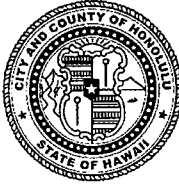


**DEPARTMENT OF PARKS AND RECREATION
KA 'OIHANA MĀLAMA PĀKA A ME NĀ HANA HO'ONANEA
CITY AND COUNTY OF HONOLULU**

1000 ULU'ŌHI'A STREET, SUITE 309 • KAPOLEI, HAWAII 96707
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RICK BLANGIARDI
MAYOR
MEIA



LAURA H. THIELEN
DIRECTOR
EOD
KEHAULANI R. BULL
DEPUTY DIRECTOR
HCPD EOD

September 10, 2025

VIA EMAIL

Mr. Sterling Higa, Chairperson
Hawai'i Community Development Authority (HCDA)
dbedt.hcda.contact@hawaii.gov

SUBJECT: Amendment of the Kalaeloa Community Development District Rules, HAR Chapter 15-215, and the Kalaeloa Master Plan

Dear Mr. Higa:

On June 12, 2024 the City & County of Honolulu officially took ownership of 400-acres of former Naval Air Station lands at Barbers Point for public park and public recreation area purposes. This event marked a historic milestone for the city, as the city first applied for these lands back in 1999. With the transfer of ownership, the Department of Parks and Recreation (DPR) faces a monumental task of planning and developing these lands to help serve the recreational needs of the people of O'ahu.

Not since the planning and development of the Patsy T. Mink Central O'ahu Regional Park and Waipio Soccer Complex has the department had the opportunity to develop a master plan for a variety of park and recreational uses outside of the urban core of Honolulu. DPR looks forward to bringing equity of park facilities and uses to the west side of O'ahu, including the 'Ewa and Kapolei Communities.

After reviewing proposed amendments to both the Draft Kalaeloa Master Plan and Draft HAR Chapter 15-215 rules, DPR has the following comments:

- DPR continues to hear from communities across O'ahu about the compelling need for additional public park and recreational space. The Kalaeloa parcels offer DPR the opportunity to think big and outside-the-box for new and varied recreational opportunities. DPR envisions some of its parcels serving a large island wide population much like the Patsy T. Mink Central O'ahu Regional Park does. In order to accomplish this vision, DPR needs large, contiguous, and unrestricted spaces to accommodate various recreational activities.

Therefore, DPR does not support to any of its Kalaeloa lands being used for infrastructure or other uses including roads, detention basins, open space areas, Miyawaki forests or utility easements that restrict use and are not directly associated with providing park and recreational opportunities for the public.

Draft Kalaeloa Master Plan

- Page 23: Table 1-1 Kalaeloa Land Ownership Summary: Table should be updated to reflect that the City and County of Honolulu owns 420 acres within Kalaeloa and that no Federal Lands are pending transfer to the City and County of Honolulu.
- Page 24: Table 1-2 Kalaeloa Land Ownership Detail: Table should be updated to reflect that the Department of Parks and Recreation owns 400 acres in Kalaeloa.
- Page 28: 1.2.2.3.b Department of Parks and Recreation: Paragraph should be updated to reflect DPR's ownership of 400 acres, consisting of 7 parcels (one parcel in the downtown area, four parcels east of the airport runway and two parcels along the coastline.)

The Department of Parks and Recreation is no longer under a licensing agreement with the Navy for two baseball parks (at Pointer Field) or Kalaeloa Beach Park.

During the BRAC process, the City expressed interest in receiving approximately 485 acres through a public benefit conveyance for the establishment of beach parks, community parks and other recreation facilities. Ultimately, conveyances of 400 acres was completed in 2024. The park areas include one parcel in the downtown area, four parcels east of the airport runway and ~~six~~ two parcels along the coastline. ~~Conveyances of all of these parcels were completed in 2024. The Department of Parks and Recreation is also under a licensing agreement with the Navy for two baseball parks (at Pointer Field) and one beach park in Kalaeloa.~~

- Page 74: Figure 3-7 Parks and Open Space Plan: The assemblage of parcels (225.4 acres) tentatively known as Kalaeloa Regional Park – Mauka, should be described as four parcels east of the airport runway not along Saratoga Ave. DPR's beach parcels do not bracket both sides of Tripoli Road. The parcels should be described as makai of Tripoli Road.

- Page 100: 4.2.3 Parks: Paragraph should be updated to note that 400 acres were transferred to the City's Department of Parks and Recreation (DPR) in 2024. The assemblage of parcels (225.4 acres) tentatively known as Kalaeloa Regional Park – Mauka, should be described as four parcels east of the airport runway not along Saratoga Ave. DPR's beach parcels do not bracket both sides of Tripoli Road. The parcels should be described as makai of Tripoli Road.

Amendments to Kalaeloa Community Development District Rules, HAR Chapter 15-215

- Zoning

DPR acknowledges changes in zoning made to several of DPR parcels. Having DPR parcels east of Corregidor Street, as well as, the "downtown" parcel zoned T3 Mixed Use, will allow for greater flexibility in uses within the 'Ewa Plain Battlefield Overlay Zone and in the downtown area.

Currently, five of DPR's properties are designated under the T2 Rural Transect Zone. DPR appreciates changes made to the T2 Zone, which increases the number of campsites allowed per acre. However, DPR still has concerns that this designation may restrict DPR's ability to manage its properties and adequately provide recreational uses to the public. DPR continues to request the flexibility to be able to provide the community with a wide variety of recreational opportunities.

- Maintenance

With such a large land area, DPR will need supporting uses that will allow the department to maintain and manage its parks and facilities as well as implement park programming. These uses include housing for park caretakers, administrative and staff offices, base yards, and outdoor storage.

- Maximum Building Height:

The T2 Rural Transect Zone limits primary building height to 28' and accessory building height to 14'. DPR requests the flexibility to design park facilities such as gymnasiums and field lighting to be higher than this limit.

- Program of Utilization:

As a condition of the transfer of the 400-acres from the Federal Government to the city, the department agreed that the properties would be used and maintained as set forth in a Program of Utilization Plan. The Program of

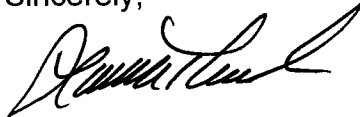
Utilization Plan was accepted by the Federal Government in 1999 and updated in 2011. DPR intends to seek approval from the Federal Government to update the Program of Utilization Plan to include recreational uses as deemed appropriate through the master planning process. DPR will need to maintain flexibility to implement uses agreed to within the Program of Utilization Plan.

- Thoroughfare Plan

DPR agrees with the proposed realignment of the Corregidor Street extension, around the edge of the Ewa Plain Battle field Overlay Zone, as long as all DPR land on the eastern side of the proposed road are contiguous. Additionally, DPR supports the Tripoli Street connector which will allow easier access to DPR's beach parcels for Ewa residents.

DPR looks forward to the opportunity to continue an open dialogue and work with HCDA to ensure that the master plan and administrative rules include the flexibility to enable DPR to meet the park and recreational needs of both Kalaeloa and the larger Oahu community.

Sincerely,

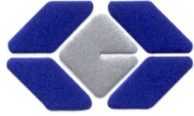


Laura H. Thielen
Director

LHT:jb

cc: Craig Nakamoto, HCDA Executive Director
Ryan Tam HCDA Director of Planning and Development

THE GENTRY COMPANIES



September 16, 2025

Chair Sterling Higa and Board Members

Hawai'i Community Development Authority
547 Queen Street
Honolulu, HI 96813

Subject: **KALAELOA PROPOSED RULES AND MASTER PLAN
AMENDMENTS**

Aloha Chair Higa,

My name is Sunny Rosario, and I am testifying on behalf of Gentry Homes, Ltd. We would like to submit comments on the proposed rules and provide our thoughts on the amendments.

Through this multi-year process, we are grateful for the opportunity to meet with Mr. Ryan Tam and his team as they draft and revise the amendments. The openness to meeting and feedback is much appreciated by Gentry. Our attached comments reinforce our previous discussions and while we are pleased with the progress made, remain concerned about how prescriptive some design elements are.

We support the passing of the amendments and hope that HCDA will remain open to further dialogue to refine the proposed rules to more efficiently serve the Kalaeloa community.

Sincerely,

GENTRY HOMES, LTD.

A handwritten signature in blue ink, appearing to read 'Sunny Rosario', with a stylized, cursive script.

Sunny Rosario
Manager of Governmental Affairs and Community Relations

Summary of Comments on Comments - Gentry (Support w comments).pdf

Page: 34

Author: JacobK Subject: Comment on Text Date: 9/8/2025 8:07:26 AM
Recommend to remove the exclusion.

Rationale: If a space is provided for recreation, it should not matter whether it overlaps with a setback. The intention is still preserved and would encourage things like pocket parks that could overlap with side or front yard requirements that would be better distributed through a large development.

We agree that recreation space should exclude parking.

rules particular to building elevations, including facades[+].

"Planting strip" means a planted and landscaped area accommodated within the furnishing area, intended to provide a buffer between pedestrians and vehicles[+].

"Principal building" means the main building on a lot, usually located toward the frontage[+].

"Principal entrance" means the main point of access for pedestrians into a building[+].

"Principal frontage" means the frontage designated to bear the address and principal entrance to the building, and the measure of minimum lot width as determined by the lot owner[+].

"Private frontage" means the area of the pedestrian thoroughway area that is privately owned. The private frontage contributes to the character of the transect, and includes the front of building, landscaping, and often a segment of the sidewalk[+].

"Project" means an endeavor undertaken by a landowner or developer to ~~build upon~~ make improvements on a lot or combination of lots[+].

"Project site" means the gross land area of a lot or a combination of lots for a proposed project[+].

"Public art" means works of art in any media that has been displayed in the physical public domain and accessible to all[+].

"Public building" is a use classification which ~~primarily~~ consists of buildings owned or developed by public entities ~~or developed~~ on government-owned lands[+] for public use.

"Public frontage" means the area between the curb of the vehicular lanes and the frontage line[+].

"Public project" means any project or activity of any county or agency of the state conducted to fulfill a governmental function for public benefit and in accordance with public policy[+].

~~["Raceway track" is a use classification which primarily consists of a facility used or intended to be used for the racing of automobiles, motorcycles, or bicycles]~~

"Recreation space" means that portion of a lot, exclusive of required yards, setback areas, or parking areas which is:

Author: JacobK Subject: Highlight Date: 9/8/2025 8:07:20 AM
Recommend removal in its entirety.

10/27/12; am and comp] (Auth: HRS
§§206E-4, 206E-5, 206E-7) (Imp: HRS §§206E-4, 206E-5,
206E-7)

§15-215-39 Frontage type. All buildings along major boulevards, avenues, or streets identified in Figure 3 (thoroughfare plan), dated July 2025, made a part of this chapter and attached at the end of this chapter, shall conform to the frontage standards set forth in [Figure 1.6 (frontage type), dated September 2012,] Figure 12, dated July 2025, made a part of this chapter, and attached at the end of this chapter, which specify element standards for each frontage type. [Eff 10/27/12; am and comp] (Auth: HRS §§206E-4, 206E-5, 206E-7) (Imp: HRS §§206E-4, 206E-5, 206E-7)

§15-215-40 Land use. (a) All lots shall conform to the land uses specified in Figure [1-7] 7 (land [use summary], use), dated [September 2012,] July 2025, made a part of this chapter, and attached at the end of this chapter.

(b) Any one or more allowed land uses may be established on any lot, subject to Figure [1-7,] 7 (land [use summary], use), dated [September 2012,] July 2025, made a part of this chapter, and attached at the end of this chapter.

(c) Where a project on a single lot proposes two or more land uses, the project shall be subject to all applicable permits and approvals. [Eff 10/27/12; am and comp] (Auth: HRS §§206E-4, 206E-5, 206E-7) (Imp: HRS §§206E-4, 206E-5, 206E-7)

§15-215-41 Building placement. (a) Facades shall be built either [parallel] up to the [build to] specified build-to line or within the built-to zone, with a minimum frontage occupancy as provided in Figure [1-8] 8 (building placement and encroachments), as applicable, dated [September 2012,] July 2025, made

215-46

Rationale: Building cost is in part driven by its squarefootage. Whenever a plan layout has to conform to parameters outside of the efficient organization of the spatial needs of the project brief one runs the major risk of adding "junk space" which is the normally hard-to-furnish excess space that is added beyond functional requirements and does not serve any particular purpose. Good buildings are both beautiful and efficient which can only result from letting the brief drive the plan layout.

Moreover, while there is risk to the efficiency of the plan which should alarm anyone who cares about either cost affordability or resource use, these do not seem to perform any function other than placing a "sticker" on an imaginary block. There is no way, for example, to measure whether adding these elements improves any experience interior or exterior in a way that would outweigh potential cost to design and build, because there is no metric for how building form affects pedestrian experience. At the end of day, these are simply generic preferences which have no place in legislation.

As we have discussed previously it appears that the intent of the rules is "activate" the frontage. We suggest that this can be achieved most easily by allowing for spaces of 10' or more than are generally low in slope. Whether covered, uncovered, above ground on a lanai or at grade as a grassed, graveled or paved area, we can see from current residential projects that all that is required to get people to activate space is the creation of space.

Particularly since several of the frontage types allowed are feasibly impossible as written (galleries and arcades for example) we feel the best way to preserve the intent while simplifying the rules is remove frontage types and allow enough space for furnishing.

Author: JacobK Subject: Highlight Date: 9/8/2025 8:06:48 AM
Should this be Figure 5? I believe that is the one that gives the occupancy percentage.

a part of this chapter, and attached at the end of this chapter.

(b) For frontage occupancy calculations, single buildings that form a courtyard of ~~fifteen feet~~ in width or less by recessing a portion of the building from the ~~[build-to]~~ build-to line, shall be measured as the full width of the building parallel to the ~~[build-to]~~ build-to line. [Eff 10/27/12; am and comp] (Auth: HRS §§206E-4, 206E-5, 206E-7) (Imp: HRS §§206E-4, 206E-5, 206E-7)

§15-215-42 Building form. (a) The height of any building or structure or portion thereof shall be measured from ~~[ground elevation.]~~ finish grade to the top of the roof.

(b) ~~[Attics]~~ Height limits for attics or raised basements, masts, belfries, clock towers, chimney flues, elevator bulkheads, church spires, cupolas, domes, ventilators, skylights, parapet walls, cornices, solar energy systems, railings, or necessary mechanical appurtenances on the roof level shall be limited to the height necessary for their proper ~~[functioning, as determined by the executive director in his sole discretion; provided, however, that notwithstanding the executive director's determination, attics]~~ functioning. Attics shall not exceed fourteen feet in height.

(c) Any part of a building which is taller than sixty-five feet ~~[and along a view corridor street, see Figure 1.12 (view corridors), dated September 2012, made a part of this chapter, and attached at the end of this chapter,]~~ shall be ~~[setback]~~ set back from the ~~[lot line abutting the view corridor]~~ principal frontage by ~~[fifty feet.]~~ at least ten feet.

(d) All principal buildings shall be constructed with building elements conforming to ~~[Figure 1.3 (development standards summary),]~~ Figure 4 (building development standards) and Figure 5 (site development standards), both dated [September 2012,] July 2025, made a part of this chapter, and attached at the end of this chapter. [Eff 10/27/12; am and comp] (Auth: HRS §§206E-4, 206E-5, 206E-7) (Imp: HRS §§206E-4, 206E-5, 206E-7)

Rationale: there are many reasons why a recess in a residential building might be more or less than 15', but this should be driven by the efficient plan layout of the unit needs. getting light and ventilation deeper into a floor plate, especially for units with more than one bedroom can get very tricky if modulation is not possible, but the building should not sacrifice these types of units - which Oahu sorely needs - in order to satisfy an arbitrary dimensional requirement.

If the recess creates public space next to the pedestrian ROW, this can only serve add things like trees or recreation areas that should be encouraged. and would only serve to add to the public experience. Allowing this alone would go a long way to solving the problem that the frontage occupancy creates.

§15-215-43 Architectural standards.

(a) Balconies, galleries, and arcades shall be made of concrete, painted wood or metal.

(b) For building facades and elevations in the [T3 general urban,] T3 mixed-use, T4 [urban center] general urban, and T5 urban center [high intensity] transect zones, a change of exterior texture and material should be accompanied by a change in plane; provided, however, glazing and spandrel glass is exempt from this provision.

(c) Fences, walls, and hedges [may be constructed or installed to a height of six feet in any side yard or rear yard and to a height of three feet in any portion of a front yard or a side yard that faces a thoroughfare] other than retaining walls:

(1) Height shall be as follows:

(A) Within front and side yards facing a main street or street: four feet.

(B) Within side and rear yards that are not facing a street: six feet;

(C) Within a required yard, walls and fences for public utilities may be constructed up to eight feet in height, and may be topped with security wire to a total height of ten feet.

(D) Within required yards, fences located on land dedicated for agricultural use may be up to ten feet in height.

(E) Outside of required yards: ten feet, except where taller fences or walls are needed to meet the venue requirements of a specific sport;

(2) Fence materials shall be as follows:

(A) Fences [and] within front yards or side yards facing a [thoroughfare] street shall be painted or constructed out of a decorative material compatible with the materials of the principal building; and

(B) Chain link or barbed wire fences and exposed cinder block walls are

Author: JacobK Subject: Highlight Date: 9/8/2025 8:07:43 AM
Recommend removing (a) entirely

Rationale: There is an expansive world of architectural products in the world and this would exclude most of them. Metal is rarely used as an exposed structural support in Hawaii because of corrosion although it is possible. For example this would exclude cementitious board (Hardie) which is by far the most common cladding material in the area and much more durable and fire resistant than wood as well as any kind of masonry which is probably the second most common building material.

As with other things, we ask that these types of provisions be removed because there is too much potential for a prescriptive list to limit products that might be better suited for the climate or building type and because the creation of prescriptive material lists cannot demonstrate a direct public good and as such does not belong in legislation that is hard to unwind.

Author: JacobK Subject: Highlight Date: 9/8/2025 8:06:30 AM
Recommend removal of this clause

Rationale: this is a silly rule. There are too many great buildings in the history of architecture where different materials and textures are generally in plane with one another.

Author: JacobK Subject: Highlight Date: 9/8/2025 8:06:39 AM
There are architectural grade blocks that can be quite nice. Please leave things like this to the design community.

- prohibited within front yards abutting any boulevard, avenue, or main street;
- (3) Retaining walls shall be constructed out of masonry or stone or another equally durable material; and
- (d) Lighting:
- (1) Entrances, arcades and passageways shall be illuminated;
- (2) Courtyards, passageways, roof gardens, corner plazas, and other landscaped areas shall provide pedestrian-scaled, tamper-proof lights;
- (3) [Lighting] Exterior lighting sources shall be constructed or installed so that [light] the bulb is fully shielded to prevent upward or horizontal light trespass, and that light is aimed downwards and does not spill over to abutting properties; [and]
- (4) Exterior lighting shall emit light at a correlated color temperature no greater than 3,000 degrees Kelvin; and
- (5) Architectural details may be accented through lighting.
- (e) Roofs:
- (1) Roofs may be accessible and may be used as roof decks, gardens, balconies or terraces;
- (2) Roofs shall either be finished with light colors for reflectivity or incorporate landscaping; and
- (3) Rooftop mechanical equipment shall be clustered away from the edge of the building and either painted to match the roof top or located behind a parapet wall or enclosed in a roof top mechanical equipment enclosure so that it is not visible from a thoroughfare, historic or public buildings.
- (f) Service functions (T3 [general urban], mixed-use, T4 general urban [center], and T5 urban center [high intensity] transect zones):
- (1) Utilities, service elements, recycling and trash elements shall be located off alleys (if applicable), or in structured parking garages where they exist. Alternatively, they may be located at least ten feet behind the facade of a principal building and

Author: JacobK Subject: Highlight Date: 9/8/2025 8:04:28 AM
Recommend modifying to minimize light trespass above 15' above-grade.

Rationale: If an area is adequately lit around its perimeter it will incur some light trespass - especially at the ROW near the property line. The only way to avoid light trespass would be not to place lights near the property line so that it is completely dark at the property line edge. Basically, if you could see a marker for the property line because of artificial light, then you have light trespass.

Given provisions elsewhere for safety and adequate lighting for through-block connections and so forth, this seems to run contrary to other intentions of the rules.

Author: JacobK Subject: Highlight Date: 9/8/2025 8:04:31 AM
This is achievable, but its super warm colored light. is there a ecological reason for this?

Author: JacobK Subject: Highlight Date: 9/8/2025 8:05:42 AM
This is really up to the utility companies not the developers.

- screened from view from a thoroughfare other than an alley or service street, with a hedge, landscaping, low wall, or fence;
- (2) Prohibited materials for constructing recycling or trash enclosures include: chain link, fencing with slats or mesh screen, cinderblocks, or unpainted wood;
 - (3) 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:
 - (A) Burying [the] underground or screening utilities and service elements [underground], as feasible;
 - (B) Constructing a utility room to enclose the utilities and service elements;
 - (C) Screening the utilities and service elements behind the building; or
 - (D) Clustering the utilities and service elements on the roof within a mechanical equipment enclosure; and
 - ~~[(4) Recycling or trash enclosures shall be of a similar material and color with the principal building.]~~
 - (g) Signage~~[- All signs shall be in compliance with the applicable rules and regulations administered by the city and county of Honolulu, as provided for in the city and county of Honolulu's land use ordinance, as it may be amended from time to time.]:~~
 - (1) Except as otherwise provided, signs shall conform to the current "B-2 Community Business District" sign regulations of the city and county of Honolulu land use ordinance, as it may be amended from time to time. The city and county of Honolulu shall be responsible for processing of sign permits, enforcement of the land use ordinance provisions, and administering appeals and variances relating to signs.
 - (2) Where possible, exterior signage should be in the two official languages of Hawai'i, 'Ōlelo Hawai'i, and English.
 - (h) Windows:

General note: 70% is unreasonably high. Most clear glazing is typically somewhere between 50-70%. This is good for North and potentially east and west facing windows. For south facing windows this would ideally drop to something like 30-40% to reduce glare inside as well as to reduce heat gain.

seventy per cent at ground level and fifty per cent for all other floors.

(j) Hawaiian Sense of Place. The architectural design of new development in the Kalaeloa CDD shall contribute to the district as a Wahi Ho'okela, Center for Excellence, by promoting and fostering a Hawaiian sense of place.

- (1) Physical manifestations of the Hawaiian sense of place may include, but are not limited to, traditional Hawaiian motifs, local building materials, and native landscaping.
- (2) Applications for improvement and development permits shall include the following materials:
 - (A) A written narrative explaining how the proposed design exhibits a Hawaiian sense of place; and
 - (B) Illustrative diagrams that describe the physical features, elements, and characteristics the proposed development will employ to exhibit a Hawaiian sense of place. [Eff 10/27/12; am and comp]
(Auth: HRS §§206E-4, 206E-5, 206E-7)
(Imp: HRS §§206E-4, 206E-5, 206E-7)

§15-215-44 Landscape. (a) The standards for landscaping for zones [T2 ~~rural/open space zone,~~] T3 ~~{general urban}~~ mixed-use zone, T4 ~~{urban center zone,}~~ general urban, and T5 urban center ~~[high intensity]~~ shall be as follows:

- (1) All required yards shall be landscaped~~[+]~~, including trees where there is adequate space. Native or adapted plant species are preferred;
- ~~[(2)]~~ New plantings shall be selected from the preferred plant species list provided in Figure 1.10 ~~(preferred plant species), dated September 2012, made a part of this chapter, and attached at the end of this chapter;]~~;
- ~~[(3)]~~ (2) Exceptional trees that are designated by the city and county of Honolulu shall be

in Figures BT.1 to BT.10, dated July 2025, made a part of this chapter, and attached at the end of this chapter.

(d) Up to seventy-five per cent of the land area occupied by stormwater management facilities, including retention and detention ponds and other bioretention devices, may be count towards open space requirements if designed to support passive recreational uses. Such a stormwater management facility shall:

- (1) Incorporate pedestrian elements such as walking paths, benches, and landscaping;
- (2) Be designed with gentle side slopes with not less than a 3:1 ratio of horizontal to vertical distance;
- (3) Customarily provide access to its recreational amenities; and
- (4) Be subject to a maintenance agreement approved by the executive director. [Eff 10/27/12; am and comp] (Auth: HRS §§206E-4, 206E-5, 206E-7) (Imp: HRS §§206E-4, 206E-5, 206E-7)

§15-215-47 Parking and loading.

(a) Applicability. This section applies to all new buildings and additions and renovations of existing buildings that increase the existing floor area by twenty-five per cent or more[-] and where parking is provided. There are no minimum parking space requirements in the Kalaeloa CDD.

(b) Access. Driveway access for parking shall be a minimum of fifty-five feet measured from the edge of the right-of-way.

(c) Curb cuts for T3 [~~general urban zone,~~ mixed-use, T4 general urban [~~center zone~~], and T5 urban center [~~high intensity zone~~] zones shall be as follows:

- (1) The number of curb cuts shall be minimized along boulevards and avenues, to the maximum practicable extent. Shared alleys, access drives and arrangements are encouraged to reduce the need for new curb cuts;

- do not necessarily require, such measures as indentation in plane, change of materials in a complementary manner, sensitive composition and juxtaposition of openings and solid wall and/or building frame and projecting elements such as awnings and marquees to provide shade and shelter; and
- (B) Exterior lighting which provides for a secure nighttime pedestrian environment by reinforcing entrances, public sidewalks, and open areas with a safe level of illumination which avoids off-site glare;
- (3) New development shall incorporate pedestrian-oriented design elements such as street furniture or other seating surfaces and design amenities scaled to the pedestrian such as awnings, drinking fountains, paseos, arcades, colonnades, plazas, non-commercial community bulletin boards, public or private art and alternative paving treatments in areas of pedestrian access, where possible. Within the city right-of-way, however, variances will be required to place and install any
 (A) Private surface encroachments; and
 (B) Non-standard sidewalk finishes.
- (4) When provided, storefront security grates or grilles shall be located inside exterior windows, shall be retractable into pockets or overhead cylinders, and shall be completely concealed when retracted.
- (5) Residential uses at the ground-floor street frontage shall incorporate planted areas, porches, front stairs and/or other elements that contribute to a pedestrian environment.
- (6) Street-facing building walls shall exhibit architectural relief and detail and be enhanced with landscaping in such a way as to create visual interest at the pedestrian level.

- (7) Stormwater drainage basins located along the Saratoga main street frontage zone shall be set back to accommodate active pedestrian-design elements such as multi-use paths, street furniture, and large canopy trees.
- (c) Build-to line. Along the Saratoga main street frontage overlay zone, buildings shall be constructed in accordance with the building placement standards in Figure 5 (site development standards), dated July 2025, made a part of this chapter, and attached at the end of this chapter, except to avoid adverse impacts to exceptional trees, existing prominent landscapes, or historic resources.
- (1) Entry courtyards, plazas, small parks, entries, outdoor eating and display areas, or other uncovered areas designed and accessible for public use may be located between the build-to line and the building, provided that the buildings are built to the edge of the courtyard, plaza, small park, or dining area. [Eff] (Auth: HRS §§206E-4, 206E-5, 206E-7) (Imp: HRS §§206E-4, 206E-5, 206E-7)

Check with DPP on this. Typically, the city has only allowed few access points to arterial roadways which is why you see so many cul-de-sacs on the west side. Developers have input on placement of the connections, but there are many rules about how close these can be together which is extremely limiting.

W/O additional connections to arterial streets, connecting internal roadways on large lots doesn't add much benefit because the vehicles are forced into the same bottle necks at the arterial connections that exist. Internal connections do however add more road surface area and thus reduces build-able area potentially lowering density, increase potential heat-island effect, and waste material resources.

- (2) New thoroughfares shall ~~[connect with existing thoroughfares;]~~ promote community connectivity and neighborhood accessibility;
- (3) New passageways that are introduced shall be a minimum of fifteen feet wide between building elevations;
- (4) New passageways that are introduced shall be un-gated and shall be ~~[publically-accessible;]~~ publicly-accessible;
- ~~[-(5) Each new block shall have an alley for service and parking access; and~~
- ~~[-(6)]~~ (5) Cul-de-sacs and dead-end streets are not permitted unless they allow for future connections[-]; and
- (7) Where provided, parking access and design shall be provided as per section 15-215-47 (parking and loading); however, land uses listed in section 12-215-62(b), above, are not required to locate parking in the third layer as shown in Figure 9 (parking placement), dated July 2025, made a part of this chapter, and attached at the end of this chapter. All other requirements of section 15-215-47 (parking and loading) shall remain in full effect.
- (d) New buildings:
 - (1) New buildings are permitted as indicated by the building types allocated to each transect[-] except as listed in section 12-215-62(b), above;
 - (2) New buildings shall have their ~~[principle]~~ principal entrance off of a new or existing thoroughfare or passageway;
 - (3) New buildings with civic or institutional uses shall be located in central locations, and be recognizable and accessible to the public;
 - (4) Buildings shall incorporate mid-block pedestrian passageways and courtyards at least every three hundred feet. Where passageways are utilized, they shall connect through the block, across existing alleys if necessary, to other passageways, to mid-block crossings, or thoroughfares for greater street grid connectivity;

- (5) When a building includes a courtyard, the courtyard shall have a minimum dimension of forty feet deep and thirty-five feet wide along the street side;
- (6) The required mid-block pedestrian passageway or courtyard shall not abut an alley; and
- (7) For large lots that abut other lots not subject to a permit application, an alley of at least twenty-six feet in width must be provided at the edge of the lot that is adjacent to the other lots to ensure access by vehicles and access to light and air of the other lots. An alternative proposal for this requirement may be considered as long as it meets the intent of providing light, room, and air to neighboring lots.
- (e) Utilities. On-site distribution utilities shall be buried underground, to the maximum extent practicable.
- (f) Large utility installations:
 - (1) Arrays of renewable energy generating units are permitted in all transect zones and special districts within the Kalaeloa CDD;
 - (2) Where arrays of renewable energy generating units are located in T4 general urban and T5 urban center zones, they must be sited so as not to be visible from the primary thoroughfare. [Eff 10/27/12; am and comp] (Auth: HRS §§206E-4, 206E-5, 206E-7) (Imp: HRS §§206E-4, 206E-5, 206E-7)

§15-215-63 Historical and cultural sites.

(a) ~~[Lots]~~ Historically or culturally significant sites located in the Kalaeloa CDD ~~[that are determined to be historically and culturally significant]~~ shall be interpreted, preserved, protected, reconstructed, rehabilitated and restored by the landowners ~~[consistent with]~~ in adherence to the implementing regulations of section 106 of the National Historic

Author: JacobK Subject: Highlight Date: 9/8/2025 10:32:29 AM

Recommend removal of this clause

Rationale:
Similar to other comments about courtyard dimensions, this needs to be driven by the layout of the building and not set artificially.

There is no good justification for this.

Author: JacobK Subject: Highlight Date: 9/8/2025 10:33:23 AM

Recommend change to: "conforming to City and County of Honolulu standards."

Author: JacobK Subject: Highlight Date: 9/8/2025 2:09:04 PM

This might be reconsidered. The Akaka VA sets a really nice precedent for using solar arrays as shading devices.

\$15-215-88 Minor ~~[changes-]~~ amendments to permits. (a) After final approval of a ~~[rules clearance, improvement permit, development permit, conditional use of vacant land permit, conditional use permit, master plan permit or variance,]~~ permit, the executive director may allow minor amendments to the application without submittal of a new or amended ~~[application when the requested amendment(s) does not+]~~ application, in order to address administrative corrections or minor adjustments or refinements to the approved project design.

(b) Examples of allowable minor amendments to permits include, but are not limited to:

- (1) ~~Administrative corrections to typographical errors, names, or mailing addresses; and~~
- (2) ~~Minor adjustments or refinements to project architectural design features such as façade treatments, type or location of landscaping, size or location of interior rooms.~~
- (c) In order to qualify as a minor change, the requested amendment(s) may not:
 - (1) ~~[Increase] Materially increase the number of allowable dwelling units, [allowable] floor area, height, or any additional land-use disturbance;~~
 - (2) ~~Introduce different land uses;~~
 - (3) ~~Request larger land area;~~
 - (4) ~~Request any variance[+] or increase an approved variance;~~
 - (5) ~~Allow any diminution in buffer or transition areas, reduction in landscaping, reduction of required yards, or any significant change in the design characteristics or materials used in construction of the structures; or~~
 - (6) ~~Reduce or eliminate conditions attached to the subject development approval.~~
- (d) Changes to development permits shall require a new public hearing, if the amendment concerns a new issue that would have itself required a public hearing prior to issuance of the original permit.
- (e) For minor changes to improvement and development permits, the applicant must also submit documentation as to how the amendment would still advance the purposes of redevelopment and be

Author: JacobK Subject: Highlight Date: 9/8/2025 2:14:36 PM

There are some design variances that might not be understood at the beginning of the project - example variance on fence height for FDR.

Author: JacobK Subject: Highlight Date: 9/8/2025 2:42:28 PM

Recommend limiting this to street tree count and reinforcing that substitutions are allowed within the city's approved list.

Rationale: Development applications for large parcels are going to be completed 2-4 years before vertical construction begins. This leaves several reasons a landscaping plan will evolve with a project: (1) civil constraints (2) nursery availability and (3) pests.

Civil layouts dictate a lot about where larger plants and trees can be planted because electrical ducts and plumbing lines need space from the root ball of even medium sized trees.

Species availability (especially if certain caliper sizes are required) can sometimes require very late stage substitution because there is a limited supply on island and bringing in plants from outside brings many hurdles.

Lastly, Hawaii regularly faces the threat of pest introductions.

For example the longhorn beetle in 2018 attacked kukui trees, and the rhinoceros beetle that has attacked palms since 2014. (The state of Hawaii Plant Industry Division issues "new pest advisories" and has issued at least 12 in the last decade. (<https://dab.hawaii.gov/pi/ppc/new-pest-advisories/>).

The ability to react and change specific species in real time is critical which may include substitutions and should be allowed and encouraged without additional bureaucratic hurdles to clear. The curtailing of palms due to the rhinoceros beetle is a good example because the root structure of palm is shallow and cannot be easily replaced like for like with even small deciduous trees given power and water distribution layouts on site.

State intervention into the design of private property should remain circumscribed to the public realm of street trees which the City and County is already equipped to regulate and enforce.

FIGURE 4: BUILDING DEVELOPMENT STANDARDS

	T2 Rural Zone	T3 Mixed-Use Zone	T4 General Urban Zone	T5 Urban Center Zone
Building Types (See Figures BT.1 - BT.10 for details on each type)				
Front yard house (BT.1)	-	●	-	-
Side yard house (BT.2)	-	●	-	-
Townhouse (BT.3)	-	●	●	●
Duplex, triplex, and quadplex (BT.4)	-	●	●	●
Flex-loft (BT.5)	-	●	●	●
Industrial barn (BT.6)	●	●	●	●
Courtyard (BT.7)	-	●	●	●
Urban block (BT.8)	●	●	●	●
Lei building (BT.9)	-	●	●	●
Tropical urban court (BT.10)	-	●	●	●
Frontage Types (See Figures FT.1 - FT.8 for details on each type)				
Lanai and front yard (FT.1)	●	●	-	-
Stoop (FT.2)	-	●	●	●
Dooryard (FT.3)	●	●	-	-
Forecourt (FT.4)	-	●	●	●
Shopfront (FT.5)	-	●	●	●
Terrace (FT.6)	-	●	●	●
Raised Terrace (FT.7)	-	●	●	●
Gallery (FT.8)	●	-	●	●
Maximum Building Height				
Primary building	28'	60'	75'	90'
Accessory building	14'	28'	28'	90'

Legend

- Permitted
- Not permitted

FIGURE 5: SITE DEVELOPMENT STANDARDS

	T2 Rural Zone	T3 Mixed-Use Zone	T4 General Urban Zone	T5 Urban Center Zone
Floor Area Ratio (FAR)				
Maximum	0.35	1.5	2.5	4.5
Building placement (See Figure 8)				
Build-to line	N/S	10-15'*	5-10'	5-10'
Frontage occupancy at build-to line	N/S	50% minimum**	60% minimum	75% minimum
Side yard setback	N/S	5'	0'	0'
Rear yard setback	N/S	5'	0'	0'

*Build-to-line is 5-10' along Saratoga main street frontage overlay zone

**Minimum of 60% frontage occupancy within Saratoga main street frontage overlay zone

Legend	
N/S	Not specified
N/A	Not applicable; does not apply

Author: JacobK Subject: Highlight Date: 9/8/2025 3:13:05 PM
Recommend (25' zone) from 10'-35' see rationale in other comment

Author: JacobK Subject: Highlight Date: 9/8/2025 3:12:46 PM
Recommend (25' zone) from 5'-30' see rationale in other comment

Author: JacobK Subject: Highlight Date: 9/8/2025 3:12:30 PM
Recommend 5'-30' (25' zone)

Rationale: The rules should be setting the regulatory floor, not be a prescribing design and as such needs more flexibility.

This should be expanded to allow enough articulation to recess light wells that can adjust for multi-bedroom apartment typologies and indented storefronts. If a possible depth of a unit might be as large as 40' on the large end, then a 25' zone would accommodate most typologies without a variance including in places where street curvature or other elements create the need to adjust orientation.

Author: JacobK Subject: Highlight Date: 9/8/2025 3:19:28 PM
Strongly recommend removal but if not possible, request uniform 50% in all zones within enlarged 25' wide zone with occupancy counted for public plazas and amenities.

Designing to overly stringent build-to-line rules and frontage types was the hardest part of making Kaulu work and the most important issue to revising design rules for Gentry.

Development is stalled in Kalaeloa and past rules (now 13 years old) have not produced significant new development. The state should be willing to make the changes necessary to help projects move forward if results have fallen short of the vision while the housing deficit continues to grow.

Author: JacobK Subject: Highlight Date: 9/8/2025 2:47:37 PM
Recommend Removal, this is counter to the language in 15-215-49(b)(2)(A) to articulate the facade including "indentation in plane." Max should be as low as possible to allow for the most flexibility in design.

FIGURE 8: BUILDING PLACEMENT AND ENCROACHMENTS

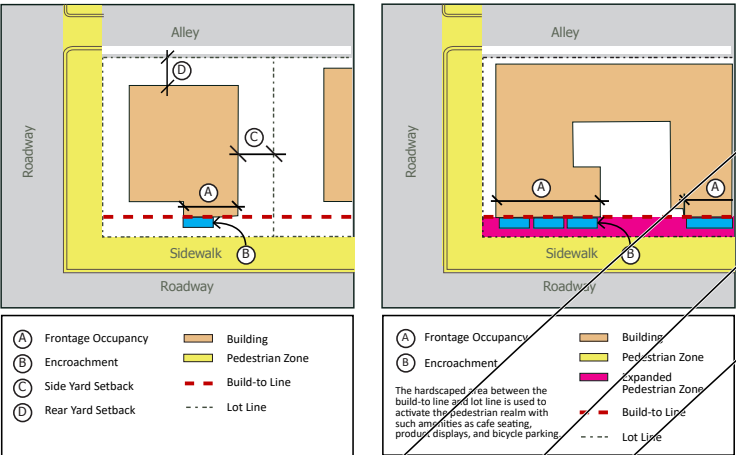


Figure 8-A: Illustrative building placement diagram for residential uses

Figure 8-B: Illustrative building placement diagram for non-residential uses

Table 8-C: Encroachments

	Horizontal Distance Requirement
Build-to Line (Front) Encroachments	
Awnings	No more than 10' or 65% of the distance from the building face to the curb, whichever is less.
Signage	No more than 3' or 33% of the distance from the building face to the curb, whichever is less.
Gallery / Arcade	No more than 2' from the face of the encroachment to the curb.
Balcony	No less than 2' from the face of the encroachment to the lot line.
Residential Porch	No less than 4' from the face of the encroachment to the lot line.
Bay Windows and Architectural Features	No less than 4' from the face of the encroachment to the lot line.
Side and Rear Encroachments	
Balconies, Porches, and Architectural Features	No less than 4' from the face of the encroachment to the lot line.

Author: JacobK Subject: Highlight Date: 9/8/2025 3:25:24 PM
Recommend removing all horizontal distance requirements for all encroachments.

Rationale: Why limit awning depth? This only helps to create more shade. Absolutely silly.

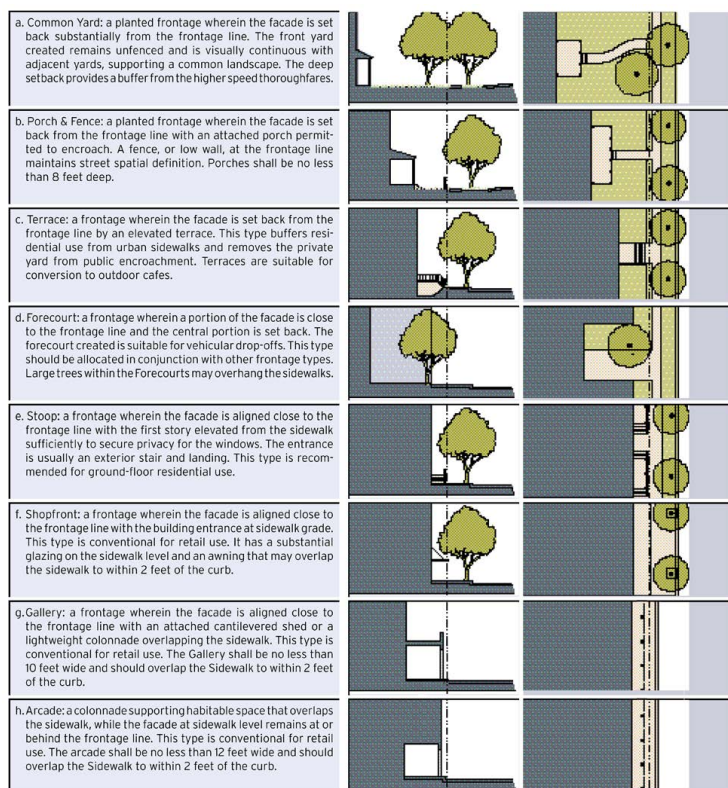
Author: JacobK Subject: Highlight Date: 9/8/2025 3:23:00 PM
Recommend removing all horizontal distance requirements for all encroachments.

Rationale: There is no discernible public good created by these rules.

Author: JacobK Subject: Highlight Date: 9/8/2025 3:27:15 PM
Recommend removal sim to others

Balcony depth and porch depth need to be driven primarily by the project brief and structural considerations.

FIGURE 12 FRONTAGE TYPES



July 2025

FIGURE BT.1 FRONT YARD HOUSE

A single-unit structure, detached on both sides, located on a private single-family lot. The unit may vary in size and can be complemented by an auxiliary building for storage, covered parking, or an accessory dwelling. It is the least dense housing typologies.

A. Pedestrian Access

1. The principal entrance to the principal building shall be directly from the street, through the front yard.
2. The principal entrance to the accessory dwelling shall be accessible directly from a frontage line, through the side yard setback of the principal building or from an alley.

B. Parking Design and Location

1. Where provided, parking shall be located in the third layer (See Figure 9).
2. Parking access shall be as per section 15-215-47 (parking and loading).

C. Open Space

1. At least twenty per cent of the lot area shall be provided as open space. At least one-third of this requirement shall be provided at-grade.

D. Frontage

1. Permissible frontage types are: Lanai and Front Yard (Figure FT.1), Stoop (Figure FT.2), and Dooryard (Figure FT.3).

E. Building Massing

1. Front facades shall have at least one encroaching element, such as porches or balconies, or plane break that cumulatively occupy at least ten per cent of the facade.
2. Principal buildings shall be one- or two-stories in height.
3. Accessory dwellings located above garages shall be limited to one story above the garage with a 12-foot maximum floor-to-floor height.
4. Accessory dwellings located at grade shall be limited to one story with 12-foot maximum floor-to-floor height.
5. Accessory dwellings shall have a maximum floor area of 800 square feet and shall not exceed fifty per cent of the principal building's floor area.



Figure BT.1-1 Front Yard House, illustrative axonometric view

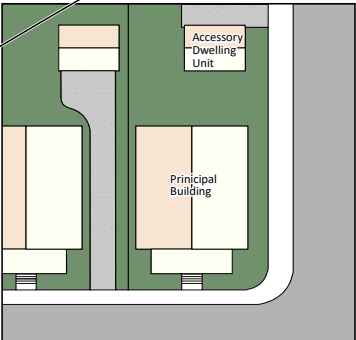


Figure BT.1-2 Front Yard House, illustrative plan view

Author: JacobK Subject: Highlight Remove Date: 9/8/2025 3:32:25 PM

Author: JacobK Subject: Highlight Remove Date: 9/8/2025 3:30:58 PM

FIGURE BT.2 SIDE YARD HOUSE

A single-unit structure, detached on one side, located on a private single-family lot. The unit may vary in size and can be complemented by an auxiliary building for storage, covered parking, or an accessory dwelling. It is one of the least dense housing typologies.

A. Pedestrian Access

1. The entrance shall be directly from the street, through the side yard, along the elevation facing the side lot line.

B. Parking Design and Location

1. Where provided, parking shall be located in the third layer (See Figure 9).
2. Parking access shall be as per section 15-215-47 (parking and loading).
3. If driveway is along the side yard, the driveway should have a permeable surface, such as pavers.

C. Open Space

1. Open space shall be located along the side yard with an area of no less than twenty per cent of the lot.

D. Frontage

1. Front facades shall have a minimum fenestration of fifteen per cent in order to prevent blank walls facing the street.
2. Permissible frontage types are Lanai and Front Yard (Figure FT.1), Stoop (Figure FT.2), and Dooryard (Figure FT.3).

E. Building Massing

1. Front facades shall have at least one encroaching element, such as porches or balconies, or plane break that cumulatively occupy at least five per cent of the facade.

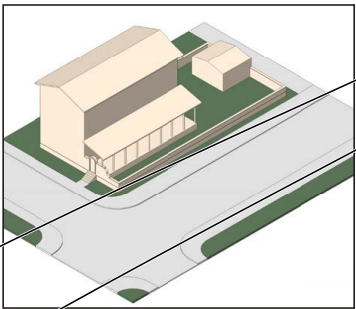


Figure BT.2-1 Side Yard House, illustrative axonometric view

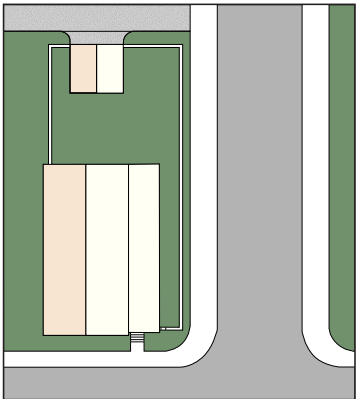


Figure BT.2-2 Side Yard House, illustrative plan view

Author: JacobK Subject: Highlight Remove Date: 9/8/2025 3:31:30 PM

Author: JacobK Subject: Highlight Remove Date: 9/8/2025 3:32:09 PM

FIGURE BT.3 TOWNHOUSE

A multi-unit, continuous structure comprising several housing units, each located on private lots with independent rear yards and separate entrances. Unit sizes may vary and can be complemented by a stacked residential addition.

Covered parking, storage, playgrounds, and other amenities can be provided in shared communal spaces, protected by the boundary formed by the row housing. This is a mid-density typology that fosters social interaction and creates an urban streetscape.

A. Facade Width

- Each townhouse may be a maximum of 26-feet wide, except that the facade of a townhouse on block corners may be up to 40-feet wide.
- A maximum of ten attached townhouses per facade string is allowed.

B. Pedestrian Access

- The entrance shall be accessible from the street, through the frontage line.

C. Parking Design and Location

- Where provided, parking shall be located in the third layer (See Figure 9).
- Parking access shall be as per section 15-215-47, parking and loading.

D. Open Space

- At least twenty per cent of the lot area shall be provided as open space.
- The open space may be located on patios or decks, or on a roof garden.
- Private patios and balconies are allowed in any yard.

E. Frontage

- Permissible frontage types are Lanai and Front Yard (Figure FT.1), Stoop (Figure FT.2), and Terrace (Figure FT.6).

F. Building Massing

- At least one encroaching element, such as a lanai or balcony, or a plane break, shall occupy at least fifteen per cent of the front facade.
- In a three-story building, a two-story townhouse can be stacked over a separate ground floor dwelling.

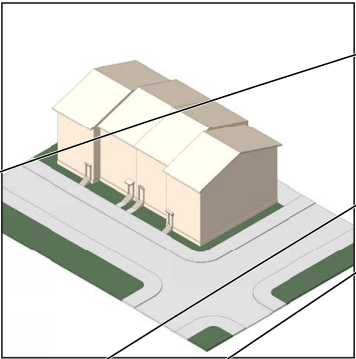


Figure BT.3-1 Townhouse, illustrative axonometric view

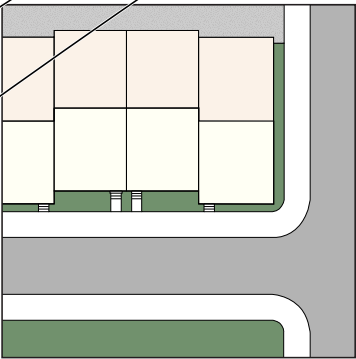


Figure BT.3-2 Townhouse, illustrative plan view

Author: JacobK Subject: Highlight Date: 9/8/2025 3:33:29 PM Remove.

Rationale: Let the unit layout drive the depth. There is absolutely no reason for the state to interject here.

Author: JacobK Subject: Highlight Date: 9/8/2025 3:33:57 PM Remove

Author: JacobK Subject: Highlight Date: 9/8/2025 3:34:11 PM Remove

FIGURE BT.4 DUPLEX, TRIPLEX, AND QUADPLEX

A residential structure containing two, three, or four housing units, arranged either side-by-side or stacked over two floors. The units may share common spaces such as a backyard, parking area, lanai, laundry, or storage. This is a mid-density typology compatible with a more suburban lifestyle, offering a convenient way to accommodate diverse types of 'ohana while maintaining a degree of independence.

A. Pedestrian Access

1. The entrance shall be directly accessible from the street, through the frontage line.

B. Parking Design and Location

1. Where provided, parking shall be located in the third layer (See Figure 9).
2. Parking access shall be as per section 15-215-47 (parking and loading).

C. Open Space

1. Each ground floor unit shall have at least 150-square feet of private or semi-private yard space in the rear yard, side yard, or integrated into the building area through courtyards and gardens. One-third of this requirement shall be provided at-grade.
2. Units above the ground floor may have access to roof garden space for passive and active recreation, patios, decks, and courtyards.

D. Frontage

1. Permissible frontage types are: Lanai and Front Yard (Figure FT.1), Stoop (Figure FT.2), Forecourt (Figure FT.4), and Terrace (Figure FT.6).

E. Building Massing

1. A minimum of fifteen per cent of the front facade shall be occupied by at least one encroaching element, such as a lanai or balcony, or a plane break.

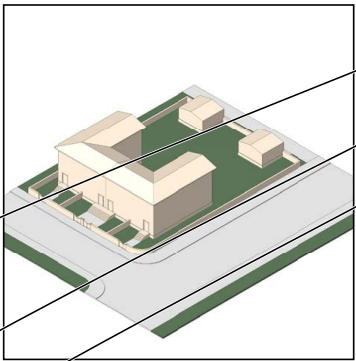


Figure BT.4-1 Duplex, Triplex, and Quadplex, illustrative axonometric view

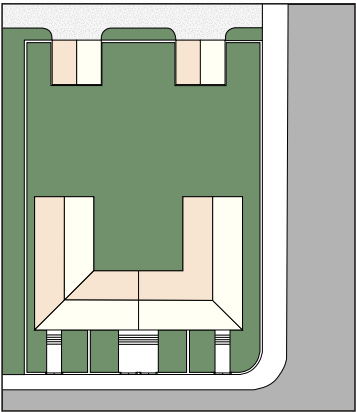


Figure BT.4-2 Duplex, Triplex, and Quadplex, illustrative plan view

 Author: JacobK Subject: Highlight Remove.	Date: 9/8/2025 3:35:47 PM
 Author: JacobK Subject: Highlight Remove.	Date: 9/8/2025 3:36:01 PM
 Author: JacobK Subject: Highlight Remove.	Date: 9/8/2025 3:36:10 PM

FIGURE BT.5 FLEX-LOFT

A multi-unit, continuous structure comprising several housing units, on a common or separate private lots, and separate entrances. Unit sizes and types may vary and can be complemented by a stacked residential addition or subdivisions. Parking, storage, and other amenities can be provided in shared communal spaces. This is a mid-density typology that fosters social interaction and creates an urban streetscape.

A. Facade Width

1. Each flex-loft can be a maximum of 30-feet wide
2. A maximum of ten attached flex-loft buildings per facade string is allowed.

B. Pedestrian Access

1. The entrance shall be accessible directly from the street, through the Frontage Line.

C. Parking Design and Location

1. Where provided, parking shall be located in the third layer (See Figure 9).
2. Parking access shall be as per section 15-215-47 (parking and loading)

D. Open Space

1. At least twenty per cent of the lot area shall be provided as open space. One-third of this requirement shall be provided at-grade.

E. Frontage

1. Permissible frontage types are: Lanai and Front Yard (Figure FT.1), Stoop (Figure FT.2), Forecourt (Figure FT.4), Shopfront (Figure FT.5), Terrace (Figure FT.6), Raised Terrace (Figure FT.7), and Gallery (Figure FT.8)

F. Building Massing

1. Facades shall have at least one encroaching element, such as a lanai or balcony, or plane break occupying at least fifteen per cent of the facade.
2. Building elevations abutting side yards shall provide at least one horizontal plane break of at least three feet, and one vertical break of at least two feet.



Figure BT.5-1 Flex-Loft, illustrative axonometric view

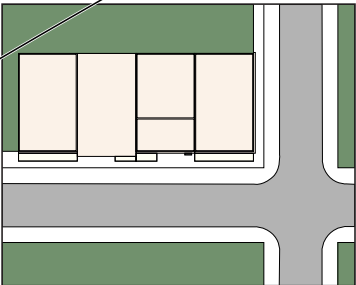


Figure BT.5-2 Flex-Loft, illustrative plan view

	Author: JacobK Subject: Highlight Remove; see comment on townhouses.	Date: 9/8/2025 3:36:31 PM
	Author: JacobK Subject: Highlight Remove.	Date: 9/8/2025 3:36:43 PM
	Author: JacobK Subject: Highlight Remove	Date: 9/8/2025 3:36:55 PM

FIGURE BT.6 INDUSTRIAL BARN

A one- or two-story open-span structure designed for light industrial or commercial use, with flexible interior layouts. This low-density typology, typical for a suburban context, supports operational efficiency and allows a wide integration between closed, covered, and open spaces.

A. Pedestrian Access

- 1. The entrance shall be accessible from the street, through the Frontage Line.

B. Parking Design and Location

- 1. Where provided, parking shall be located in the third layer (See Figure 6).
- 2. Parking access shall be as per section 15-215-47 (parking and loading).

C. Open Space

- 1. For lots between 10,000 and 20,000 square feet, the minimum open space is proportional to the lot size and provided in Table BT.6-1.
- 2. For lots greater than 20,000 square feet, at least twenty per cent of the lot area shall be provided as open space. One-third of this requirement shall be provided at-grade.
- 3. Permeable pavement parking areas can count towards the open space requirement for this building type.

D. Frontage

- 1. Permissible frontage types are Lanai and Frontyard (Figure FT.1), Stoop (Figure FT.2), Dooryard (Figure FT.3), Shopfront (Figure FT.5), Terrace (Figure FT.6), Raised Terrace (Figure FT.7), and Gallery (Figure FT.8).

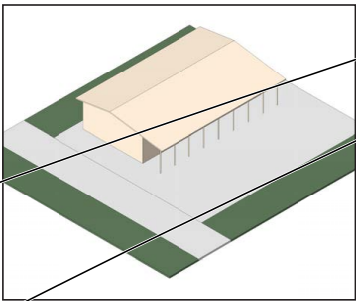


Figure BT.6-1 Industrial Barn, illustrative axonometric view

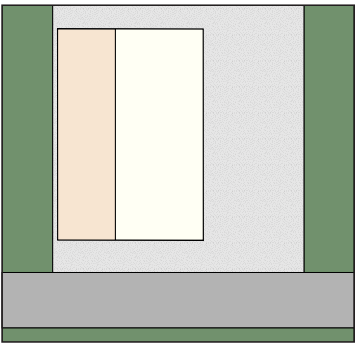


Figure BT.6-2 Industrial Barn, illustrative plan view

Table BT.6-1 Minimum Open Space

Lot Area (square feet)	Minimum Open Space (percent of lot area)
15,001 to 20,000	10%
10,001 to 15,000	5%
less than 10,000	0%

Author: JacobK Subject: Highlight Date: 9/8/2025 3:38:36 PM
This is too typology specific and hard to follow

Author: JacobK Subject: Highlight Date: 9/8/2025 3:37:11 PM
Remove

FIGURE BT.7 COURTYARD

A continuous structure comprising several housing units, retail or industrial spaces, on common or separate private lots, accessible from one or multiple shared courtyards that serve the units' access directly or through lobbies.

The open courtyard can be designed as a "safe space" with services for the community such as covered parking, storage, swimming pools, and gardens. This is a mid- to high-density typology that fosters social interaction and creates layers of privacy.

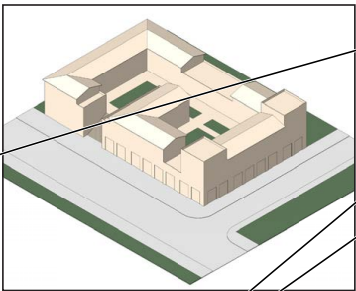


Figure BT.7-1 Courtyard, illustrative axonometric view

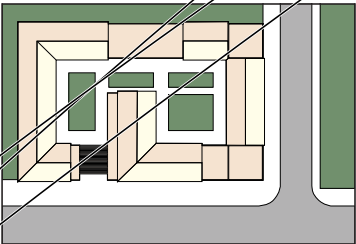


Figure BT.7-2 Courtyard, illustrative plan view

A. Pedestrian Access

1. Ground floor courtyard(s) shall be accessible from the street through the frontage line and through an open or covered passageway.
2. Raised courtyards shall be accessed through a lobby, accessed directly from the principal frontage.
3. The principal entrance to each ground floor unit at the principal frontage shall be directly from the frontage line, or from a courtyard.
4. Access to units above raised courtyards shall be through a lobby with direct access to each courtyard. Upper floor exterior corridors should be less than 25-feet in length. Longer corridors should be enclosed.
5. All retail spaces should be accessed from a ground floor, single-tenant entry along a street, courtyard, or passageway.

B. Parking Design and Location

1. Where provided, parking shall be located in the third layer (See Figure 9).
2. Parking access shall be as per section 15-215.47 (parking and loading).
3. If accommodated in an above-ground garage, parking shall be concealed from view at the public frontage through a line of habitable space.

C. Open Space

1. At least twenty per cent of the lot area shall be provided as open space in the form of one or more courtyards open to the sky.

D. Frontage

1. Permissible frontage types are Lanai and Frontyard (Figure FT.1), Stoop (Figure FT.2), Shopfront (Figure FT.5), Terrace (Figure FT.6), and Gallery (Figure FT.8).

E. Building Massing

1. Front facades shall have at least one encroaching element, such as porches or balconies, or plane break that cumulatively occupy at least ten per cent of the facade.

Author: JacobK Subject: Highlight Remove. Absurdly specific.	Date: 9/8/2025 3:40:26 PM
Author: JacobK Subject: Highlight Remove - very hot in Kalaeloa shade should be encouraged.	Date: 9/8/2025 3:43:30 PM
Author: JacobK Subject: Highlight Remove	Date: 9/8/2025 3:40:19 PM
Author: JacobK Subject: Highlight Remove	Date: 9/8/2025 3:40:36 PM

FIGURE BT.8 URBAN BLOCK

A typology that is typical for an industrial building, possibly complemented by commercial spaces or offices, in an urban context. It is usually a single development with an open frontage facing the main street, which provides access. The side facades and rear of the volume, located at the center of the block, contain service spaces such as parking, storage, or manufacturing.

A. Pedestrian Access

- 1. Entrances to upper floors shall be accessed through an interior lobby, which is accessed directly from the street.
- 2. All retail spaces should be accessed from a ground floor, single-tenant entry along a street, courtyard, or passageway.

B. Parking Design and Location

- 1. Where provided, parking shall be located in the third layer (See Figure 9).
- 2. Parking access shall be as per section 15-215-47 (parking and loading).
- 3. If accommodated in an above-ground garage, parking shall be concealed from view at the public frontage through a liner of habitable space for at least the first 21 feet of building height; service streets and alleys excluded.
- 4. Above-ground garages above 21 feet in height shall be screened from view at the public frontage by landscaping, green screens, or cladding, or concealed from view through a liner of habitable space.

C. Open Space

- 1. At least twenty per cent of the lot area shall be provided as open space and shall be open to the sky. One-third of this requirement shall be provided at-grade.

D. Frontage

- 1. Permissible frontage types are Lanai and Frontyard (Figure FT.1), Stoop (Figure FT.2), Dooryard (Figure FT.3), Shopfront (Figure FT.5), Terrace (Figure FT.6), and Gallery (Figure FT.8).

E. Building Massing

- 1. Front facades shall have at least one encroaching element, such as porches or balconies, or plane break that cumulatively occupy at least ten per cent of the facade.

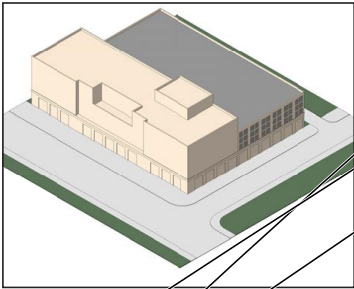


Figure BT.8-1 Urban Block, illustrative axonometric view

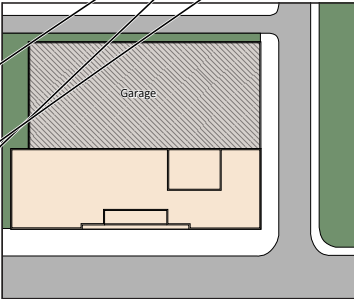


Figure BT.8-2 Urban Block, illustrative plan view

Author: JacobK Subject: Highlight Date: 9/8/2025 3:42:03 PM
Remove - very hot in Kalaeloa shade should be encouraged.

Author: JacobK Subject: Highlight Date: 9/8/2025 3:40:57 PM
Remove.

Author: JacobK Subject: Highlight Date: 9/8/2025 3:40:48 PM
Remove

FIGURE BT.9 LEI BUILDING

A continuous structure comprising single or multiple housing units, retail, or industrial spaces on common or separate private lots. It is usually a single development, accessible from one or multiple shared lobbies.

As a lei, the frontage facing the main street, the side facades and rear of the volume, are open and host active functions. The center of the block contains service spaces such as parking, storage, or manufacturing. This mid-to high-density typology activates the street while hosting service spaces.

A. Pedestrian Access

- Entrances to upper floors shall be accessed through an interior lobby, accessed directly from the street.
- All retail spaces should be accessed from a ground floor, single-tenant entry along a street, courtyard, or Passageway.

B. Parking Design and Location

- Where provided, parking shall be located in the third layer (See Figure 9).
- Parking access shall be as per section 15-215-47 (parking and loading).
- If accommodated in an above-ground garage, parking shall be concealed from view at the public frontage through a liner of habitable space on at least three sides of the building. Where exposed to the street, above-ground garages shall be screened from view at the public frontage by landscaping, green screens, or cladding.

C. Open Space

- At least twenty per cent of the lot area shall be provided as open space and shall be open to the sky. One-third of this requirement shall be provided at-grade.
- Each open space shall have a minimum dimension of thirty feet on any one side.
- Projections into the open space are permitted on all sides of the space, provided that the thirty-foot minimum dimension is maintained.

D. Frontage

- Permissible frontage types are Lanai and Frontyard (Figure FT.1), Stoop (Figure FT.2), Shopfront (Figure FT.3), Terrace (Figure FT.6), Raised Terrace (Figure FT.7), and Gallery (Figure FT.8).

E. Building Massing

- Front facades shall have at least one encroaching element, such as porches or balconies, or plane break that cumulatively occupy at least ten per cent of the facade.

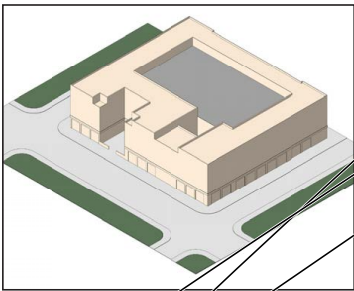


Figure BT.9-1 Lei Building, illustrative axonometric view

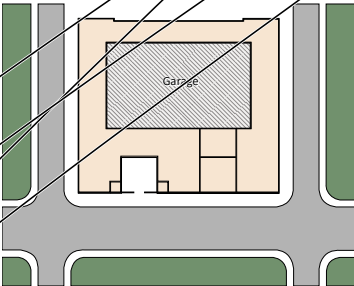


Figure BT.9-2 Lei Building, illustrative plan view

	Author: JacobK Subject: Highlight	Date: 9/8/2025 3:44:24 PM
	Remove - very hot in Kalaeloa shade should be encouraged.	
	Author: JacobK Subject: Highlight	Date: 9/8/2025 3:45:34 PM
	Remove - there is no justification for enshrining this in law.	
	Author: JacobK Subject: Highlight	Date: 9/8/2025 3:45:43 PM
	Remove	
	Author: JacobK Subject: Highlight	Date: 9/8/2025 3:45:58 PM
	Remove	

FIGURE BT.10 TROPICAL URBAN COURT

A single- or multi-unit structure, detached on one side, located on a single or multi-family lot. The unit may vary in size and can be divided horizontally or vertically into multiple apartments or retail spaces that are accessible from a habitable shared lanai. It can be complemented by an auxiliary building for storage or covered parking. This is a mid- to high-density typology that fosters social interaction, offers an open covered space for encounter, and creates layers of privacy.

A. Pedestrian Access

1. Circulation to all upper floors shall be through an exterior corridor, lobby, or courtyard.
2. All retail spaces should be accessed from a ground floor, single-tenant entry along a street, courtyard, or passageway.

B. Parking Design and Location

1. Where provided, parking shall be located in the third layer (See Figure 9).
2. Parking access shall be as per section 15-215-47 (parking and loading).

C. Open Space

1. At least twenty per cent of the lot area shall be provided as open space. One-third of this requirement shall be provided at-grade.
2. Open space shall have a minimum dimension of thirty feet on any one side.
3. Projections into the open space are permitted on all sides of the space, provided that the thirty-foot minimum dimension is maintained.

D. Frontage

1. Permissible frontage types are: Lanai and Front Yard (Figure FT.1), Stoop (Figure FT.2), Dooryard (Figure FT.3), Shopfront (Figure FT.5), Terrace (Figure FT.6), Raised Terrace (Figure FT.7), and Gallery (Figure FT.8).

E. Building Massing

1. Front facades shall have at least one encroaching element, such as porches, balconies, or a plane break that cumulatively occupy at least ten per cent of the facade.

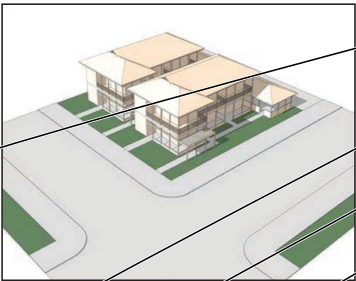


Figure BT.10-1 Tropical Urban Court, illustrative axonometric view

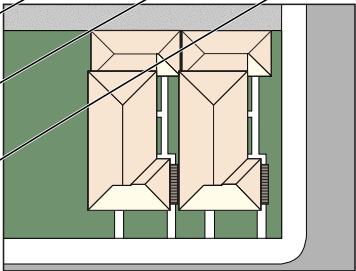


Figure BT.10-2 Tropical Urban Court, illustrative plan view

 Author: JacobK Subject: Highlight Remove.	Date: 9/8/2025 3:46:54 PM
 Author: JacobK Subject: Highlight Remove.	Date: 9/8/2025 3:46:35 PM
 Author: JacobK Subject: Highlight Remove.	Date: 9/8/2025 3:46:14 PM
 Author: JacobK Subject: Highlight Remove.	Date: 9/8/2025 3:46:22 PM



Hunt Development Group, LLC
737 Bishop St., Suite 2750
Honolulu, HI 96813
808-585-7900

September 16, 2025

Craig Nakamoto, Executive Director
Hawai'i Community Development Authority
547 Queen Street
Honolulu, Hawai'i 96813
Email: dbedt.hcda.contact@hawaii.gov

Via Email Only

Re: Comments to HCDA's Kalaeloa Master Plan and Rules Amendments dated July 2025

Dear Mr. Nakamoto,

The following comments are made on behalf of Hunt Communities Hawaii LLC, Kalaeloa Ventures, LLC (and its successors int interest), HCHP1 LLC, VA Aloha, LLC, Wakea Garden Apartments, LLC, KVP6AC, LLC and KVP11, LLC (collectively, "Hunt"), owners or lessees¹ of parcels located within the Kalaeloa Community Development District ("KCDD").

Hunt is in favor of the new Kalaeloa Master Plan and Rules being approved. The adoption of clear, finalized rules is critical for effective planning and development to occur in Kalaeloa. When rules remain in draft form, it is challenging to move forward with development, as the standards remain uncertain. Clear and predictable rules that facilitate the creation of homes and commercial opportunities for local families and businesses are fully aligned with Hunt's objectives in Kalaeloa. Since the plan and rule amendment process began in 2020, we have actively participated in numerous work sessions with HCDA and appreciate the collaborative and transparent approach that has characterized this process.

Please find our comments on the July 2025 Kalaeloa Master Plan and Kalaeloa Rules described below, respectively.

Kalaeloa Master Plan (Attachment A)

Hunt supports HCDA's vision for the Kalaeloa Master Plan, which aims to create social value, foster economic development and employment, and encourage more housing through smart planning and balanced development. We appreciate the plan's increased flexibility, which takes into account the urban infill nature of redeveloping a former Naval Air Station, thus providing a means for an incremental approach and the ability to respond to market conditions as Kalaeloa takes shape. Of the comments listed in **Attachment A**, we would like to reiterate two key points from our August 6, 2024 comment letter concerning HCDA's July 2024 Kalaeloa Master Plan and Rules Amendments, specifically regarding a) infrastructure financing and b) site drainage.

¹ Under that certain Real Estate Ground Lease for Barbers Point made by a Hunt affiliate and the United States of America, Department of the Navy, dated October 6, 2008, as amended.

1. **Infrastructure Financing:** Hunt appreciates HCDA's reference to the ongoing Infrastructure Master Plan and acknowledges its leadership in regional infrastructure planning. We look forward to reviewing the updated plan and would like to emphasize the importance of using current data and ensuring fair infrastructure financing. The cost and availability of infrastructure remain major barriers to housing in Kalaeloa. Continued progress will require strong support from all levels of government to ensure resources are distributed equitably. The 2006 Kalaeloa Master Plan estimated infrastructure costs to be approximately \$470 million, a twenty-year figure that has likely increased significantly. Given the scale of investment and the area's diverse land ownership, it is essential that federal and state agencies contribute their fair share, whether through direct funding or in-kind support such as Payment in Lieu of Taxes (PILT)². We respectfully request that the Master Plan include language recognizing the importance of equitable infrastructure financing and affirming HCDA's commitment to securing contributions from federal and state agencies.
2. **Drainage:** Hunt appreciates HCDA's revisions to the drainage description³ which clarify that not all runoff currently received by the former NASBP Coral Pit located on Hunt land is accounted for or approved. However, we note that similar references on page 93 of the *July 2025 Draft KMP* lack this clarifying language. We request that HCDA add the same clarification to the section on page 93 to ensure consistency and accuracy. For the record, Hunt reiterates that it is not aware of any recorded easements or executed agreements facilitating drainage to parcels identified as TMK (1) 9-1-13:093 and TMK (1) 9-1-13:094, which are privately owned by Hunt and intended for economic development. We object to any implication in the Master Plan Draft that such agreements exist.

Additional comments to the *July 2025 Draft KMP* are included as **Attachment A**.

Kalaeloa Rules (Attachment B)

There are many positive elements in the current draft rules some of which include the removal of minimum FAR requirements, the introduction of a Renovation Permit and right-sizing of the permitting process, updates to the Regulating Plan (Figure 4) and Land Use table (Figure 7), and the continued allowance for light industrial uses which support job creation and provide space for these businesses to continue fueling economic growth in the region.

However, there are several comments that remain outstanding and are outlined in **Attachment B**. We continue to discuss these with staff and look forward to them being satisfactorily addressed so that Hunt can provide strong support at the November hearing date. Of these, our high-priority comments are as follows:

1. **Restrictions on fence heights and materials for industrial uses:** Hunt requests that HCDA review and revise the regulations on fence heights and allowable materials for industrial properties. Security and safety are paramount for industrial tenants and operations, and the current restrictions limit the ability to adequately secure sites. Lower fences increase the risk of unauthorized access and theft, and create a safety issue for the public, particularly in areas where materials or equipment are stored. Without

² <https://www.doi.gov/sites/default/files/documents/2025-06/2025nationalsummarypilt062025-508.pdf>

³ July 2024 KMP (page 28) and July 2025 KMP (page 30)

this flexibility, properties may face increased security risks, reduced market competitiveness, and a higher likelihood of needing variances, which can delay projects and increase costs.

2. **‘Ewa Battlefield Overlay language:** Hunt appreciates the thoughtful edits made to the ‘Ewa Battlefield Overlay section in the July 2025 draft and thanks HCDA for its ongoing engagement with Hunt, the Navy, and historic partners. However, two key issues remain. Hunt recommends that the designated preservation areas within the overlay zone be limited to those previously discussed and agreed upon with stakeholders, specifically the compass rose, swimming pool, and the extant portion of the warm-up mat. In addition, we request the removal of references to Philippine Sea Street, as it is not currently designed to City & County standards and may require realignment in the future. Expanding preservation requirements beyond these areas or including unclear references can create uncertainty for future development and may conflict with infrastructure planning and site access.
3. **Historical and cultural sites language:** Hunt requests that the rules governing historical and cultural sites be revised to align with the established review process under HRS §6E-42 and HAR §13-284-1. Specifically, the requirement for State Historic Preservation Division (SHPD) review should begin after a permit application is submitted, not before. This change will clarify the sequence of review, reduce confusion, and ensure compliance with state law. Additionally, we ask that the language regarding developer responsibilities for maintaining historic and cultural sites be clarified to reflect reasonable standards for upkeep, consistent with the age and condition of the properties.
4. **Validity period of Conditional Use of Vacant Land and Renovation Permits:** Hunt requests that HCDA extend the allowable duration for certain permit types to better reflect the realities of development in Kalaeloa. For the Conditional Use of Vacant Land permit, we recommend that the permit remain effective until the area is redeveloped in conformance with the underlying transect zoning. This permit has proven to be a valuable tool for reactivating Kalaeloa properties during interim periods, before market conditions make redevelopment feasible. This flexibility helps bring people, jobs, and economic activity to the district ahead of full redevelopment. For Renovation Permits, we recommend allowing time extensions, as permitting and other delays often exceed the one-year approval period. Providing the option for extensions will help ensure that projects are not unnecessarily stalled due to circumstances outside the applicant’s control.
5. **Consolidate Light Industrial and Warehousing Land Uses:** Hunt requests that warehousing be included under the broader category of “light industrial” in the Land Use Table, rather than having a separate row. Warehousing is a typical component of light industrial operations and is already cited as an example within HCDA’s definition of “light industrial.” Creating a separate category for warehousing could inadvertently restrict flexibility and limit the ability to respond to market needs.
6. **Proposed Warehouse Overlay Zone:** Hunt requests that HCDA include a new section establishing development standards for a Warehouse Overlay Zone. This addition is necessary to address the recent determination by the Keeper of the National Register of Historic Places, which found that eleven WWII-era storage buildings are eligible for listing as contributing resources to a potential warehouse historic district. By adopting clear standards, HCDA can help guide the preservation, interpretation, and redevelopment of these historic resources. This will ensure that the buildings are

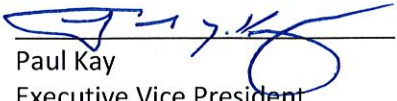
protected in the interim, while also allowing for compatible new development in the future. Hunt recognizes that there may be additional ways to address this, such as a Memorandum of Agreement or Programmatic Agreement, and is open to discussing this further with HCDA, the Navy, and historic partners.

Please find a list of our comments on the Rules included in **Attachment B**.

Thank you for your continued partnership and for considering our comments. We look forward to working together to realize the shared vision for Kalaeloa.

Sincerely,

By:

A handwritten signature in blue ink, appearing to read "P. Kay", is written over a horizontal line.

Paul Kay
Executive Vice President
Hunt Development Group, LLC
A Texas limited liability company

Enclosures

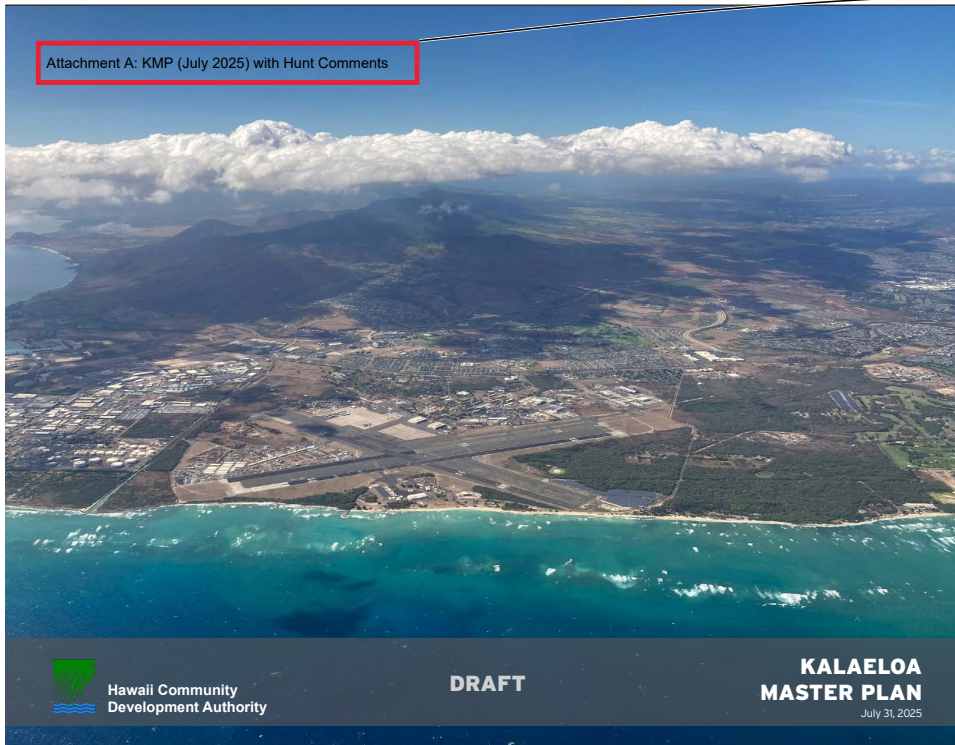
Attachment A: KMP (July 2025) with Hunt Comments

Attachment B: Hunt comments_ HCDA's Kalaeloa Rules Amendments - July 2025

Summary of Comments on Comments - Hunt 20250916.pdf

Page: 5

Author: Hunt Subject: Rectangle Date: 9/2/2025 10:53:24 AM
Attachment A: KMP (July 2025) with Hunt Comments



1.0 Plan Overview

1.0.1 Background of the Master Plan Amendment

In June 2002, Governor Benjamin Cayetano signed into law Senate Bill 2702 (becoming Act 184) which transferred responsibility for Kalaeloa from the Naval Air Station Barbers Point (NAS Barbers Point) Redevelopment Commission to the Hawai'i Community Development Authority (HCDA). Pursuant to Act 184, the Kalaeloa Community Development District (KCDD) was established, comprising approximately 3,700 acres of land that included all of the land within the former NASBP (see Figure 1-1).

Hawai'i Revised Statutes (HRS) Chapter 206E required that a master plan be developed following establishment of the KCDD and the original Kalaeloa Master Plan (Plan) was adopted by the Authority in 2006. The Plan recognized a unique opportunity to redevelop the former NAS Barbers Point based on a strategic vision of Kalaeloa as a "Center for Excellence" or Wahi Ho'okela within the 'Ewa region of O'ahu. To implement this vision, the HCDA adopted a set of core values and principles to guide the redevelopment of Kalaeloa. The planning framework, written into the 2006 Plan, remains valid and is reiterated in this amended Master Plan.

In adopting the 2006 Plan, there was full acknowledgement that the redevelopment process would be complex, including the

likelihood of successes and setbacks along the way and unpredictable events and fluctuating market cycles. Since then, the rail line's under construction with operations under way in the western half of the system; major housing and commercial projects have been completed throughout the 'Ewa Plain even as the high cost of housing remains a top concern; and stewardship of cultural resources has moved forward with establishment of the 'Ewa Plain Battlefield Memorial and Kalaeloa Heritage Park.

This Master Plan Amendment has been undertaken with particular attention to the following objectives:

- Identify relevant changes from 2006 to the present within and surrounding the KCDD
- Identify favorable and detrimental conditions to redevelopment in the KCDD
- Refresh the information and data in the Master Plan and coordinate with the amendments to the Administrative Rules
- Update the Regulating Plan which establishes the pattern of land uses within the KCDD and serves as the official land use map to be implemented by the Administrative Rules
- Reevaluate priorities to inform public investments over a 20-year planning horizon

1.0.2 The Kalaeloa Master Plan

In 2020, the HCDA began the process of amending the 2006 Plan to respond to current and anticipated challenges facing redevelopment and chart an economically feasible and realistic course over a 20-year timeframe.

The planning team reviewed the 2006 Plan and Urban Design Guidelines along with ancillary plans, studies, and other reference documents completed during the intervening period. The planning team also conducted interviews with stakeholders, met with government agencies, and held community workshops to receive feedback on various planning concepts.

The amended Master Plan was written to distill this information into a planning document that provides an overview of the opportunities and vision for Kalaeloa and explains how they are linked to the implementing Administrative Rules. In this regard, the Master Plan is organized in the following manner:

- **Setting the Stage - Understanding the Pieces:** Chapter 1 reviews the history of Kalaeloa beginning with the closure of NASBP and past planning efforts. Chapter 1 also includes a description of the current setting of Kalaeloa in terms of land ownership, land uses, schools, transit, infrastructure, physical characteristics, protected species and

Author: Hunt Subject: Highlight Date: 9/1/2025 8:24:31 PM
We recommend HCDA review and update this table before the Masterplan is adopted.

Author: Hunt Subject: Sticky Note Date: 9/1/2025 2:25:36 PM
We request the area for Hunt Communities Hawaii, VA Aloha LLC, and Wakea Garden Apartment LLC be combined, and represented under 'Hunt Companies, Inc.'

Author: Hunt Subject: Sticky Note Date: 9/2/2025 11:24:40 AM
When comparing against the FY26 Land Owner Assessment Table 2, there appears to be some outdated information. https://dbedt.hawaii.gov/hcda/files/2025/04/2-2025.05.07-Staff-Report-for-Kalaeloa-Landowner-Assessment_final.pdf

Table 1-2: Kalaeloa Land Ownership Detail

Landowner	Land Area (acres)	Percent	Landowner	Land Area (acres)	Percent
Federal			Private Landowners		
Federal	782.7	21.2%	Aloha Properties Unlimited	0.9	0.0%
Federal (pending transfer to unidentified parties)	213.0	5.8%	Eagle River Investors Hawaii LLC	9.5	0.3%
State of Hawaii			Gentry Kalaeloa LLC	21.3	0.6%
Department of Hawaiian Home Lands	552.5	15.0%	Hawaii Conference of 7th-Day Adventists	1.2	0.0%
Department of Education	14.5	0.4%	Henkels and McCoy Inc	2.0	0.1%
Department of Transportation - Airports Division	808.7	21.9%	Hunt Communities Hawaii (includes pending transfers)	396.1	10.7%
Hawaii Community Development Authority	161.9	4.4%	Kaimana Kalaeloa Owner LLC	17.7	0.5%
Hawaii Public Housing Authority	12.3	0.3%	Kalaeloa Water Company LLC	3.7	0.1%
University of Hawaii	2.4	0.1%	Mahana Kalaeloa Owners LLC	15.9	0.4%
City of County of Honolulu			Makai Kalaeloa Owner LLC	44.5	1.2%
Board of Water Supply	20.0	0.5%	U.S. VETS	5.1	0.1%
Department of Parks and Recreation	395.6	10.7%	VA Aloha LLC	9.5	0.3%
Various			Wakea Garden Apartments LLC	25.0	0.7%
Right-of-way	179.5	4.9%	Total Land Area	3,695.7	100.0%

Data as of 4/30/24; Source: City and County of Honolulu GIS

Author: Hunt Subject: Highlight Date: 9/1/2025 2:30:46 PM

We recommend HCDA review and update this map before the Masterplan is adopted. In the legend, please change Hunt Development Corporation to Hunt Companies, Inc. Additionally Parcel 12 is pending transfer, VA Aloha is owned by Hunt, P1 increment 3 is Gentry.

Author: Hunt Subject: Comment on Text Date: 9/2/2025 1:05:19 PM

Note that the HCDA legend color should be pink, BWS is not CCH, and US Vets & Cloudbreak should be reviewed.

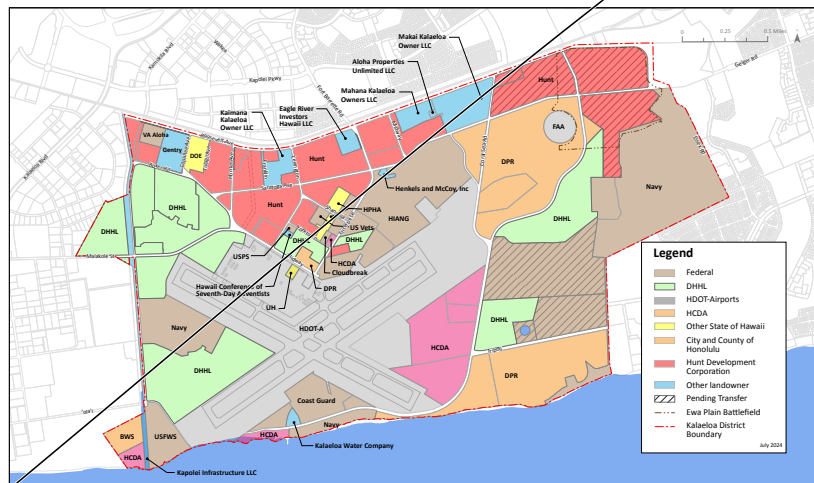


Figure 1-6: Kalaeloa Land Ownership, 2024

	Author: Hunt	Subject: Comment on Text	Date: 9/1/2025 2:34:52 PM
Recommend updating the acreage to align with Table 1-2: Kalaeloa Land Ownership Detail.			
	Author: Hunt	Subject: Cross-Out	Date: 9/2/2025 11:01:25 AM
The baseball parks are within Hunt's property and are not leased to the Department of Parks and Recreation			

1.2.2.3 City and County of Honolulu

1.2.2.3.a Board of Water Supply – Desalination Facility

The Honolulu Board of Water Supply (BWS) acquired 21 acres of land in the southwest corner of Kalaeloa through a public benefit conveyance for the purpose of developing a reverse osmosis desalination plant to supplement O’ahu’s potable water supply. The BWS has entered into an agreement to design, build, operate, and maintain a facility that will deliver 1.7 mgd of potable water for industrial users at Campbell Industrial Park. An adjoining 10-acre parcel has also been identified for transfer to the BWS.

1.2.2.3.b Department of Parks and Recreation

During the BRAC process, the City expressed interest in receiving approximately 485 acres through a public benefit conveyance for the establishment of beach parks, community parks and other recreation facilities. The park areas include one parcel in the downtown area, four parcels east of the airport runway and six parcels along the coastline. Conveyances of seven of these parcels were completed in 2024. The Department of Parks and Recreation is also under a licensing agreement with the Navy for two baseball parks (at Pointer Field) and one beach park in Kalaeloa.

1.2.2.4 Private Entities

1.2.2.4.a HUNT Companies

Hunt Companies currently has—or is expecting transfer of—fee interest in approximately 896 acres in Kalaeloa, making it the single largest private developer within the Kalaeloa District, and second only to DHHH with approximately 552 acres of developable land. The Hunt properties form a swath across the northern edge of the District and span the District’s eastern and western boundaries. Many of the parcels front Roosevelt Avenue and/or Saratoga Avenue, two major thoroughfares. Because Hunt’s holdings comprise large, contiguous parcels of land, future development and redevelopment offers the potential for holistic planning and design. To date, Hunt has developed the Kalaeloa Professional Center and VA Clinic, which are major employment centers, and retrofitted several Navy-built structures for residential, commercial, and recreational uses.

1.2.2.4.b Blackstone Group (Kaimana Kalaeloa Owner) - Orion, Makai, and Orion Park Housing

In April 2016, Blackstone Group acquired the fee interest in three housing areas at Kalaeloa, including: Orion, Makai, and Orion Park. Orion encompasses a 13-acre site that contains 116 multi-family units. Makai covers a 43-acre parcel and contains 280 multi-family units. Orion Park

housing is a 16-acre parcel and contains 120 multifamily units.

1.2.2.5 Unallocated Land

During the BRAC process, several government agencies withdrew their interest in receiving lands in Kalaeloa. The U.S. Fish and Wildlife Service (USFWS) withdrew interest in three of the four parcels it was designated to receive. These parcels, totaling approximately 200 acres, are relatively undeveloped and contain wetlands and habitat for endangered plant and bird species and archaeological sites. The HDOT-Airports and the University of Hawai’i expressed interest in receiving a parcel, leaving the third and largest parcel (about 146 acres) unallocated.

Similar undeveloped parcels in the eastern portion of Kalaeloa, totaling 135 acres were previously designated for public benefit conveyance to the State Department of Land and Natural Resources (DLNR) to HCDA. However, the State later withdrew their interest. Two of the parcels were previously used by the Navy as skeet and trap ranges. As a result, the surface soils were heavily contaminated with lead and were subsequently removed and encapsulated in the Navy’s landfill parcel in the western portion of Kalaeloa. These parcels also contain archaeological sites and have been designated as a critical habitat for the endangered ‘akoko plant.

Please add: It should be noted that there are no recorded easements or executed agreements facilitating drainage to the NAS Barbers Point coral pit, which is owned by Hunt and intended for economic development.

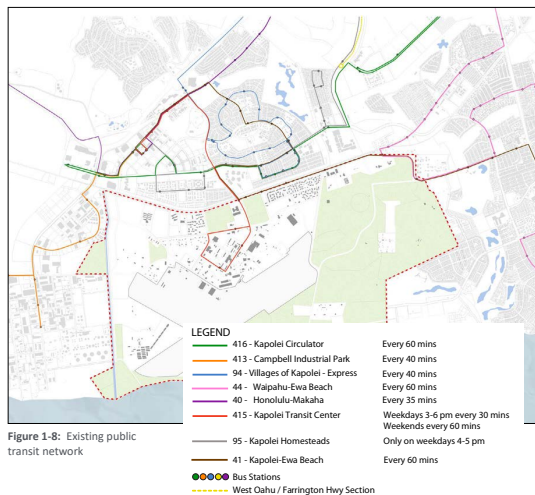


Figure 1-8: Existing public transit network

stops along Roosevelt Avenue in Kalaeloa. The current terminus of the Skyline rail transit line is at Kualaka'i (East Kapolei) station, which is roughly 1.5 miles from the northern boundary of the District.

1.2.3.3 Drainage

In 2017, a Drainage Report was prepared by R.M. Towill Corporation (RMT). Although a draft report, it remains the most thorough assessment that has been done in Kalaeloa to date. The information in this section is based on that report.

Kalaeloa partially falls within the City of Kapolei watershed and the Kalo Gulch watershed. The lower limit of the Kapolei Village watershed is the NAS Barbers Point coral pit, located makai of Roosevelt Avenue and east of Enterprise Street on land owned by Hunt Companies. This facility receives all excess runoff not retained in the watershed. Some of the runoff conveyed to this facility was accounted for and approved as the region developed, and some of the drainage is not. The regional watershed boundaries and the limits of Kalaeloa are illustrated in Figure 1-9.

Previous development of Kalaeloa was mainly intended for the Navy's use and the existing drainage system and roadways were not constructed in accordance with State or City standards. The existing drainage system consists of 253 drywells that were located

Author: Hunt Subject: Comment on Text Date: 9/2/2025 2:23:45 PM
We feel today's readings should be closer to 1.9 MGD. Please verify with KWC or note that this estimate will be verified in the Infrastructure Master Plan.

Water for Kalaeloa is provided by existing wells and reservoirs located 3 miles north of Kalaeloa. According to the 2015 data from the flowmeter at the wells, the estimated average daily flow is approximately 2.2 million gallons per day (mgd). The water meter readings are closer to 1.0 mgd. Further investigation is underway to determine the cause of this discrepancy or location of system leakage. Most of the existing water demand is generated in the northern housing area, the downtown industrial area located north of Midway Street, and the golf course. Water from the two wells is conveyed by a 24-inch transmission main which terminates in a vault mauka of Roosevelt Avenue across from the northern housing area. From there, distribution is split and water to the northern housing area, golf course, Coast Guard and beach areas is from an 18-inch main and water to the downtown, airport and western industrial areas and school is from a 24-inch main.

The Kalaeloa water system is also connected to the BWS transmission line on Fort Weaver Road. A pressure booster pump located on Geiger Road, at the southern perimeter of the Honouliuli Wastewater Treatment Plant (WWTP), is operated when there is a need to use the BWS water source. The use of BWS water occurs only during emergencies.

Water to the downtown area and Kalaeloa Airport is distributed by a 24-inch waterline

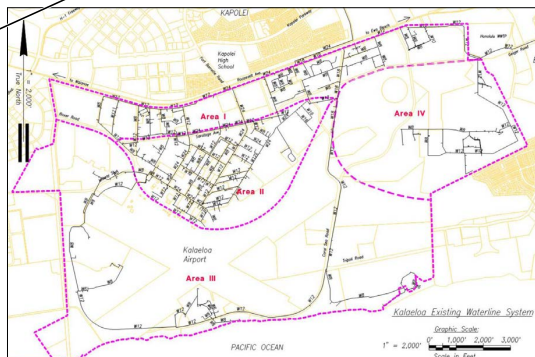


Figure 1-10: Existing Water Supply Network. Source: Draft Kalaeloa Potable Water Master Plan, R.M. Towill Corporation, June 2016.

and a system of 12-inch and 8-inch distribution mains. Water to the eastern portion of Kalaeloa, the Coast Guard station and beach areas is from an 18-inch waterline with 12-inch and 8-inch distribution lines. Figure 1-10 shows the major water lines of the existing water system.

The source of Kalaeloa's potable water is a well shaft located mauka of the H-1 Freeway. Kalaeloa has a permitted water allocation or pumpage limit of 2.3 mgd. Also located in the mauka area outside the District are two reservoir sites each with one underground reservoir. One of the reservoir sites is co-

Author: Hunt Subject: Comment on Text Date: 9/16/2025 4:47:13 PM
Info not current. Five Star Logistics is not the tenant anymore. Perhaps note the use (commercial/industrial) rather than the tenant name.

Author: Hunt Subject: Comment on Text Date: 9/16/2025 4:47:21 PM
(replace/insert) ".....DreamHouse Public Charter School as well as the former Navy fitness center which is leased to American Renaissance Academy. Other building renovations have resulted in upgraded spaces for the bowling alley and numerous warehouses for local businesses."

1.2.4 Existing Structures and Recent Development

Figure-ground diagrams are drawings that illustrate the relationship between the built and the unbuilt environment within the study area. Land coverage of buildings is visualized as grey solid mass (figure), while public spaces formed by streets, parks and plazas are represented as voids (ground). Such diagrams are used to explore built form patterns and the continuity of open space (see Figure 1-17).

Development in Kalaeloa has been relatively slow since the adoption of the 2006 Master Plan, presumably due to proximity to the various military uses, inadequate infrastructure, and airport land-use considerations. Meanwhile, neighboring areas, namely Kapolei to the north and Hoakalei to the east have seen significant development. The 2020 figure ground diagram illustrates the "grain" and scale of new development at that time, of which the most significant was the FBI Field Office, meant to serve as a gateway and catalyst for new construction in the area.

Since 2020, the pace of development and redevelopment has picked up. Figure 1-18 provides an overview of major assets within the District. The Kalaeloa Professional Center on Shangrila Street provides almost 50,000 SF of Class A office space for financial, medical, and other professional services, and includes a wing for the Warrior Ohana medical facility.



Figure 1-17: Kalaeloa figure ground diagram. Source: HCDA, 2020

A former Navy Exchange furniture store was redeveloped and now houses Five Star Transportation, a large distribution company.

Also redeveloped was the former Navy Bachelor Officer's Quarters (BOQ) which currently provides 100 affordable rental units. The BOQ mess hall was transformed into an

educational facility for DreamHouse Public Charter School. Other building renovations have resulted in upgraded spaces for the convenience store and gas station and bowling alley.

New construction includes the Daniel K. Akaka VA Outpatient Clinic with approximately

Author: Hunt Subject: Inserted Text Date: 9/16/2025 4:46:16 PM
(spelling) Hawaii Water Co.

Author: Hunt Subject: Cross-Out Date: 9/16/2025 4:47:31 PM
a private utility company.

for solar projects. A deterrent to residential development is the inadequate state of existing infrastructure.

1.3.4.1.d Honolulu Board of Water Supply

Kalaeloa's potable water needs are currently being met by Hawaii's Water Company, a private company. Although BWS has no plans to take over water supply, it is planning to construct a desalination plant within the District that is expected to be completed by approximately 2028 and operate for at least 20 years.

1.3.4.1.e Kalaeloa - Hawai'i Department of Transportation

Kalaeloa Airport is a resource for businesses, training, and recreational aviation activities. It plays a critical role improving safety and efficiency at Honolulu International Airport by accommodating many of the general aviation operations that would otherwise occur there. Statewide, the airport supports emergency activities, such as U.S. Coast Guard marine search and rescue as well as Hawaii National Guard rapid deployment from their Kalaeloa facilities. Because Kalaeloa Airport is recognized as an important asset for the state's aviation system, the Kalaeloa Airport Development Plan identifies ongoing and future safety and security enhancements and capital improvement projects.



The DreamHouse Academy is located in rehabilitated former Bachelor Officer Quarters (BOQ) mess hall.

1.3.4.1.f Honolulu Authority for Rapid Transportation (HART)

Given changes in the rail project's construction timeline, it is premature to designate a specific route for the rail extension into Kalaeloa. Regardless, a pedestrian-friendly environment would bolster future transit developments by rail and/or bus.

1.3.4.1.g Honolulu Fire Department (HFD)

The HFD does not have a station at Kalaeloa at present, but will require one in the future. The department has identified what it considers an ideal site, adjacent to the FBI facility, which would provide land for a new station, indoor classrooms, storage, and a large outdoor training facility.

1.3.4.1.h Barbers Point Elementary School

Barbers Point Elementary School has a capacity for 700 students, but the facility is outdated and needs refurbishment. Off campus, surrounding streets lack continuous sidewalks and there are no streetlights. Development of safe pedestrian and bike routes to and from the school would greatly benefit the students.

1.3.4.1.i DreamHouse Academy Public Charter School

DreamHouse Academy opened in July 2020 in a leased building adjacent to Wakea Apartments. The school will be moving in 2024 to a permanent facility in Kapolei which will allow expanded enrollment.

	Author: Hunt	Subject: Comment on Text	Date: 9/2/2025 2:28:39 PM
	, if the grid is upgraded to HECO standards.		
	Author: Hunt	Subject: Comment on Text	Date: 9/1/2025 2:51:50 PM
	Hunt Companies, Inc.		
	Author: Hunt	Subject: Cross-Out	Date: 9/2/2025 2:29:06 PM
	Please replace with: Hunt is the largest private landowner in Kalaeloa.		

1.3.4.1.j Kapolei High School

Although Kapolei High School is located outside the CDD, it is an important local stakeholder in planning for Kalaeloa. In 2021-22, there were slightly over 2,000 students enrolled in grades 9 through 12. Kapolei High School will experience enrollment pressures as residential growth continues in the school's catchment area. The high school itself is located within a 20-minute walk of most areas slated for residential development in Kalaeloa and is within a 30-minute bicycling area of almost the entire District. There are opportunities to develop safe routes to school for both modes, including a safe crossing through the nearby intersection of Roosevelt Avenue and Enterprise/Fort Barrette Road.

1.3.4.2 Private Entities

1.3.4.2.a Hawaiian Electric (HECO)

The electrical grid in Kalaeloa is owned by the Navy, run by a subcontractor, and powered by a HECO substation. **HECO is interested in acquiring ownership of the grid.** Climate-change-induced sea level rise is not projected to affect existing electrical infrastructure.

1.3.4.2.b Hunt Companies Hawaii

Hunt owns the majority of developable land in Kalaeloa and frequently produces planning studies to guide development on their parcels. Hunt's insights and community comments



Ka'ulu by Gentry single detached homes.

ranging from rural to urban center (see Section 3.2). The land uses and densities permitted within each type of transect form a compatible mix and contribute to the character of that transect.

2.3.3 Interim Uses

Interim land uses, such as storage and maintenance facilities, are temporary, acceptable land uses that do not preclude the intended long-term, preferred land uses from occurring. Allowing interim land uses offers short- to medium-term benefits to Kalaeloa while reserving maximum benefit for future uses. Interim uses shall be reviewed and coordinated with landowners in Kalaeloa for appropriateness, ability to align with the strategic goals and objectives, and ease of redevelopment to the preferred land use. Thus, interim uses that do not contribute to the appropriate mixture of land uses or immediate benefit of the community shall be restricted.

2.3.4 Potential Relocations

Another opportunity to facilitate and enhance redevelopment is the potential relocation of existing uses. While many existing uses are encumbered by deed restrictions placed at the time the properties were conveyed, possibilities exist for the HCDA to work with landowners and the Federal government to optimize land use within Kalaeloa over the

Why the "20-Minute City?"

The 20-minute city is the key concept that will help Kalaeloa become a Center for Excellence by:

- Placing emphasis on what people love about cities: their vibrant streets and neighborhoods, and their convenience. Shorter travel times mean more time for recreation and family, and more money saved.
- Improving the quality of life and promoting equality and diversity by enhancing accessibility to services.
- Fostering healthy lifestyles by encouraging human-powered transportation, such as biking and walking, which have proven health benefits. The 20-minute city enhances walkability which results in fewer pedestrian and vehicular crashes and can also help alleviate loneliness by making it easier to meet and interact with neighbors.
- Relying on less pollution-emitting and less carbon-intensive forms of mobility, which have proven environmental benefits. Sprawling urban development is very energy intensive whereas a compact urban form thrives on accessible, multimodal transportation options.



Cities as disparate as Portland, Oregon and Melbourne, Australia have already been working on "20-minute neighborhoods" that employ these very concepts. And in recent years, the market has been sending a clear signal: homes in walkable neighborhoods are at a premium. Smart Growth, a U.S. advocacy group, argues this indicates that there is not nearly enough supply. 20-minute cities produce livable, equitable, healthier and environmentally-friendly benefits - all befitting a Center for Excellence.

Proposed renovations and new work should receive the appropriate approvals from SHPD and abide by any applicable covenants, and Federal and State laws and requirements.

Plan (SCORP) which is prepared on a 5-year cycle.

Although dedicated open spaces and corridors are vitally important for passive and active recreation, a community's street network should also be enhanced to provide public amenities. Shade, either from trees or structures, should always be incorporated to not only foster walkability, but also help reduce the heat island effect. Shared paths and cycle tracks provide mobility options, and are active transportation options that promote healthy lifestyles. Public art can provide additional interest and expressions of local meaning in the streetscape. Street networks are usually the biggest landholding in the public realm, and presents the greatest opportunities for equitable public access to shade, recreation, mobility, and civic aesthetics.

2.3.5.2 Cultural Resources - Kalaeloa's Living Heritage

Kalaeloa and the broader 'Ewa region are rich in cultural history and significance. The presence of archaeological sites, endangered species, and native plants on relatively open land in proximity to the Kalaeloa coastline presents an opportunity to revisit the native Hawaiian cultural traditions that existed in the region prior to Western contact and to educate the broader community about the 'Ewa region's rich history.

Early Native Hawaiian Period

Cultural and archaeological sites of Ewa Plain's earliest inhabitants have been conserved and protected through collaborative efforts that created the Kalaeloa Heritage Park (KHP). The HCDA partnered with the Kalaeloa Heritage and Legacy Foundation (KHLF) to establish the park. Through KHLF's stewardship, the park is a remarkable living heritage site which represents an authentic educational setting and medium for the preservation of Hawaiian cultural traditions and practices. KHP's programs actively engage the community with hands-on participation through its service and work-study opportunities. One of its educational programs with the University of Hawaii West O'ahu's Botany program resulted in the cultivation and reforestation of native plants such as 'ahinahina o 'Ewa.

Ewa Plantation Era

The extant tracks within the historic OR&L railroad right-of-way along the northern boundary of Kalaeloa are owned by the State of Hawaii and managed through the dedicated stewardship of the Hawaiian Railway Society (HRS). The collaboration between HRS and the government agency is crucial for the education and appreciation of the rail system's contributions at Kalaeloa. The HCDA recognizes the importance of stakeholders' participation in the decision-making processes

for the future development of this viable mode of transportation at Kalaeloa.

Military in the Pacific and World War II

The period of military presence at Kalaeloa played an important role to bolster the United States' defense capabilities during the period of tension evolving in the Pacific, throughout World War II and the subsequent Cold War period.

On May 2016, Ewa Field was placed on the National Register of Historic Places (NRHP) as the 'Ewa Plain Battlefield. ~~Proposed renovations and new work will conform to the Secretary of the Interior's Standards for Rehabilitation and Guidelines for the Treatment of Cultural Landscapes.~~ Respectful treatment of historically significant sites is essential to recognize the bravery and sacrifices of those who served during this period in American history. Kalaeloa's pivotal role during World War II can be honored by thoughtful remembrance through preservation, education, interpretation, and commemoration.

2.3.5.3 Natural Resources

According to the Division of Forestry and Wildlife under the State's Department of Land and Natural Resources, Hawai'i is home to more than 1,400 native vascular plant taxa, 90% of which are not found anywhere else.

of the "Second City" of Kapolei and the overall 'Ewa district provides a large market for quality fresh fruits and vegetables.

- Greenhouses and aquaponics farms could be relatively small in scale and could blend in with future plans and developments for light industrial and related land uses in Kalaeloa. These forms of intensive agriculture do not require large volumes of irrigation water – a plus factor for farms in the hot, dry 'Ewa district.
- Programs could be developed for the restoration of Kalaeloa coastal fisheries and limu. Limu is a form of ocean algae that was traditionally an important source of nutrition for native Hawaiian people. Limu restoration programs would have cultural, educational, and food value.

2.3.6 Addressing Regional Traffic Congestion

Due to increased development and the necessity to commute to school and work, traffic on existing arterial roadways and the H-1 Freeway is congested on a daily basis. Roadways such as Farrington Highway, Roosevelt Avenue, and Geiger Road provide some relief in the east-west direction but are also frequently congested. Construction of Kualaka'i Parkway and completion of

the Kapolei Parkway have improved ingress and egress; however, additional measures are necessary to reduce regional traffic congestion. One of these measures is the development of Kalaeloa according to the principles of the 20-minute city. Convenient and efficient mass transit service is also critical.

Consistent with the principles of the 20-minute city, another approach to reducing regional traffic congestion is to increase employment opportunities in the 'Ewa region, thereby reducing the necessity for area residents to commute outside the region to work.

2.3.6.1 Streets & Roadways

Improvements to the street network within and adjacent to Kalaeloa present an opportunity to enhance regional connectivity both east-to-west and north-to-south and improve vehicular traffic flow within the 'Ewa region. In addition to current regional transportation plans and ongoing road improvement projects, several new improvements are proposed (Refer to Figure 2-1). Any streets crossing historic resources, such as the Historic Hawaiian Railway at Renton Road, must receive the appropriate approvals from SHPD and other relevant agencies and abide by all Federal and State laws and requirements.

- Develop Saratoga Avenue as the major urban corridor through Kalaeloa. The alignment should avoid the 'Ewa Plain Battlefield Memorial.
- Enhance vehicular circulation and connectivity on Fort Barrette Road, including refinements to intersection operations at Roosevelt Avenue and Fort Barrette/Enterprise Roads.
- Extend Wakea Street into Kalaeloa and provide a direct link to the H-1 Freeway interchange.
- Develop a roadway connection to Campbell Industrial Park and Kalaeloa Harbor via Malakole Street.
- Develop a mauka-makai connection on the east side of Kalaeloa in the vicinity of Ka Makana Ali'i.

In 2016, the City of Honolulu released the Complete Streets Design Manual to ensure that public streets and surrounding spaces serve everyone's transportation needs, whether by car, bike, bus, rail, or foot. New streets in Kalaeloa should reflect this vision and be built to such standards. Additional street standards are part of the City and County of Honolulu's Subdivision Rules and Regulations and apply to construction plans needing review by the Department of Planning and Permitting.

Author: Hunt Subject: Comment on Text Date: 9/16/2025 4:47:40 PM
Recommend that statement include more specificity on type of conceptual illustration; which in this case is a massing diagram intended to show massing/scale of buildings utilizing potential heights/densities. It does not necessarily depict a development site plan.

Option:
"This massing diagram is a conceptual illustration intended to depict....."

Author: Hunt Subject: Cross-Out Date: 9/2/2025 3:01:20 PM

maintenance support. Also located downtown were public services, such as the post office, that benefited from a central location. The historic downtown is roughly bounded by Midway Street with Enterprise Street serving as a central spine. The street pattern reflects the layout of the airfield with streets angled to fit within the crook of the crossing runways. The historic downtown continues to provide ample opportunities for infill development to enrich the mix of land uses.

Beyond the historic downtown, however, the Regulating Plan envisions the mixed-use area expanding northward to Roosevelt Avenue. A cluster of blocks in the downtown area is in the general urban transect (T4) to enable future infill development. Heading north, parcels located between Saratoga Avenue and Roosevelt Avenue are in the urban center transect (T5) and would form a defined hub or "new downtown." Concentrated urban activities and denser urban form would anchor a multi-modal corridor and potential transit-oriented development.

A long-term redevelopment objective is to upgrade Saratoga Avenue into a linear, promenade type mixed-use area. This objective is supported by a land use overlay called the Saratoga Frontage Zone to promote development that will activate and enliven the street scene.

A primary objective for the mixed-use area, or downtown Kalaeloa, is to create a physical environment that supports the evolution of the 20-minute city. To that end, this area will be a place where:

- Residents can walk or bike to work, school, the local transit station or mobility hub, or to the essential services needed for day-to-day life as well as to enjoy the cultural amenities of the Kalaeloa community.
- A variety of mobility options allow for ease of movement within the area and connections to the region at large.
- Neighborhood streets are valued beyond their ability to carry traffic, but as significant urban places in and of themselves, because they are where neighbors, friends and colleagues meet and socialize. They are supported by streets with sidewalk cafes, lively plazas, and restful parks.

On the east side of Kalaeloa, another overlay zone will support the preservation and interpretation of historic resources within the Ewa Plain Battlefield Historic District. Overlay regulations are intended to integrate history within the development of private land uses.



This conceptual illustration of a view looking west shows how elements of the historic Ewa Plain Battlefield, such as the warming-up mat, could potentially be preserved alongside interpretations of the old runways (as recreational open space) within a new mixed-use neighborhood incorporating residential, commercial, and light industrial uses.

3.1 Neighborhoods

The mixed-use neighborhood is the building block of the 20-minute city, in which many of life's daily needs are a 20-minute walk, bike, or bus-ride away, and a key to supporting walkable urban places. This, in turn, will support economic development by helping to attract new employers and employees, to live, work, shop and play in Kalaeloa neighborhoods.

Four key strategies will be critical in realizing the vision for Kalaeloa as a community of neighborhoods. These include:

- **Saratoga Avenue** and other framework streets are key to linking neighborhoods to each other. Serving as Kalaeloa's new main street, Saratoga has the potential to become the area's signature main street - an iconic and memorable place. Pedestrian-friendly building frontages and wide sidewalks are particularly important along Saratoga, as with the primary thoroughfares linking neighborhood centers to one another.
- **Multi-modal connectivity** between neighborhoods and activity centers is key to unlocking the value of mixed-use infill development and offering convenient access to nearby jobs, housing, recreation and commercial amenities. Bus routes will need to be reconfigured to connect these neighborhoods, while region-wide transit, such as an extension



Outdoor restaurant seating can help activate the urban environment

of the rail transit line, should be prioritized for the future.

- **Placemaking** is a planning concept that carefully links the circulation and open space network (core elements of the public realm) with existing and new private development. Making great places is the payoff for connected, mixed-use development, as each increment adds value to surrounding properties.

On top of this, great places arise as new developments contribute to the distinctive character of an area.

- **Pedestrian-friendly design** can bring daily necessities within an easy walk of many residents, stimulating economic activity while reducing the stress on transportation systems. Thus, neighborhoods should be limited in size to the distance a pedestrian can walk in

Does the gray bold represent Saratoga Overlay? If so, should align with the regulating plan.

five minutes—roughly 1/4 mile from the center of a neighborhood to its edge—as well as provide a street network that prioritizes pedestrian safety and comfort. Local streets should be woven into the network to create walkable block-sizes.

Building design should reinforce the pedestrian orientation of the neighborhoods by gently framing the streets and public spaces to provide visual delight that makes walking a joy. General development standards that are part of the Kalaeloa community development district rules include form-based code requirements to promote consistent, quality urban environments in the respective transect zones. In general, development standards seek to accomplish the following objectives:

- New development should always front streets with human-scale, pedestrian-oriented frontages, an ensemble that is tailored to specific street types and includes sidewalks, curbs, plantings, bicycle facilities, and street trees that provide shade.
- Design should emphasize the continuity of public frontages with buildings or landscape edges while discouraging large surface parking lots and blank walls.

To accomplish these objectives, the plan identifies several conceptual neighborhoods

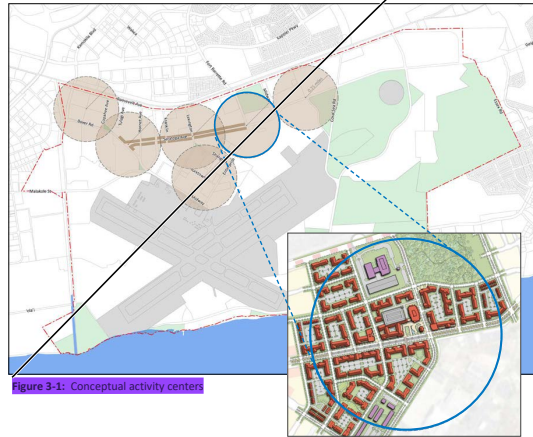


Figure 3-1: Conceptual activity centers



Figure 3-2: Illustrative conceptual neighborhood (East Saratoga)

Is there a date for 'existing conditions' photos?

Illustrative Conceptual Buildout

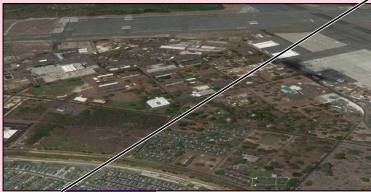


Figure 3-3: Existing conditions - makai view



Figure 3-5: Existing conditions - mauka view



Figure 3-4: Illustrative build out - makai



Figure 3-6: Illustrative build out - mauka

Author: Hunt Subject: Comment on Text Date: 9/1/2025 3:16:22 PM

We request HCDA remove the park located on Parcel 13 as this figure illustrates the publicly-accessible open space network.

Figure 3-7 Parks and Open Space Plan illustrates the publicly-accessible open space network. An equitable distribution of open spaces in neighborhood centers and within the fabric of the neighborhood itself will ensure a livable and lively public realm. These spaces will be fronted by streets and buildings ensuring “eyes on the park.” Public spaces in neighborhood centers are generally hardscaped to easily accommodate various activities, such as farmers markets and festivals.

Alternatively, public spaces within the neighborhood fabric are generally landscaped for recreation, such as sports fields, parks, and playgrounds. An area of approximately 220 acres along Saratoga Avenue, tentatively known as Kalaeloa Regional Park – Mauka, has the potential to provide significant space for active sports fields, such as baseball and soccer, play courts for basketball and tennis, dog park, and a swimming center, passive recreational facilities and open areas for picnicking and public events.

Another assemblage that includes the existing Kalaeloa Beach Park, and a future Kalaeloa Regional Park - Makai, bracket both sides of Tripoi Road. The campground could be expanded to include enhanced bathroom and shower facilities, as well as additional camp sites. New parking areas and connecting lanes (for example, the completion of Eisenhower Road) would allow enhanced access by the

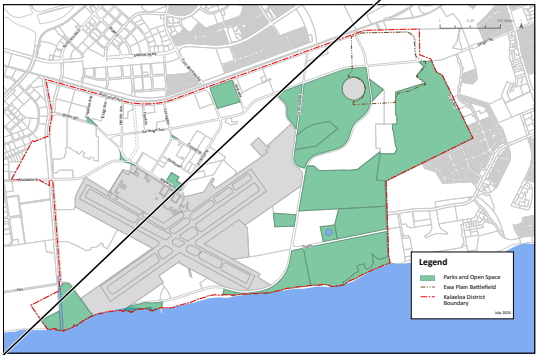


Figure 3-7: Conceptual parks and open space plan

Figure 3-9 shows the existing and proposed network of bicycle facilities, based on the 2019 O'ahu Bike Plan. Corridors for separate and shared bicycle facilities will help to determine where additional curb-to-curb width may be needed as the profiles of Kalaeloa roads take their finished form.

LEGEND

Existing and Proposed Bicycle Facilities

		Shared Use Path
		Bike Lane
		Shared Roadway
		Buffered Bike Lane
		Shoulder Bikeway
		Protected Bike Lane

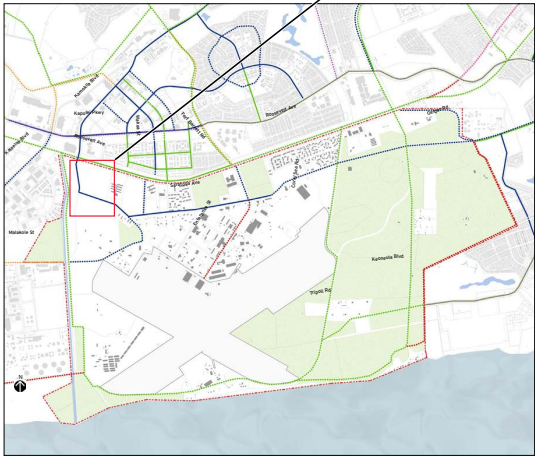


Figure 3-9: 2019 O'ahu Bike Plan - Existing and Proposed facilities

Remove this reference as P18/19A are in T3, or specify that "portions of the 'Ewa Plain Battlefield are located within the T2 zone."

3.2.1 Transect Zones



3.2.1.1 T2 Rural Zone

The T2 zone is comprised of large lots with natural landscapes, beaches, developed and undeveloped park areas, pedestrian and bicycle trails and limited agricultural use. The T2 zone consists primarily of lots along the ocean, lots reserved for regional parks or open space. Cultural, archaeological, and environmental uses and sites, such as the Kalaeloa Heritage Park and the Ewa Plain Battlefield, are located within the T2 zone. Properties located within the T2 zone may also various outdoor recreation facilities, such as aquatic centers, beach parks, campsites, and associated parking facilities.



Properties in T2 also include "eco-industrial" uses defined as environmentally-compatible industries that benefit the island-wide population. Industries such as solar or hybrid energy generation, bio filtration, hydroponic farming and other such sustainable technologies are compatible in these parcels. These industries require large land areas and can be located within the airport's runway protection zones (RPZ) where height restrictions limit development or, in some areas, where noise contours resulting from airport activities exceed 65-decibel day-night average sound levels (DNL). Any occupied structures built within these areas must comply with FAA requirements for development.



3.2.1.2 T3 Mixed Use Zone

The T3 Mixed Use Zone is characterized by lower density development with a wide mix of activities. Some areas may be predominantly residential, characterized by single-family homes, duplexes, townhomes, and small apartment buildings. These areas may also include live-work spaces, home-offices, studios, and bed and breakfast inns. Limited local-serving retail and commercial uses, such as health care providers, neighborhood cafes, and small office buildings, are also permitted in the T3 zone. Generally, buildings would not be taller than three stories and surface parking would be provided on the side or rear of the lot. Residential densities are expected to range from 8 to 20 dwelling units per acre and commercial uses are not to exceed a floor area ratio (FAR) of 1.5.



Other T3 areas may contain more commercial and light industrial uses than residential neighborhoods. Such uses could include professional offices, logistics and warehousing, and commercial recreation. The objective of the T3 zone is to meet an array of community and economic needs, while maintaining healthful levels of air and noise impacts and visual compatibility with surrounding development.

Where commercial and light industrial development results in larger-sized blocks or buildings that are set back farther from the street, sidewalks will need to be designed to maintain a pedestrian friendly quality. Vegetative screening is required to wrap large areas of parking, loading, or buildings with blank walls. Sites with large surface parking lots are opportunities for incorporating photovoltaic panels, both as a source of renewable energy and to reduce the heat island effect.



3.2.1.3 T4 General Urban Zone

The T4 General Urban zone contains a diverse mix of uses at higher intensities than T3. Residential building types generally include townhomes and urban apartment buildings, as well as live-work spaces. Retail, hotel, and office uses are permitted.

Generally, buildings are not taller than five stories and may have a mix of garage and/or surface parking in the rear of the lot or the middle of the block, screened from view. Residential densities would range from 16 to 40 dwelling units per acre and commercial uses do not exceed 2.5 FAR.



3.2.1.4 T5 Urban Center Zone

The T5 Urban Center Zone includes a diverse mix of uses at higher intensities than T4 with the highest allowable density and height, containing a mix of retail, office buildings, civic uses, and residential. The T5 zone is the vibrant and bustling heart of Kalaeloa. Buildings are set close to the sidewalks to activate street life and sidewalks are wider to accommodate outdoor dining and public street furniture. Buildings are generally not taller than seven stories and will have garage parking screened from view along primary streets. Residential densities range from 40 to 100 dwelling units per acre and commercial uses do not exceed 3.5 FAR. Civic spaces include urban parks, plazas and squares. Tree-lined streets include curbs, sidewalks and landscaping on smaller-sized blocks and traffic-calming techniques implemented throughout.

3.3 Connectivity

The Plan envisions new streets to be woven into the existing street grid, as shown in Figure 3-11. Proposed new regional thoroughfares, including the extension of Wakea Street and connection of Saratoga Avenue to Coral Sea Road, would greatly increase connectivity within the district.

Given the listing of the 'Ewa Plain Battlefield on the National Register of Historic Places in 2016, however, the planned City and State roadways east of Coral Sea Road are being re-evaluated. Instead of continuing Saratoga Avenue east to Geiger Road, for example, it could be connected mauka to Roosevelt Avenue outside of the Battlefield. The future extension of Kualaka'i Parkway also needs to be reconsidered to avoid the historic elements of the 'Ewa Field which are to be preserved. The City- and State-owned rights-of-way through the 'Ewa Field could potentially be exchanged for alternative alignments or other uses.

3.3.1 Street Grid

The map depicted in Figure 3-11 is conceptual in nature. As each parcel is developed, streets are expected to be added, subtracted, or moved from where they are shown on this map. The street network can be viewed as an arrangement of blocks defined by their perimeters or the sum of all sides. In general, block sizes decrease as area land uses diversify and/or intensify. As such, block-size perimeters

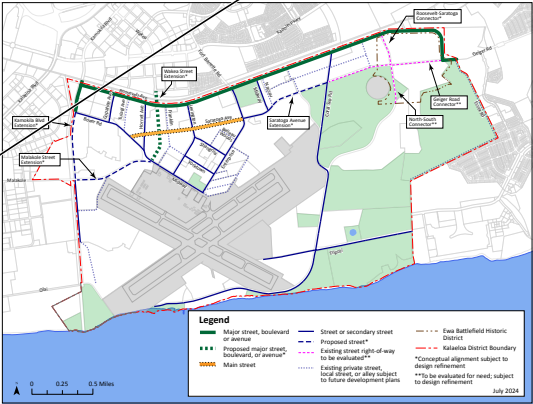


Figure 3-11: Conceptual thoroughfare Plan

the near future, autonomous shuttles could also provide on-demand first- and last-mile connectivity between mobility and residential developments.

3.3.2 Thoroughfare Standards for Complete Streets

All new and upgraded thoroughfares should be designed under the City of Honolulu's "Complete Streets" policy. Streets should generally consist of vehicular lanes and public frontages. Bicycle lanes will also be appropriate on some streets. Public frontages contribute to the character of the Transect Zone, and should include the types of sidewalks, curbs, planters, bicycle facilities, and street trees that contribute to a walkable, multimodal thoroughfare. Streets should be designed in context with the urban form and desired design speed of the Transect Zones through which they pass. Streets may include vehicular lanes in a variety of widths for parked and for moving vehicles, including bicycles. Within Transect Zones T3 through T5, pedestrian comfort shall be a primary consideration of street design.

Design conflicts between vehicular and pedestrian movement generally **shall** be decided in favor of the pedestrian. To discourage fast, cut-through traffic, traffic calming measures should accompany the interconnected street network called for in these standards. A large measure of traffic



A multi-year demonstration project in Fairfax County, Virginia utilized an autonomous shuttle to connect the Dunn Loring Metrorail Station with the Mosaic District, a 31-acre urban mixed-use retail development.

calming would be provided through the use of appropriately dimensioned travel and parking lanes. (Excessive street width has been identified as a major contributor to higher vehicle speeds and a higher incidence of severe injuries). Additional techniques may be employed to calm traffic further, for pedestrian safety and convenience.

3.3.2.1 Articulated Crosswalks

At crosswalks, visual and physical articulation signal the special needs of pedestrians to motorists. Articulation can be created through the use of special pavers and textured or

colored concrete. Like speed humps, raised intersections change the vertical plane and force motorists to slow down. Crosswalks that are placed at the same level as abutting sidewalks signal that pedestrians take precedence.

3.3.2.2 Bulbouts

Bulbouts extend curbs and replace portions of the parking lane. They are especially warranted at intersections and other pedestrian crossings, where they slow motorists, provide a pedestrian refuge, and reduce pedestrian crossing distances.

- 

Author: Hunt Subject: Comment on Text Date: 9/2/2025 2:54:50 PM
- Recommend stating: may require the transfer of additional land to governmental entities to expand the ROWs.
- 

Author: Hunt Subject: Comment on Text Date: 9/1/2025 3:30:02 PM
- Will these apply to federal and state agencies as well?

4.1 Infrastructure

4.1.1 Public Dedication

The Master Plan anticipates that all future utility systems at Kalaeloa will be operated by local utility providers such as HECO, Kalaeloa Water Company, BWS, Hawaiian Telcom, and others. New roads, drainage, water supply, and wastewater systems will need to be designed to the standards of the organizations or agencies with jurisdiction.

4.1.2 Thoroughfares

The Master Plan identifies the classification for each existing and proposed thoroughfare of the Master Plan. All thoroughfares, (except for private streets) are intended to be constructed to City of Honolulu standards. Some existing thoroughfare rights-of-way at Kalaeloa do not conform to existing standards and will require the transfer of additional land to governmental entities to expand the ROWs. The HCDA will lead the coordination of the construction of these thoroughfares with costs being borne by both the public and private sectors. In accordance with City Ordinance Section 33A.1.3, traffic impact fees would be assessed on developers within Kalaeloa to provide regional transportation improvements.

4.1.3 Public Transit

There are two primary types of public transit proposed for Kalaeloa: expanded bus service and rail connection.

4.1.3.1 Bus Service

Bus service should be enhanced to link downtown Kapolei to the Kapolei Transit Center and the Kualaka'i (East Kapolei) Skyline rail station in order to provide high quality connections to downtown Honolulu and other locations. This would potentially include improving existing route 415 of Thebus to 15-minute headways, as well as adding two routes: one that runs the length of Saratoga Ave and another that runs along Coral Sea Road (to the beach parks), both with 15-minute headways during peak periods.

4.1.3.2 Rail Service

Direct rail service to Kalaeloa could be developed as part of an extension of the Skyline rail transit system from the Kualaka'i (East Kapolei) Station to a terminus in West Kapolei. The City and County of Honolulu's Locally Preferred Alternative (LPA) that was adopted in 2006 included an alignment with stations near Saratoga Avenue at North-South Road, Fort Barrette Road, and Wakea Street. This alignment through Kalaeloa, however, does not follow the existing streets or block patterns and requires extensive new rights-of-way. To minimize impacts to existing and planned development, an alternative



alignment could follow Roosevelt Avenue or the parallel drainage channel. Because such an alignment could serve both Kalaeloa and Kapolei, it could potentially have higher ridership than the 2006 LPA.

A rail station and interim terminus at the Ka Makana Ali'i shopping center integrated with a transit center and a park-and-ride facility would also improve transit service to Kalaeloa.

Note that the 2006 Kalaeloa Master Plan originally envisioned the rail transit extension running in a center median along Saratoga Ave. This would be appropriate as an at-grade light rail transit (LRT) or bus rapid transit system, and could be designed to enhance a pedestrian-oriented urban community. Future transportation planning efforts will have to revisit the potential safety, cost, ridership, and technology aspects of these and other potential alternatives for providing direct transit service to Kalaeloa.

Author: Hunt Subject: Comment on Text Date: 9/1/2025 3:29:54 PM
a draft drainage report

Author: Hunt Subject: Comment on Text Date: 9/1/2025 3:30:37 PM

Restate the following that was previously mentioned :

Although a draft report, it remains the most thorough assessment that has been done in Kalaeloa to date.

Author: Hunt Subject: Comment on Text Date: 9/16/2025 4:51:41 PM

We believe in this in reference to P12, in which case, it should be stated that future design/engineering will determine # of drainage basins. It could end up being > 2.

However, if this is in reference to P13. We object to this statement.

Author: Hunt Subject: Comment on Text Date: 9/2/2025 2:20:15 PM

Restate the following after this sentence: Some of the runoff conveyed to this facility was accounted for and approved as the region developed, and some of the drainage is not. It should be noted that there are no recorded easements or executed agreements facilitating drainage to the NAS Barbers Point coral pit, which is owned by Hunt and intended for economic development.

Author: Hunt Subject: Comment on Text Date: 9/16/2025 4:47:58 PM

I believe "Kapolei Village" is supposed to be Villages of Kapolei (VOK). If so, all references to Kapolei Village should be replaced with VOK.

Author: Hunt Subject: Comment on Text Date: 9/1/2025 3:32:48 PM
RMTC

4.1.4 Drainage

Managing drainage during implementation of the Master Plan is two-fold: regional drainage from the mauka watershed that flows into Kalaeloa and runoff within Kalaeloa. In June 2017, the R.M. Towill Corporation (RMTC) produced a [drainage report](#) of Kalaeloa that was commissioned by Hunt Companies that addressed both of these issues. [The recommendations below represent key elements of the 2017 drainage report.](#)

4.1.4.1 Regional Drainage

RMTC recommended regional drainage improvements to channel offsite runoff from the [Kapolei Village](#) watershed and prevent flooding within Kalaeloa during large storm events.



KALAELOA MASTER PLAN

The existing four 6-foot x 4-foot box culverts that convey offsite flows from the lower channel/basin to the NASBP coral pit under Roosevelt Avenue were proposed to be demolished and upgraded to three 9-foot x 10-foot box culverts. The proposed box culverts would be designed to accommodate a peak flow rate of 3,900 cubic feet per second (cfs) entering Kalaeloa from the Kapolei Village watershed. The proposed box culverts would provide adequate freeboard to meet City Storm Drainage Standards and alleviate the flooding that currently occurs in the vicinity.

The NASBP coral pit is an integral part of the regional drainage system design for Kalaeloa. [It captures and disposes of all offsite runoff from the Kapolei Village watershed and there is no outlet to the Pacific Ocean.](#) A total runoff volume of 1,150 acre-feet enters the coral pit from the Kapolei Village watershed and onsite areas within Kalaeloa. The volume of runoff from the Kapolei Village watershed and areas within Kalaeloa under the proposed condition is not expected to change. The resulting excess capacity of the NASBP coral pit is estimated to remain at approximately 243 acre-feet. Any future use of the NASBP coral pit must receive all appropriate permits and clearances.

4.1.4.2 On Site Drainage

[RMTC](#) recommended that drainage areas within Kalaeloa continue to follow the

existing drainage patterns during large storms exceeding the capacity of the proposed onsite drainage facilities and no other regional type of drainage facilities are required.

The storm drainage system within Kalaeloa was broken up into three basic areas: 1) large existing sump areas, 2) developable parcels, and 3) areas within the proposed HCDA/City of Honolulu right-of-way.

- **Existing Sump Areas.** The large existing sump areas would remain in place, with the exception of one, which is proposed for development but would be replaced by two drainage basins. Proposed City roadways and parcels would be served by a backbone drainage collection system consisting of roadway catch basins and underground drain culverts that convey runoff to existing sumps or proposed retention basins located in Kalaeloa. Existing parcels not planned for development would be served by the backbone drainage collection system where possible. The remaining existing parcels would continue to follow the existing drainage patterns. The environmental advantage of maintaining the sump areas as part of the drainage plan is that using the existing sumps as percolation/retention basins to hold the 100-year, 24-hour storm event would exceed the City of Honolulu storm water quality standards.

Author: Hunt Subject: Comment on Text Date: 9/2/2025 2:56:15 PM
Include mention of desalinization; BWS recently received a grant to explore this.

Author: Hunt Subject: Comment on Text Date: 9/1/2025 3:56:46 PM
Restate the following that was previously mentioned :

Although a draft report, it remains the most thorough assessment that has been done in Kalaeloa to date.

Author: Hunt Subject: Cross-Out Date: 9/1/2025 3:56:54 PM
RMTC's 2016 report proposed

Author: Hunt Subject: Comment on Text Date: 9/2/2025 2:57:02 PM
KWC standards

Author: Hunt Subject: Comment on Text Date: 9/1/2025 3:58:57 PM
HCDA, BWS, CWRM, and KWC.

Author: Hunt Subject: Comment on Text Date: 9/2/2025 2:58:52 PM
Typo: In

Author: Hunt Subject: Comment on Text Date: 9/1/2025 4:00:36 PM
KWC standards

4.1.5 Potable Water

In September 2016, RMTC prepared the Draft Kalaeloa Potable Water Master Plan. This master plan identified the need for Kalaeloa's water system to be improved and expanded to meet BWS standards and accommodate anticipated future water demands, the latter of which was projected to triple over current usage to 3.266 million gallons per day (mgd). This increase in demand was predicated on new housing units being constructed at Kalaeloa, but mitigated by the HCDA's mandate to utilize reclaimed or non-potable water for irrigation. The RMTC plan assumed a buildout that was less than the maximum buildout that would be allowed. Demand for potable water was derived by applying a land utilization factor to parcels to account for site conditions such as topography and previously identified areas of cultural or biological significance which limited development to less than maximum permitted densities.

It is important to reassess those buildout assumptions to ensure that the demand estimates in the 2016 RMTC plan are still applicable. It is also recommended that the 2016 plan be reviewed and updated as necessary to reflect any other changes in existing conditions, updated assumptions, or operational issues that have been made since the system was acquired by the Kalaeloa

Water Company (KWC), which is a subsidiary of Hawaii Water Service Company, Inc.

The RMTC plan (2016) stated that:

The anticipated 3.226 mgd demand is higher than the present 2.337 mgd water allocation for the Barbers Point Wells. Additional water source of 0.930 mgd must be requested from the BWS in order to accommodate the increase in water demand for ultimate development. Another option would be to petition the Commission on Water Resources Management to increase the Barbers Point water allocation. (p. 8-1)

The RMTC plan also advised that the "request for 0.930 mgd of average daily flow is sizeable" and requests for water service should be made by the HCDA after approval of the Kalaeloa Master Plan amendment. While the water may not be required immediately, the request will allow KWC to evaluate their water resource situation and determine if water can be made available from the existing system or if additional water wells need to be drilled and permitted. If additional wells need to be drilled and permitted, the request for water may require negotiation between the HCDA and BWS. Development and operation of the potable water system will be under the auspices of KWC in accordance with the Honolulu BWS standards. Major components

of the system will include source, storage, and transmission.

~~It is proposed that none of the existing Navy lines be incorporated into the water system on a permanent basis, primarily because these lines are about 50 years old and are generally too small to service the planned densities. Indeed, the RMTC plan (2016) stated that:~~

~~*With the exception of the 24-inch line from the wells to Kalaeloa and along Roosevelt and Enterprise and the 18-inch line along Roosevelt and Coral Sea, most of the existing water lines in Kalaeloa do not have sufficient capacity to meet existing and projected fire flow requirements and are proposed to be removed or abandoned. (p. 8-1)*~~

For full buildout of the Kalaeloa Master Plan to be realized, water will need to be obtained from KWC, who will only provide service to portions of the water system where the water lines have been upgraded to meet BWS standards. It should be noted that, since assuming ownership of the water system, KWC has made significant improvements to the existing water lines, including a comprehensive leak detection and repair program to reduce water loss. In 2025, KWC initiated a project to evaluate and design replacement water mains, beginning in the downtown area.

Author: Hunt Subject: Cross-Out Date: 9/2/2025 10:55:54 AM
KWC

Author: Hunt Subject: Cross-Out Date: 9/1/2025 4:02:58 PM

Author: Hunt Subject: Comment on Text Date: 9/1/2025 4:02:04 PM
KWC standards

Author: Hunt Subject: Cross-Out Date: 9/1/2025 4:01:56 PM
KWC

To receive additional permanent water allocation, KWC will require the payment of facilities charges and a commitment to discontinue the use of potable water that is used for irrigation when non-potable water becomes available. This will require the construction of a separate non-potable water system as the water system is upgraded to meet **BW5** standards. Developers at Kalaeloa will be required to pay Hawai'i facility charges prior to connecting to the water system. KWC will also award "credits" to the HCDA for water infrastructure improvement expenditures.

The RMTC plan stated that the existing water wells are in good condition, but the existing reservoirs would need to be renovated and additional reservoir capacity of 3.75 million gallons would be required. The existing water well and reservoir site is the preferred location for the new reservoir. Due to site constraints, this location must be thoroughly investigated.

KWC has agreed to provide interim water to the Kalaeloa area from a master meter off Kamokila Boulevard to facilitate the development of parcels located between Roosevelt Boulevard and Saratoga Avenue. As the water distribution system is brought up to **BW5 standards**, additional parcels can receive KWC service. During the conversion from the original system to BW5 standard water lines, the water systems may have to be operated separately. Fire protection for industrial

parcels would have to be provided by the original system during the transition.

For existing Kalaeloa developments that disconnect from the Navy water system and connect to the proposed KWC system, either master meters or individual building meters could be installed, depending on the situation. If master meters are used, the owner of the system served by the meter would be responsible for billing individual users and paying the KWC for water supplied through the master meter.

4.1.6 Reclaimed (Non-Potable) Water for Irrigation

The BWS has been providing a supply of reclaimed (or R-1) water for irrigation use. BWS owns the R-1 recycling facility and distribution system (referred to as the "purple pipe"). Secondary effluent from the Honouliuli wastewater treatment plant is delivered to the recycling facility for tertiary treatment. The supply of R-1 water is currently available to the edge of Kalaeloa. Although R-1 is flowing, it is estimated to be approaching capacity.



Author: Hunt Subject: Cross-Out Date: 9/1/2025 4:03:42 PM

Author: Hunt Subject: Comment on Text Date: 9/1/2025 4:04:28 PM

Restate the following that was previously mentioned :

Although a draft report, it remains the most thorough assessment that has been done in Kalaeloa to date.

Author: Hunt Subject: Comment on Text Date: 9/1/2025 4:04:49 PM

Restate the following that was previously mentioned :

Although a draft report, it remains the most thorough assessment that has been done in Kalaeloa to date.

To take advantage of R-1 water to make parks and landscaped areas, non-potable water lines will need to be extended to individual parcels within the District. This can be achieved after the City increases R-1 supply.

In December 2016, RMTC prepared a Draft Kalaeloa Non-Potable Water Master Plan, based on buildout projections at the time.

The RMTC plan concluded that there would be an increase in demand for reclaimed water to 1.583 mgd or 2.5 times current usage (which, at the time, was limited to the Barbers Point Golf Course) to support the full development of Kalaeloa. However, the RMTC plan assumed a buildout that was less than what was allowed, based on parcel-specific land utilization factors.

The RMTC plan asserted that the existing Kalaeloa non-potable water system would require significant improvements to meet BWS standards and accommodate anticipated future water demand of an additional 0.983 mgd of non-potable water for ultimate development. The most appropriate source is the BWS R-1 reclaimed water system. RMTC proposed to use as much of the existing system when the lines are replaced. Non-potable R-1 water is presently available but new developments are likely to require the generation of additional R-1 water supply.

The BWS currently produces reclaimed water that exceeds its current commitments

(including full buildout of the City of Kapolei) by 2.7 mgd. This capacity is expected to increase when the City improves its secondary treatment capacity at the Honouliuli Wastewater Treatment Plant (scheduled completion in 2025) and the BWS expands its reclaimed water facility. Most of the current supply is allocated to existing developments.

The preliminary R-1 projection of 0.983 mgd average daily flow is sizeable and requests for non-potable water service should be made after approval of the Kalaeloa Master Plan update. While the non-potable water may not be required immediately, the request would allow the BWS to evaluate their non-potable water resource situation and work with the City on the expansion to the Honouliuli WWTP, to determine when additional non-potable water can be made available to the existing system or if new users must wait until additional water reclamation facilities are constructed.

The BWS has agreed to provide R-1 non-potable water when it is available. For a private system, the R-1 non-potable water will be provided by a meter off Kamokila Boulevard, where Roosevelt Avenue meets Geiger Road. As KWC brings the potable water distribution system up to current standards, it would be most cost-effective if the non-potable system were upgraded at the same time so that additional parcels can receive KWC potable and BWS non-potable water.

During the conversion from the original system to KWC standard water lines, the dual water systems may have to be operated separately.

The replacement of the existing water lines as identified in Section 4.1.5, above, may provide the opportunity to rehabilitate the existing lines for non-potable water distribution. With the exception of the 24-inch line from the wells to Kalaeloa, along Roosevelt Avenue and Enterprise Street and the 18-inch line along Roosevelt Avenue and Coral Sea Road.

Most of the remaining existing water lines in Kalaeloa may be used for the non-potable water system if these pipes fall within the future road right-of-way. The Navy has stated that these pipes are cast or ductile iron and it may be possible to rehabilitate these pipes. However, because these pipes are currently owned by KWC, their rehabilitation and reuse would have to be coordinated with KWC.

4.2.7 Sewer

In July 2016, RMTC prepared a Pre-Final Kalaeloa Sewer Master Plan. The plan concluded that Kalaeloa's sewer system will require modifications and upgrades to accommodate anticipated future sewage flows. Like the potable water system, the sewer system is owned and operated by KWC.

Full development of Kalaeloa would significantly increase the average wastewater daily base flow from 0.35 mgd to 3.1 mgd.

However, as in other utility reports prepared by RMT, buildout was assumed to be less than what was allowed based on parcel-specific land utilization factors. It is important to reassess those buildout assumptions to ensure that the demand estimates in the 2016 sewer plan are still applicable. It is also recommended that the 2016 sewer plan be reviewed and updated as necessary to reflect any other changes in existing conditions, updated demand assumptions, or operational issues since that time.

As part of the plan, a hydraulic analysis of the existing sewer system was undertaken and concluded that, except for one pump station located south of the airport's runways, the existing pump stations in Kalaeloa do not have sufficient capacity to meet projected wastewater flow requirements and are proposed to be removed or abandoned.

One proposed change to the existing sewage flow pattern is to discontinue the use of the 30-inch gravity line which conveys flow from the east and west sewer lines beneath the runways. Due to air traffic at the airport, access to the sewer line is restricted and limited; therefore, the RMT plan proposed that wastewater from the east and west sewer lines converge at the same location north of the airport, then pumped northward towards Independence Road where it would



be discharged into a 30-inch gravity line and conveyed east to the Honolulu wastewater treatment plant.

All new sewage facilities including pumping stations and lines would be designed in accordance with KWC and City standards. Pumping stations would require a large concrete dry pit to house the pumps, a building over the pit for ancillary equipment, and a separate room for a standby generator.

Where such stations are visible to the public, they should be screened with landscaping or provided with design details that relate to the architecture of the area. Developers at Kalaeloa will be assessed sewer facility charges by the City for offsite wastewater transport, treatment, and disposal. Therefore, it is recommended that any sewer master plan be submitted to the City for approval.

Author: Hunt Subject: Comment on Text Date: 9/1/2025 4:08:34 PM

HCDA will play a critical leadership role in planning, coordinating, and financing regional improvements to improve connections between Kalaeloa and adjoining areas, including Kapolei, Ēwa Beach, and Campbell Industrial Park.

Author: Hunt Subject: Comment on Text Date: 9/2/2025 3:00:37 PM

Public agencies, both federal and state, should pay their fair share of infrastructure costs, be it through Payment in Lieu of Taxes (PILT), GO bonds or other. We respectfully request that the Master Plan include language recognizing the importance of equitable infrastructure financing and affirming HCDA's commitment to securing contributions from federal and state agencies.

4.3 Financing

In the implementation of the Master Plan, private developers will finance new development for their projects and public agencies will finance new improvements on their lands. The remaining piece of financing is for the construction of new infrastructure and utility systems to serve public and private sector developments.

4.3.1 Grant Sources

The U.S. Department of Commerce's Economic Development Administration (EDA), through its Public Works and Economic Development Facilities Assistance Program, provides funds for infrastructure improvements that promote economic development. Total EDA awards at other former military bases show that bases which attracted the most funding each received between \$8 and \$11 million.

Major roadways and improvements that support transit use or alternative modes of transportation may be eligible for other funding sources, particularly the Infrastructure Investment and Jobs Act, also known as the Bipartisan Infrastructure Law, enacted in 2021. These funds are typically provided through regional metropolitan planning organizations (MPOs). The HCDA will work with the O'ahu MPO to secure available funds.

4.3.2 Bond Financing

The remaining cost of infrastructure improvements will need to be financed through bond issuances that, depending upon the type of bond, will be repaid either from assessments on property owners or tax revenues generated by new development at Kalaeloa. A range of bond tools can be used, but since repayment is based on new development, their use will be limited to infrastructure serving new development projects.

Financing for infrastructure improvements on lands owned by public agencies could be accomplished through state-issued general obligation bonds.

4.3.3 Hawai'i Community Development Authority Special Assessment Bonds

The HCDA, subject to authorization by the Legislature, may issue and sell bonds to provide funds to finance public facilities that are backed by assessment on benefitting landowners. The salability of these bonds would likely be based upon the bond market's confidence that the landowners directly affected by the improvements would be able to cover bond payments, regardless of the timing of new development.

4.3.4 Community Facilities District Bonds

The State has provided counties with the authority to issue Community Facilities District bonds that can be used to finance infrastructure improvements (HRS §46-80.1). Community Facilities District bonds are paid through assessments on future property owners and are thus backed by the property rather than the City. Community Facilities District bonds also require that the financed improvements be dedicated to the City.

One limitation of Community Facilities District bonds is that they tend to slightly reduce the sale prices and value of new development, in order to offset the additional assessments that property owners must pay. These bonds are backed by the bond market's confidence in market conditions and the proposed development project, and thus may not be saleable until developers are selected.

4.3.5 Federal Infrastructure Funds

In 2021, President Biden signed the Infrastructure Investment and Jobs Act "to authorize funds for Federal-aid highways, highway safety programs, and transit programs, and for other purposes." This Act and other subsequent funding legislation may provide opportunities to help finance certain infrastructure projects in Kalaeloa.

We request HCDA to add "It is common practice to combine Community Facilities District (CFD) financing to supplement TIF financing to offset low property tax revenues in the early years of a district-wide effort."

Tax Increment Finance Bonds

The State has authorized counties to issue Tax Increment Finance bonds that can be used to finance infrastructure improvements (HRS §46-101 et. seq.). A tax increment district is first established for an area to be redeveloped. As new development occurs, the incremental additions in property tax revenues that are generated (after deducting the costs of new municipal services such as public safety, public works, etc.) can be used to finance bonds.

This technique does not result in an increase in property tax rates, nor does it impact activities that are currently funded by existing property tax revenues in the tax increment district. Because Tax Increment Finance bonds are repaid from property taxes that new property owners have to pay, there is no potential impact on property values as there is with Community Facilities District financing.

The limitation of Tax Increment Finance bonds is that there must be an existing tax increment flow to finance bonds. This means that Tax Increment Finance bonds may be more appropriate in later phases in Kalaheo's development.



Add US Coast Guard, National Guard, and City & County.

interagency coordination is critical if the Master Plan is to be successfully implemented.

There are several ways in which this coordination can occur, which involve varying degrees of formality. At the most informal level, agency-to-agency contact through meetings and written correspondence on a frequent basis can address many of the coordination issues involved in development planning and project implementation. When specific property maintenance or development agreements are necessary, more formal means of coordination are required.

Depending upon the circumstances, a formal Memorandum of Agreement or contract between parties may be warranted and can be negotiated in such a manner that conditions of the agreement are binding upon the parties.

Another method is the creation of a Kalaeloa Redevelopment Leadership Group consisting of the HCDA, DHHL, HDOT-A, and the Navy to seek major infrastructure development funding from federal and state sources. The funding and implementation of significant projects by this Leadership Group will incentivize further investment by other Kalaeloa landowners, catalyzing development in the District.

Led by the HCDA, the Leadership Group would meet regularly to do the following:

- Explore the implementation challenges to create shared problem framing. These challenges might involve changing the status quo.
- Reconnect the long-term and short-term. This group would be asked to create specific tactics for moving forward, (e.g., solving the electrical grid hookup), identify fundamental changes and corresponding actions needed to reach the envisioned future.
- Engage and anchor the vision of the Master Plan with relevant agencies, departments, and landowners thereby relating it to their own objectives and practices.

The third, and most formal, mechanism for coordination is through the enactment of legislation. Depending upon the circumstances and the parties involved, legislation could be sought at the federal, State, or City level. Legislation should be considered when seeking funding or when there are structural changes in the authority or relationships between parties. Since such actions are subject to public debate and policy making, uncertainties exist in the process. Further, the timing required for the passage of legislation may adversely impact development phasing and implementation.

High Priority Comments:

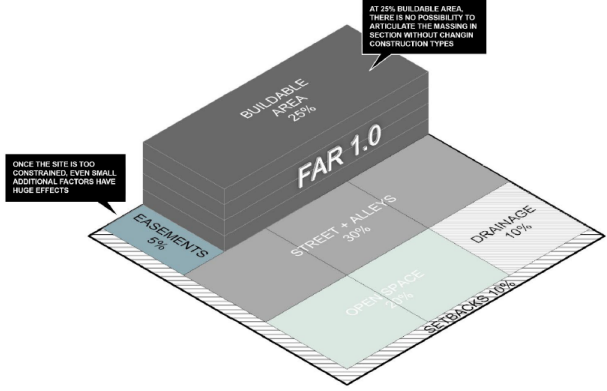
#	Section	Comment
1	§15-215-43 Architectural Standards.	For security and safety reasons, we request that HCDA add the following underlined language: - §15-215-43(C)(1)(F): <u>“Within a required yard, walls and fences for industrial uses may be constructed up to eight feet in height.”</u> - §15-215-43(C)(2)(B): “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.	- 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.	- 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> - 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.	§15-215-80 Conditional Use of Vacant Land. §15-215-85 Approval validity Period	We request that HCDA extend the allowable duration for the following permit types: - 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 conformance with the underlying transect zoning. 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.

#	Section	Comment
5.	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.”
6.	New Proposed Section: Warehouse Overlay Zone development standards	We recommend adding the Warehouse Overlay Zone development standards. Proposed language is listed below. Hunt recognizes that there may be additional ways to address this, such as a Memorandum of Agreement or Programmatic Agreement, and is open to discussing this further with HCDA, the Navy, and historic partners. <u>Warehouse Overlay Zone development standards</u> (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 MCAS-Ewa. The scale and land uses of new development impacting the Warehouse District shall be compatible with the site's historical significance. (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. (c) Proposed undertakings affecting the Warehouse District shall adhere to the following requirements: (1) Project development and design shall comply with the terms of any applicable historic covenants attached to the property; (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). (d) Review and approval procedures: (1) Project reviews shall be initiated through the authority's permit application processes; (2) All applications shall include the supporting documentation in accordance with state HRS chapter 6E and federal regulations, as applicable; (3) As applicable under HRS sections 6E-8, 6E-10 and 6E-42, the process will follow the prescribed steps and timelines; (4) The authority may enforce any applicable protective covenants, and may incorporate applicable provisions into permit conditions. (e) Protections of the World War II Storage buildings within the Warehouse District overlay zone: (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. (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

#	Section	Comment
		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.

Additional Comments

#	Section	Comment
1.	§15-215-8 Definitions. §15-215-26 Thoroughfare plan. Figure 6: Street Trees	We request HCDA adjust the rules so that the Thoroughfare plan regulations and Street tree regulations only apply to public streets, not private streets. Definitions: - 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. Thoroughfare plan: - We request that only public thoroughfares conform to the thoroughfare standards set forth in section §15-215-26. Street Trees: - 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.	We request adding the clause "if practicable" into subsection §15-215-43 (f)(3) so that it reads: - "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>:" This change allows flexibility in cases where full concealment—such as of poles and overhead lines—is not feasible.
4.	§15-215-44 Landscape.	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. 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.

#	Section	Comment
5.	§15-215-47 Parking and Loading.	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. 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.
6.	15-215-49 Saratoga main street frontage overlay	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. 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.
7.	Figure 2: Regulating Plan	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: - 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
8.	Figure 4: Building Development Standards	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. 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. 

#	Section	Comment
9.	Figure 6: Street Trees	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.



STATE OF HAWAII | KA MOKU'ĀINA 'O HAWAII
DEPARTMENT OF TRANSPORTATION | KA 'OIHANA ALAKAU
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DIR0002336
STP 8.3973

September 17, 2025

VIA EMAIL: dbedt.hcda.contact@hawaii.gov

Mr. Craig K. Nakamoto, Executive Director
Hawaii Community Development Authority
547 Queen Street
Honolulu, Hawaii 96813

Attention: Mr. Ryan Tam, Director of Planning and Development

Dear Mr. Nakamoto:

Subject: Amendment of the Kalaeloa Community Development District (CDD) Rules,
Hawaii Administrative Rules (HAR) Chapter 15-215, and Kalaeloa Master Plan
Kalaeloa, Oahu, Hawaii

Thank you for your letter, dated July 31, 2025, requesting the Hawaii Department of Transportation's (HDOT) review and comments on the subject amendments. The HDOT understands the Hawaii Community Development Authority (HCDA) is proposing to update the Kalaeloa CDD, HAR Chapter 15-215, and Kalaeloa Master Plan. The proposed amendments are to streamline the permitting processes and improve regulatory predictability and consistency.

The HDOT has the following general comments:

1. The HDOT acknowledges that HCDA recently conveyed to our planning staff via telephone conversation that efforts will be underway to initiate a meeting coordination with the HDOT to discuss the revised amendments before November 2025. The HDOT would also like to engage in discussions at the upcoming meeting relating to the pursuance of roadway plans, the state road dedication to the City and County of Honolulu, and timetable matters.
2. Based on the latest revision of the 2025 CDD Rules relating to State roads, the HDOT acknowledges the following key changes:
 - a. Regulating Plan (Figure 2): Kalaeloa District Boundary outline changed in the northeast portion.

- b. Thoroughfare Plan (Figure 3): Access changes on Roosevelt Avenue and realignment of the North and South connectors in order to minimize impact to a historical site.
3. The HDOT had previously reviewed the amendments in 2024 and provided comments in letter STP 8.3801, dated August 5, 2024, in which the first set of comments 1 and 2 and comments 7 through 11 for the Kalaeloa Master Plan are still valid and applicable.

The HDOT has the following comments to the proposed HAR, Chapter 15-215:

1. The HDOT offers comments on the inclusion of limited camping facilities in HAR §15-215-23(b)(1). Camping and libraries are identified as incompatible land uses if they fall within the 60-Day-Night Average Sound Level (DNL) or greater noise contours of the Kalaeloa Airport (JRF) Noise Exposure Map per the attached State of Hawaii Land Use Guidelines, unless noise level reduction measures are incorporated into the building design. While the revised rules appropriately require the HDOT review and conditional use permits, the HDOT recommends that the rules also reference the 60 DNL planning threshold in this section, so that they may be planned in accordance with Figure 1-15 in the Kalaeloa Master Plan.
2. The HDOT supports the addition of HRS§ 15-215-24.5(a) and 15-215-24.5(b)(3), exempting the HDOT and its tenants from the development standards and permitting process.
3. Given the Kalaeloa Community Development's proximity to JRF and potential impacts from current or future operations, the HDOT requests that HCDA include language in the Rules update requiring developers and/or applicants to consult with the HDOT Airports on the need for avigation, noise, and/or wildlife easements for their project.
4. The HDOT appreciates the opportunity to comment on development permit applications with the implementation of the master plan. We recommend adding a description of the HDOT's involvement in the HAR Improvement and Development Permits section.

The HDOT has the following comments on the proposed Kalaeloa Master Plan:

1. The HDOT recommends maintaining consistent labeling conventions across maps in the Kalaeloa Master Plan, including alignment with related planning documents such as the Infrastructure Master Plan. Consistency in symbology, color coding, and naming conventions, where possible, will improve clarity and facilitate cross-referencing between documents. Additionally, please review the legend in Figure 1-6: Kalaeloa Land

Ownership, 2024 (page 25). The color used to represent HCDA parcels on the map does not match the color indicated in the legend.

2. On page 27, Section 1.2.2.2.e, the HDOT recommends that any data be properly cited, especially if they relate to HDOT or Federal Aviation Administration (FAA) information. This includes operations data and share of statewide operations in this section, including the year of data used for the percent share data, as well as the stated acreage, including for both the airport and the ramp area. The runway length information included in this section is outdated and should be removed. The HDOT recommends replacing the specific runway dimensions with a more general description of the airport's configuration, such as noting the presence of 2 parallel runways and 1 crosswind runway.
3. On page 36, Section 1.2.3.9 Airport Zoning discusses airport zoning around JRF. The HDOT requests that discussion of the Hawaii Revised Statutes (HRS), Chapter 262, Airport Zoning Act, which gives the HDOT the authority to restrict land use and potential hazards around State-Owned Airports, be included in this section. Please review the [Technical Assistance Memorandum](#) for further guidance.
4. On page 36, Section 1.2.3.7.b, Figure 1-14, the Kalaeloa Home Lands Solar farm, located directly in line of Runway 11-29 at JRF, is noted as "planned." The HDOT has previously reviewed the Development Permit Application (KAL 21-004) and submitted comments in letter STP 8.3241, dated August 23, 2021, stating opposition to this proposed development as this project creates unsafe conditions for aircraft operations at JRF.
5. On page 48, Section 1.3.4.1.e uses "Honolulu International Airport." Honolulu International Airport was renamed to "Daniel K. Inouye International Airport" in 2018. The HDOT requests the name be corrected.
6. On page 79, Section 3.2.1.1 T2 Rural zone, proposes the use of areas within the Runway Protection Zone (RPZ) for "eco-industrial" uses. The HDOT discourages the use of these areas as they are important safety areas for the operation of aircraft. As described in the [FAA Advisory Circular 150/5300-13B](#), Airport Design, Page 3-48, "The primary goals are to clear the RPZ areas of incompatible objects and activities, and to ensure this area remains clear of such objects and activities." Land uses within the RPZ should not create a wildlife attractant or allow people to congregate within the RPZ. The HDOT requests that the HCDA include a description of the RPZ and its purpose within the Kalaeloa Master Plan.

The section states that "Industries such as solar or hybrid energy generation, bio filtration, hydroponic farming, and other such sustainable technologies are compatible in

these parcels.” Any proposals shall incorporate measures to minimize hazardous attractants in compliance with the [FAA Advisory Circular 150/5200-33C, Hazardous Wildlife Attractants on or Near Airports](#), as well as glint/glare issues common in photovoltaic. If the proposed agricultural project results in wildlife attractant, these hazards shall be immediately mitigated by the developer upon notification by the HDOT and/or FAA.

The land use compatibility restrictions are described where portions of the land fall within noise contours that exceed 65 DNL. The State of Hawaii has adopted stringent restrictions due to our outdoor lifestyle and single-wall construction that is common in Hawaii. The HDOT establishes that 60 DNL be used as a planning level for noise-sensitive land uses. The HDOT suggests that a discussion of the State of Hawaii Land Use Compatibility Guidelines also be included in this section.

7. On page 103, the HDOT requests that HCDA change the text “All development within 20,000 feet of the runways at JRF require HDOT and FAA review” to “All development within 5 miles of the airport boundary requires HDOT review, and any development within 20,000 feet of the runways at JRF requires HDOT and FAA review.” The HDOT recommends this language be included in both the Kalaeloa Master Plan and the Kalaeloa Community Development District Rules (HAR Chapter 15-215) to ensure consistent application during land use and permitting reviews.
8. The HDOT recommends adding a “Highways” section under Section 1.2.2.2, describing the conveyance of roads and status or timetable to the HDOT. Also, include the HDOT approvals required for any work on State highways’ right-of-way (ROW).
9. The Implementation Plan or Governance under Chapter 4 may also include a discussion of the conveyance of State roads to the County, including status or timetable.
10. The HDOT continues to advocate for the expansion of safe bicycle and pedestrian routes on State highways. In addition to the City and County of Honolulu resources, the general public is encouraged to review information regarding the HDOT program and plans available at the following website:

<https://highways.hidot.hawaii.gov/stories/s/h4ss-c6xy>

The site provides links to both the bicycle and pedestrian planning portals, including interactive maps of planned improvements within the State ROW.

Please submit any subsequent land use entitlement-related requests for review or correspondence to the HDOT Land Use Intake email address at DOT.LandUse@hawaii.gov.

Mr. Craig K. Nakamoto, Executive Director
September 17, 2025
Page 5

STP 8.3973

If there are any questions, please contact Mr. Blayne Nikaido, Planner, Land Use Section of the HDOT Statewide Transportation Planning Office at (808) 831-7979 or via email at blayne.h.nikaido@hawaii.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ed Sniffen', written in a cursive style.

EDWIN H. SNIFFEN
Director of Transportation

Attachment

TABLE A.2-3 LAND USE COMPATIBILITY GUIDELINES – STATE OF HAWAII

LAND USE	YEARLY DAY-NIGHT AVERAGE SOUND LEVEL (DNL) IN DECIBELS					
	BELOW 60	60–65	65–70	70–75	75–80	80–85
Residential						
Low density residential, resorts, and hotels (outdoor facility)	Y ¹	N ²	N	N	N	N
Low density apartment with moderate outdoor use	Y	N ²	N	N	N	N
High density apartment with limited outdoor use	Y	N ²	N ²	N	N	N
Transient lodgings with limited outdoor use	Y	N ²	N ²	N	N	N
Public Use						
Schools, day-care centers, libraries, and churches	Y	N ³	N ³	N ³	N	N
Hospitals, nursing homes, clinics, and health facilities	Y	Y ⁴	Y ⁴	Y ⁴	N	N
Indoor auditoriums and concert halls	Y ³	Y ³	N	N	N	N
Governmental services and office buildings serving the general public	Y	Y	Y ⁴	Y ⁴	N	N
Transportation and parking	Y	Y	Y ⁴	Y ⁴	Y ⁴	Y ⁴
Commercial Use and Government Use						
Offices – government, business, and professional	Y	Y	Y ⁴	Y ⁴	N	N
Wholesale and retail – building materials, hardware, and heavy equipment	Y	Y	Y ⁴	Y ⁴	Y ⁴	Y ⁴
Airport businesses – car rental, tours, lei stands, ticket offices, etc.	Y	Y	Y ⁴	Y ⁴	N	N
Retail, restaurants, shopping centers, financial institutions, etc.	Y	Y	Y ⁴	Y ⁴	N	N
Power plants, sewage treatment plants, and base yards	Y	Y	Y ⁴	Y ⁴	Y ⁴	N
Studios without outdoor sets, broadcasting, production facilities, etc.	Y ³	Y ³	N	N	N	N
Manufacturing, Production, and Storage						
Manufacturing, general	Y	Y	Y ⁴	Y ⁴	Y ⁴	N
Photographic and optical	Y	Y	Y ⁴	Y ⁴	N	N
Agriculture (except livestock) and forestry	Y	Y ⁵	Y ⁵	Y ⁵	Y ⁵	Y ⁵
Livestock farming and breeding	Y	Y ⁵	Y ⁵	N	N	N
Mining and fishing, resource production, and extraction	Y	Y	Y	Y	Y	Y
Recreational						
Outdoor sports arenas and spectator sports	Y	Y ⁶	Y ⁶	N	N	N
Outdoor music shells, amphitheaters	Y ⁶	N	N	N	N	N
Nature exhibits and zoos, neighborhood parks	Y	Y	N	N	N	N
Amusements parks, beach parks, active playgrounds, etc.	Y	Y	Y	Y	N	N
Public golf courses, riding stables, cemeteries, gardens, etc.	Y	N	N	N	N	N
Professional/resort sport facilities, locations of media events, etc.	Y ⁶	N	N	N	N	N
Extensive natural wildlife and recreation areas	Y ⁶	N	N	N	N	N

NOTES:

Y – Yes, land use and related structures are compatible without restrictions.

N – No, land use and related structures are not compatible and should be prohibited.

- 1 A noise level of DNL 60 dBA does not eliminate all risks of adverse noise impacts from aircraft noise. However, the DNL 60 dBA planning level has been selected by the State of Hawaii, Department of Transportation – Airports Division as an appropriate compromise between the minimal risk level of DNL 55 dBA and the significant risk level of DNL 65 dBA.
- 2 Where the community determines that these uses must be allowed, noise level reduction (NLR) measures to achieve interior levels of DNL 45 dBA or less should be incorporated into building codes and be considered in individual approvals. Normal local construction employing natural ventilation can be expected to provide an average NLR and will not eliminate outdoor noise problems.
- 3 Because the DNL descriptor system represents a 24-hour average of individual aircraft noise events, each of which can be unique in respect to amplitude, duration, and tonal content, the NLR requirements should be evaluated for the specific land use, interior acoustical requirements, and properties of the aircraft noise events. NLR requirements should not be based solely upon the exterior DNL exposure level.
- 4 Measures to achieve the required NLR must be incorporated into the design and construction of portions of these buildings where the public is received, office areas, noise-sensitive areas, or where the normal noise level is low.
- 5 Residential buildings require an NLR. Residential buildings should not be located where noise is greater than DNL 65 dBA.
- 6 The impact of amplitude, duration, frequency, and tonal content of aircraft noise events should be evaluated.

SOURCE: Hawaii Revised Statutes 205-2, *Districting and Classification of Lands*; State of Hawaii Department of Transportation – Airports Division, *Lihue Airport Noise Compatibility Plan, Volume 1, Noise Exposure Map Report*, May 1989; State of Hawaii, Department of Transportation – Airports Division, *Hilo International Airport FAR Part 150 Noise Exposure Map Update*, April 2013.

From: Micah Witty-Oakland <micah@legacyventureshi.com>
Sent: Wednesday, September 17, 2025 3:50 PM
To: Tam, Ryan AM <ryan.am.tam@hawaii.gov>
Cc: Alex Bugaj <alex@legacyventureshi.com>; Pamela Witty-Oakland <pamela@legacyventureshi.com>
Subject: [EXTERNAL] Comments: Kalaeloa Proposed Master Plan and Rules Amendments

Aloha Ryan,

Mahalo for HCDA's work on the Kalaeloa Community Development District Master Plan and Rules Amendments. On behalf of Legacy Ventures, working with DHHL to develop a motorsports facility in Kalaeloa, we respectfully request that HCDA reinstate "Raceway track" as a defined use classification and include it in the land-use matrix.

This use was previously defined as:

- "Raceway track" means a facility used or intended to be used for the racing of automobiles, motorcycles, or bicycles.

With the City and County of Honolulu also pursuing a dirt track facility, reinstating this classification would ensure consistency across jurisdictions and provide clarity for both public and private sector motorsports initiatives.

Thank you for the opportunity to provide comments on the proposed amendments to Kalaeloa's Master Plan and Rules. We appreciate HCDA's continued efforts to ensure the plan and rules reflect strong foresight for practical and compatible uses that will help Kalaeloa thrive.

Mahalo,

Micah Witty-Oakland
Legacy Ventures
524 Keawe Street #110
Honolulu, Hawaii 96813
Direct: 808-679-7668

July 21, 2017

Office of the Navy Inspector General
Washington, D.C.

Captain Richard D. Hayes III
Regional Engineer Navy Region Hawaii
Naval Facilities Hawaii 400 Marshal I Road
Joint Base Pearl Harbor Hickam, Hawaii 96860

Elizabeth Merritt, Attorney
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Joint Base Pearl Harbor Hickam, Hawaii 96860

LT Gary J. Riley, MSCE, PE, USPHS
U.S. EPA Region 9, Superfund Division
75 Hawthorne Street
San Francisco, CA 94105

Aloha e, Captain Richard D. Hayes, Ms. Denise Emsley,

These are my comments on the Proposed Plan, Barbers Point Sanitary Landfill by NavFac Hawaii, Solid Waste Management project.

I, Michael Kumukauoha Lee, recognized Native Hawaiian cultural practitioner of limu, Papakilohoku and recognized cultural descendant of the ahupua'a of Honouliuli, Ewa, is most sincerely requesting further investigation and documentation into the disregard of established Federal and State of Hawaii laws that should be protecting our native cultural resources and identified important ancient Hawaiian habitation area used for centuries.

This is a depraved indifference to the rights of my Hawaiian cultural practice and iwi kupuna burials in this area. There is cause of standing of imminent harm to my family's Hawaiian cultural resources.

I am referencing the site which today is used as a military toxic waste dumping place contaminating the subsurface fresh water systems which directly sustain my cultural limu medicine practice. The Ewa shore was once known as the Hale o Limu – House of Limu, for the many abundant varieties of limu varieties sustaining our Hawaiian people and the once thriving fisheries supporting also our turtles, seals and reef fish.

This area, prior to being taken over in WW-II for a Navy air base, was a well known wetlands, ancient pond on land in the Ewa, Oahu area called Kalaeloa under the jurisdiction of the US Navy which has been in the news recently. Many maps and old air photos, as well as the Navy Base Realignment and Closure studies conducted by the Tuggles in 1997-99, show this area as a wetland and pond area. While the use of the area was justified under the emergency defense conditions of WW-II, the Navy must now fully restore the area to natural conditions and stop the contamination and pollution of our reef, fisheries and limus, not to mention the possible health issues to our people swimming in tide pools containing cancerous chemicals.

Please see attached addendum with photos. Because this activity clearly has had an Adverse Effect under NEPA, NHPA, Hawaii State Law, the Hawaii State Constitution, Article XII, Section 7, a Cultural Landscape Report and Biological Hazards analysis needs to be done as mitigation and remediation for the prior military use of this area. This would be the fair response and certainly not just putting some dirt over the cancerous chemical contamination and leaving it to pollute and kill our fisheries, endangered reef animals and young children swimming there.

Why aren't the State and Federal laws that are supposed to protect us and our cultural heritage being followed? Why was I, as the officially recognized cultural and lineal descendant of this area not fully consulted on the project plans in the very beginning before they proceeded with the very first meeting? It strongly appears there was an attempt to hide this and not notify me, which is inexcusable as I have been a Section 106 consultant in prior Navy projects and I have recognized cultural descendant status from Honouliuli Ewa by the City, State and US Navy.

The person chosen as the Navy's Hawaiian consultant with regard to this site's cultural and religious resources is not the area's officially recognized Hawaiian cultural practitioner by the

Oahu Island Burial Council and State of Hawaii Historic Preservation Division, as I am. Further, his unlicensed hearsay site analysis has allowed the Navy to override the advice of the SHPD's chief archeologist who recommended an Archeological Inventory Survey and no use of heavy construction machinery on the very fragile wetland, wildlife refuge and 10,000 year old Ordy pond. This current Navy dump site is in fact also an ancient water pond and wetlands of very high Hawaiian cultural and Western scientific value surrounded by many archeological sites. This is a fact and documented in reports and maps prior to the Navy use of the area and after the closing of the Navy air base. The Navy is trying to escape responsibility for this environmental and cultural injustice.

I must constantly rely upon vigilant protection of my religious, traditional and customary Native Hawaiian practices and cultural and natural resources or I will lose them forever. As the kahu, or keeper, of the iwi kupuna in this area, as recognized by the Oahu Island Burial Council and State of Hawaii Historic Preservation Division, it is my responsibility to ensure the protection and safety of all the bones and objects within my family's burial complexes in this area. There has been no adequate archeology surveys of this area since the 1990's, known to have Hawaiian many archeological sites and wahi pana. Further, no comprehensive studies have been done to prove the environmental safety and no ill effects on the fisheries, reef and to human occupants living and using this area for sustenance and recreation.

Also, as a long time kahunalapa'auokekaiolimu, or Native Hawaiian practitioner of limu medicine, disturbance of the fresh water source and water conditions in these interior wetlands adversely affect my protected cultural limu practice. Fresh water flows through an extensive network of underground interconnected Karst caverns and channels from the mountains to the sea and contains the nutrients that feed the foundation of our Ewa eco-system food chain. This Navy dump area is among the last remaining large ancient pond and wetlands in the entire Honouliuli Ewa area of my practice, as the rest have been damaged by land development using heavy equipment crushing the subsurface mountains to the sea Karst water transport system.

I view this threat to my cultural practices as significant and have the justification under the Hawaii State Constitution to protect my cultural rights in this area. The Hawaii State Constitution, Article XII, Section 7, provides protection for subsistence, cultural and religious purposes possessed by ahupua'a tenants. I am urging an immediate investigation and mitigation because my rights are being violated and my important cultural resources are being damaged without adequate protection.

This project is receiving Federal funds on US Navy administered Federal property and must comply with the National Historic Preservation Act (NHPA), National Environmental Protection Act (NEPA), Chapter 6E of the Hawaii Revised Statutes, Navy environmental directives and NAGPRA. They should perform an Archeological Inventory Survey, Cultural Landscape Report and Biological Environmental Hazards Report and not just rely upon unprofessional unlicensed hearsay advice.

I have a long standing officially documented vested interest in this area as a recognized Kahuna Lapa'au La'au o Limu and have successfully challenged these culturally protected rights in court and obtained a favorable ruling from the First Circuit Court of the State of Hawaii. Due to the

urgency of this construction activity and damage already done I am requesting your expeditious attention to this investigation and reply within two weeks.

Aloha,

Mukul Humphreys Lee

91-1200 Keaunui Drive, Unit 614,
Ewa Beach, Hawaii 96701
808-683-1954

Please see Addendums, Attachments, Legal Documents and Photographs



Native Hawaiian Cultural Practitioner and recognized Kahuna Lapa'au La'au o Limu at Kualaka'i Beach, Oahu which is directly below the Navy toxic waste dump site.



A relaxing, educational experience and opportunity to taste samples of freshly picked limu. However does this limu contain cancer causing contaminants? The Navy has no studies showing the subsurface water under the dump site which was a WW-II coral quarry dug right down to the ground water and ocean tide level isn't poisoning limu, fish, sea creatures and people.



Kualaka'i Beach, Oahu is an especially beautiful showcase of both Hawaiian limu and Ewa Plains Karst. A wide range of both Hawaiian limu and Karst (limestone) formations can be seen in this location as well as often seen sea turtles and Hawaiian monk seals sunning on the beach.



The limu shown in the surf is all edible or has a Hawaiian cultural medicinal use. Where are the studies showing the Navy toxic dump isn't poisoning this important Hawaiian cultural resource?



Activities of ancient Hawaiian culture are found throughout this coastal area and burials are known to be found in the nearby sand dunes. At one time the Ewa fisheries and limu were highly abundant in this area before WW-II. Hawaiian cultural history has stories of the sister of the revered goddess Pele visited this place called the Spring of Hoakalei. The very first Polynesians were known to have made their first landings here. They were attracted by the lushness, richness and beauty that would sustain centuries of native Hawaiian families.





It is very important to understand that the fresh water flowing through the subsurface caves and channels nourishes the wide variety of “House of Limu” sea algae. Limu actually requires fresh water in order to survive. Without it the shoreline limestone rocks are bare and lifeless and an entire ecosystem is killed off. This is documented Western science and not a “Hawaiian belief”

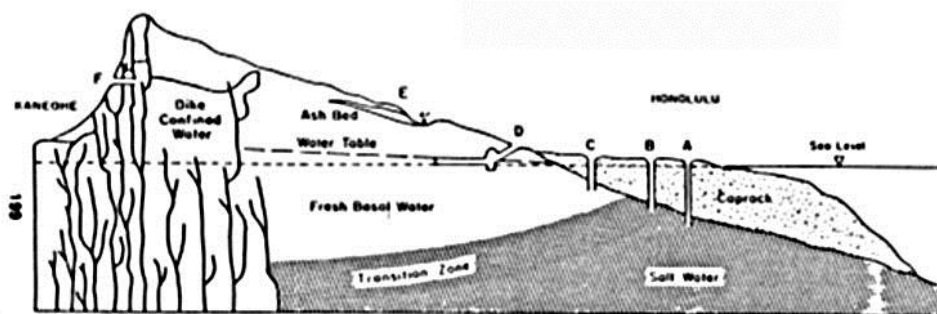
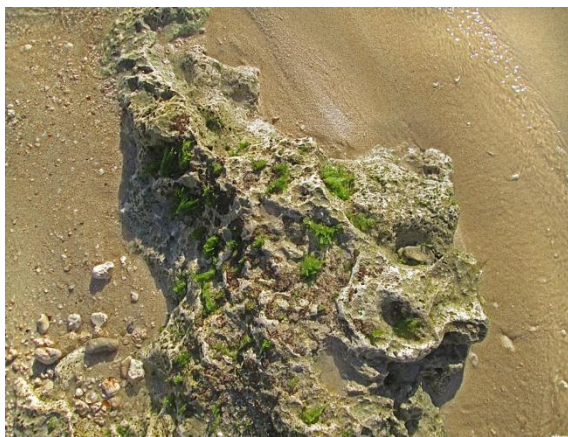


Figure 5. Generalized Groundwater Occurrence in the Honolulu, Oahu, Area
(from Macdonald, Abbott, and Peterson, 1983)

Known since ancient times as the “House of Limu” for many varieties and flavors as well as medicinal uses. All of the geological formations are ancient coral reef.





Reef fish, sea turtles and monk seals are often seen in the shallows and near shore waves.

The natural attraction is great but we do not know how much invisible pollution and cancerous chemical contamination is being carried and transmitted through the food chain to humans.





Mike Lee's entire cultural practice is based upon the connectedness of the upland Karst water system where this very old Ti plant grows, with the beach areas makai at Kualaka'i – Nimitz Beach where he picks limu for food and medicinal purposes. Limu colonies vary greatly in type and quality depending upon the season of the year. Each has a unique taste and the fresh karst limestone water affects all of this and all creatures big and small depend on this resource or the area becomes a lifeless sea desert.





Found in Karst sinkholes are even honey bee hives important for pollination of area plants. They are attracted to the subsurface fresh water. Clearly an entire ecosystem of insects, birds, plants fish, etc all depend on the Ewa Plain karst water system. Chemical contamination and destruction of this extremely important upland to lowland shoreline ecosystem and the Hawaiian cultural history that supported centuries of Hawaiian families clearly shows we do not have a sustainable culture and are killing off all our resources that sustain natural life on the Ewa Plain.



WRITTEN DIRECT TESTIMONY OF MICHAEL KUMUKAUOHA LEE

I am Native Hawaiian and a Hawaiian cultural practitioner. I have been recognized by several government entities as a Hawaiian cultural practitioner, such as the Honolulu City Council, the First Circuit Court, the Oahu Island Burial Council, and the Office of Hawaiian Affairs. Please refer to my affidavit for more information regarding my heritage and background as a recognized Hawaiian cultural practitioner.

I live at 91-1200 Keauniu Drive, Unit 614, Ewa Beach, Hawaii 96701, which is about 3 miles from the site. I am familiar with the area as it lies within my family's Ahupua'a Honouliuli in the Moku (or district) of Ewa. I am currently the only descendent recognized by the Oahu Island Burial Council (OIBC) to protect the iwi kupuna, or royal bones and burials, located within the Ahupua'a Honouliuli. I have been involved in several case hearings to protect the iwi kupuna and my cultural practices in this area. Please see my affidavit for more details.

There are culturally very significant sites within this area and adjacent land parcels, namely the extensive underground and interconnected "karst" or water system, and areas which have also been proven to be a part of a burial complex of my Hawaiian family. Iwi kupuna are buried in subsurface in the karsts in and around this site and parcel area. The subterranean karst topography is characterized by an extensive system of porous channels and caverns that have been carved out by flowing groundwater over time.

The karst system underneath the proposed site is culturally significant for two reasons. First, as stated above, iwi kupuna are buried within it and such places are sacred to Native Hawaiians. As the kahu, or keeper, of the iwi kupuna in this area, and it is my responsibility to ensure the safety of all the bones and objects within my family's burial complex. Second, fresh water flows through an extensive network of underground interconnected caverns from the mountains to the sea and contains the nutrients that feed the foundation of our food chain. The fresh water nourishes the algae and limu at the sea coast, and in turn the algae and limu are the food for all the mollusks, opihi, haukiuki, invertebrates, crabs, lobsters, shrimp, and the puumoo or chiton, that Native Hawaiians use for traditional ceremonies, such as the Mawaewae ceremony for newborn babies. The fresh water running through the cavern system exits into the sea through water holes along the Ewa shoreline. In ancient times, the Ewa shoreline was called Haleolimu, or the house of limu, due to the abundant amount of limu that thrived there. Today there is substantially less limu due to polluted urban runoff.

Furthermore, as a long time kahunalapa'auokekaiolimu, or Native Hawaiian practitioner of limu medicine, any disturbance in the fresh water source or water conditions at the Ewa seashore will adversely affect and could destroy the limu and thereby degrade my cultural practice or make such cultural practices impossible. I visit the Ewa seashore at least twice a month to identify and/or gather limu for my limu medicine practice. I also teach others about the practice of limu

medicine. I was one of the co-founders of the Ewa Limu Project, the purpose of which is to restore the limu along the Ewa Beach coastline, while making every effort to replant for future harvest and to educate the community to replant and strengthen the various types of limu found there. The Honolulu City Council honored the co-founders for the success of the project, as evidenced by a certificate that I received on January 28, 2004, entitled “Honoring and Commending the Ewa Limu Project.” See my affidavit for more details.

I view the potential threat to my cultural practices as significant and does not even mention the underground karst system throughout the area and the importance of it to my iwi kupuna and cultural practices. I have a right under the Hawaii State Constitution to protect my cultural rights in the area. The Hawaii State Constitution, Article XII, Section 7, provides:

The State reaffirms and shall protect all rights, customarily and traditionally exercised for subsistence, cultural and religious purposes and possessed by ahupua'a tenants who are descendants of native Hawaiians who inhabited the Hawaiian Islands prior to 1778, subject to the right of the State to regulate such rights.

The people that were chosen as consultants with regard to cultural resources are not Hawaiian cultural practitioners in the area. Urban and storm water runoff from the construction and project site entering the sea by way of above ground or through the Karst limestone will devastate the limu and other sea life at the Ewa seashore. With large erratic rainstorms becoming more frequent in our state, I believe managing polluted runoff is a legitimate concern, with potentially significant impacts in the area.

- I am a Papakilohökü and a Native Hawaiian practitioner of limu medicine and a practitioner of the Hä;
- My knowledge of limu was taught to me by my grandfather, Kino Guerrero and Uncle Walter Kamana;
- My knowledge of Hä comes from Aunty Alice Holokai;
- I possess knowledge of the Kaona of the 2102 lines of the Kumulipo;
- I am compelled to come forward at this time to reveal certain facts regarding significant Native Hawaiian cultural sites due to the threat of imminent harm, alteration, and destruction of sacred sites;

Proper identification and protection of historic and cultural sites. Protection of exercise of my religious and traditional and customary native Hawaiian practices and historical, cultural and natural resources my practices rely upon.

The Legislature has found that historic sites and especially unmarked burial sites are at increased risk of destruction and it serves the public interest to protect and preserve the traditional cultural landscape. Furthermore, the Constitution of the State of Hawai'i, in Article 12, Section 7, protects the exercise of traditional and customary practices and inherently, the resources these practices rely upon.

My connection to 'Ewa, the individuals buried in the unmarked burial areas, the knowledge I possess of traditional uses of the resources in the area, like limu, are important to the general public as there are established healing properties for many common and fatal diseases society is afflicted with. Preserving the cultural heritage of Hawaii is important to the wellbeing of the populace. Article XII, Section 7, of the Constitution of the State of Hawaii states:

TRADITIONAL AND CUSTOMARY RIGHTS, Section 7. The State reaffirms and shall protect all rights, customarily and traditionally exercised for subsistence, cultural and religious purposes and possessed by ahupua'a tenants who are descendants of native Hawaiians who inhabited the Hawaiian Islands prior to 1778, subject to the right of the State to regulate such rights.

Notwithstanding the strong Constitutional mandates and statutory obligations set forth to recognize the duties of the State of Hawaii and its sub-agencies to protect the traditional and customary rights of native Hawaiians and Hawaiians, the Hawaii Supreme Court has set forth judicial guidance and interpretation in this regard as well.

In Public Access Shoreline Hawaii vs. Hawaii County Planning Commission (PASH), 79 Hawai'i 425 (1995), hereinafter PASH, the Hawaii Supreme Court, recognizing over 150 years of court decisions validating the existence of Native Hawaiian traditional and customary rights as part of the state's common law, reiterated that:

The State is obligated to protect the reasonable exercise of customarily and traditionally exercised rights of Hawaiians.

In Ka Pa'akai O Ka 'Aina v. Land Use Commission, 94 Haw. 31 (2000), hereinafter Ka Pa'akai, the Hawaii Supreme Court, again noting it was clear that the State and its agencies are obligated to protect the reasonable exercise of customarily and traditionally exercised rights of Hawaiians, to the extent feasible, noted the findings of the Hawaii State Legislature in 2000 that:

[T]he past failure to require native Hawaiian cultural impact assessments has resulted in the loss and destruction of many important cultural resources and has interfered with the exercise of native Hawaiian culture. The legislature further finds that due consideration of the effects of human activities on native Hawaiian culture and the exercise thereof is necessary to ensure the continued existence, development, and exercise of native Hawaiian culture. Act 50, H.B. NO. 2895, H.D. 1, 20th Leg. (2000).

The Ka Pa'akai court also noted:

With regard to native Hawaiian standing, this court has stressed that "the rights of native Hawaiians are a matter of great public concern in Hawaii." *Pele Defense Fund v. Paty*, 73 Haw. 578, 614, 837 P.2d 1247, 1268 (1992), certiorari denied, 507 U.S. 918, 113 S. Ct. 1277, The Ka Pa'akai court also set forth an analytical framework, in that instance for the LUC to adhere to, but in the spirit and intent of the law, a framework that all State and County entities should follow, especially the DLNR, which is espoused as follows. The proper analysis of cultural impacts should include:

1) the identity and scope of "valued cultural, historical, or natural resources" in the petition area, including the extent to which traditional and customary native Hawaiian rights are exercised in the petition area; (2) the extent to which those resources -- including traditional and customary native Hawaiian rights -- will be affected or impaired by the proposed action; and (3) the feasible action, if any, to be taken by the (agency) to reasonably protect native Hawaiian rights if they are found to exist.

Via this Testimony, I am helping the DLNR fulfill their duty on behalf of the public.

I have been granted standing in the Papipi Road issue and Kalo'i Case issue, before this very same DLNR for the very same area ('Ewa). I have also been recognized as a cultural descendant by the O'ahu Island Burial Council to this very same area and the primary informant for the ali'i burial complex and heiau which the OIBC officially recognized. I have a very strong, distinct and vested interest in this area as a Kahuna Lapa'au La'au o Limu and successfully challenged the CDUA for Kalo'i Gulch and obtained a favorable January 17, 2008 ruling from the First Circuit Court vacating this Board's May 11, 2007 Order granting Haseko's request for a conservation district use permit to discharge polluted stormwater into the ocean.

The Court remanded the decision "to the Board for receiving evidence and providing findings of fact and conclusions based upon a supplemental record." The Court's decision was based on the fact that "Haseko's water quality analysis failed to consider the cumulative impacts of the proposed project with existing stormwater discharges; or nutrient loads from Haseko's proposed stormwater outfall."

Any Relief Petitioner Seeks or Deems Itself Entitled to

Proper analysis of water quality and cumulative impacts of the proposed project with existing stormwater discharges; or nutrient loads from proposed stormwater outfall as mandated by the First Circuit Court in their January 17, 2008 Order.

Proper identification and protection of historic and cultural sites. Protection of exercise of my religious and traditional and customary native Hawaiian practices and historical, cultural and natural resources my practices rely upon, and underground water resources, such as the underground stream (Karst) which was breached, be adequately and corrected.

Mr. Lee has lived in the Moku (or district) of Ewa for over 13 years. He uses the area of One'ula in Ewa to gather limu and teach others. He also performs cultural practices related to communicating and honoring his ancestors. (Lee Aff. 11.)

One of the primary traditional cultural practices in the Petition Area was the gathering of native plant species. (FEIS, App. F at 91; 3/1/12, M. Lee 69: 19-25.)

Native Hawaiians traditionally gathered several types of limu in the Ewa area. (FEIS, App. F. at 98; Lee Aff. 4-9.))

The gathering of limu is a traditional and customary practice of Native Hawaiians. (3/1/12, M. Lee 75:4-8; Lee Aff 6.)

Mr. Lee's grandfather, Kimo Valentine Guerrero, and Walter Kamana taught him about limu and the limu medicine. (3/1/12, M. Lee 60: 24-25, p. 61, l. 1; Lee Aff. 9.)

Mr. Lee can identify approximately seventy different types of Hawaiian limu by sight. (Lee Aff. 10.)

Limu gathering has taken place in the area around the Petition Area, and in areas that would be impacted by the proposed development, for over 500 years. (3/1/12, M. Lee 70: 4-13.)

Mr. Lee and other Native Hawaiians regularly gather limu in and around the Petition Area and in areas that would be impacted by the proposed development. (3/1/12, M. Lee 70: 11-17.)

In addition to limu, the high quality soils found in the Honouliuli area are also a Native Hawaiian cultural resource. (3/1/12, M. Lee 75: 7-12.)

The health of limu depends on a mix of salt water and fresh water. (Lee Aff. 45-46.)

The urbanization of the Petition Area would significantly increase the area's impermeable surface thereby increasing the amount of surface water runoff. (Lee Aff. 47; 3/1/12 M. Lee, 94: 15-25, 95: 1-13; 96:17-20.)

Petitioner has not provided any studies regarding the impact that the increased urban and storm water runoff would have on the limu and other sea life at the Ewa seashore. (Lee Aff. 47.)

Petitioner does not propose, or commit to, any specific measures to mitigate the impact of increased runoff on the karst system and limu gathering rights.

One of the reasons the karst cave system is culturally significant is because it allows fresh water to flow out to the ocean and nourish the limu and sea life. (Lee Aff. 45-47; 3/1/12 M. Lee 72: 3-5.)

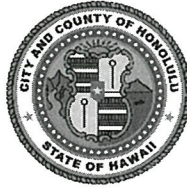
The fresh water karst and ancient burial cave system is the foundation for the limu at One'ula, which in ancient times was called Haleolimu, or the house of limu, which supports large amounts of sea life, a primary source of protein. (Lee Aff. 46; 3/1/12 M. Lee 72:1-5.)

Removal of freshwater from the underground karst system negatively impacts the health and quantity of limu. (3/1/12, M. Lee 72: 3-23.)

DEPARTMENT OF TRANSPORTATION SERVICES
KA 'OIHANA LAWELAWE 'ŌHUA
CITY AND COUNTY OF HONOLULU

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TP9/25-944288

September 22, 2025

Mr. Ryan Tam
Director of Planning and Development
Hawaii Community Development Authority
547 Queen Street
Honolulu, Hawaii 96813

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HAWAII COMMUNITY
DEVELOPMENT
AUTHORITY

Dear Mr. Tam:

SUBJECT: Notice of Public Hearings Regarding the Amendment of the
Kalaeloa Community Development District Rules, Hawaii
Administrative Rules Chapter 15-215, and the Kalaeloa
Master Plan

Thank you for the opportunity to provide written comments regarding the Notice of Public Hearings Regarding the Amendment of the Kalaeloa Community Development District Rules, Hawaii Administrative Rules Chapter 15-215, and the Kalaeloa Master Plan (DKMP). We have the following comments.

1. DKMP, Figure 2-1 and Section 2.3.6.4, Pages 66. The Department of Transportation Services (DTS) will regard the 2006 Locally Preferred Alternative as the conceptually planned rail alignment plan until completion of any future official studies.
2. DKMP, Section 3.3.1.3, Pages 85. The Applicant shall revise this section and corresponding rules to provide for the following Transit Improvements.
 - i. Require the developer, management entity, or owners' association to adopt (i.e., be responsible for litter removal, cleaning and maintenance of bus stop shelter, benches and floor area) anticipated future bus stops fronting their project site at no cost to the City and County of Honolulu (City).

- ii. The developer shall provide concrete roadway bus pads designed to DTS requirements at each bus stop.
 - iii. The developer shall design bus stops to conform with the Federal Americans with Disabilities Act requirements and shall be subject to both City and State Department of Transportation requirements.
 - iv. The developer shall construct new bus stop shelters at each bus stop and include trash receptacles, seating furniture with dividers, bus stop posts and signs, and sufficient lighting.
 - v. The developer shall reconstruct or repair bus stop shelters when damaged by motor vehicle collisions, arson, corrosion, weather, vandalism, insects, and other means.
 - vi. The developer shall provide bus stop bays if appropriate at each bus stop.
3. DKMP, Section 3.3.2, Page 83. The O'ahu Bike Plan (2019) did not consider the level of development planned in the DKMP, as such the plan should consider the need for additional bikeway facilities to serve the planned development and with facility selection based on the context of the accompanying additional vehicular traffic (for example, only including bike routes on very low traffic streets). The DKMP's emphasis on the "20-minute city" concept, which DTS thoroughly supports, makes the need for a more robust bikeway network even more important.
4. Kalaeloa Community Development Districts Rules, Section 15-215-26 (c), page 215-43 states, "Thoroughfares that are to be dedicated to the City and County of Honolulu shall be designed to the appropriate City and County of Honolulu standards, such as the complete streets design manual and subdivision street standards, as it may be amended from time to time." We wholly support this work and approach.
5. Disability and Communication Access Board (DCAB). Project plans (vehicular and pedestrian circulation, sidewalks, parking and pedestrian pathways, vehicular ingress/egress, etc.) should be reviewed and approved by DCAB to ensure full compliance with Americans with Disabilities Act requirements.
- i. Kalaeloa Community Development District Rules. S15-215-47(h) Structures. Page 215-61: Should include provisions for accessible parking stalls.

6. Transportation Impact Assessment (TIA). Each individual development project in the DKMP boundaries shall perform a TIA to examine the vehicle, pedestrian, bicycle, and public transit safety, stress, and comfort levels at the nearby intersections and driveways with corresponding improvements to mitigate these impacts by applying Complete Streets principles. The developer shall discuss the future year growth rate, trip distribution, mode split, and route assignment assumptions used in the TIA.

When appropriate, the TIA should identify an appropriate speed limit for the streets adjacent to the project by analyzing conflict density and activity level, among other contextual factors, to determine the speed limit that will best minimize the risk of a person being killed or seriously injured. The National Association of City Transportation Officials (NACTO) Safe Speed Study methodology is recommended. A Safe Speed Study should be conducted for the longest relevant segment of a street corridor affected by the project.

The developer shall submit all native files (e.g., Synchro, Excel, etc.) for the raw multi-modal counts (in the format specified at <https://geocounts.com/api/format/> and the example file at <https://bit.ly/DTS-count-sample>) and accompanying analyses to the DTS Regional Planning Branch (RPB) at dtsplanningdiv@honolulu.gov. Please refer to the DTS TIA Guide for multimodal assessment tools and recommended analyses. The TIA Guide can be found at <http://www4.honolulu.gov/docushare/dsweb/View/Collection-7723>.

7. Transportation Demand Management (TDM) Strategies. Each individual development project in the DKMP boundaries shall incorporate the following TDM elements.
 - i. Page 19 of the City's TIA Guide requires sponsors of projects that generate 100 or more net new a.m. or p.m. peak period vehicle trips and contain ongoing operational strategies to submit an annual TDM compliance report for the first five years following completion of the project (or completion of each phase for phased projects) for review and approval by the City and County of Honolulu. The annual report should document the status and effectiveness of the transportation improvements including the actual vehicle trip reduction.

Mr. Ryan Tam, Director of Planning and Development
September 17, 2025
Page 4

- ii. Page 19 of the City's TIA Guide requires sponsors of projects that generate 50 or more net new a.m. or p.m. peak period vehicle trips to develop and include a TDM Strategy in the TIA.
 - iii. Pages 20-22 of the City's TIA Guide describes recommended TDM strategies, including, but not limited to: providing subsidized transit passes to residents and employees; informing residents, staff, and visitors of vanpool and car share programs to promote alternate modes of transportation; unbundled parking, and parking cash out.
8. Street Usage Permit. A street usage permit from the DTS should be obtained for any construction-related work that may require the temporary closure of any traffic lane, sidewalk, bicycle lane, or pedestrian mall on a City street.
9. Neighborhood Impacts. The area representatives, neighborhood board, as well as the area guests, businesses, emergency personnel (fire, ambulance, and police), O'ahu Transit Services, Inc. (TheBus and TheHandi-Van), etc., should be kept apprised of the details and status throughout the project and the impacts that the project may have on the adjoining local street area network.

Should you have any questions, please contact Bartholomew Mikitowicz, of my staff, at (808) 768-6681.

Very truly yours,



J. Roger Morton
Director