

**DECISION-MAKING PUBLIC HEARING
KALAELOA COMMUNITY DEVELOPMENT DISTRICT
MASTER PLAN AND RULES**

I. BACKGROUND

In 2020, the Hawaii Community Development Authority (“HCDA” or “Authority”) staff and the consulting firm Torti Gallas+Partners began updating the 2006 Kalaeloa Master Plan¹ and the Kalaeloa Community Development District Rules, Section 15-215, Hawaii Administrative Rules (“HAR”).² The Authority held a presentation public hearing on August 7, 2024, however, suspended the decision-making public hearing to receive and consider additional input from stakeholders and agencies. Since the presentation public hearing on September 3, 2025, HCDA staff have been incorporating additional input from stakeholders and agencies into the draft plan and rules.

Concurrently with the preparation of the master plan and rules, HCDA is also updating the Kalaeloa Infrastructure Master Plan which also includes work that will over time divest the Navy from its electrical system to bring reliable electrical service to the Kalaeloa community development district. Land use and other data from the master plan are being incorporated into the infrastructure analysis, and draft reports are targeted for completion by the end of the year. HCDA also plans to conduct a climate resiliency implementation study that will include Kalaeloa, as well as a programmatic environmental assessment.

II. COMMENTS RECEIVED

Between the publication of the hearing notice on July 31, 2025 and the comment deadline of September 17, 2025, HCDA received 22 comment letters or emails from agencies and individuals. These included 6 requests for additional time to provide comments. Three individuals provided oral testimony at the public hearing on September 3, 2025. Another 4 comments or emails and related testimonies were received between September 18, 2025 and October 24, 2025.

Individual commenters were generally concerned about development within Kalaeloa and impacts to historic, cultural, and environmental resources.

- Historic Preservation: Several commenters expressed concern with and opposition to any development within the Ewa Plain Battlefield. One commenter suggested to front-load HRS Chapter 206E compliance in karst and Ewa Plain Battlefield areas. Commenters also expressed the need to acknowledge the historical significance of Pride Field and provide an opportunity for the community to restore it for youth sports, cultural gatherings and community wellness.

- Karst System: Commenters expressed concerns about protecting the system of karst caves in the 'Ewa region from ground disturbance, deep foundations, mass grading, and dewatering. There was a suggestion to develop rules for a karst protection district overlay zone and require developers to prepare and follow karst and cave management plans during construction. Commenters also requested coordination with State of Hawai'i Commission on Water Resource Management on hydrology and groundwater safeguards.
- Ecology and Environment: Commenters also expressed concern about endangered plants such as the endangered 'akoko plant, Ordy Pond, and the pueo (owls). Commenters also expressed concerns about the U.S. Navy dumping facility located within Kalaeloa and threats from PCB-contaminated soil. There was also support to focus on native plants and to keep and strengthen environmental standards.
- Development: Commenters expressed concerns with development-related issues such as water availability, sewage treatment capacity, traffic, homelessness encampments, and feral cats. One commenter questioned if this plan was more development-focused than the 2006 master plan. Another commenter suggested that the Kalaeloa lands were converted to conservation and that urban development was focused on infill opportunities in other areas, such as along the rail line. Another commenter questioned if an environmental assessment needed to be completed.

Developers generally expressed concerns with details on the extent and requirements associated with the form-based zoning code regulations. The need to clarify land use requirements for raceway sports facilities was also raised.

Agency comments included feedback from the Department of Parks and Recreation, the State of Hawai'i Department of Transportation, the Honolulu Police Department, the Office of State Planning and Development. A late comment was also received from the City and County of Honolulu Department of Transportation Services.

Finally, HCDA staff also presented an overview of the draft plan and rules at the regular meeting of the Makakilo/ Kapolei/ Honokai Hale Neighborhood Board on August 27, 2025. Comments and questions from the board and the community included questions about infrastructure concerns, water resources, green building standards, traffic and employment, the proposed racetrack, and the concept of a 15–20-minute city. Unfulfilled commitments for underground utilities in Ho'opili and the Makakilo Drive extension were also raised.³

III. DISCUSSION

Updates to the master plan since the July 31, 2025 draft included additional information about historic and cultural preservation in Chapters 1 (Setting the Stage) and 4 (Implementation). Additional information from the Ka Pa‘akai analysis, including proposed implementation measures, was also incorporated into the plan. Staff also incorporated other technical corrections, agency comments, text edits, and new photos into the plan.

Overall, the proposed amendments to the Kalaeloa Community Development District plan and rules (i) recognize the cultural and natural resources in the Kalaeloa community development district, (ii) strengthen protections for historic properties, and (iii) incorporate some recommended mitigation measures balanced with facilitating development. Since the July 31, 2025 draft rules were prepared, staff have incorporated additional edits in response to comments and other needed clarifications. Some of the more significant updates include the following:

- 15-215-3(b): Formal recognition that portions of the area are subject to conformance with Coastal Zone Management regulations as set forth in Hawai‘i Revised Statutes (HRS) Chapter 205A;
- 15-215-6(a)(6): Recognition that airport land use zoning regulations take precedence over the Kalaeloa rules;
- 15-215-8: Restored the definition of “raceway tracks” and incorporated into the definition of outdoor commercial recreation. The definition of “parks and outdoor recreation” was also revised to explicitly include ancillary commercial uses, as may be needed in the future to support park operations;
- 15-215-23: More flexibility on allowable size of camping facilities and restrictions associated with airport noise compatibility guidelines was added into the T2 rural zone regulations;
- 15-215-26: Street tree approval, planting, and maintenance standards are updated to more closely align with City and County of Honolulu standards;
- 15-215-43: Architectural standards for fences, windows, frontages, and other requirements were revised to provide additional flexibility;
- 15-215-47: Further aligns street tree, parking lot landscaping, stormwater runoff, and bicycle parking requirements with City and County of Honolulu standards;
- 15-215-49(b)(7): Sidewalk requirements along stormwater drainage basins within the Saratoga main street frontage zone were clarified;
- 15-215-50(d) and (e): Clarifies that permit conditions may incorporate provisions of historic preservation covenants and that HCDA may become a signatory to agreements with landowners to resolve adverse impacts to historic resources.
- 15-215-63: Establishes an ‘Aha council to provide non-binding advice regarding cultural issues and development. Landowner obligations for the maintenance of historic or culturally are also clarified.
- 15-215-78: Clarifies the mitigation requirements of chapters 343 and 6E, HRS.
- 15-215-80: Extends the validity period for conditional use of vacant land permits, based on the availability of adequate infrastructure.

IV. KA PA‘AKAI ANALYSIS

Keala Pono Archaeological Consulting, LLC conducted a Ka Pa‘akai analysis of the proposed changes to the Kalaeloa Master Plan and Rules. The analysis was designed to identify any cultural resources or practices that may occur in the project area, determine potential impacts to resources or practices, and identify potential mitigation actions.

The background research consisted of reviewing traditional and historic documentation as well as the land use history of the area. The researchers conducted interviews with 14 community members to obtain ethnographic information about the cultural significance of the area and to identify concerns regarding potential effects to resources, paces of traditional importance, and cultural practices.

The researchers identified many cultural and natural resources within the Kalaeloa-Barbers Point area. The area was traditionally known for the use of kālūa, or sinkholes, for the interment of iwi kūpuna or the practices of kālūamahi (sinkhole agriculture) and kālūawai (sinkhole water access points). Many traditional and customary native Hawaiian rights are exercised to gather food, medicine, practice other traditional arts, care for ancestral remains, and carry on with spiritual practices. The researchers found that many of these traditional practices rely on the existence of these natural resources and/or cultural sites, and that they would be threatened unless plans are not proactively put in place to explicitly protect these resources from destruction.

The analysis identified that feasible actions to reasonably protect Native Hawaiian rights could include:

- Developing comprehensive inventories of extant culturally and historically significant sites and traditional cultural landscapes in Kalaeloa;
- Conducting natural resource surveys of the coastal seascape, subterranean hydrological flows, and the karst systems to understand the effects of contamination of water and pollution on the seashore.
- Conducting biological surveys of endangered plants, forests, the pueo and other endangered birds, limu, ‘ōpae‘ula (shrimp), and other species which are gathered for food, medicine, or other traditional practices.
- Developing clear plans and commitments to protect these resources and to ensure that access can be granted to the community so that traditional/customary practices can continue to be exercised.
- Develop processes to ensure consistent, transparent communication.

Based on these recommendations, HCDA intends to conduct studies on the biological, marine, and archaeological resources in Kalaeloa, including a hydrological study of subterranean water flows. HCDA also intends to conduct a study on traditional cultural landscapes. HCDA also intends to establish an ‘Aha advisory council to provide non-binding advice for development. HCDA will also initiate a dialogue with the U.S. Navy and other stakeholders regarding the cleanup of Ordy Pond, explore potential

mechanisms to support the maintenance of cultural resources, and identify ways support access for cultural practitioners. A summary of these actions is attached.

V. RECOMMENDATION

HCDA staff recommends:

1. The Authority accept the HCDA staff proposal to incorporate the following recommendations from the Ka Pa‘akai analysis into the relevant sections of the Kalaeloa Master Plan and Rules, as described in Attachment 2:
 - Undertake various environmental, archaeological, and cultural landscape studies;
 - Establish an ‘Aha advisory council on cultural issues related to development;
 - Advocate for the cleanup of Ordy pond;
 - Support access for cultural practitioners; and
 - Consider means to support the preservation of traditional cultural landscapes.
2. The Authority adopt the proposed amendments to the Kalaeloa Master Plan and Rules, subject to non-substantive edits for formatting and style.

Citations: ¹ Hawai‘i Community Development Authority. (March 1, 2006). *Kalaeloa Master Plan*. <https://dbedt.hawaii.gov/hcda/files/2013/04/Kalaeloa-Master-Plansmall.pdf>

² Hawai‘i Community Development Authority. (September 11, 2012). *Kalaeloa Community Development District Rules. Title 15, Subtitle 4, Chapter 215, Hawaii Administrative Rules*. <https://dbedt.hawaii.gov/hcda/files/2018/02/Ch.-215-Kalaeloa-CDD-Rules-EFF-2012-10-27.pdf>

³ Neighborhood Commission Office, Makakilo/Kapolei/Honokai Hale Neighborhood Board No. 34 (Wednesday, August 27, 2025). *Draft Regular Meeting Written Summary for Video Record*. https://www4.honolulu.gov/docushare/dsweb/Get/Document-353103/34_2025_08Min.pdf

Attachments:

1. Summary of Proposed Amendments to the Kalaeloa Rules, November 5, 2025
2. Summary of Disposition/Implementation of the Recommendations and Mitigating Measures Contained in the Ka Pa‘akai Analysis for the Kalaeloa Master Plan and Rules (Keala Pono Archaeological Consulting, LLC, October 2025), November 5, 2025
3. Proposed Amendments to Kalaeloa Master Plan – Final Draft, November 5, 2025
4. Kalaeloa Community Development District Rules, Proposed Amendments to Hawai‘i Administrative Rules, Title 15, Chapter 215, Final Draft (Ramseyer Version), November 5, 2025
5. Ka Pa‘akai Analysis for the Kalaeloa Master Plan and Rules, Honolulu Ahupua‘a, ‘Ewa District, Island of Hawai‘i, Keala Pono Archaeological Consulting, LLC, October 2025

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