request exemption)
SIDEYARD SETBACK - NONE (TOD TABLE 5-1)	N/A
REAR YARD SETBACK - 10′ (TOD TABLE 5-1)	N/A
FRONT YARD SETBACK (TOD FIGURE 5-5)	
- ALA MOANA BLVD.: 10′ SETBACK	COMPLIANT
- ATKINSON DR.: 5′ SETBACK	NONCOMPLIANT (request exemption)
PODIUM HEIGHT - 65′ MAX. (TOD 5.9.2.)	COMPLIANT
TOWER WIDTH - 100′ MAUKA/ MAKAI ORIENTATION (TOD 5.3.4)	NONCOMPLIANT (request exemption)
TOWER SETBACK - 50′ @ COMMON BOUNDARY (TOD 5.9.3)	COMPLIANT

PROPOSED ZONING ENVELOPE - TOD COMPLIANCE

200′ MAX. HEIGHT (SUBDISTRICT A) (TOD FIGURE 5-4)

400′ MAX. HEIGHT (SUBDISTRICT B) (TOD FIGURE 5-4)

18′-0″ PROTUBERANCES (TOD 5.3.3)

1′:10′ HEIGHT SETBACK ABOVE 40′ - VARIANCE (TOD TABLE 5-1)

SIDE YARD SETBACK - N/A (TOD TABLE 5-1)

REAR YARD SETBACK - N/A (TOD TABLE 5-1)

FRONT YARD SETBACK (TOD FIGURE 5-5)

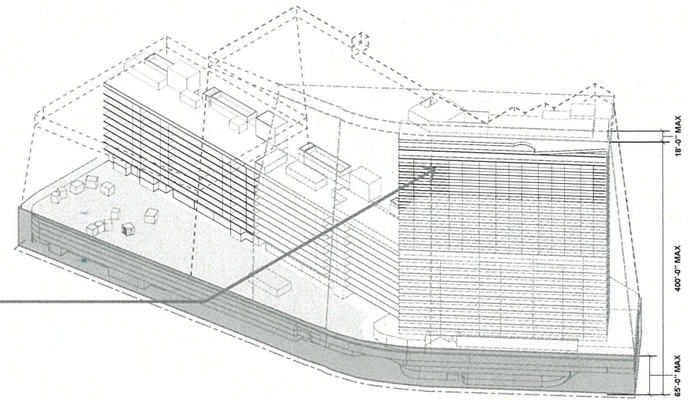
ALA MOANA BLVD.: 10′ SETBACK

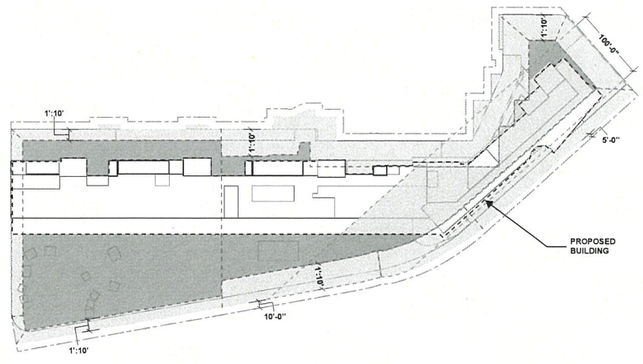
ATKINSON DR.: 10′ SETBACK - VARIANCE

PODIUM HEIGHT - 65′ MAX. (TOD 5.9.2)

TOWER WIDTH - 100′ - VARIANCE (TOD 5.3.4)

TOWER SETBACK - 50′ @ COMMON BOUNDARY (TOD 5.9.3)





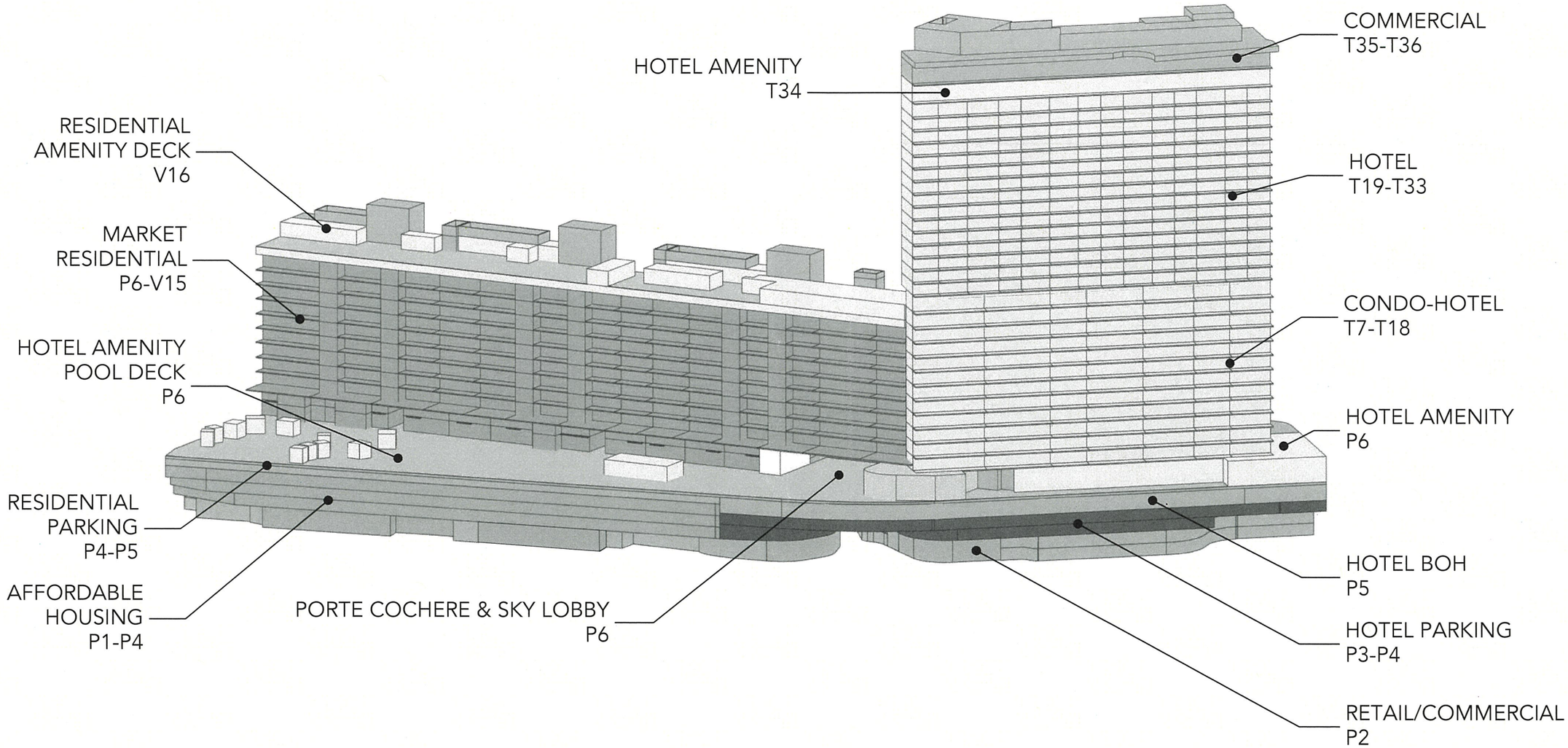
COMPLIANT TOD PODIUM ENVELOPE

COMPLIANT TOD TOWER ENVELOPE

TOD TOWER ENVELOPE (W/O 1:10 SETBACK ABOVE 40')

1588 ALA MOANA
PROPOSED PROGRAM

EXHIBIT C-3



1588 ALA MOANA

PROPOSED PROGRAM SECTION - 400' CONDO-HOTEL/HOTEL | 200' RESIDENTIAL CONDO

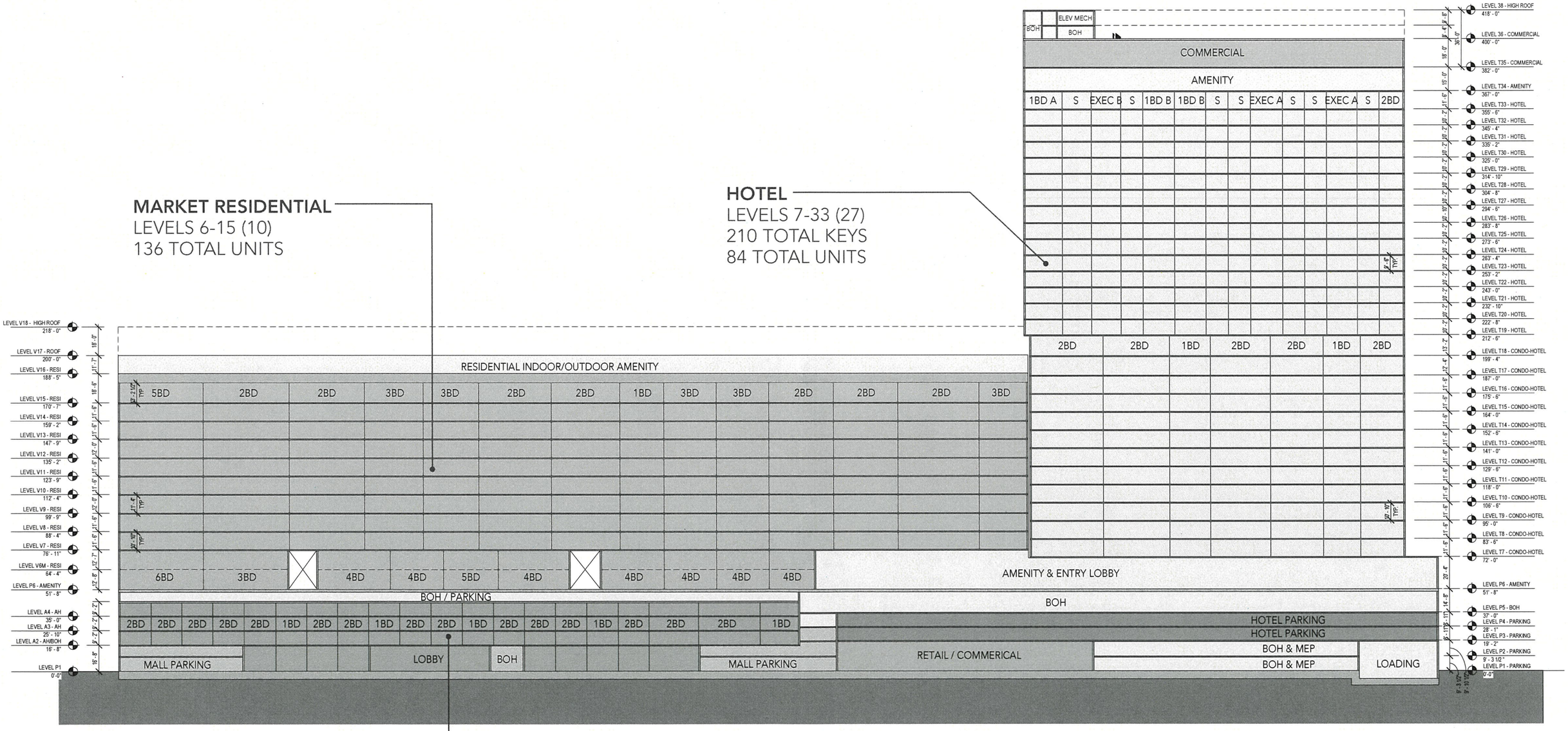
EXHIBIT C-4

0' 60' 120'

1" = 60'-0" WHEN PRINTED ON 11X17

MARKET RESIDENTIAL
LEVELS 6-15 (10)
136 TOTAL UNITS

HOTEL
LEVELS 7-33 (27)
210 TOTAL KEYS
84 TOTAL UNITS



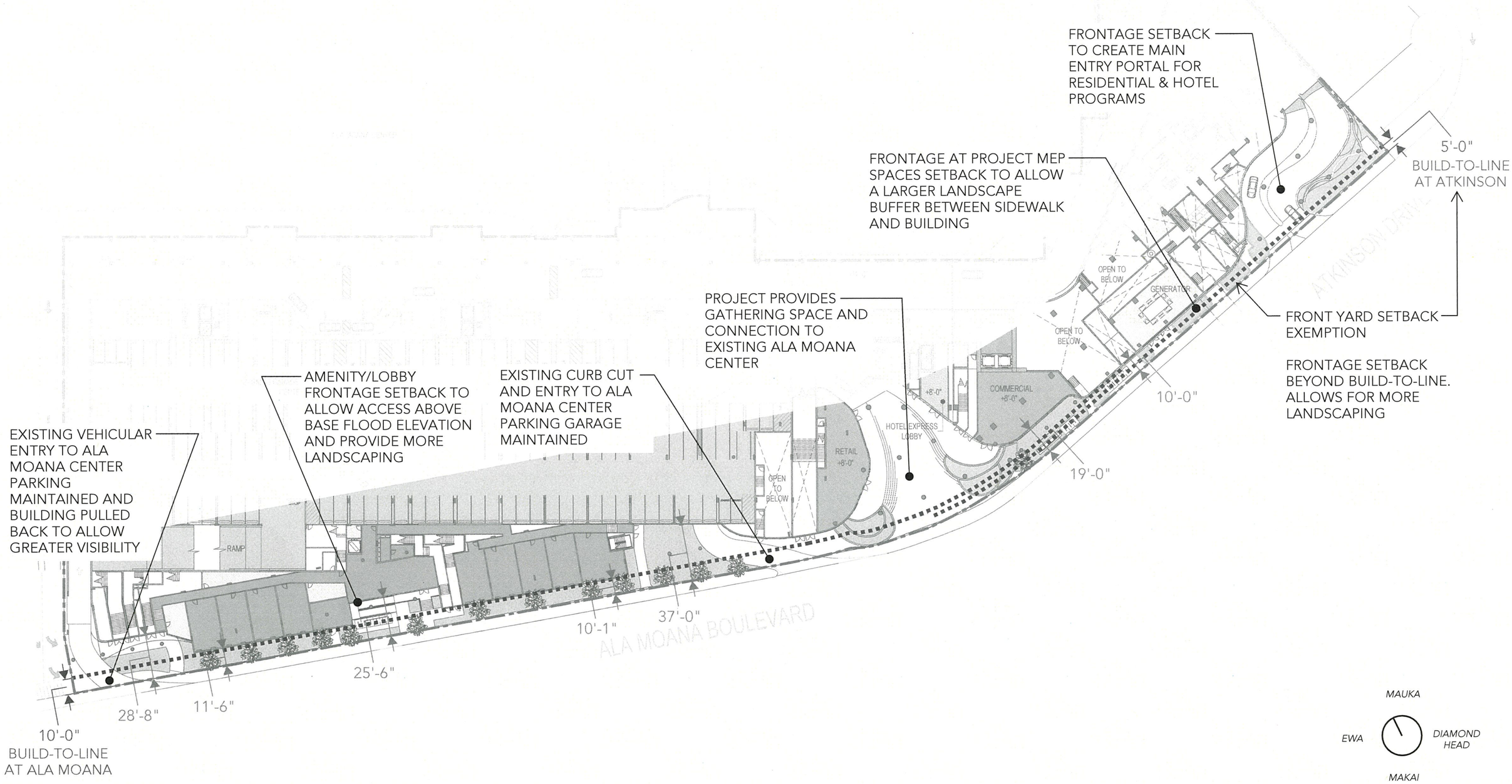
AFFORDABLE RESIDENTIAL
LEVELS 1-4 (4)
69 TOTAL UNITS

1588 ALA MOANA
STREET FACADE & BUILDING PLACEMENT

EXHIBIT C-5

0' 60' 120'

1" = 60'-0" WHEN PRINTED ON 11X17



MAUKA

EWA DIAMOND HEAD

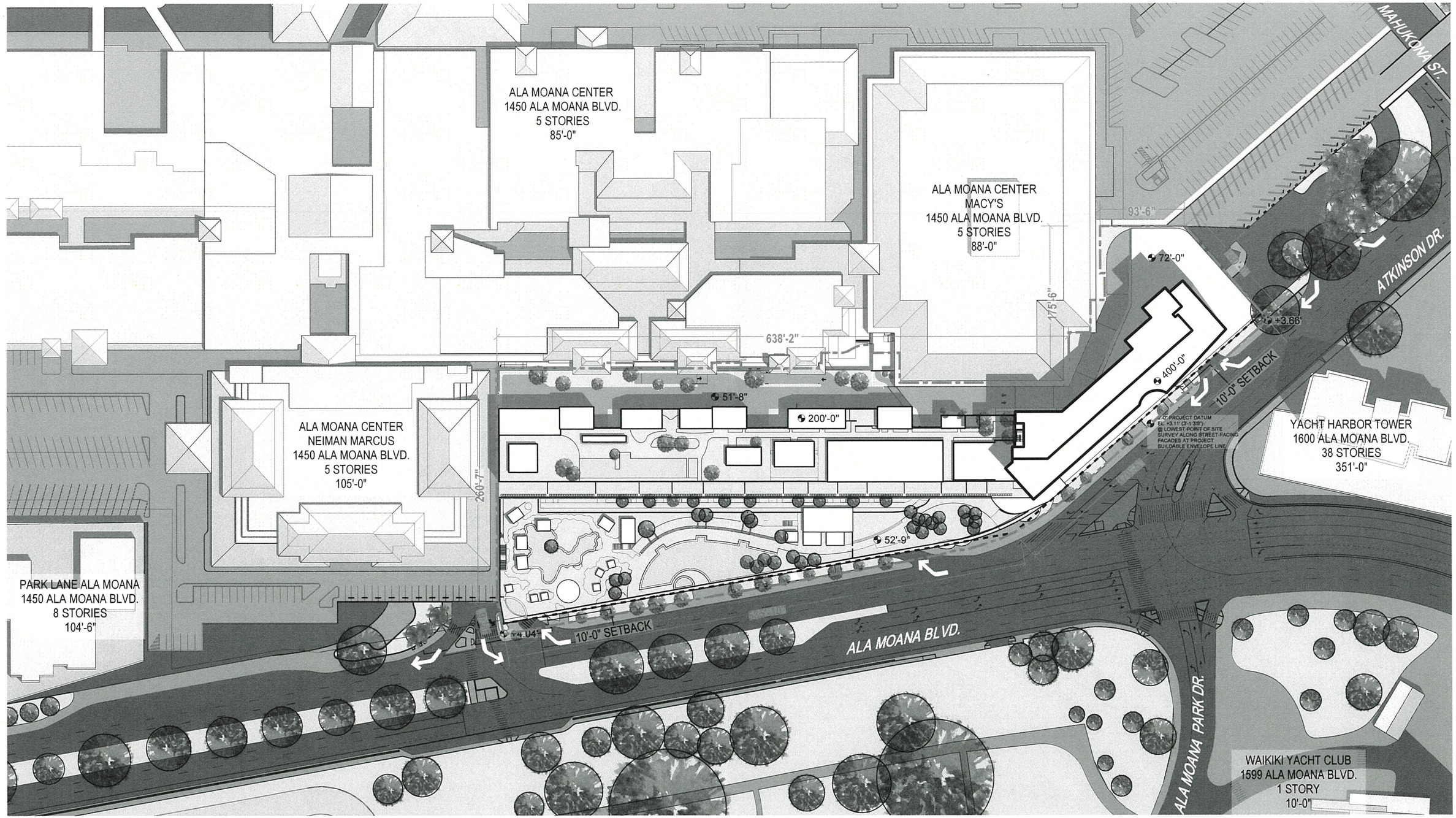
MAKAI

1588 ALA MOANA
PROPOSED SITE PLAN

EXHIBIT C-6

MAUKA
EWA
DIAMOND HEAD
MAKAI

TOTAL LOT AREA = 187,174 SF



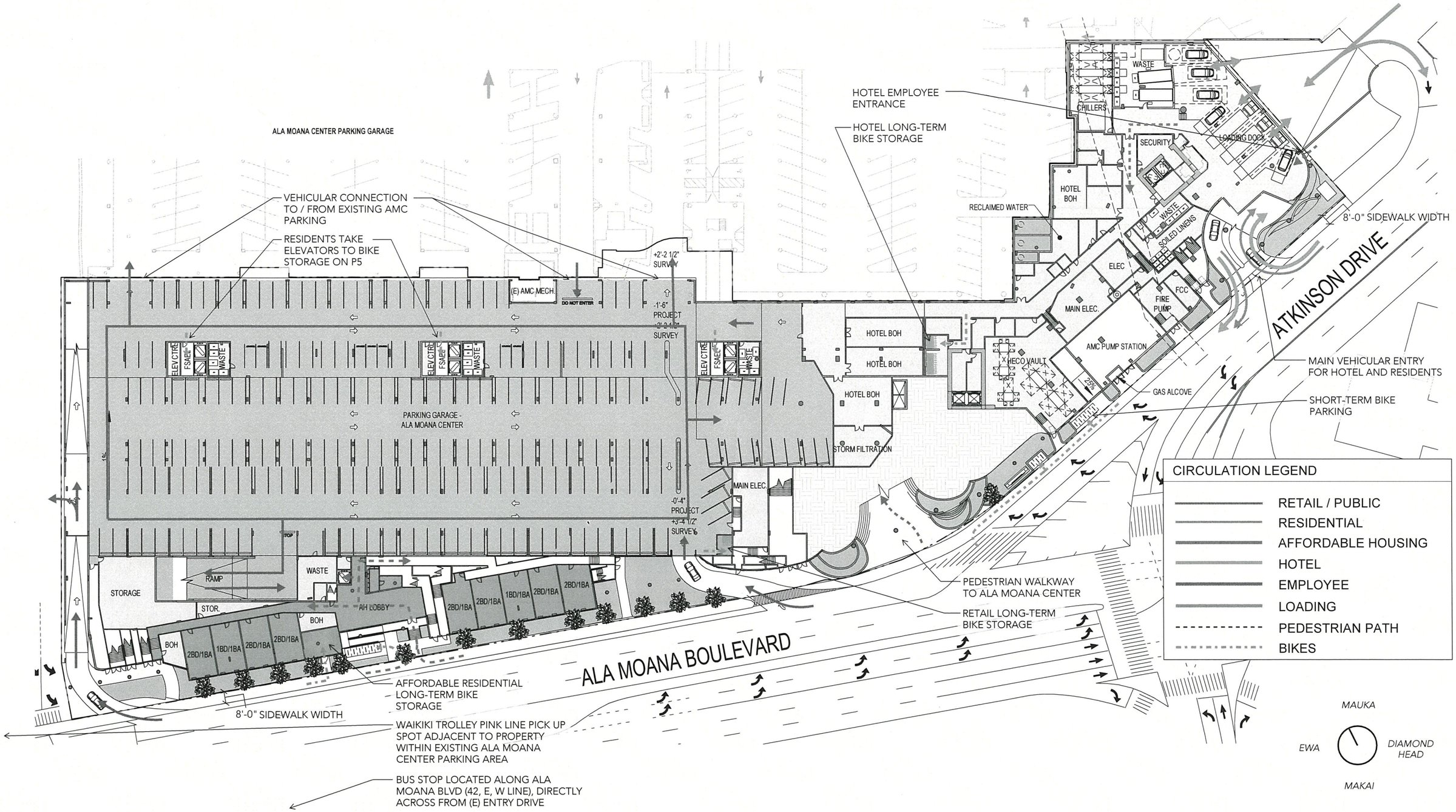
1588 ALA MOANA

LEVEL 1 CIRCULATION DIAGRAM

EXHIBIT C-7

0' 60' 120'

1" = 60'-0" WHEN PRINTED ON 11X17



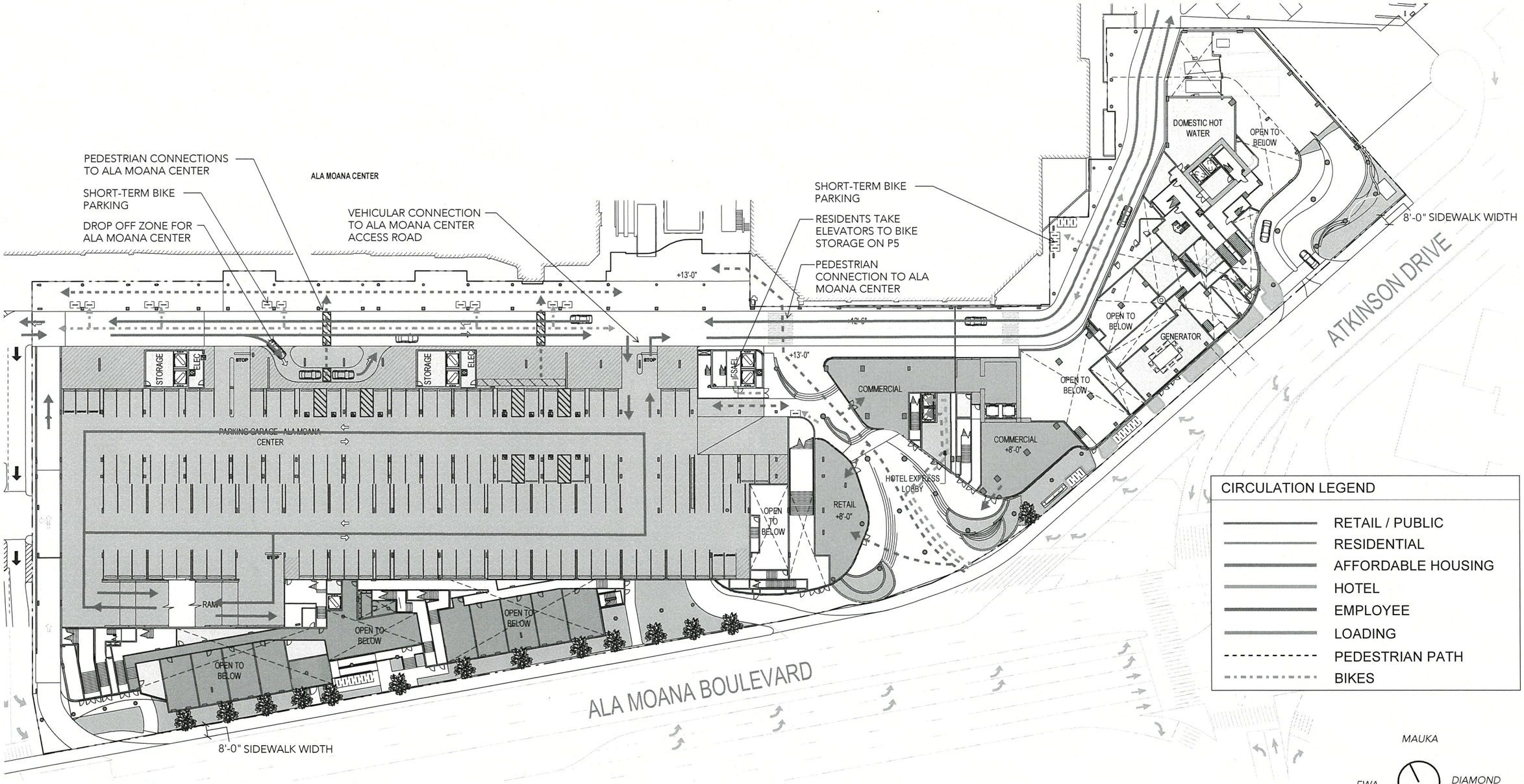
1588 ALA MOANA

LEVEL 2 CIRCULATION DIAGRAM

EXHIBIT C-8

0' 60' 120'

1" = 60'-0" WHEN PRINTED ON 11X17



CIRCULATION LEGEND

- RETAIL / PUBLIC
- RESIDENTIAL
- AFFORDABLE HOUSING
- HOTEL
- EMPLOYEE
- LOADING
- PEDESTRIAN PATH
- BIKES

MAUKA

EWA DIAMOND HEAD

MAKAI

1588 ALA MOANA

CONCEPTUAL SECTION - ALA MOANA SETBACK

EXHIBIT C-9

0' 50' 100'

1" = 30'-0" WHEN PRINTED ON 11X17

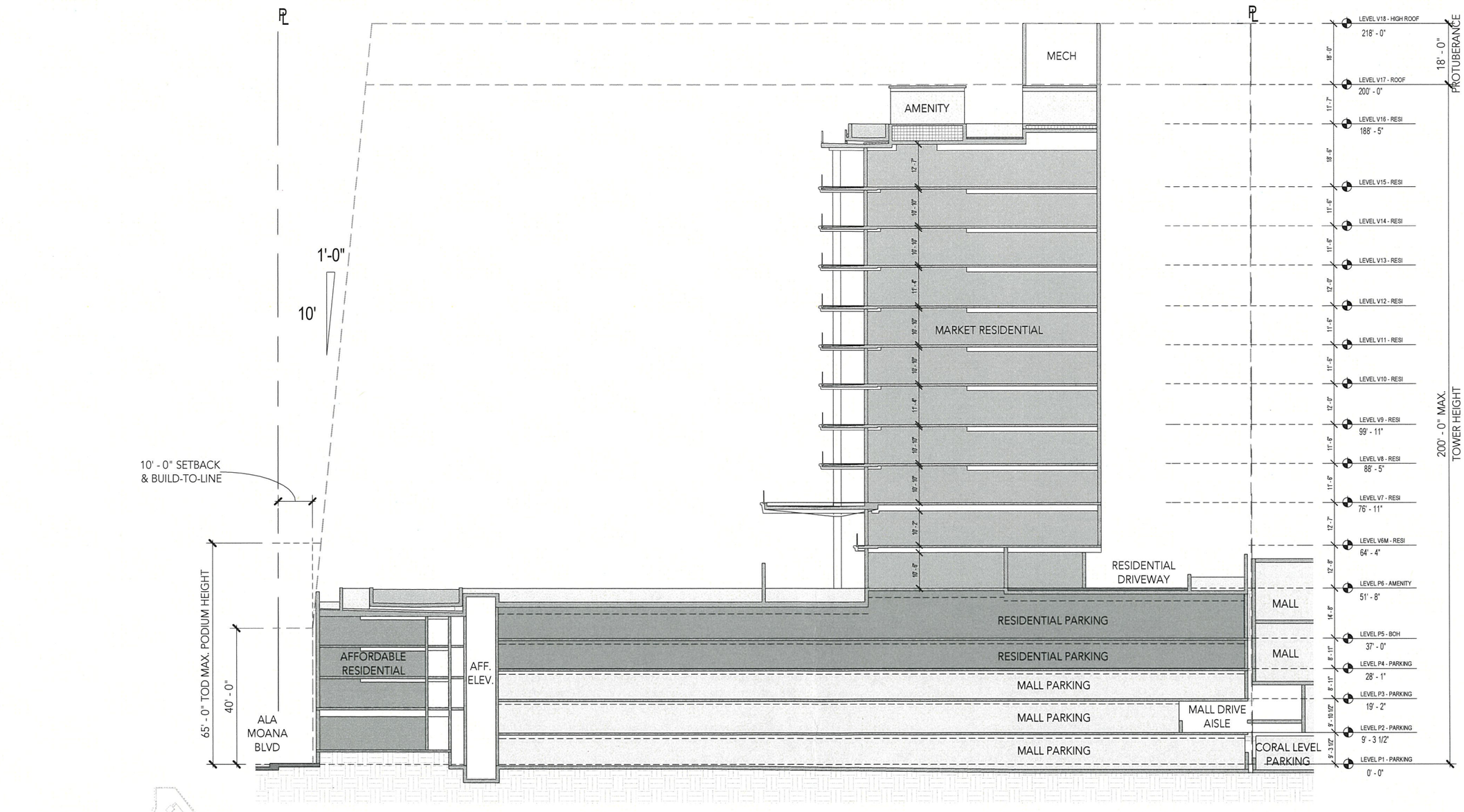


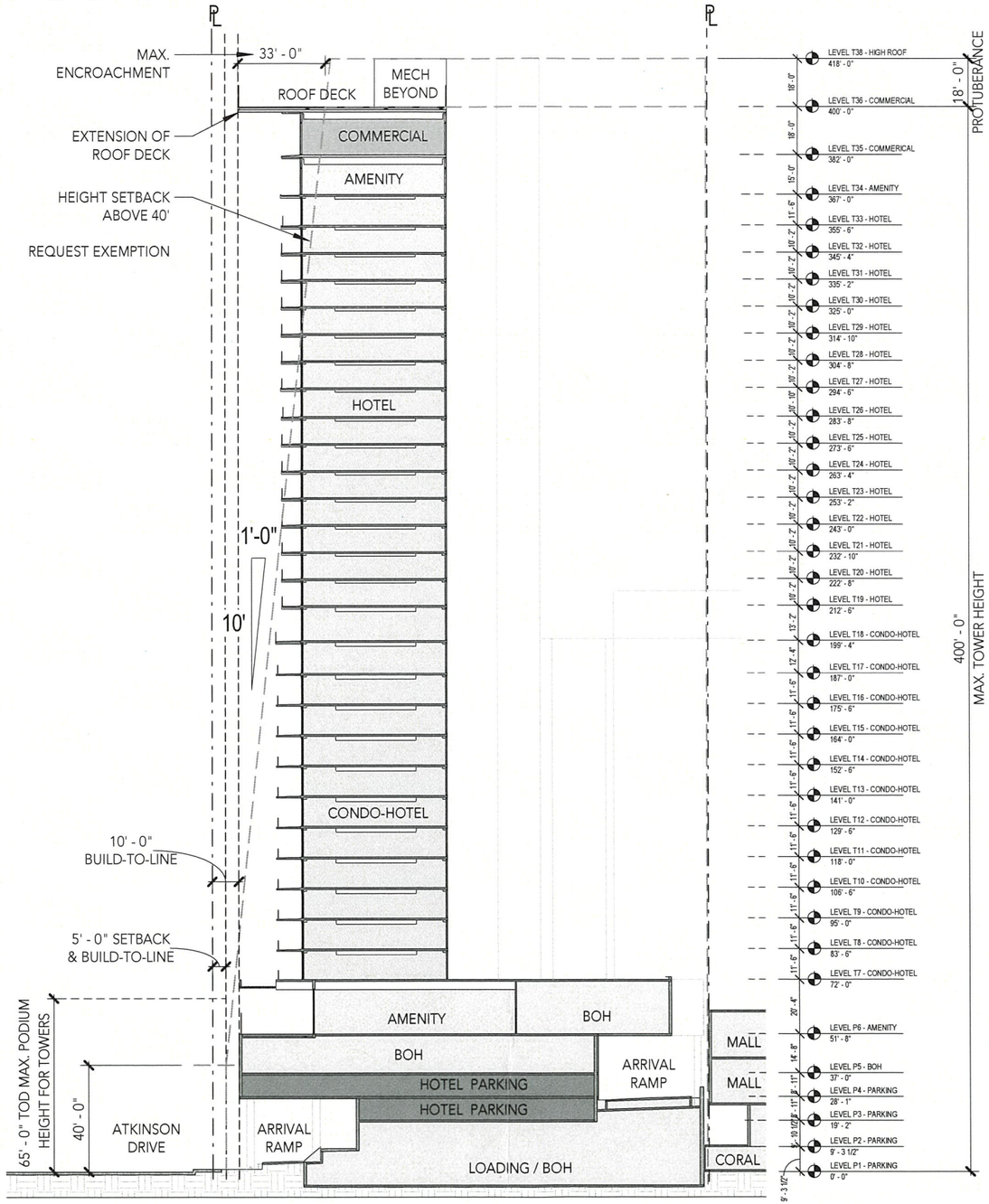
EXHIBIT C-10

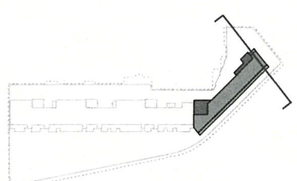
0' 50' 100'

1" = 50'-0" WHEN PRINTED ON 11X17

1588 ALA MOANA

CONCEPTUAL SECTION - ATKINSON SETBACK





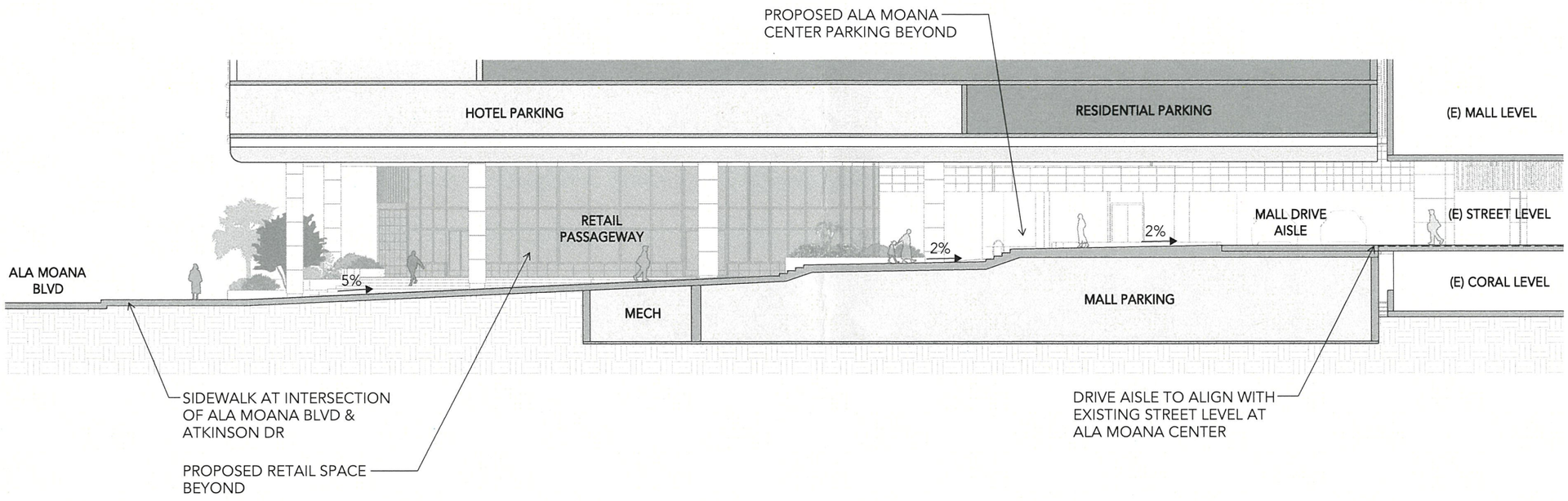
1588 ALA MOANA

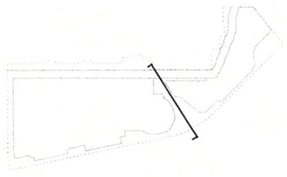
CONCEPTUAL SECTION - RETAIL PASSAGEWAY

EXHIBIT C-11

0 4' 8' 16'

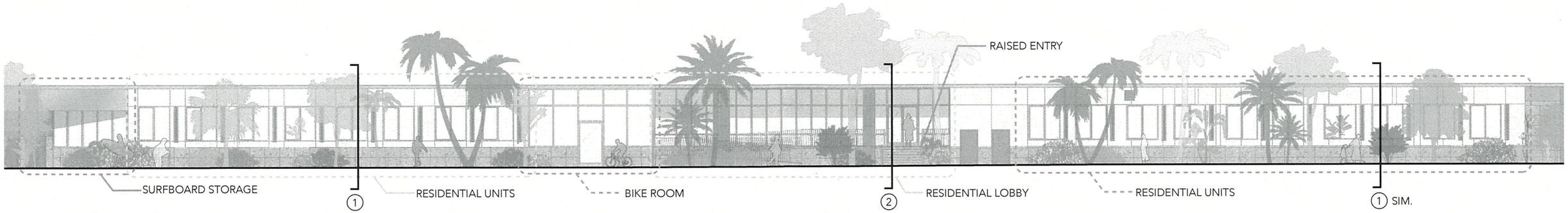
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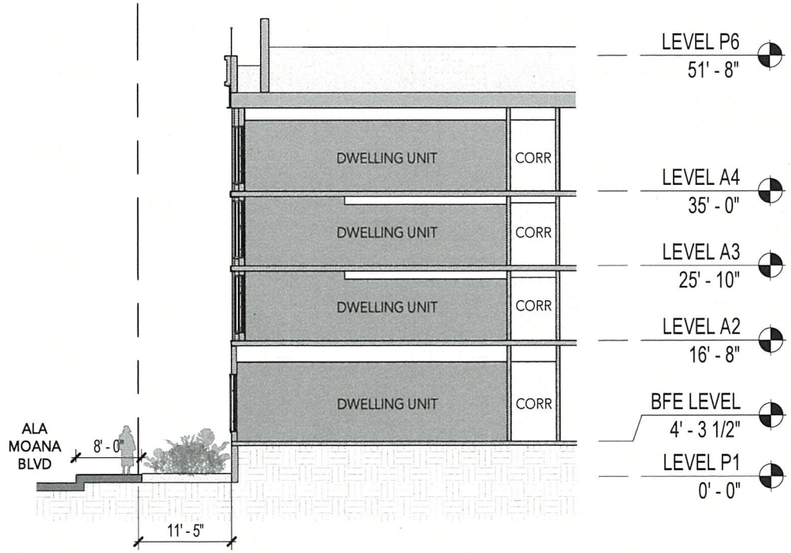




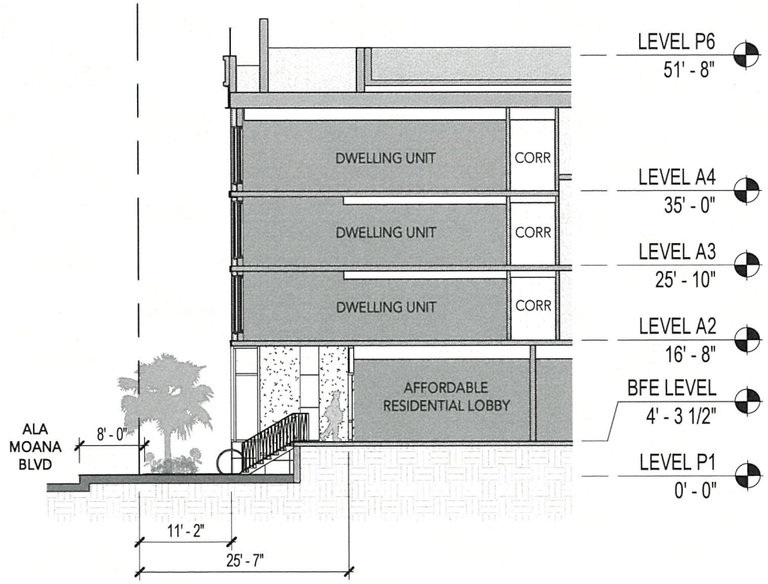
1588 ALA MOANA

GROUND FLOOR RESIDENTIAL UNITS - ELEVATION & SECTIONS

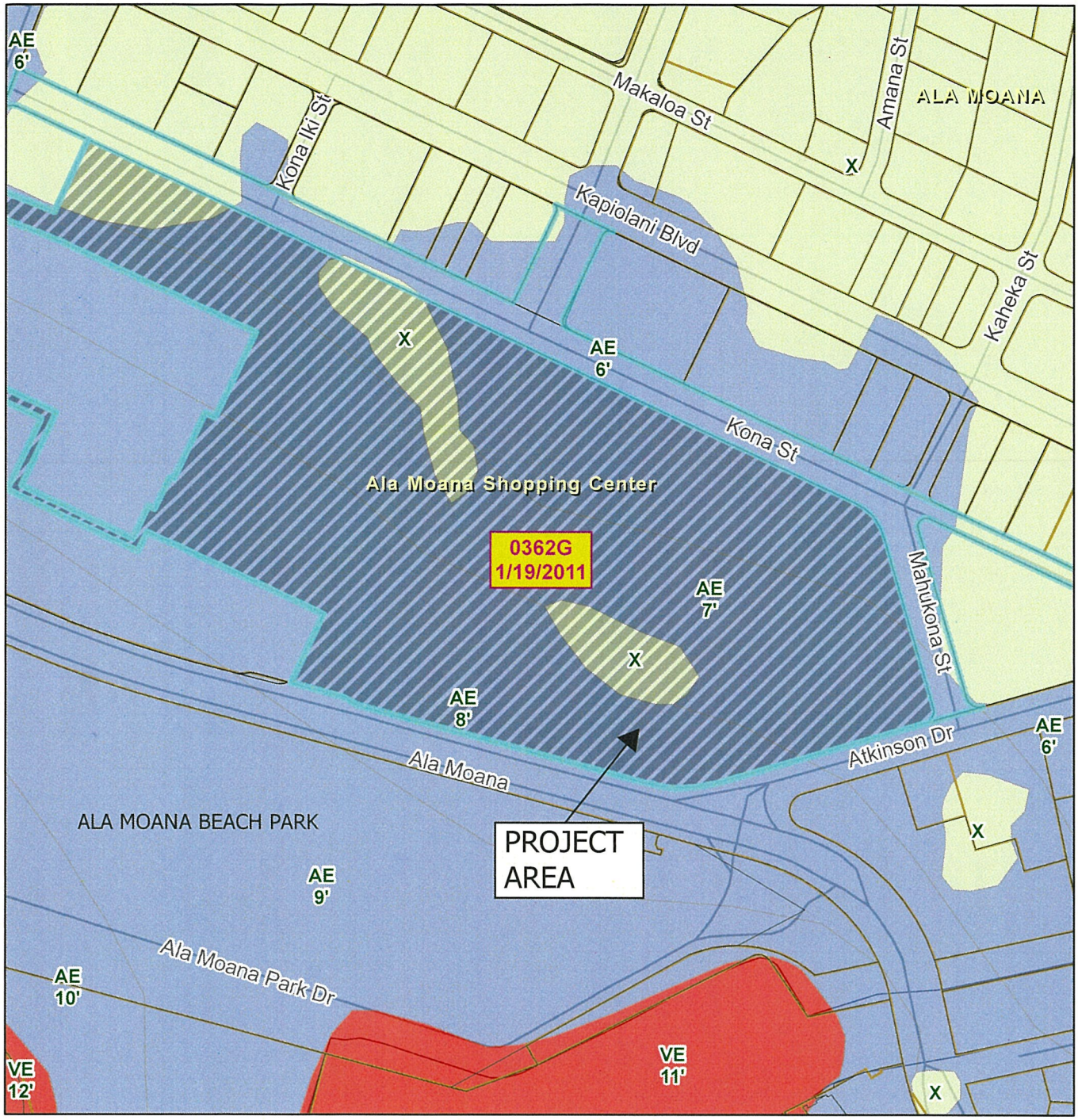




1 SECTION AT DWELLING UNITS



2 SECTION AT RESIDENTIAL LOBBY



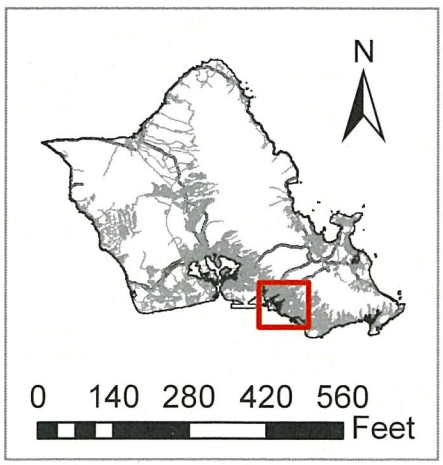


EXHIBIT D
FLOOD ZONE MAP

FILE NO. 2026-PDP-1

TAX MAP KEY 2-3-038: 014 (POR.)

1450 ALA MOANA BLVD - ALA MOANA

June 2026

Department of Planning and Permitting
Land Use Permits Division
City and County of Honolulu

HONOLULU CITY COUNCIL

KE KANIHELA O KE KALANA O HONOLULU

CITY AND COUNTY OF HONOLULU

No._____

RESOLUTION

APPROVING A CONCEPTUAL PLAN FOR AN INTERIM PLANNED DEVELOPMENT-TRANSIT PROJECT FOR THE 1588 ALA MOANA DEVELOPMENT PROJECT.

WHEREAS, on April 8, 2026, the Department of Planning and Permitting ("DPP") accepted the application (DPP Reference Number 2026-PDP-1) of KCR Development (the "Applicant") for Interim Planned Development-Transit ("IPD-T") approvals to redevelop 187,174 square (sq.) feet (ft.) of land zoned BMX-3 Community Business Mixed Use District within the Ala Moana Neighborhood Transit Oriented Development ("TOD") Plan area with a mixed-use development project, located at 1450 Ala Moana Boulevard, and identified as Tax Map Keys 2-3-038: 041 (the "Project"); and

WHEREAS, as proposed, the Project involves the demolition of the existing parking structure; the construction of a new 38-story (400 ft. in height) hotel tower with 294 hotel units, 17 story, 200 ft. tall residential tower with a total of 205 dwelling units (136 market-rate dwelling units and 69 affordable rental dwelling units), and a five-story podium with residential units, ground floor commercial uses, a residential and hotel lobby, a porte-cochère, and parking; and

WHEREAS, on May 8, 2026, the DPP held a public hearing which was attended by the Applicant's agent, DPP staff, Department of Information Technology staff, and approximately 82 members of the public; 26 oral testimonies were provided and three written testimonies were received by the DPP; and

WHEREAS, on _____, the DPP, having duly considered all evidence and reports of said Public Hearing and the review guidelines established in the Revised Ordinances of Honolulu 2021 ("ROH") § 21-2.110-2 and 21-9.100-5, completed its report and transmitted its Report and Recommendations of approval to the City Council ("Council") by Departmental Communication _____ (2026); and

WHEREAS, the conceptual plan for the Project is set forth in the exhibits attached hereto as Exhibits A, B, C-1 through C-12, and D and is further described in Departmental Communication _____ (2026), all of which are incorporated herein by this reference; and

WHEREAS, the Council, having received the Report and Recommendations of the DPP on _____and having duly considered the matter, desires to approve the conceptual plan for the Project, subject to the conditions enumerated below; now, therefore,

RESOLUTION

BE IT RESOLVED by the Council of the City and County of Honolulu that the conceptual plan for the Project is approved, subject to the following conditions:

A. After City Council approval of the IPD-T Permit for the Project, the Applicant must submit to the DPP for review and approval, an application for a Special District ("SD") Major Permit, including detailed plans and drawings of the Project.

B. The Project is allowed the following bonuses and design flexibility:

1. The maximum Floor Area Ratio ("FAR") for the Project is 6.2 for the Project Area. Additional floor area, up to a maximum FAR of 7.0, may be authorized to accommodate more or larger affordable housing units;

2. The maximum FAR dedicated to hotel uses is a FAR of 2.2 for the Project Area;

3. The maximum height of the Project is 400 ft. Rooftop structures must conform to ROH § 21-4.60(c);

4. The hotel tower may encroach approximately 33 ft. into the Atkinson Drive height setback, as shown in the plans;

5. The buildings are not required to be placed in a mauka-makai orientation;

6. The tower width is 955.5 ft. instead of 100 ft;

7. Tower separation is not required;

8. Active ground floor uses are not required along Atkinson Drive, but appropriate landscape screening and pedestrian oriented design is required; and

9. The loading requirement is reduced by up to 50 percent.

C. The following community benefits must be provided prior to the issuance of any certificate of occupancy, or as otherwise specified below:

1. Improvements to the Ala Moana Boulevard and Atkinson Drive intersection, as envisioned in the TOD Plan, or, if the State Department of Transportation ("SDOT") does not support similar improvements by the

time any certificates of occupancy are issued, a monetary contribution of $5 million to the City for Complete Streets improvements within the Ala Moana TOD Plan area. If a monetary contribution is provided, the timing may be phased to approximately equal annual contributions beginning with the first payment being made concurrently with the issuance of any certificate of occupancy, and over a five year period afterwards (i.e., $1 million annually).

2. A monetary contribution of $1.5 million to the City for additional street tree implementation within the Ala Moana TOD Plan area. The timing may be phased to approximately equal annual contributions beginning with the first payment being made concurrently with the issuance of any certificate of occupancy, and over a five year period afterwards (i.e., $300,000 annually).

3. A total of 38 affordable housing rental units as a community benefit for residents earning up to 80 percent of the AMI limit for an affordable period of 30 years, or up to 120 percent AMI limit for an affordability period of 60 years. The affordable housing units must comply with the DPP's Affordable Housing Rules.

4. Incorporation of a gray water reuse system.

5. A new bus stop located along the Project's frontage. If a location is identified, the Project is responsible for any existing or future bus stop improvements at no cost to the City. This includes responsibility for litter removal, cleaning and maintenance of bus shelter, benches, and floor area. If a location is not identified by the Department of Transportation Services ("DTS"), this community benefit will be deemed satisfied.

6. A Biki Station located near the site or near a bus stop. If a location is identified, the Project is responsible for implementation. If a location is not identified, this community benefit will be deemed satisfied.

D. Updated plans for the SD Permit must show:

1. 10 ft. wide sidewalk along Ala Moana Boulevard and Atkinson Drive;

2. Zoning data table indicating compliance for the Project Area and for the joint development;

3. Pedestrian oriented improvements and street trees in the setback area between the building and the build-to line along both frontages;

4. Details of the design for the pedestrian corridor showing design consistent with Complete Streets concepts and with the existing or proposed pedestrian design scheme across the Ala Moana Shopping Center to support consistency in design language and safety;

5. Height measured from existing grade or finished grade whichever is lower; and

6. Details of material, color, and finish for the sidewalks.

E. Prior to the issuance of a certificate of occupancy, the Applicant must coordinate with the DPP, SDOT, DTS, and Department of Parks and Recreation to:

1. Provide all required community benefits;

2. Ensure that all access driveways are designed with pedestrian and bicycle safety measures in place;

3. Confirm compliance with Complete Streets policies by the DTS including review of the access driveways, sidewalks, crossings, and internal pedestrian paths;

4. Confirm approval of plans by the SDOT; and

5. Obtain approval of Street Tree Plans incorporating suspended paver system or other advanced planting systems that provide sufficient un-compacted soil volumes for root growth to support extra-large street trees.

F. Prior to applying for a foundation permit, the Applicant must submit an updated wind study wind tunnel test to quantify the wind conditions and evaluate the effectiveness of any wind mitigation strategies for public areas.

G. Prior to the issuance of a building permit, the Applicant must submit to the DPP Traffic Review Branch for review and approval:

1. A timeline with anticipated dates for obtaining major building permits for demolition and construction work, including the date of occupancy. This

will also identify when a Construction Management Plan ("CMP"), Traffic Management Plan ("TMP"), and updates or validation of the findings of the Traffic Impact Report ("TIR") will be submitted.

2. The CMP should:

   a. Identify the type, frequency, and routing of heavy trucks and construction-related vehicles, and provide remedial measures, as necessary;

   b. Identify and limit vehicular activity related to construction outside the peak periods of traffic, utilizing alternate routes for heavy trucks, and provisions for on-site or off-site staging areas for construction workers and vehicles;

   c. Include preliminary or conceptual traffic control plans; and

   d. Include the condition of roadways prior to the start of construction activities so that the existing roadway can be restored to its original or improved condition upon completion.

3. The TMP must be prepared for the Project and must include Traffic Demand Management ("TDM") strategies to limit vehicular trips for daily activities by residents. TDM strategies could include carpooling and ride sharing programs, transit, bicycle and pedestrian incentives and other similar TDM measures. The TMP should address where pick-up/drop-off would occur and how delivery trucks would access/egress the site and how it will be managed. A post TMP will be required after full build-out, to validate the relative effectiveness of the various TDM strategies identified in the initial report. The TMP should include how loading areas will be accessed and coordinated with Ala Moana Center.

4. A post TIR must be prepared and submitted to the DPP approximately six to nine months after the issuance of the certificate of occupancy to validate the traffic projections, distribution, and assignment contained in the initial TIR. If additional traffic mitigation measures or modifications are necessary to support related traffic impacts directly attributable to this development, the applicant will be required to implement these measures. If the findings of the post TIR are inconclusive, a follow up study may be required within a year of this prior study, as necessary. The Applicant must coordinate with

the DPP and DTS to ensure that the design of these intersections meets Complete Streets standards and serves all users.

H. All residential and hotel parking spaces must be unbundled.

I. Vehicular access on Atkinson Drive is limited to right-in and right-out only.

J. All loading and trash pick-up operations must be done on-site. These areas must be designed such that vehicles enter and exit front first.

K. Adequate on-site turn-around areas must be designed to ensure that the layout of parking spaces in the loading/delivery area does not interfere with turning maneuvers for large vehicles.

L. Approval of this IPD-T Permit does not constitute compliance with other Revised Ordinances of Honolulu ("ROH") Chapter 21 or governmental agencies' requirements, including building permit approval(s). They are subject to separate review and approval. The Applicant should be responsible for ensuring that the final plans for the Project approved under this permit comply with all applicable ROH Chapter 21 and other governmental provisions and requirements.

M. The Applicant must obtain a building permit for the Project within five years of the date of City Council approval of the IPD-T Permit for the Project. Failure to obtain a building permit within this period will render this approval null and void, provided that this period may be extended as follows:

1. The Director of the DPP may extend this period if the Applicant demonstrates good cause, but the period should not be extended beyond one year from the initial deadline without the approval of the City Council, which may grant or deny the approval in its complete discretion.

2. If the Applicant requests an extension beyond one year from the initial deadline and the Director of the DPP finds that the Applicant has demonstrated good cause for the extension, the Director must prepare and submit to the City Council a report on the proposed extension, which must include the Director's report and recommendations thereon, and a proposed resolution approving the extension. The City Council may approve the proposed extension, or an extension for a shorter or longer period, or deny the proposed extension, by adoption of a committee report or resolution.

3. If the City Council fails to take final action on the proposed extension within the first to occur of:

   a. Sixty days after receipt of the Director of the DPP's report, or

   b. The Applicant's then-existing deadline for obtaining a building permit;

   the extension should be deemed denied.

R. Any request to extend the deadline of an approved building permit for the Project, must be transmitted to the DPP, Land Use Permits Division for review and approval. This is to ensure that the proposed development is still a catalytic Project within the rail corridor, the community benefits remain commensurate with the bonuses allowed, and the Project meets the standards of review pursuant to ROH § 21-9.100-5(k).

S. Except as modified herein, the Project must conform to the conceptual plan approved and all conditions established herein. Any changes to the conceptual plan (except as modified herein) will require a new application and approval by the City Council. The Director of the DPP may approve changes to the Project that do not significantly alter the size or nature of the Project if the changes remain in conformance with the conceptual plan and conditions set forth herein. Any alteration or change in the size or nature of the Project which significantly alters the proposed development should require a new application.

BE IT FURTHER RESOLVED that the Council finds as follows with respect to this conceptual plan for the Project, as conditioned herein:

1. The Project concept, as a unified plan, is in the general interest of the public;

2. The requested Project boundaries and requested flexibility with respect to development standards relating to maximum building, maximum density, height setbacks, and front yards are generally consistent with the objectives of the TOD and the provisions enumerated in ROH § 21-9.100-8(a)(1)(E), 21-9.100-8(a)(1)(F), and § 21-9.100-9(b);

RESOLUTION

3. The requested flexibility with respect to development standards relating to maximum building height, maximum density, height setbacks, and front yards are commensurate with the public amenities and community benefits proposed;

4. The Project's additional density and height will not be detrimental to the quality of the neighborhood character or urban design, and will not negatively impact adopted public views; and

5. The public amenities and community benefits proposed will produce timely, demonstrable benefits to the community, support a neighborhood transportation network, and implement the vision established in ROH § 21-9.100-4 and § 21-9.100-6; and

BE IT FINALLY RESOLVED by the Council of the City and County of Honolulu that copies of this Resolution be transmitted to Dawn Takeuchi Apuna, Director of the DPP, 650 South King Street 7th Floor, Honolulu, Hawai'i 96813; BSC Acquisitions II, LLC, 2270 Kalākaua Ave #1788, Honolulu, Hawai'i 96814; and Isaiah Sato, R.M. Towill Corporation, 2021 North King Street, Suite 200, Honolulu, Hawai'i, 96819

INTRODUCED BY:

_____

_____

_____

_____

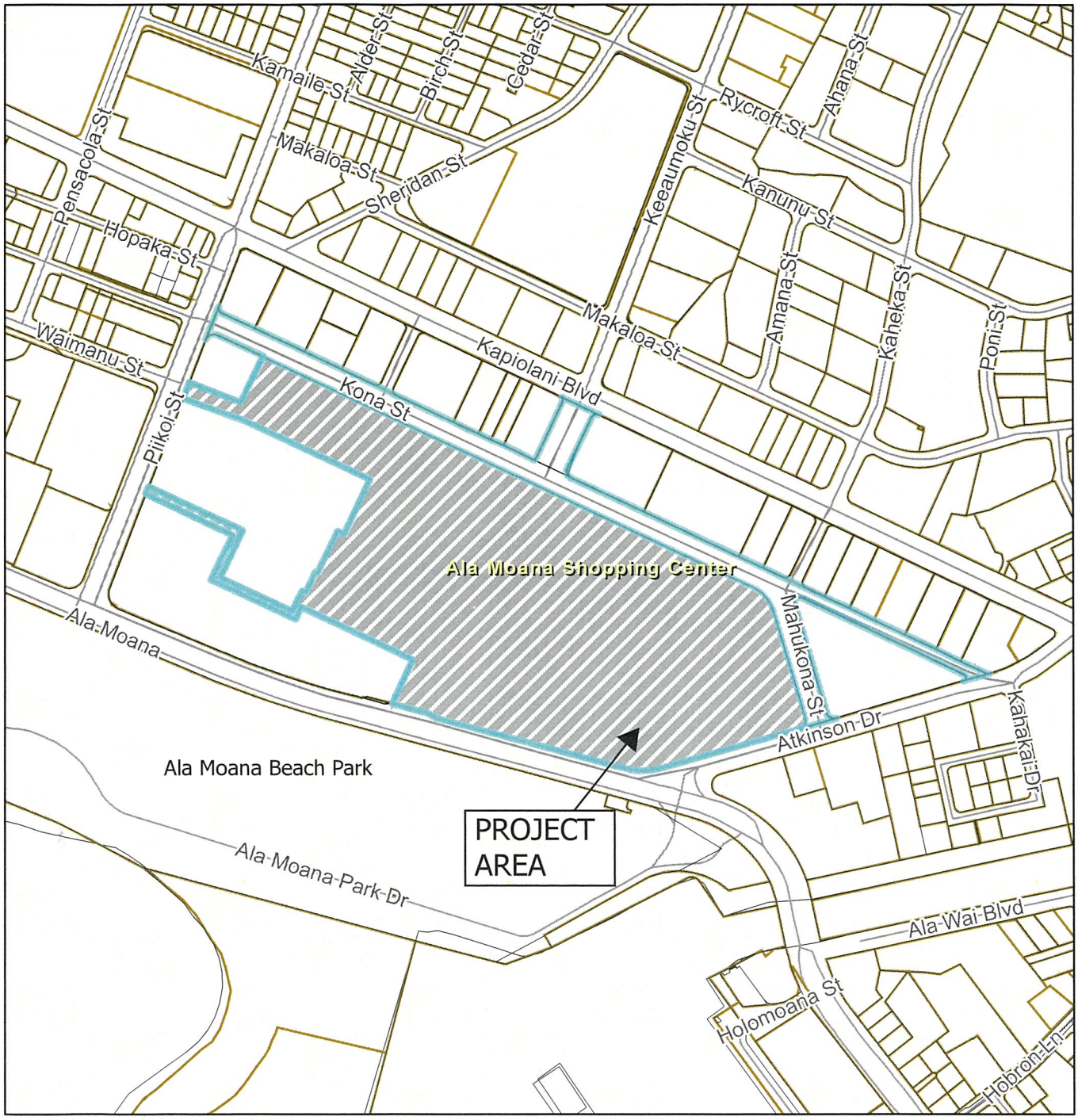
_____

DATE OF INTRODUCTION: _____

_____

_____ _____

Honolulu, Hawai'i Councilmembers



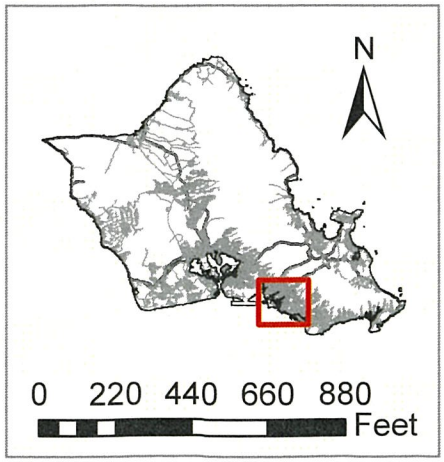


EXHIBIT A
LOCATION MAP

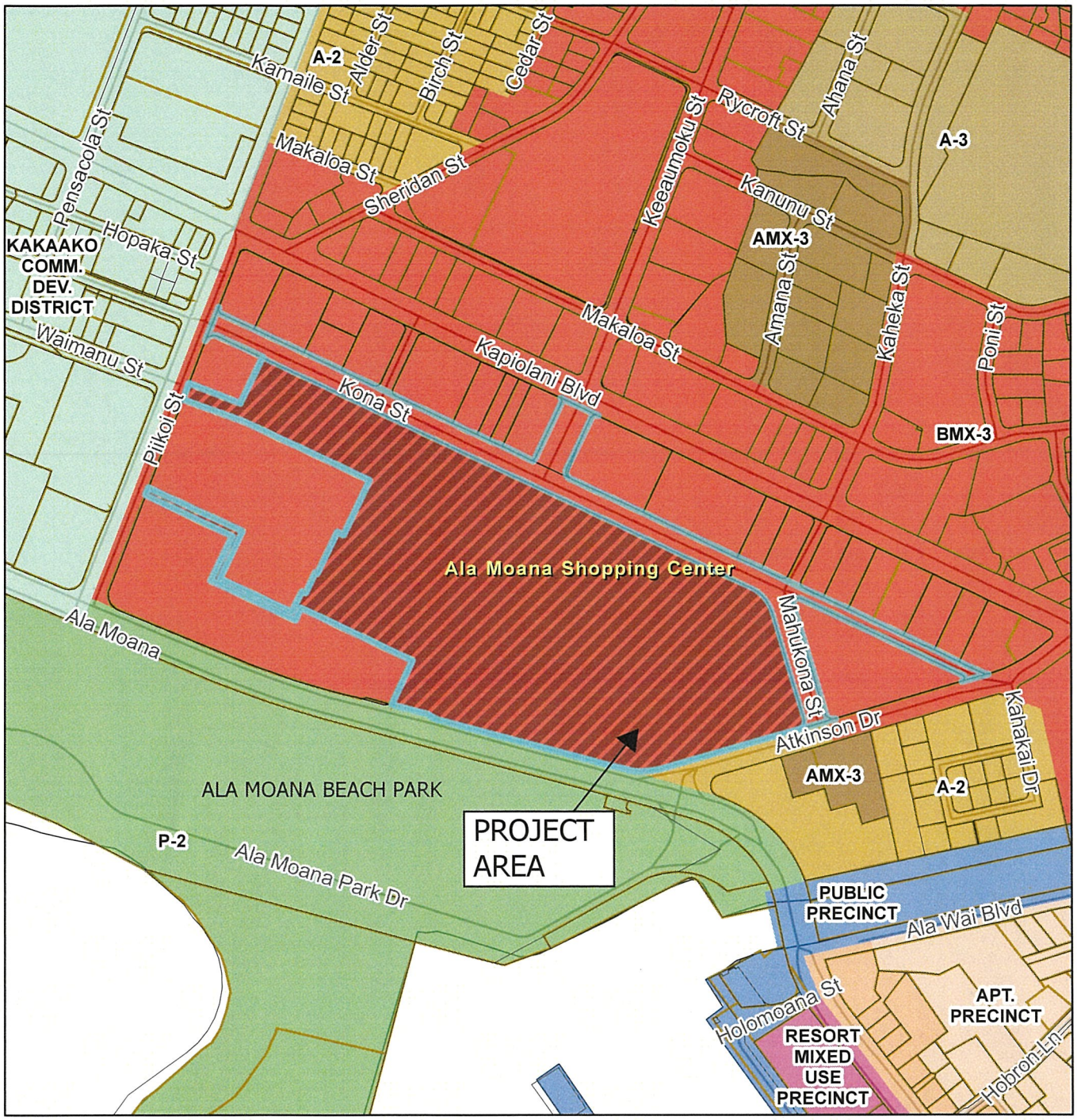
FILE NO. 2026-PDP-1

TAX MAP KEY 2-3-038: 014 (POR.)

1450 ALA MOANA BLVD - ALA MOANA

April 2026

Department of Planning and Permitting
Land Use Permits Division
City and County of Honolulu



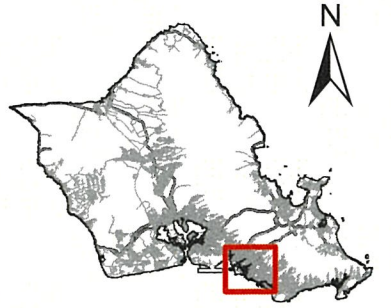


EXHIBIT B
ZONING MAP

FILE NO. 2026-PDP-1

TAX MAP KEY 2-3-038: 014 (POR.)

1450 ALA MOANA BLVD - ALA MOANA

May 2026

Department of Planning and Permitting
Land Use Permits Division
City and County of Honolulu

1588 ALA MOANA
PROJECT ZONING INFORMATION

Item	Section/Source	Info/Code Requirement	Proposed
Parcel Info	Assesor's Record	1588 Ala Moana Blvd Lot 24 (Currently a combined lot with Ala Moana Center. Subdivision application to DPP to be submitted this year)	n/a
Lot Area	Proposed Lot Split	187,174 sf	n/a
Zoning District / TOD Subdistrict	TOD Figure 5-2 TOD Figure 3-5	TOD Subdistrict A & B: BMX-3 Community Business Mixed Use District TOD Subdistrict A: Ala Moana Center TOD Subdistrict B: Convention Center	n/a
Height Limit	TOD Figure 5-4	TOD Subdistrict A: Base Height = 100'; Proposed with community benefits = 200' TOD Subdistrict B: Base Height = 100'; Proposed with community benefits = 400'	200' / 400' per TOD map
Height Setbacks	TOD Table 5-1 LUO 21-3.120-2(c)	Above 1st floor: none required Above 40': 1':10'	Above 40': 1':10' (Request Exception)
Yard Setbacks	TOD Table 5-1, Figure 5-5 LUO Table 21-3.4	Sideyard Setback: none required Rear yard setback: 10' Front yard setback: Ala Moana Blvd.: Setback Type 2 = 10' Atkinson Dr: Setback type 3A = 5'	Sideyard: n/a (per JDA w/ AMC) Rear yard: n/a (per JDA w/ AMC) Front yard: Ala Moana Blvd: 10' Atkinson Dr: 10'
Floor Area	TOD Figure 5-3 LUO Table 21-3.4	1,310,218 sf max. (187,174 x 7)	1,155,846 sf
Floor Area Ratio	TOD Figure 5-3 LUO 21-9.100-5.(e)(1)(C)	7.0	6.2 (1,155,846 sf / 187,174 sf)
Bonus Floor Area		LUO Base Floor Area: 2.5 x 187,174 sf = 655,109 sf LUO Max. Floor Area: 7 x 187,174 sf = 1,310,218 sf	1,155,846 sf - 655,109 sf = 500,737 sf
Street-Level Transparency	TOD Table 5-1 LUO 21-9.100-8(a)(5)(A)	TOD = 75% LUO = 60%	Ala Moana Blvd = 75.2% Atkinson Dr = 58.3% Total = 66.8% (Request Exemption)
Street Façade & Building Placement / Building Frontage	LUO 21-9.100-8(a)(3)(D)(iii) TOD Sec. 5.3.4	Ground floor building façade must be placed within the maximum front setback (10'-0") for at least 65% of the linear street frontage Frontage to meet building build-to-line Ala Moana Blvd: 50% frontage at 10'-0" Atkinson Dr: 70% frontage at 5'-0"	Varies from 10'-0" to 37'-0" (Request Exemption)
Active Ground Floor Uses	LUO 21-9.100-7	80%	Ala Moana Blvd: 88.8% Atkinson Dr: 68.2% Total: 80.7%
Tower Width & Tower Separation	TOD 5.3.4 TOD 5.9.3	Tower Width: 100' Mauka/Makai orientation Tower Separation: 100' tower separation / 50' setback from common boundary	Tower Width: 574' / 240' (Request Exemption) Tower Separation: > 100' to adjacent towers

EXHIBIT C-1

Unit Mix	Type	Count	Avg Size
Residential - Market	1BR	9	1,090
	2BR	63	1,926
	3BR	46	2,346
	4BR	7	3,410
	5BR	10	3,862
	6BR	1	5,520
Total:		**136**	
Residential - Affordable	1BR/1BA	4	613
	2BR/1BA	57	629
	2BR/2BA	8	776
Total:		**69**	
Condo-Hotel	1BR	24	975
	2BR	60	1,580
Total:		**84**	
Hotel	SUITE	105	560
	EXEC SUITE	45	697
	1BR SUITE	45	807
	2BR SUITE	15	900
Total:		**210**	

1588 ALA MOANA
PROPOSED ENVELOPE

EXHIBIT C-2

LUO ZONING ENVELOPE

100′ MAX. HEIGHT (LUO ZONING MAP HEIGHT LIMIT)	NONCOMPLIANT (request exemption)
18′ PROTUBERANCES (SEC. 21-4.60(c)(1))	COMPLIANT
1′:10′ HEIGHT SETBACK ABOVE 40′ (SEC. 21-3.120-2(c)(2))	NONCOMPLIANT (request exemption)
SIDEYARD SETBACK - 10′ (LUO TABLE 21-3.4)	N/A
REAR YARD SETBACK - 10′ (LUO TABLE 21-3.4)	N/A
FRONT YARD SETBACK - 10′ (LUO TABLE 21-3.4)	COMPLIANT

TOD ZONING ENVELOPE

200′ MAX. HEIGHT (SUBDISTRICT A) (TOD FIGURE 5-4)	COMPLIANT
400′ MAX. HEIGHT (SUBDISTRICT B) (TOD FIGURE 5-4)	COMPLIANT
18′ PROTUBERANCES (TOD 5.3.3)	COMPLIANT
1′:10′ HEIGHT SETBACK ABOVE 40′ (TOD TABLE 5-1)	NONCOMPLIANT (request exemption)
SIDEYARD SETBACK - NONE (TOD TABLE 5-1)	N/A
REAR YARD SETBACK - 10′ (TOD TABLE 5-1)	N/A
FRONT YARD SETBACK (TOD FIGURE 5-5)	
- ALA MOANA BLVD.: 10′ SETBACK	COMPLIANT
- ATKINSON DR.: 5′ SETBACK	NONCOMPLIANT (request exemption)
PODIUM HEIGHT - 65′ MAX. (TOD 5.9.2.)	COMPLIANT
TOWER WIDTH - 100′ MAUKA/ MAKAI ORIENTATION (TOD 5.3.4)	NONCOMPLIANT (request exemption)
TOWER SETBACK - 50′ @ COMMON BOUNDARY (TOD 5.9.3)	COMPLIANT

PROPOSED ZONING ENVELOPE - TOD COMPLIANCE

200′ MAX. HEIGHT (SUBDISTRICT A) (TOD FIGURE 5-4)

400′ MAX. HEIGHT (SUBDISTRICT B) (TOD FIGURE 5-4)

18′-0″ PROTUBERANCES (TOD 5.3.3)

1′:10′ HEIGHT SETBACK ABOVE 40′ - VARIANCE (TOD TABLE 5-1)

SIDE YARD SETBACK - N/A (TOD TABLE 5-1)

REAR YARD SETBACK - N/A (TOD TABLE 5-1)

FRONT YARD SETBACK (TOD FIGURE 5-5)

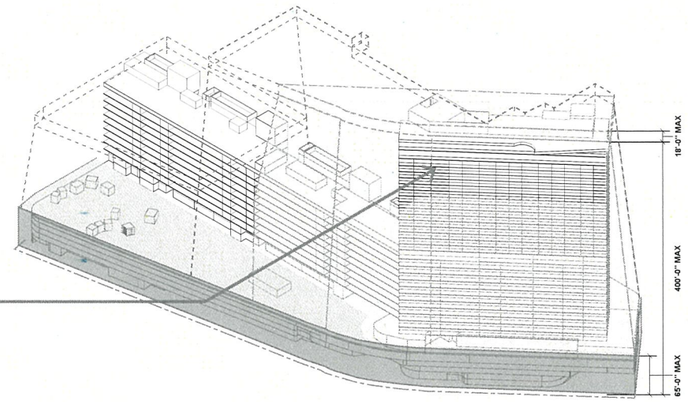
ALA MOANA BLVD.: 10′ SETBACK

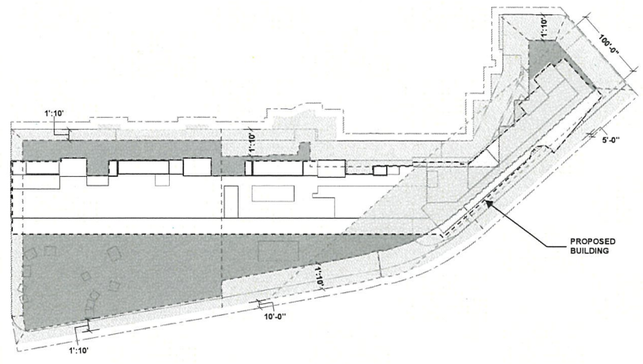
ATKINSON DR.: 10′ SETBACK - VARIANCE

PODIUM HEIGHT - 65′ MAX. (TOD 5.9.2)

TOWER WIDTH - 100′ - VARIANCE (TOD 5.3.4)

TOWER SETBACK - 50′ @ COMMON BOUNDARY (TOD 5.9.3)





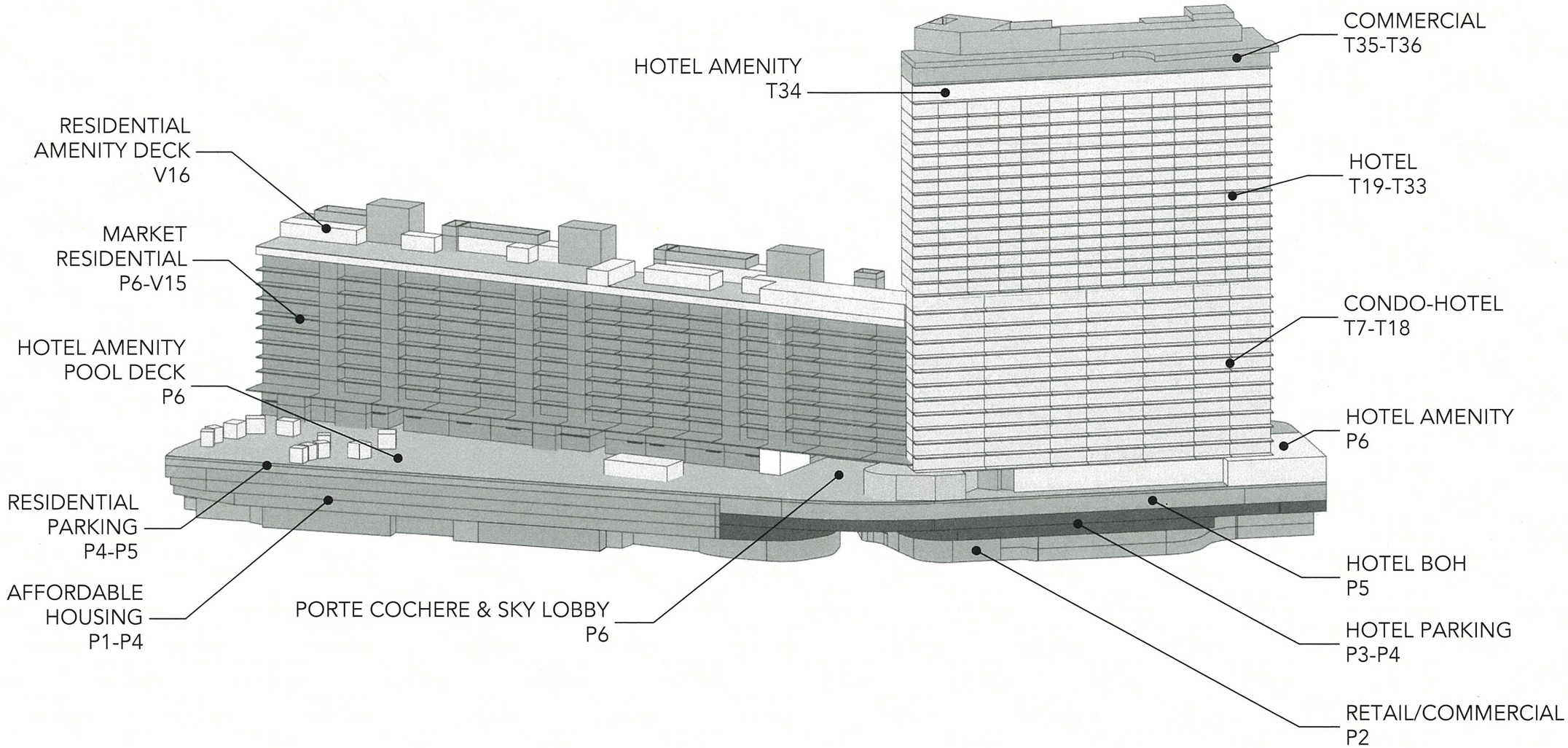
COMPLIANT TOD PODIUM ENVELOPE

COMPLIANT TOD TOWER ENVELOPE

TOD TOWER ENVELOPE (W/O 1:10 SETBACK ABOVE 40')

1588 ALA MOANA
PROPOSED PROGRAM

EXHIBIT C-3



1588 ALA MOANA

PROPOSED PROGRAM SECTION - 400' CONDO-HOTEL/HOTEL | 200' RESIDENTIAL CONDO

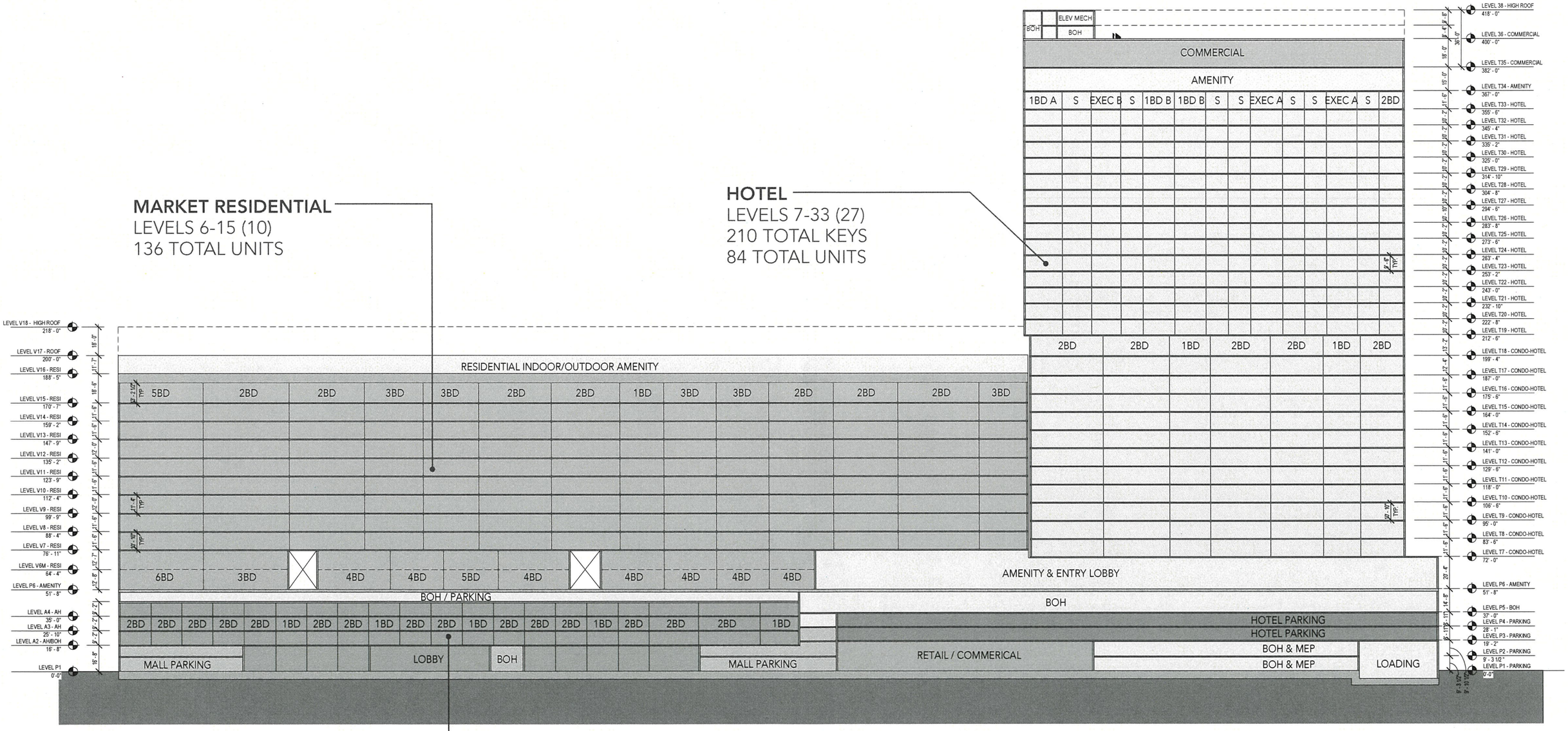
EXHIBIT C-4

0' 60' 120'

1" = 60'-0" WHEN PRINTED ON 11X17

MARKET RESIDENTIAL
LEVELS 6-15 (10)
136 TOTAL UNITS

HOTEL
LEVELS 7-33 (27)
210 TOTAL KEYS
84 TOTAL UNITS



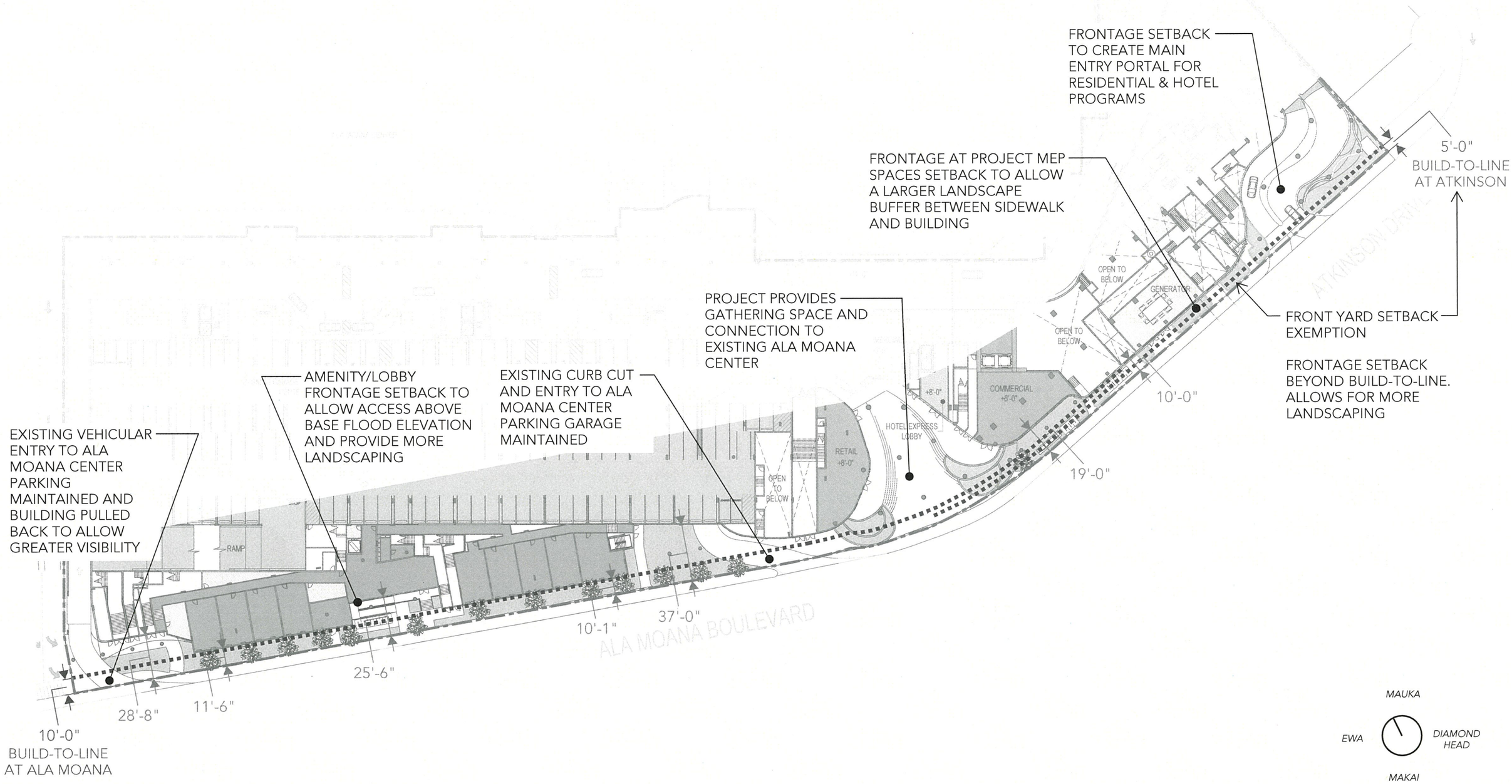
AFFORDABLE RESIDENTIAL
LEVELS 1-4 (4)
69 TOTAL UNITS

1588 ALA MOANA
STREET FACADE & BUILDING PLACEMENT

EXHIBIT C-5

0' 60' 120'

1" = 60'-0" WHEN PRINTED ON 11X17



MAUKA

EWA DIAMOND HEAD

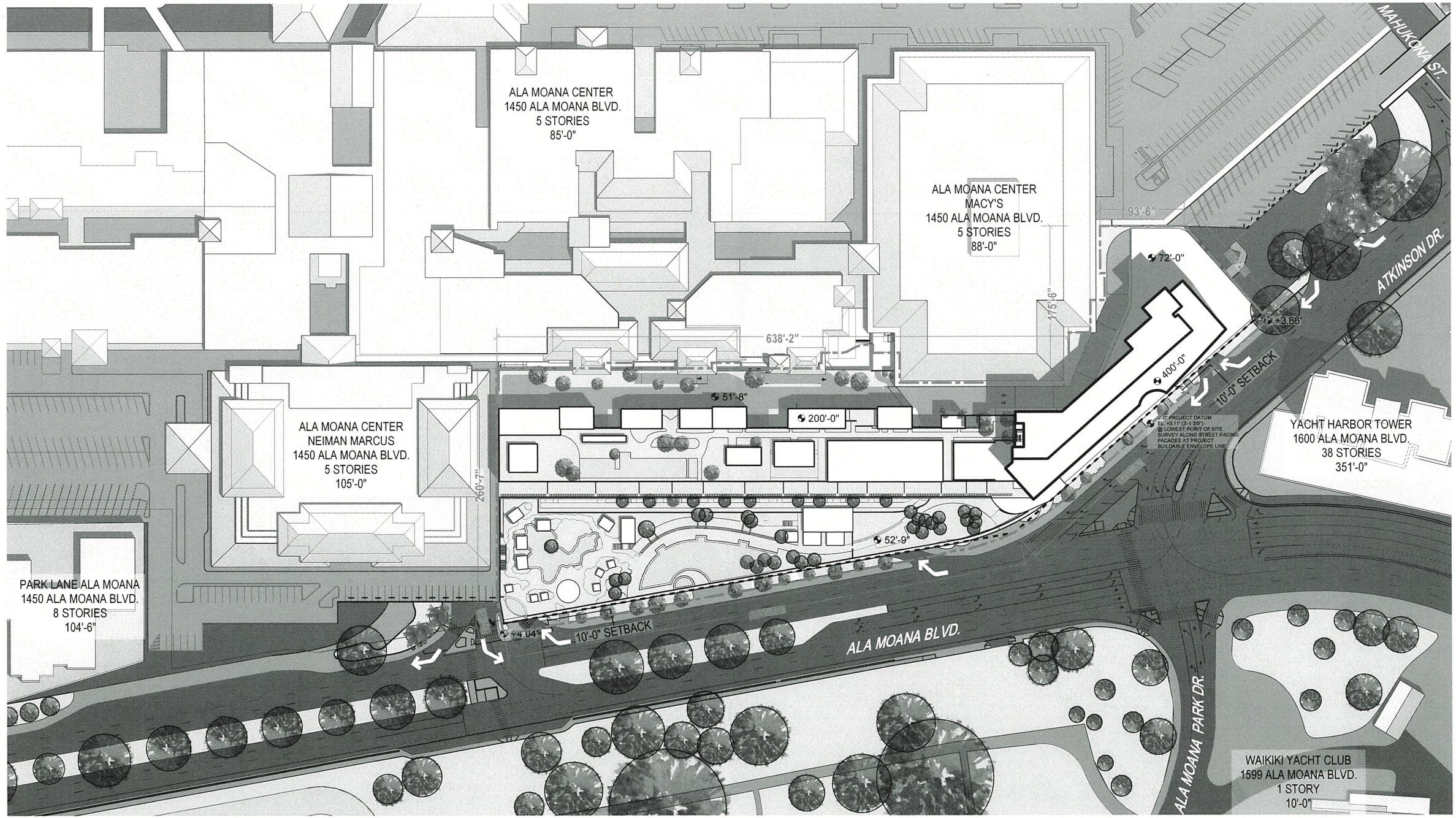
MAKAI

1588 ALA MOANA
PROPOSED SITE PLAN

EXHIBIT C-6

MAUKA
EWA
DIAMOND HEAD
MAKAI

TOTAL LOT AREA = 187,174 SF



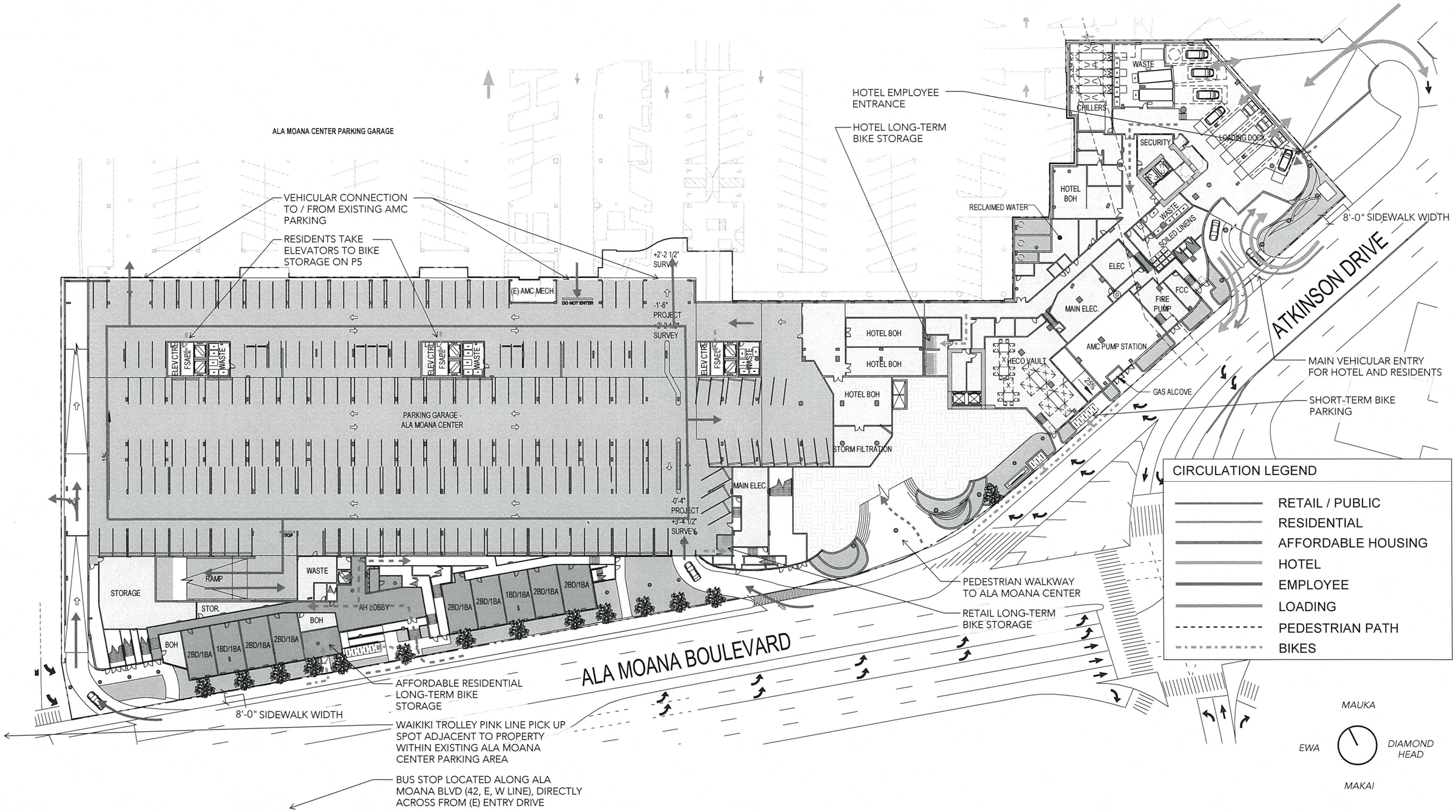
1588 ALA MOANA

LEVEL 1 CIRCULATION DIAGRAM

EXHIBIT C-7

0' 60' 120'

1" = 60'-0" WHEN PRINTED ON 11X17



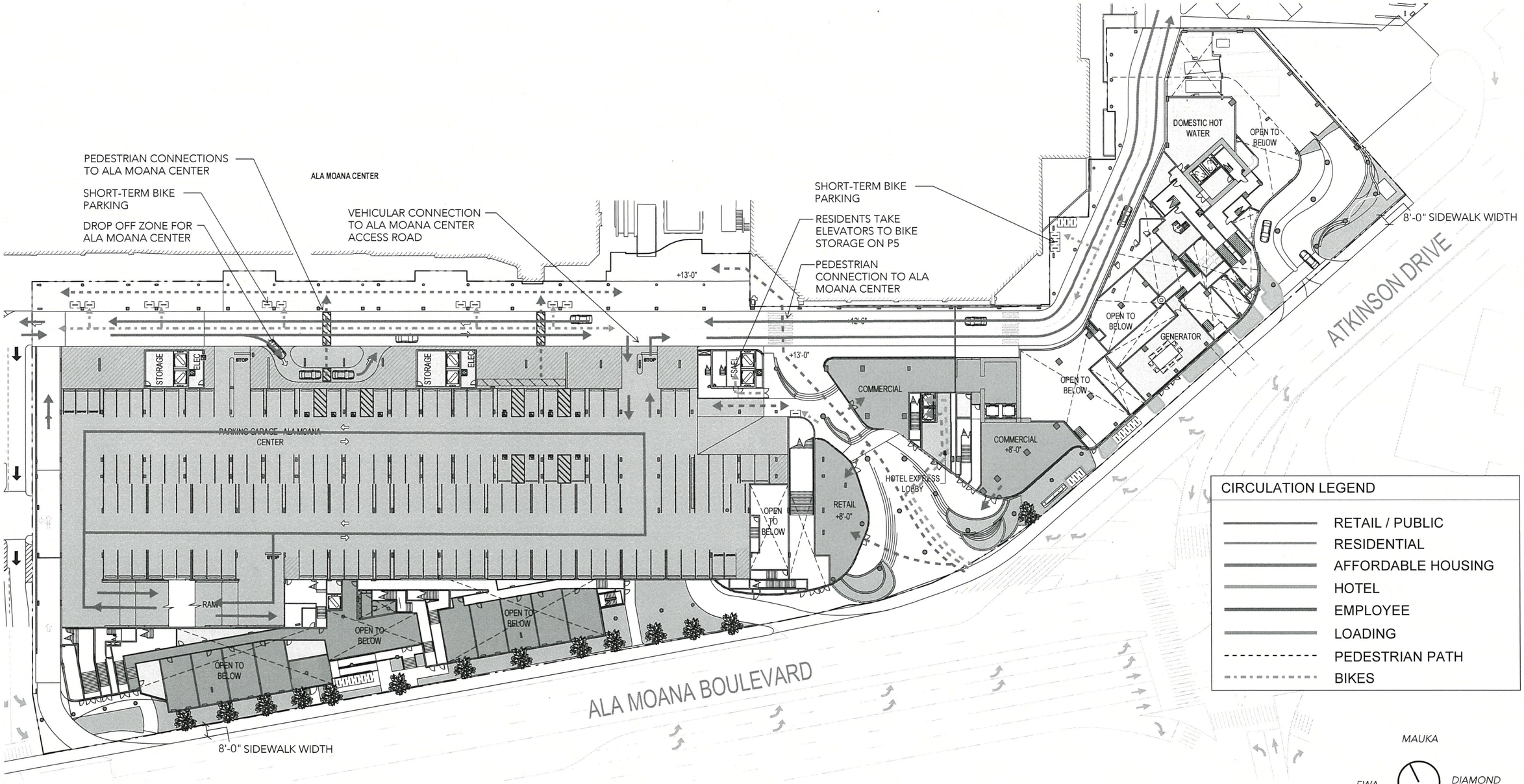
1588 ALA MOANA

LEVEL 2 CIRCULATION DIAGRAM

EXHIBIT C-8

0' 60' 120'

1" = 60'-0" WHEN PRINTED ON 11X17



CIRCULATION LEGEND

- RETAIL / PUBLIC
- RESIDENTIAL
- AFFORDABLE HOUSING
- HOTEL
- EMPLOYEE
- LOADING
- PEDESTRIAN PATH
- BIKES

MAUKA

EWA DIAMOND HEAD

MAKAI

1588 ALA MOANA

CONCEPTUAL SECTION - ALA MOANA SETBACK

EXHIBIT C-9

0' 50' 100'

1" = 30'-0" WHEN PRINTED ON 11X17

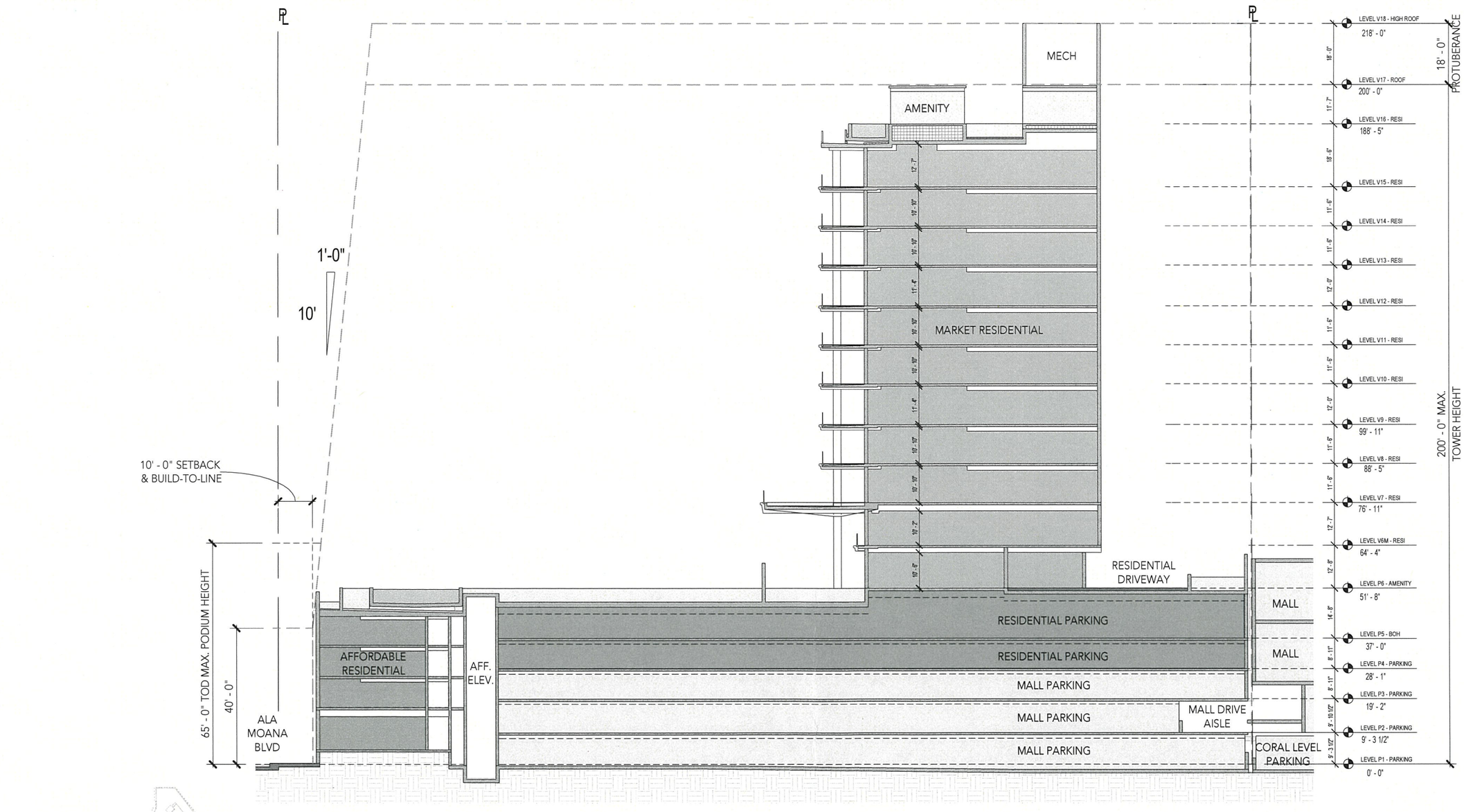


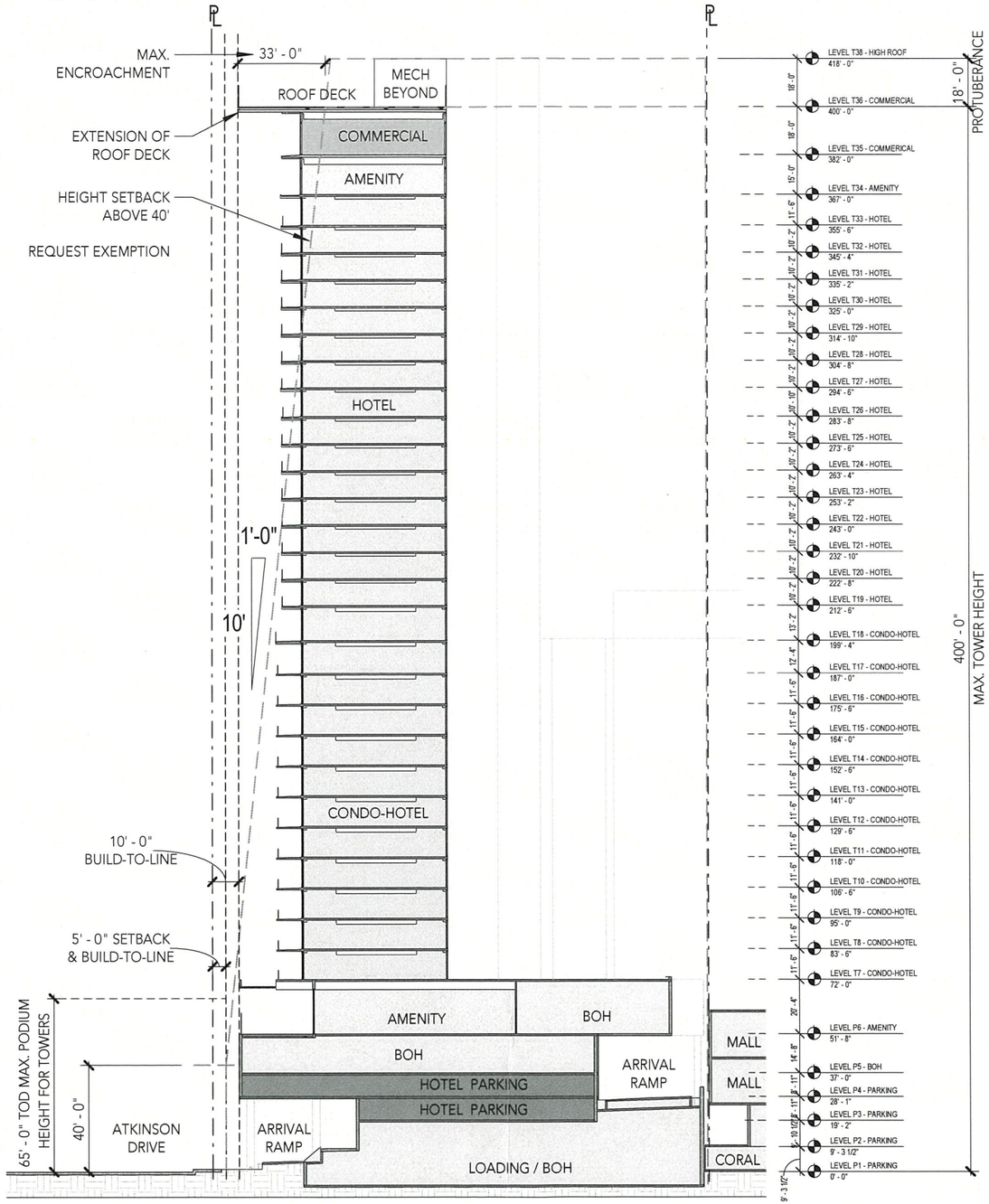
EXHIBIT C-10

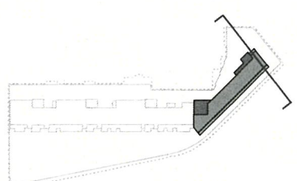
0' 50' 100'

1" = 50'-0" WHEN PRINTED ON 11X17

1588 ALA MOANA

CONCEPTUAL SECTION - ATKINSON SETBACK





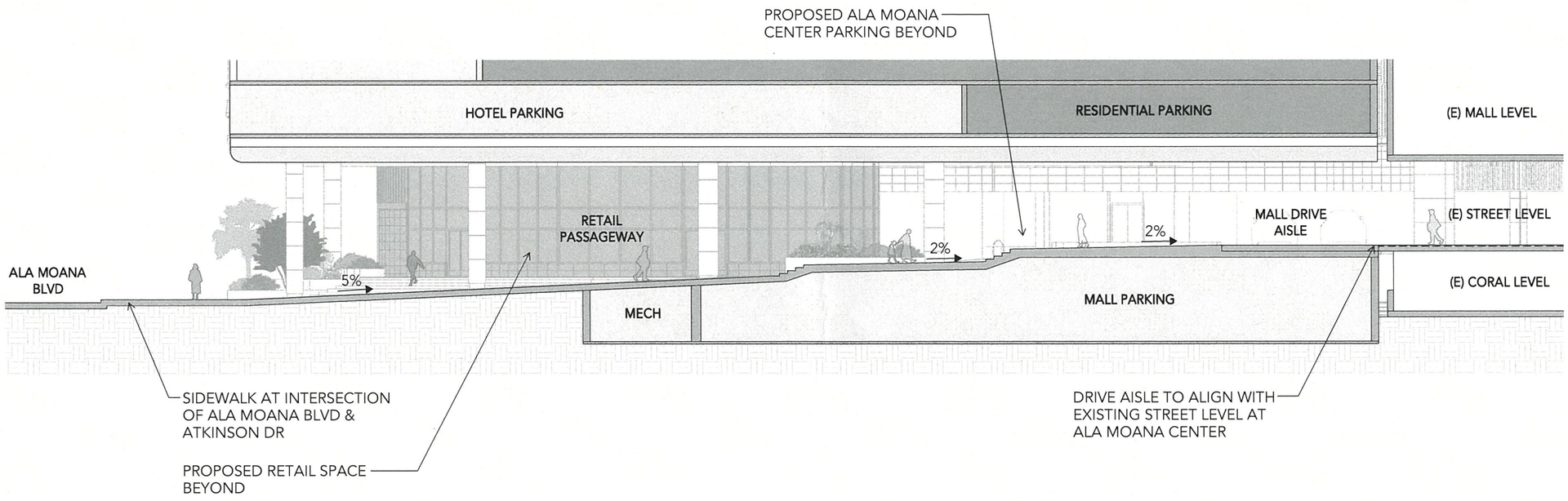
1588 ALA MOANA

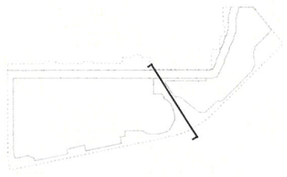
CONCEPTUAL SECTION - RETAIL PASSAGEWAY

EXHIBIT C-11

0 4' 8' 16'

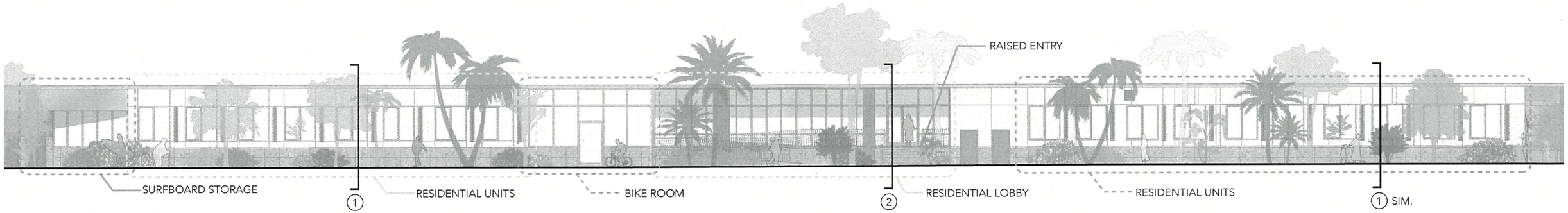
1" = 20'-0" WHEN PRINTED ON 11X17

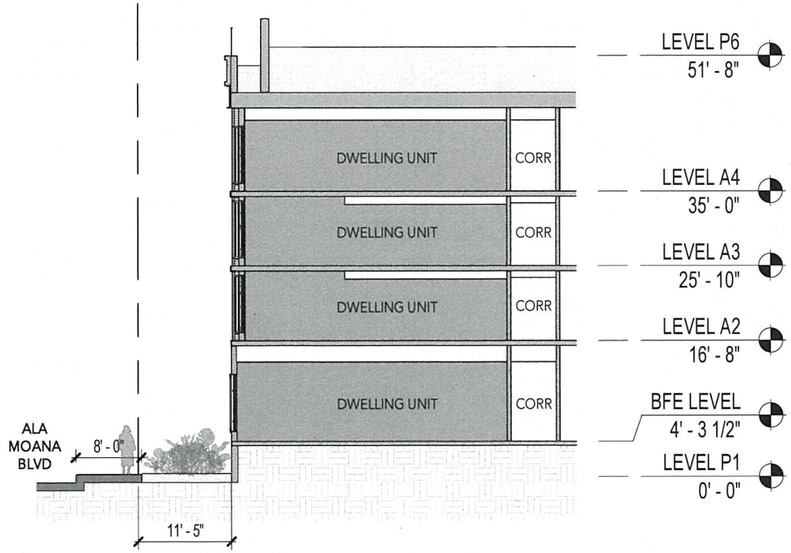




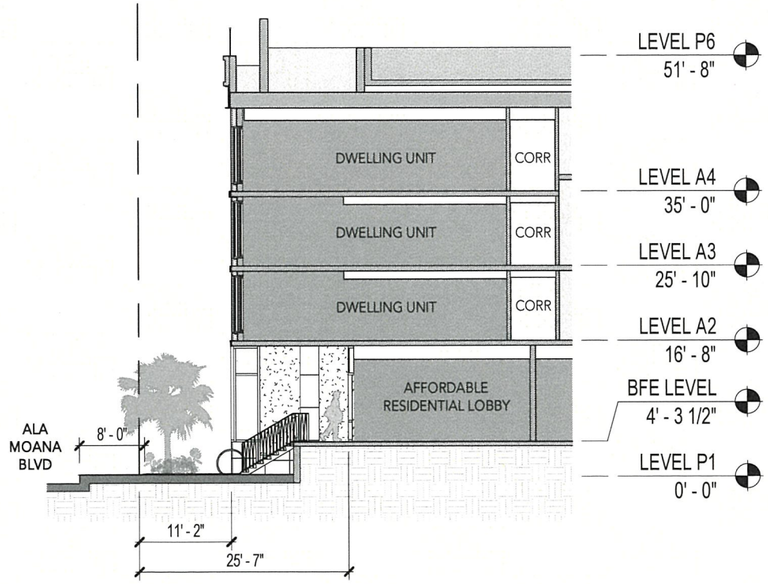
1588 ALA MOANA

GROUND FLOOR RESIDENTIAL UNITS - ELEVATION & SECTIONS

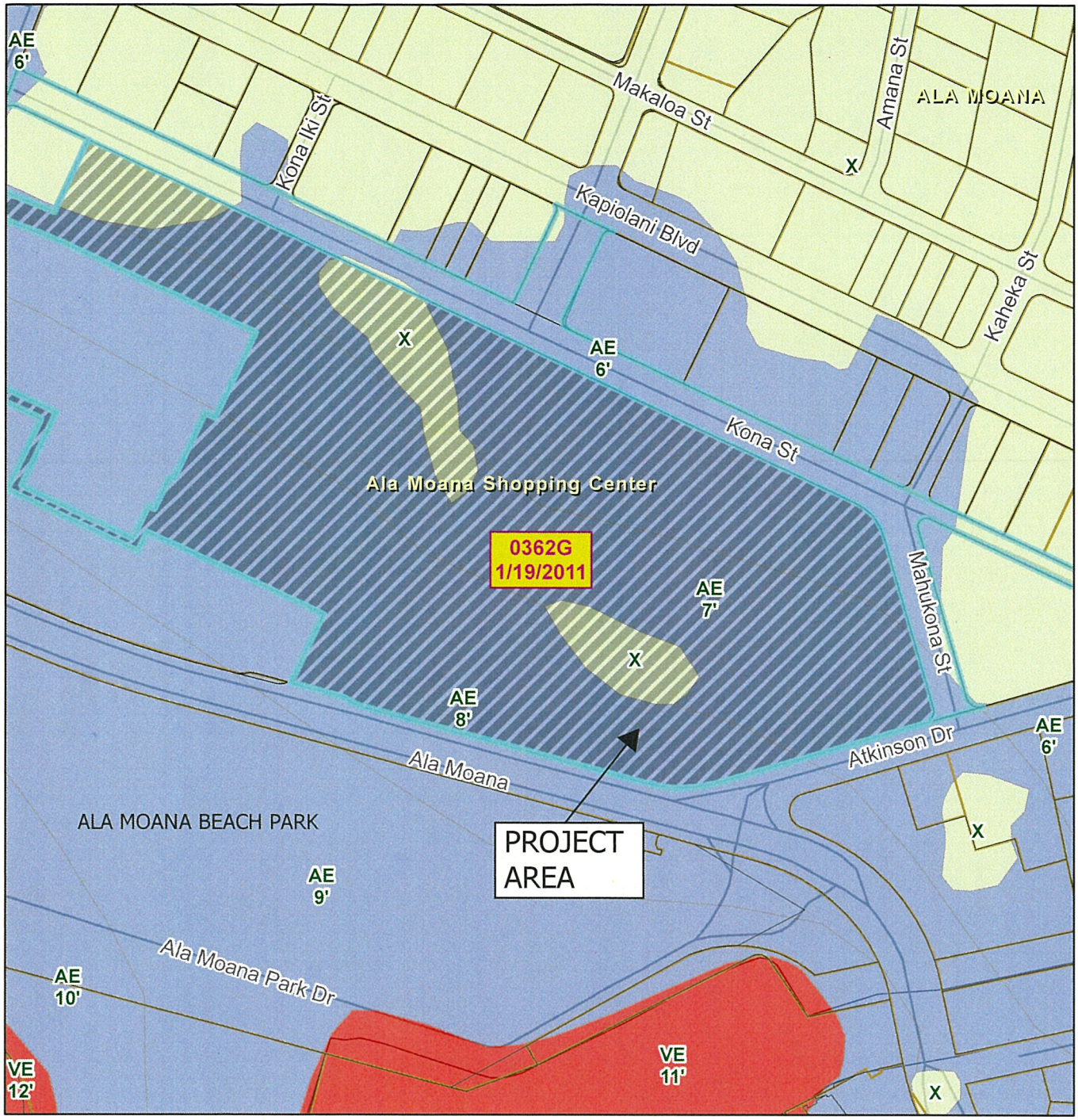




1 SECTION AT DWELLING UNITS



2 SECTION AT RESIDENTIAL LOBBY



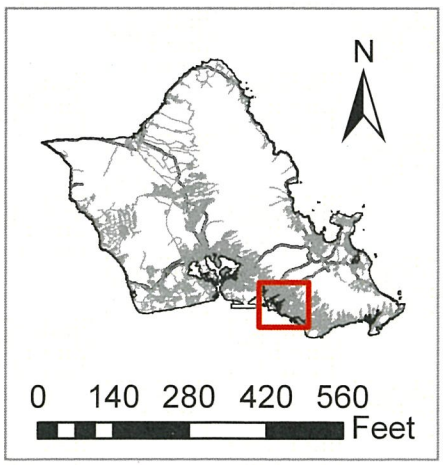


EXHIBIT D
FLOOD ZONE MAP

FILE NO. 2026-PDP-1

TAX MAP KEY 2-3-038: 014 (POR.)

1450 ALA MOANA BLVD - ALA MOANA

June 2026

Department of Planning and Permitting
Land Use Permits Division
City and County of Honolulu