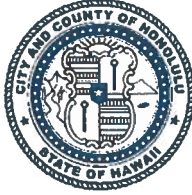


HONOLULU POLICE DEPARTMENT
KA 'OIHANA MĀKA'I O HONOLULU
CITY AND COUNTY OF HONOLULU

801 SOUTH BERETANIA STREET • HONOLULU, HAWAII 96813
TELEPHONE: (808) 529-3111 • WEBSITE: www.honolulu.org



RICK BLANGIARDI
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RADE K. VANIC
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KAHU MĀKA'I KŌIKAWA

AARON TAKASAKI-YOUNG
RYAN T. NISHIBUN
INTERIM DEPUTY CHIEFS
NA HOPE LUNA NUI MĀKA'I KŌIKAWA

OUR REFERENCE EO-SH

August 18, 2025

SENT VIA EMAIL

Mr. Ryan Tam
ryan.am.tam@hawaii.gov

Dear Mr. Tam:

This is in response to the letter received from Executive Director Craig K. Nakamoto dated July 31, 2025, requesting comments for the proposed amendments to the Kalaeloa Community Development District Master Plan and Rules.

The Honolulu Police Department has reviewed the information provided and does not have concerns at this time.

If there are any questions, please call Major Gail Beckley of District 8 (Kapolei, Wai'anae) at (808) 723-8400.

Sincerely,

A handwritten signature in black ink, appearing to read "Glenn Hayashi".

GLENN HAYASHI
Assistant Chief of Police
Support Services Bureau

From: [Ogawa, Seiji](#)
To: [Tam, Ryan AM](#)
Subject: Kalaeloa Community Development District Rules comments
Date: Tuesday, August 19, 2025 11:01:57 AM

Hi Ryan,

Please see below for OPSD's comments on the Kalaeloa Rules.

I have reviewed the subject amendments to HRS Section 15-215 and have two comments:

1. §15-215-6 Compliance with other regulations. §15-215-6(a)(4) is amended to specify certain, presumably federal, regulations including "environmental controls" which would preempt Kalaeloa CD District Rules in case of conflict. The principle of federal preeminence over State regulations is well-established, and I'm unclear as to why HCDA felt the need to specify these regulations in the proposed change. However, given current climate of U.S. environmental policy, it may not be prudent to emphasize federal "environmental controls" overriding State regulations.
2. I noticed that several sections include amendments to landscaping, parking, and Green Building standards that relate to water conservation measures. I assume that CWRM is aware of the proposed rules (and Master Plan) change, but given yesterday's discussion with CWRM, we might want alert Katie Roth in case this slipped by CWRM's radar. Kalaeloa is within Oahu's Water Management Area.

Thank you,

Seiji Ogawa
TOD Planning Program Manager
State of Hawai'i Office of Planning & Sustainable Development
Dept. of Business, Economic Development & Tourism
235 S. Beretania Street, 6th Floor
Honolulu, Hawaii 96813

August 21, 2025

Mr. Craig K. Nakamoto, Executive Director
Hawai'i Community Development Authority
Department of Business, Economic Development & Tourism
State of Hawai'i
547 Queen Street
Honolulu, Hawai'i 96813

Subject: Comments on Proposed Amendments to the
 Kalaeloa Community Development District Rules (HAR, Title 15, Chapter 215)
 and Draft Master Plan (July 2024 Revised Version)

Dear Mr. Nakamoto:

Bowers + Kubota Consulting, Inc. (B+K) appreciates the opportunity to provide comments on the Hawai'i Community Development Authority's (HCDA) proposed amendments to the Kalaeloa Community Development District Rules (HAR, Title 15, Chapter 215). In particular, we offer comments as the proposed rules relate to a 20.03-acre property situated within the Kalaeloa Community Development District (Kalaeloa CDD) that is identified as Tax Map Key (1) 9-1-031: 028 and has a street address of 91-447 Olai Street, Kapolei, Hawai'i. We have the following comments on the proposed rule amendments due to the resulting impact this change would have on the use of the property.

This 20.03-acre property owned by the Board of Water Supply (BWS) is currently being developed for a seawater desalination facility with an initial capacity of 1.7 million gallons per day (MGD), expandable to 5 MGD. The site is also under consideration for a granular activated carbon (GAC) reactivation facility within an unused area of this property and other infrastructure to support long-term water system operations. The parcel is located below (makai of) Olai Street and a large State-owned property presently leased by Hawai'i Meats, LLC. Adjacent east of the Kalaeloa property lies a large artificial drainage channel, and to the west is the James Campbell Industrial Park. The surrounding land uses are predominantly industrial, making the site well suited for public utility infrastructure and inconsistent with open space or agricultural designations.

Comments on Rule Amendments

With this background associated with the Kalaeloa property, we respectfully offer the following comments.

1. We are opposed to the proposed change in transect designation from T3 General Urban Zone to T2 Rural Zone for the subject property under the draft rules and Draft Kalaeloa Master Plan update. We recommend retaining a land use designation (transect) similar to



T3 General Urban Zone that accommodates current and future infrastructure such as water treatment and related operational facilities.

Justification: The T2 Rural Zone is primarily intended for open space, parks, and limited agricultural or renewable energy uses. This would not support the existing and planned infrastructure on the site, including a seawater desalination facility and a potential GAC reactivation facility. The property is located adjacent to Campbell Industrial Park and is already being developed with a desalination water facility, making it more appropriate for a designation that accommodates potential industrial uses. Therefore, a different transect designation that accommodates potential industrial uses is more appropriate for this property and allows the BWS to include other industrial-related uses to support the island's drinking water system.

2. We recommend the land uses allowed under the T4 General Urban Zone be expanded to accommodate light and other industrial uses that would make the transect designation consistent with the current regulations. The T3 Mixed Use and T4 General Urban Zones transects under the new proposed rules are more oriented toward commercial and residential mixed uses, which may limit the ability to support light or other types of industrial uses.

Justification: The proposed T4 General Urban Zone emphasizes residential and commercial mixed uses and does not clearly accommodate infrastructure that supports water system operations. Under the current T3 designation, these uses are permitted with a Rules Clearance Permit. Maintaining this flexibility under the T4 zone would ensure consistency with existing regulations and support the long-term planning and development of critical facilities.

3. There is no definition of what "eco-industrial" use entails. We suggest that the description created for this term should be flexible to accommodate broader eco-industrial related uses and activities especially as technology in the industry changes. Such eco-industrial uses should include light and other industrial activities to be more flexible.
4. Under Figure 1.3 Development Standards Summary, "Industrial" building types should be Permitted or Permitted with Conditional Use under the T4 General Urban Zone.
5. Under Figure 1.7 Land Use Summary, "Light Industrial" use should be included under other transect types such as T4 General Urban Zone. There should also be accommodation of other more moderate types of industrial uses.
6. Revise the proposed definition of "heavy industrial" under §15-215-8 to eliminate the last sentence that states "Heavy industrial use is not permitted in the Kalaeloa CDD."

Mr. Craig K. Nakamoto, Executive Director
Hawai'i Community Development Authority
Comments on Kalaeloa CDD Proposed Rule Amendments

Page 3

We appreciate HCDA's consideration of our comments as part of the public review of the proposed amendments to the Kalaeloa Community Development District Rules (HAR, Title 15, Chapter 215) and master plan. We would like to be informed of any public hearings, comment periods, and additional updates to this amendment process so that we may monitor this as it affects our property and planning for its use. If you have any questions, please feel free to contact me at (808) 836-7787.

Very truly yours,

A handwritten signature in black ink, appearing to read "Ron Sato", written in a cursive style.

RONALD SATO, AICP
Senior Project Manager

August 23, 2025

Board Members

Hawaii Community Development Authority

RE: PRESERVING EWA / HAWAII COMMUNITY DEVELOPMENT AUTHORITY PLANS FOR EWA BATTLEFIELD

The Ewa community has expressed concern about urban development and the possible loss of its historic cultural identity for many years. Early plans by the City of Honolulu included expanding the Diamond Head side of Renton Road into a wide divided highway, but citizens objected and that project was scaled back to a four lane, tree-lined roadway. When the Ewa Plantation Manager's house was acquired by the City as part of the Ewa Villages renewal project, citizen concerns got the City to restore the exterior, but the dream of a community center there remains a dream as no renovation of the interior has occurred. It was citizens who successfully got the Ewa Plain Battlefield, the sacred ground where Americans died in 1941, listed on the State and National Registers of Historic Places. Citizens objected to the condition of precontact cultural resources left behind by the military within Barber's Point Ewa Naval Air Station (BPNAS), such as Ordy Pond, and the unauthorized demolition by a Navy lessee of WWII warehouses and Cold War structures. It was citizens and local non-profits who paid for pedestrian and aerial ground penetrating radar studies to identify possible additional cultural resources when these citizens felt government studies were inadequate.

Initial government planning art Ewa was hindered by two major factors:

1. Jurisdictional Problems. The Navy had, instead of following traditional procedures to offer surplus federal land to local authorities when closing bases, instead entered into a lease-to-own agreement with developer Hunt Corporation; meanwhile, the State of Hawaii authorized the Hawaii Community Development Corporation (HCDA) authority over the entire former BPNAS premises. The Navy claims jurisdiction, while the State's Administrative Rules for Kalaeloa (dated July 31, 2025) §15-215-3(e) state "if a property under federal ownership...converts to private ownership, then the requirements of the rules shall apply".
2. Planning Process. Original plans for the former NASBP followed 1950s-era planning norms, with a Levittown approach of complete land clearance and new road grid imposed on the land regardless of past land use practices. Initially only an information marker was erected to explain the area's history.

Hunt Corporation, should it receive title from the Navy, obviously wishes to maximize yield - which means maximum buildout.

HCDA has had a more conservative approach. To its credit, recently revealed potential urban designs from HCDA suggest preservation of the battle scarred 1941 Warming Up Platform, Hangar site, part of a Runway, and isolated resources such as the Swimming Pool. Unfortunately, the Mooring Mast/Control Tower site (the only one in the State) is not identified by HCDA for preservation. The only portion of the Ewa Battlefield slated for large open space in the July 1, 2025 HCDA Kalaeloa Community Development District Rules is immediately adjacent to the FAA parcel (Figure 2, Regulating Plan, p15-217-116). Most of the 1941 Ewa Battlefield would be developed as a mixed-use zone, with both commercial and residential tract activities, with a sixty foot height limit (Figure 4, Building and Development Standards, p15-217-118).

Any potential development of the 1941 Ewa Battlefield should consider the following:

1. **It is important to note that the 1941 Ewa Battlefield Marine Corps Air Station (MCAS) constitutes less than 5% of the NASBP.**
2. As mentioned before, Ewa Battlefield is listed on both the Hawaii and National Registers of Historic Places. Americans died here. This is sacred ground.
3. The Keeper of the National Register of Historic Places recommended actually expanding the officially recognized boundaries of the 1941 Ewa Battlefield beyond the then-designated base. Indeed, recent efforts by the Navy to removed historic significance status for outbuildings was denied by the Keeper.
4. Most WWII sites on Oahu remain on active military bases, where the general public does not have access. At Ewa Battlefield, this is not the case, and so the opportunity is there for general public education of this crises period in our history.
5. Ewa Battlefield is under the flight paths of Kalaeloa Airfield's Runways 4R, 22L and 22R.), making the area less desirable noise and safety-wise for residential use.
6. Ewa Battlefield is more than a mile from Saratoga Avenue, the designated focus of commercial development by Hunt and HCDA.
7. The Ewa community wants to further maintain our cultural sense of place. This requires steps: more systematic identification of resources, decisions on what to preserve, and rules ensuring long term preservation. None of these steps have been completed to the community's satisfaction. Many people are beginning to question whether our politics are reflecting the community's declared interests.

It is important to note that the Navy has actually changed its development plans with Hunt in the past, relocating them from Ford Island to Kalaeloa. Surplus Navy land elsewhere on Oahu could be used in a land swap with Hunt. Ewa Battlefield can become both an educational tool and valuable open space.

For these reasons, I oppose any urban development at the 1941 National Historic Registered Ewa Battlefield. I hope that HCDA will change its plans.

Mahalo nui loa,

A handwritten signature in blue ink, reading "Ross W. Stephenson". The signature is written in a cursive, flowing style.

Ross W. Stephenson, PhD
Historian and Urban Planner
(808) 679-9060
Rwaylands808@aol.com

High Priority Comments:

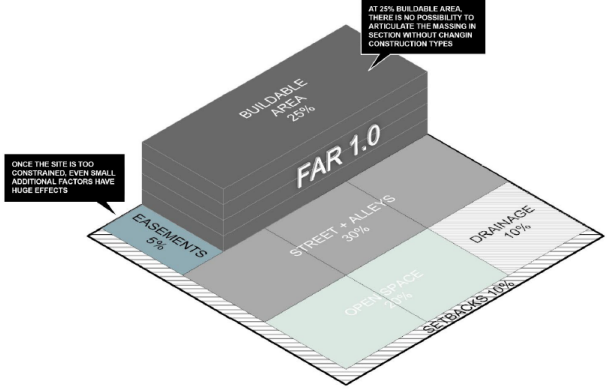
#	Section	Comment
1	§15-215-43 Architectural Standards.	For security and safety reasons, we request that HCDA add the following underlined language: <ul style="list-style-type: none"> - §15-215-43(C)(1)(F): <u>“Within a required yard, walls and fences for industrial uses may be constructed up to eight feet in height.”</u> - §15-215-43(C)(2)(B): “Chain link or barbed wire fences and exposed cinder block walls are prohibited within front yards abutting any boulevard, avenue, or main street, <u>except when associated with industrial uses</u>”
2.	§15-215-50 Ewa Plain Battlefield overlay zone development standards.	<ul style="list-style-type: none"> - While we acknowledge that additional preservation sites may be required by SHPD in the future, the preservation sites agreed to, specific to the Battlefield, are limited to 3. Therefore, we request that §15-215-50(e)(1) be reworded to “The three primary preservation areas of the Ewa Plain Battlefield overlay zone are the 1943 compass rose, swimming pool, and warm-up mat on a portion of the extant runway.” - We request striking “and a through Philippine Sea Street” from §15-215-50(e)(2) and have it read “Development within the vicinity of these sites shall be compatible with future plans to provide public access to each site.” Philippine Sea St is not currently designed to City & County Standards and may require realignment in the future. - It appears §15-215-50(d)(5) is inadvertently numbered and should be §15-215-50(d)(4)
3.	§15-215-63 Historical and cultural sites.	<ul style="list-style-type: none"> - We recommend revising the language in §15-215-63(b) to read: <u>“Prior to a permit application being deemed complete by the authority, a developer shall...”</u> <ul style="list-style-type: none"> o This change better aligns with HRS §6E-42 and HAR §13-284-1, which establishes that the State Historic Preservation Division (SHPD) review process begins after a permit application is submitted to a state or county agency. Requiring SHPD review before submittal creates confusion and may conflict with the legally defined sequence of review. Based upon prior communication with SHPD we understand that SHPD does not begin review until after a permit application has been submitted, consistent with the rules. - We recommend revising the language in §15-215-63(c) to read: “Developers shall take reasonable steps to ensure all historic or culturally significant properties are properly maintained and kept in good repair, consistent with the age and condition of the properties.”
4.	Figure 7: Land Use	We request that HCDA consolidate “warehousing” under the broader category of “light industrial” in the land use table. Warehousing is a typical component of light industrial operations and is already cited as an example within HCDA's definition of “light industrial.”
5.	New Proposed Section: Warehouse District overlay zone development standards	<p>We recommend adding the Warehouse District overlay zone development standards. Proposed language is listed below.</p> <p style="text-align: center;"><u>Warehouse District overlay zone development standards</u></p> <p>(a) Purpose. Eleven WWII Storage Buildings are eligible for listing in the National Register of Historic Places as contributing resources to a potential warehouse historic district associated with WWII-era development of</p>

#	Section	Comment
		<p>MCAS-Ewa. The scale and land uses of new development impacting the Warehouse District shall be compatible with the site's historical significance.</p> <p>(b) The Warehouse District includes a five-foot perimeter surrounding the exterior surfaces of building slabs of eleven World War II-era storage buildings: Quonset Huts #1144, #1149, #1150, #1152, #1153, #1562, #1570, wood-frame warehouses #1142, #1143, #1145, and #1147, and the location of Building #1141. The area is depicted in the regulating plan (Figure 2) in the Kalaeloa Community Development District (KCDD) Rules.</p> <p>(c) Proposed undertakings affecting the Warehouse District shall adhere to the following requirements:</p> <p>(1) Project development and design shall comply with the terms of any applicable historic covenants attached to the property;</p> <p>(2) The executive director or the authority may convene a design advisory board to review projects impacting the Warehouse District, as pursuant to section 15-215-78(f).</p> <p>(d) Review and approval procedures:</p> <p>(1) Project reviews shall be initiated through the authority's permit application processes;</p> <p>(2) All applications shall include the supporting documentation in accordance with state HRS chapter 6E and federal regulations, as applicable;</p> <p>(3) As applicable under HRS sections 6E-8, 6E-10 and 6E-42, the process will follow the prescribed steps and timelines;</p> <p>(4) The authority may enforce any applicable protective covenants, and may incorporate applicable provisions into permit conditions.</p> <p>(e) Protections of the World War II Storage buildings within the Warehouse District overlay zone:</p> <p>(1) The World War II Storage buildings determined to be eligible for the National Register of Historic Places (Buildings 1144, 1149, 1150, 1152, 1153, 1562, 1570, 1142, 1143, 1145 and 1147) shall be retained in a manner consistent with the Secretary of the Interior's Standards for Treatment of Historic Properties, until such time that any of the structures are proposed for removal or renovation.</p> <p>(2) At the time any of the eleven structures are proposed for removal or renovation, interpretation for the education of the community will be included in the mitigation of any project's adverse effects on the warehouse district. The interpretation shall include the history of the warehouse district buildings and their context within the WWII buildup and activity at the Marine Corps Air Station-Ewa.</p>

Additional Comments

#	Section	Comment
1.	§15-215-8 Definitions.	We request HCDA adjust the rules so that the Thoroughfare plan regulations and Street tree regulations only apply to public streets, not private streets.

#	Section	Comment
	<p>§15-215-26 Thoroughfare plan.</p> <p>Figure 6: Street Trees</p>	<p>Definitions:</p> <ul style="list-style-type: none"> - We request that HCDA specify that the "Public Frontage" definition is along a public thoroughfare. - We request that HCDA specify that the "Thoroughfare" definition is for publicly owned way/passageways. <p>Throughfare plan:</p> <ul style="list-style-type: none"> - We request that only public thoroughfares conform to the thoroughfare standards set forth in section §15-215-26. <p>Street Trees:</p> <ul style="list-style-type: none"> - We request that the private roads be removed from Figure 6: Street Trees.
2.	§15-215-43 Architectural Standards.	We recommend removing the requirement in §15-215-43(d)(4) that states, "Exterior lighting shall emit light at a correlated color temperature no greater than 3,000 degrees Kelvin." This restriction is unnecessarily limiting and may hinder the implementation of lighting solutions that are more effective for visibility, safety, and operational needs.
3.	§15-215-43 Architectural Standards.	<p>We request adding the clause "if practicable" into subsection §15-215-43 (f)(3) so that it reads:</p> <ul style="list-style-type: none"> - "Utilities and service elements that are visible from thoroughfares other than alleys shall not be visually intrusive and shall be incorporated in the building structure through use of the following strategies, <u>if practicable</u>:" <p>This change allows flexibility in cases where full concealment—such as of poles and overhead lines—is not feasible.</p>
4.	§15-215-44 Landscape.	<p>It is not practicable to eliminate the use of compost or mulch in landscaping or to quarantine all new materials, as required in §15-215-44(b)(3) and §15-215-44(b)(7), respectively. We recommend deleting those provisions or revising them to state that state guidelines should be followed.</p> <p>Additionally, we note that §15-215-44(b)(2) merely discourages palms and §15-215-26(d)(4) prohibits palms from being used to satisfy street tree requirements. We recommend aligning these provisions.</p>
5.	§15-215-47 Parking and Loading.	<p>The landscaping requirements for parking and loading areas under §15-215-47(g)(1) and (2) and are overly burdensome and cost-prohibitive. We recommend HCDA remove these sections or align with City & County standards.</p> <p>For example, six-inch caliper trees are quite large (equivalent to a 300-gallon tree or approximately 28-30 feet tall). For the VA clinic parking lot, tree sizes varied from 2-inch to 4-inch caliper trees.</p>
6.	15-215-49 Saratoga main street frontage overlay	<p>Hunt anticipates that Parcel 6B will be utilized as a drainage basin in the future to service the nearby parcels. The language under 15-215-49 (b)(7), requiring drainage basins along the Saratoga main street frontage zone to be set back to accommodate active pedestrian-design elements, could reduce the basin's drainage capacity.</p> <p>We recommend that HCDA revise this requirement to align with City & County sidewalk and landscape strip standards. This would ensure pedestrian accessibility while preserving the functionality of essential drainage infrastructure.</p>

#	Section	Comment
7.	<p>§15-215-80 Conditional Use of Vacant Land.</p> <p>§15-215-85 Approval validity Period</p>	<p>We request that HCDA extend the allowable duration for the following permit types:</p> <ul style="list-style-type: none"> - Conditional Use of Vacant Land (§15-215-80(a)(2)): We recommend amending this section to allow the permit to remain effective until the area is redeveloped. In practice, this permit has been a valuable tool for reactivating Kalaeloa properties during interim periods (prior to market conditions that make redevelopment feasible), helping to bring people, jobs, and economic activity to the district ahead of full redevelopment. - Renovation Permits (§15-215-85(a)): We recommend allowing time extensions for renovation permits, as permitting and other delays often exceed the one-year approval period following HCDA approval.
8.	Figure 2: Regulating Plan	<p>We caution against upzoning parcels that will not likely redevelop within the next 20-30 years, as this will unnecessarily increase the public infrastructure burden:</p> <ul style="list-style-type: none"> - Update/downzone the Barbers Point Elementary School parcel to T2 or PRU (instead of T3) - Housing that already exists (i.e. Kalaeloa Rental Homes) should stay T3 and not be upzoned
9.	Figure 4: Building Development Standards	<p>We request increasing the height limits for all transect zones. Once setbacks, open space, drainage, streets/alleys, easements, parking loading, and other layout practicalities (e.g. fire access, utilities, building separations) are incorporated, reaching the maximum FAR becomes infeasible.</p> <p>The diagram below, provided by Gentry, demonstrates what a 1.0 FAR might look like on a 1-acre parcel after HCDA requirements and layout practicalities are incorporated, and illustrates the impracticability of the height limit.</p> 
10.	Figure 6: Street Trees	<p>We request that gallon size or caliper be used when specifying the type or size of tree planting, as this is standard practice and is easier to confirm compliance at time of planting during construction.</p>