

Bill 2 (2020)
Testimony



May 20, 2020

RE: SUPPORT for Bill 2 (2020)
Related to off-street parking and loading

Dear Chair Menor, Vice Chair Waters and Members of the Committee on Zoning, Planning, and Housing,

Thank you for this opportunity to testify in support of Bill 2 (2020). Blue Zones Project was brought to Hawaii by HMSA to help increase the overall well-being of our communities and to make Hawaii a healthier, happier place to live, work and play. To accomplish that goal, we address ways that we can lower obesity rates, tobacco use, and chronic diseases.

Blue Zones Project actively works to promote active transportation and city infrastructure that aligns with the goals of building a more livable city and transportation equity for all residents. This bill would change requirements for the planning and construction of parking and loading in our communities and provide more space for housing, pedestrian infrastructure, and other design elements that supports livability, both now and in the future.

Honolulu requires a shift towards transportation options that makes the healthy choice easier, while promoting safety and accessibility. We also must make policy decisions that align with our unified goal of reducing our carbon impact on the environment. Bill 2 (2020) would support these efforts and promote transportation by modes such as bicycle, mass transit, ride share, and walking, which would also lower traffic congestion and reduce the wear and tear on our roads.

Mahlao for this opportunity to testify in support of Bill 2 (2020).

Sincerely,

A handwritten signature in black ink, appearing to read "Colby Takeda".

Colby Takeda, MPH, MBA
Senior Manager
Blue Zones Project

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Henry A. Saunders
President

Fax Submittal: 768-3827

Email Submittal: <http://www.honolulu.gov/ccl-testimony-form.html>

TESTOMONY TO THE HONOLULU CITY COUNCIL
CITY AND COUNCIL OF HONOLULU

Honolulu City Council Committee on Zoning, Planning and Housing

In Support of BILL 2 (2020)

Regarding:

LAND USE ORDINANCE AMENDMENT
RELATING TO OFF-STREET PARKING AND LOADING

Chair Ron Menor, Vice Chair Tommy Waters and Members of the Committee on Zoning,
Planning and Housing,

I am Harry Saunders, President of Castle & Cooke Hawai'i. Thank you for the opportunity to
submit testimony with comments to Bill 2 (2020), including the proposed CD1.

Castle & Cooke Hawai'i generally supports the City's intent to comprehensively update the off-
street parking and loading requirements, reduce traffic, lessen our impact on the environment,
and reduce vehicle miles traveled. There are concerning provisions in Bill 2 that will impact
the feasibility and marketability of development in the future. We offer our comments:

1. **Sec. 21-6.40 Bicycle parking.** This section mandates the number of bicycle parking
spaces required.
 - The amount of short-term bicycle parking may be excessive for smaller projects
that have multiple buildings that are in areas outside of the city core.
 - The location of a centralized area for long term storage is difficult for the
convenience of all residents in projects with a density of less than 20 DU/AC.
 - Placement of short-term bicycle parking is problematic due to conflicts with other
site elements within townhouse or apartment flat projects.
 - Short-term bicycle parking would not be used due to security issues.

2. **Sec. 21-6.80 Surface parking site planning.**
 - a. **Sec. 21-6.80 (a) (2) (B)** – This section requires “at-grade parking must be set back
25 feet from the buildable-area boundary adjacent to the primary frontage, unless
the parking lot is screened by a building.”

Members of the Committee on Zoning, Planning and Housing,
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- Requirements are economically restrictive for owners of small to medium sized lots or all owners of front-loaded lots.
- Not business friendly as the commercial/retail frontage exposure along existing city standard lot width is reduced.
- Hidden parking from a visual perspective for drivers will result in reduced commercial retail traffic.
- Consumes more lot area on business or mixed-use properties with zero side and rear setbacks due to landscaping and parking setbacks from side and rear property lines.
- Reduces buildable area.
- Increases costs for property line walls as required in this bill. Currently, commercial buildings are often built on the rear and side property lines.
- May increase traffic congestion on city streets due to incoming and outgoing conflicts on parking lot driveways.
- May result in security issues for business owners with multiple front and back entries.

3. Sec. 21-6.90 Structured parking site planning and design standards.

- a. **Sec. 21-6.90 (a) (1)** – This section requires “[a]ll structured parking within 40 feet of a buildable area boundary adjacent to a street, other right-of-way (such as a bicycle path), or public park must be lined, wrapped, or screened with active floor area, except that those in the industrial districts.”

- A 40-foot setback is excessive for property owners given the requirements included in Section 21-6.80 restricting parking fronting primary streets.
- Results in 20% to 40% loss of property use on a standard 50 foot to 100 foot wide city lot.
- Residential and commercial liners on parking structures are not economically feasible due to the reduction of building efficiencies from the 80% baseline.
- Single loaded corridors are in the 50% to 60% building efficiencies and are not cost efficient to develop.
- Parking screens are expensive ranging in the \$ 75/SF to \$ 100/SF to construct.
- Parking screens reduce the amount of natural ventilation resulting in the need for accessory 24/7 mechanical ventilation that increases energy costs.

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4. **Sec. 21-6.100 Unbundled Parking.** This section requires “[o]ff-street parking spaces may be leased or rented through a separate agreement, but may not be sold as condominiumized real estate to individual owners, other than a management company, homeowner’s association, or similar entity capable of managing all off-street parking spaces on the site.”

The master planned community of Koa Ridge is a mixed use community in central Oahu. All 3,500 planned residential units will be developed as condominiums, including single family detached, paired homes, various low density attached and medium density product.

- Unbundling of condominium parking would be impractical and adversely affect market acceptability.
- While it may be intended for structured parking, the broad language needs to exclude low density housing outside the primary urban core.
- May not be appropriate for projects with less than 2.5 FAR as the amount of unused parking is less significant.
- Would not be marketable to sell projects without parking outside the city core given the higher amount of 2 car families.
- Amount of car ownership within families is not static and increases over time. Could result in future parking issues.
- May hinder new projects or redevelopment of older properties being non-competitive as measured against the current standard of ownership of parking stalls assigned to units.

We request that you delete Sec. 21-6.100.

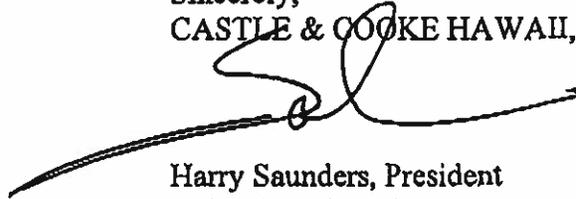
5. **Sec. 21-6.140 Passenger ride hailing services and deliveries.** This section requires “[a] driveway sized to accommodate at least two vehicles designed for drop-off and pickup of passengers and deliveries.”
- Adds additional cost while reducing use of property to construct wider driveways.
 - Decreases and interrupts street frontages along pedestrian ways for wider driveway aprons.
 - The offloading of materials and picking up passengers is an intermittent occurrence that can be mitigated by the operational management of current required LUO loading and parking stalls.

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In the wake of the COVID-19 pandemic, it is imperative that the people of Hawai'i are given the opportunity to get back on their feet. In order to do that, we need decisions that help stimulate economic recovery and not add to the cost of living in Hawai'i and hurt our businesses.

Thank you for your consideration of my testimony. Should you have any questions, please feel free to contact us.

Sincerely,
CASTLE & COOKE HAWAII, INC.

A handwritten signature in black ink, appearing to read 'Harry Saunders', with a long horizontal flourish extending to the left.

Harry Saunders, President
fsakai@castlecooke.com
Phone: 548-4884



May 21, 2020

Honorable Ron Menor, Committee Chair
and Council Chair Emeritus
Honorable Tommy Waters, Vice Chair
Council Committee on Zoning, Planning and Housing
City and County of Honolulu

**Comments and Request for Amendments and Postponement relating to Bill 2 (2020),
Proposed CD1 Relating to LUO Amendment relating to Off-Street Parking and Loading.**

ZPH Meeting: Thursday, May 21, 2020, 9:00 a.m., at City Council Chamber

The Land Use Research Foundation of Hawaii (LURF) is a private, non-profit research and trade association whose members include major Hawaii landowners, developers, and energy utility companies. LURF's mission is to advocate for reasonable, rational, and equitable land use planning, legislation and regulations that encourage well-planned economic growth and development, while safeguarding Hawaii's significant natural and cultural resources, and public health and safety.

LURF generally supports Bill 2 (2019), CD1, however, it adds non-health and safety requirements that could increase the costs of housing and mixed-use development and could limit the flexibility and economic recovery of housing and mixed-use commercial projects. LURF and its members have met, and plan to continue meeting with the City's Department of Planning and Permitting (DPP) regarding possible amendments to Bill 2. Under the circumstances, we are respectfully requesting a **postponement of action on Bill 2 until July 2020**, to allow LURF members and other housing stakeholders the opportunity to meet with DPP to discuss the **following proposed amendments**:

1. **Sec. 21-6.80 Surface parking site planning.** This section requires *at grade* parking must be set back 25 feet from the buildable-area boundary adjacent to primary frontage, unless the parking lot is screened by a building. Experts in office, industrial, retail residential and mixed-use real estate have indicated that this requirement will increase costs, will limit the buildable area, which would hinder economic recovery, and will discourage existing commercial properties from making renovations in order to avoid this new setback requirement. Thus, LURF would respectfully recommend **amendments that would allow this concept to be an alternative that is incentivized**. LURF and its members have approached DPP to further discuss this matter.
2. **Sec. 21-6.90 Structured parking site planning and design standards.** This section *requires that for most districts, structured parking adjacent to a street, right of way or public park must include a 40-foot setback that must be lined, wrapped, or screened with active floor area*. According to experienced housing and mixed use developers, this requirement would severely increase housing costs, increase engineering and construction costs, and severely restrict the number of housing units that could be developed on smaller parcels and parcels bordered by more than one street, right of way and parks. This is a major issue, and LURF would respectfully recommend **amendments that would allow this concept to be an alternative that is incentivized**. LURF and its members have approached DPP to further discuss this provision.

3. **Sec. 21-6.100 Unbundled parking.** This section *prohibits the sale of parking spaces to individual owners and requires that the parking spaces be sold to a management company, homeowner's association, or similar entity.* While this concept may work for specific projects in certain areas, real estate experts confirm that this requirement would severely impact sales of units as most homebuyers desire dedicated parking units and would result in on-street parking problems in surrounding neighborhoods. This is a very important issue, so LURF would respectfully recommend **amendments that would allow this concept to be an alternative that is incentivized.** LURF and its members have approached DPP to further discuss this issue.
4. **Sec. 21-6.140 Passenger ride hailing services and deliveries.** This section *requires additional areas on the project site for ride hailing and delivery services,* and according to housing experts, would increase the costs of housing projects and create practical and safety issues. Under the circumstances, LURF would respectfully recommend **amendments that would allow those services to be addressed by other on-site alternatives which are incentivized.** LURF and its members have contacted DPP to further discuss alternatives.
5. **Sec. 21-3.90-1(c)(1) Apartment mixed use district uses and development standards.** This section *limits the use of yard areas to access drives, walkways, and landscaping,* thereby prohibiting all other uses of yard areas. According to experts in live-work housing projects and mixed-use developments, this restriction would prohibit the creation of sustainable *"live-work-play"* mixed-use communities which include housing with convenience stores and coffee shops and restaurants with outdoor dining areas. LURF would respectfully recommend **amendments that would allow those uses, which could also be incentivized to encourage sustainable live-work-play communities.** This section has the potential to provide community benefits which support sustainability, and LURF and its members have contacted DPP to further discuss possible amendments.
6. **Sec. 21-4.70-1(e) Landscaping and screening.** This section *requires all rooftop machinery and equipment to be screened from view from all directions, including from above, except for any machinery or equipment whose function would be impaired by screening.* While the proposed requirements could be aesthetically pleasing, building experts have confirmed that adding screening structures to roofs would increase the costs of housing with additional installation and maintenance costs, as well as costs and risks relating to design and structural problems to address wind uplift loads and penetrations into the roofing system. Under the circumstances, LURF would respectfully recommend **amendments to delete this section.** LURF and its members have contacted DPP to further discuss this issue.

LURF appreciates the efforts of DPP and supports the general intent of many of the provisions of Bill 2 (2020), Proposed CD1. However, under the circumstances, LURF respectfully urges your favorable consideration of this request for a **postponement of ZPH Committee action until July 2020** to allow LURF, its members and other stakeholders to meet with DPP regarding **possible amendments to Bill 2 as described above.**

Thank you for the opportunity to present testimony regarding this matter.



**TESTIMONY TO THE HONOLULU CITY COUNCIL
COMMITTEE ON ZONING
CITY AND COUNTY OF HONOLULU
HONOLULU HALE, COUNCIL CHAMBERS
9:00 AM
May 21, 2020**

RE: Bill No. 2 (2020), LUO Amendment Relating to Off-Street Parking and Loading

Chair Ron Menor, Vice-Chair Tommy Waters, and members of the Committee:

My name is Dwight Mitsunaga, 2020 President of the Building Industry Association of Hawaii (BIA-Hawaii). Chartered in 1955, the Building Industry Association of Hawaii is a professional trade organization affiliated with the National Association of Home Builders, representing the building industry and its associates. BIA-Hawaii takes a leadership role in unifying and promoting the interests of the industry to enhance the quality of life for the people of Hawaii. Our members build the communities we all call home.

BIA-Hawaii has concerns regarding this bill, which would require "unbundled parking". This would mean that parking spaces would be sold and conveyed separate from the unit sale. While we understand the intent of the amendment, we have concerns about how this could adversely affect the housing market on Oahu. Housing prices are already astronomically high on Oahu, and we are now also facing economic devastation brought on by the current pandemic. We suggest that more research be conducted before passing this as another mandate on housing.

Thank you for the opportunity to provide comments on this matter.

Speaker Registration/Testimony

Name Kris Hui
 Phone 808-380-1894
 Email kris.hui@brookfieldpropertiesdevelopment.com
 Meeting Date 05-21-2020
 Council/PH
 Committee Zoning
 Agenda Item Bill 2 (2020)
 Your position
 on the matter Comment
 Representing Organization
 Organization Brookfield Properties
 Do you wish
 to speak at the No
 hearing?

May 21, 2020

Chair Ron Menor
 Vice-chair Tommy Waters
 Members of the Committee on Zoning, Planning and Housing
 City Council, City and County of Honolulu
 Honolulu, Hawaii 96813-3077

RE: Bill 2 (2020) – LUO AMENDMENT RELATING TO OFF-STREET PARKING AND LOADING

Hearing date: May 21, 2020 at 9:00 am

Aloha Chair Menor and members of the committee,
 Mahalo for the opportunity to submit testimony with comments on Bill 2 (2020),
 including the proposed CD1.

Bill 2 seeks to update the City's off-street parking and loading requirements established in the Land Use Ordinance ("LUO"). Brookfield Properties is generally in favor of the City's efforts to provide comprehensive and effective regulation of parking within the LUO. We support the City's efforts to encourage the use of alternative transportation and the development of a diversified transportation network. There are, however, some revisions needed to ensure Bill 2 does not include excessive burdens, especially design standards that will impact the viability of development to occur and also to dramatically increase development costs for all projects particularly housing, and the development of mixed-use projects. These are outlined below:

(1) Section 21-6.80: Surface parking site planning. This section requires "at-grade parking must be set back 25 feet from the buildable-area boundary adjacent to the primary frontage, unless the parking lot is screened by a building."

While we can appreciate this approach, most commercial properties in Honolulu have surface parking to encourage business traffic at the site that is beyond this proposed setback. However, requiring a 25-foot setback will discourage new mixed-use development by impacting the ability of a project to maximize the buildable area as well as increase the cost of new development. It will also discourage existing sites from seeking a renovation in order to avoid compliance with this setback.

(2) Section 21-6.90: Structured parking site planning and design standards. This section requires that “[a]ll structured parking within 40 feet of a buildable area boundary adjacent to a street, other right-of-way (such as a bicycle path), or public park must be lined, wrapped, or screened with active floor area, except those in the industrial districts.”

As a developer of mixed-use projects and housing- both market and affordable housing, we do not typically believe in ‘lining’ parking garages just to provide a visual relief of parking structures, as it could then further create a stigma of ‘tower vs. liner units’.

Liner units may suggest a developer to place affordable housing to these lower floor units, or if LUO policy ‘requires’ active liner units, then some buildings may choose to not allow podium residents to access amenities.

Written
Testimony

Liner/wrap units in parking podiums are very inefficient, as typically they are single-loaded corridors and require more operational maintenance, driving up maintenance fees if it is a for-sale condo, or just costs in general.

In addition, parking structures require certain dimensions to be efficient. This provision would reduce the floor area available for parking resulting in less parking being available, increasing podium heights, and/or driving up costs and making parking and/or housing less efficient.

Ingress/egress for additional fire exit stairs may be required, including separate ‘podium’ elevators, trash chutes for functionality to have residents not cross from the tower elevator bank through active parking and drive-aisles.

This section should be revised as lining parking is not always practical. Most specifically, it will significantly impact the ability of smaller parcels (One Acre or less) to be developed and will lead to less housing being developed. In addition, larger parcels (1 One Acre or more) may be impacted as well particularly parcels adjacent to two or more streets as the excessive 40-foot setback, and most specifically the lining, wrapping and screening of parking with active floor area is not always feasible, impacting two to four sides of a project.

Mahalo,

Kris Hui

Testimony
Attachment



May 20, 2020

The Honorable Ron Menor, Chair
The Honorable Tommy Waters, Vice Chair
Members of the Committee on Zoning Planning and Housing
City Council, City and County of Honolulu
Honolulu, Hawaii 96813-3077

RE: **Bill 2 (2020) – LUO Amendment Relating to Off-Street Parking and Loading**
Hearing Date: May 21, 2020 at 9:00am

Aloha Chair Menor and Members of the Committee on Zoning, Planning and Housing,

Mahalo for the opportunity to submit testimony on behalf of D.R. Horton, offering comments to the amendments proposed by the Department of Planning and Permitting (“DPP”) by way of Chair Menor’s proposed CD1 (“Proposed CD1”).

First and foremost, I would like to express our appreciation for the effort and energy DPP has put into this bill to contemporize off-street parking and loading requirements for applicability today and in the foreseeable future. Some of the language in the Proposed CD1 is very thoughtful towards development practicality and relevance as well as mindful of the continued rising cost of housing in Hawaii.

A good example of this is **Sec. 21-6.30 (h) Incentives for alternative transportation**. This section recognizes new and developing transportation alternatives, such as bicycle sharing and car sharing, that have the potential to reduce the demand for off-street parking spaces. The Proposed CD1 appropriately provides a reduction of off-street parking spaces as an incentive to include bicycle sharing and car sharing facilities within a project. This strategy of encouraging investment in transportation alternatives with offsetting parking requirements is an effective tool that balances forward thinking ideas with practical implementation.

There are, however, at least four sections that we feel are problematic, requiring more collaborative discussion amongst DPP and development stakeholders.

1. **Sec. 21-6.100 Unbundled Parking:**

Problem #1: One size DOES NOT fit all.

As we have learned from the recent Bill 25 discussions regarding EV charging, a singular requirement applied across the board simply does not work for all development projects. Residential projects vary in size, design, location, operations, market demand, etc. This proposed unbundled parking requirement is no different. While it is arguable that this strategy was effective at 801 South Street, a secured structure parking high rise within the Honolulu urban core, it would not at be effective at all in an unsecured open parking townhouse development in East Kapolei.

Problem #2: Disregard for current market driven demand.

Hawaii's homebuyers demand dedicated parking stalls. It is market driven. Homeownership in Hawaii is the largest investment families will make. With that commitment comes the expectation of stability and security for the next largest investment, their automobile. It is in bad faith to disregard this key element to homeownership that the housing market, at all levels, demands.

Problem #3: Reduces property value and resale values.

A condominium unit without dedicated limited common area parking stalls will be devalued against a comparable condominium unit with dedicated stalls. This will affect resale values, and potentially appraised values, of new units mandated to unbundle parking, putting these homeowners at a disadvantage.

Problem #4: Affects homebuyer lending qualification.

The leasing/renting of unbundled parking stalls via a homeowner's association or management company will create an additional monthly expense outside of the homeowner's mortgage payment, ultimately reducing borrowing capacities. This is additional expense is akin to condominium maintenance fees. This will make homeownership for Hawaii's families that much more difficult.

Problem #5: Adds significant burden of operational management of parking spaces to homeowner's association and property management company.

The management of leasing/renting parking stalls to individual tenants/homeowners will require additional staffing and expertise (including a licensed real estate broker) currently not provided by a typical condominium property management company. This will be an additional expense, not to mention an operational nightmare, for homeowner associations that are already battling rising maintenance fees.

Problem #6: Leasing or renting parking stalls will discourage tenants and homeowners from taking on additional monthly expenses, inevitably resulting in undesirable on-street parking within surrounding neighborhoods.

This will be the unintended consequence of unbundled parking. If given the choice, tenants/homeowners will opt out of leasing/renting parking stalls. Some may opt out because they don't own a car. Many opting out will do so to save costs, choosing to instead find free parking on surrounding neighborhood streets. I know we can all agree that this is absolutely not acceptable.

Proposed Solution: Offer incentives to develop projects with unbundled parking where it makes sense with market acceptance.

Do not make this mandatory. Implement the same incentive strategy that DPP proposed in *Sec. 21-6.30 (h) Incentives for alternative transportation*. Instead of mandating unbundled parking across the board, encourage developers to explore its viability for specific projects with incentives such as, but not limited to:

- a. Increased densities and building heights
- b. Reduced setbacks
- c. Reduced impact and permitting fees
- d. Expedited permitting
- e. Transferable parking credits

2. **Sec. 21-6.140 Passenger ride hailing services and deliveries:**

Thoughtful yet Problematic: Another good example of DPP's forward thinking approach to ride sharing and delivery services that are gaining in popularity. However, the proposed requirements simply layers unnecessary costs onto housing and creates potential safety hazards.

The proposed language requires additional site accommodations for ride sharing and delivery services when projects require at least two loading spaces. These additional site accommodations are in addition to the two loading spaces, ultimately increasing the amount of parking stalls required and thus increasing cost. Furthermore, the proposed language requires that a driveway sized to accommodate two vehicles be included for drop-off and pickup of passengers and deliveries. A "driveway" suggests that this area be located directly off a main roadway, something that 1.) may not be allowed by the Traffic Review Branch of the City and County of Honolulu and 2.) could potentially be a safety hazard.

Proposed Solution: Reduce loading stall requirement to one stall (instead of two) to allow the addition of on-site parking for drop-off and pickup of passengers and deliveries. Delete "driveway" requirement.

This solution will balance the growing needs of ride sharing and delivery services with very static and infrequently used loading spaces without significantly increasing the cost of housing.

3. **Sec. 21-3.90-1(c)(1) Apartment mixed use district uses and development standards:**

Problem: "Except for necessary access drives and walkways, all yards must be landscaped."

DR Horton has developed a half dozen AMX2 zoned developments at our Mehana and Hoopili master planned communities in Kapolei. Within each of these mixed-use developments we have built both live-work units as well as commercial condos fronting sidewalks and streets (setback areas). The possible commercial uses allowed to operate within AMX2 zoned developments, such as restaurants, coffee shops and convenient stores, would greatly benefit from outdoor dining areas directly adjacent to their establishments. Unfortunately, the current and proposed language does not allow for it.

Proposed Solution: Revise language to read "Except for necessary access drives, walkways and outdoor dining areas that support adjacent commercial uses, all yards must be landscaped."

4. **Sec. 21-4.70-1(e) Landscaping and screening:**

Problem: This section requires "All rooftop machinery and equipment to be screened...from view from all directions, including from above, provided that screening from above is not required for any machinery or equipment whose function would be impaired by the screening."

Screening any type of rooftop machinery and equipment from above will be costly and unnecessary. Although some machinery and equipment could potentially be exempted from this screening, there will inevitably be others that would be required to be screened from above, such as ductless mini split air conditioning equipment. Screening from above is problematic for the following reasons:

- a. It will require structurally designed screening elements that must withstand wind uplift loads.
- b. It will require additional penetrations into the roofing system that roofing manufacturers and builders typically want to avoid to reduce the potential for leaks.
- c. It will be costly to install and maintain. The additional cost is not justified by the limited, if any, visual benefit this proposes to create.

Proposed Solution: Revise language to read delete "including from above".

The Honorable Ron Menor, Chair
The Honorable Tommy Waters, Vice Chair
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In summary, we believe that the Proposed CD1 has merit. However, we would welcome the opportunity to further discuss these specific sections that we feel can be clarified and improved upon through collaboration with DPP and development stakeholders.

Mahalo for your time and consideration. It is very much appreciated. Should you have any questions, please do not hesitate to contact me at #782-4109 or ttonaki@drhorton.com.

Sincerely,



Tracy Tonaki
Senior Vice President



KAMEHAMEHA SCHOOLS®

Honolulu City Council
Committee on Zoning, Planning and Housing

Time: 9:00 a.m.
Date: May 21, 2020
Room: City Council Chambers

TESTIMONY

by Kau'i Burgess
Director of Community & Government Relations

RE: Bill 2-2020, Relating to Off-Street Parking and Loading

E ka Luna Ho'omalua Menor, ka Hope Luna Ho'omalua Waters, a me nā Lālā o kēia Kōmike, aloha mai.

Kamehameha Schools appreciates the opportunity to provide the following **comments** on Bill 2-2020, relating to off-street parking and loading requirements within the Land Use Ordinance (ROH Ch. 21).

Kamehameha Schools believes that every keiki deserves a home in which to live, grow, and thrive. Without access to stable, quality housing, health care, and basic commercial services, Hawai'i's learners are substantially less likely to succeed in their educational, career, and life paths, thereby reinforcing perpetual cycles of socioeconomic inequity.

Despite the ongoing COVID-19 pandemic, Kamehameha Schools continues to have confidence in our commercial real estate portfolio, the continued master planning of our lands and upcoming development projects. We will continue to focus on our urban core strategy and building projects that reflect our values and support Hawai'i's communities and keiki. To this effort, we are diligently working on several self-development projects, as well as new projects with various development partners. We are now working even harder, given the current COVID-19 crisis, to entitle and permit these projects expeditiously to begin construction, kōkua the revitalization of the economy, and put community members back to work as soon as possible. **Over the next two to three years** we are working to break ground on projects with total development costs estimated to be in excess of \$1.675 billion. These projects include:

- Waipahu Redevelopment (3.5 acres)
 - Mixed-use TOD Development
 - Approx. \$175M Total Development Costs
 - Up to 500 affordable rental homes and affordable senior rental homes
 - Approx. 50,000 SF commercial

- Kapālama
 - Initial Mixed-use project within Phase I of the Kapālama Kai Master Plan
 - Approx. **\$300M** Total Development Costs
 - 600-900 affordable and workforce homes
 - Approx. 25,000 SF of commercial
- Kaka‘ako
 - Mixed-use development of two of the remaining five blocks
 - Approx. **\$750M** Total Development Costs
 - Up to 1,000 affordable, workforce, and market homes
 - Approx. 80,000 SF of commercial
- Mō‘ili‘ili
 - Mixed-use (Apartments, Hotel, Student Housing) development at the Pucks Alley and former Varsity Theater property
 - Approx. **\$450M** Total Development Costs
 - 315 affordable and workforce rental apartments
 - 725 bed student housing project
 - 180 room limited service hotel
 - Up to 80,000 SF of commercial

To allow for and encourage the development of affordable and workforce housing that Hawai‘i’s keiki and ‘ohana need, we believe an effective and efficient regulatory system is critical. Such a system enables developers and home builders to design and timely permit financially viable projects; protect Hawai‘i’s unique natural and cultural resources; and consider input from the Native Hawaiian and greater community, addressing concerns appropriately. Through such regulatory processes, we uphold the integrity of Hawai‘i’s values for aloha ‘āina and lōkahi.

With these values and principles in mind, we recognize and support the positive regulatory updates proposed in this bill, noted below:

- No requirement for off-street parking within the Primary Urban Center Plan area and the Ewa Plan area; and
- Where parking is required:
 - Requirements are based on net vs. gross floor area ratio;
 - Joint-use parking and loading is allowed; and
 - Alternative transportation is incentivized, such as bicycle parking, bicycle sharing, car sharing, motorcycle and moped parking.

We applaud these amendments that reduce the City’s current excessive minimum parking requirements and promote climate-friendly transportation options. These proposed positive updates can help the development and redevelopment of Honolulu’s housing deficit, new commercial and mixed-use projects, while advancing Hawai‘i’s sustainability goals.

However, there are several sections of this Bill **that will significantly impair the ability to develop housing and commercial projects in Honolulu.**

Concerning requirements include:

- The Director's ability to impose parking maximums (Section 21-6.30 (e));
- Limitations on access to parking from primary frontage/roadways (Section 21-6.80);
- Required parking setbacks, including:
 - 10' from all sides and rear yards;
 - 25' from the primary frontage road; and
 - 40' from any street (Section 21-6.90);
 - Relief from the 40' setback requires 20' of wrapped "active" floor area;
- Required unbundled parking (Section 21-6.100);
- Director's ability to impose special loading requirements (Sec. 21-6.120); and
- Required driveways and parking for ride hailing services and deliveries (Sec. 21-6.140).

In addition, Kamehameha Schools respectfully **requests that this committee defer decision making** on this bill until the Department of Planning and Permitting and developers have a chance to convene and collaborate on identifying viable solutions to the language of this bill in an effort to support DPP's community planning kuleana, while helping to stimulate the housing development that Hawai'i's 'ohana and economy need. Ensuring development projects are feasible is essential to the state's economic recovery, and changing development rules at this point – without the necessary mutual understanding that can only be accomplished through collaboration – could prevent advancement of many planned projects, and negatively impact the state's recovery efforts. A meeting is currently being scheduled with developers and DPP for June.

In summary, Kamehameha Schools appreciates the effective components of this legislation but recommends that the sections that are detrimental to development outlined above – which will significantly deter the much needed and beneficial development in our community – be eliminated. Without the elimination of these provisions, KS' current development plans for all projects listed above (with the exception of Kaka'ako due to HCDA jurisdiction), as well as future developments in other market areas, will not only be severely impacted, but may no longer be financially viable.

Founded in 1887, Kamehameha Schools is an educational organization striving to restore our people through education and advance a thriving Lāhui where all Native Hawaiians are successful, grounded in traditional values, and leading in the local and global communities. We believe that community success is individual success, Hawaiian culture-based education leads to academic success and local leadership drives global leadership.

Mahalo for the opportunity to testify.

NAIOP

COMMERCIAL REAL ESTATE
DEVELOPMENT ASSOCIATION

HAWAII CHAPTER

May 20, 2020

Chair Ron Menor
Vice-chair Tommy Waters
Members of the Committee on Zoning,
Planning and Housing
City Council, City and County of Honolulu
Honolulu, Hawaii 96813-3077

RE: **Bill 2 (2020) – LUO AMENDMENT RELATING TO OFF-STREET PARKING
AND LOADING**
Hearing date: May 21, 2020 at 9:00 am

Aloha Chair Menor and members of the committee,

Mahalo for the opportunity to submit testimony with comments on Bill 2 (2020), including the proposed CD1. NAIOP Hawaii is the local chapter of the nation's leading organization for office, industrial, retail, residential and mixed-use real estate. NAIOP Hawaii has over 200 members in the State including local developers, owners, investors, asset managers, lenders and other professionals.

Bill 2 seeks to update the City's off-street parking and loading requirements established in the Land Use Ordinance ("LUO"). NAIOP Hawaii is generally in favor of the City's efforts to provide comprehensive and effective regulation of parking within the LUO. NAIOP Hawaii also supports the City's efforts to encourage the use of alternative transportation and the development of a diversified transportation network. There are, however, some revisions needed to ensure Bill 2 does not include excessive burdens, especially design standards that will impact the viability of development to occur and to dramatically increase development costs for all projects particularly housing (affordable and workforce). These are outlined below:

- (1) **Section 21-6.80: Surface parking site planning.** This section requires "*at-grade parking must be set back 25 feet from the buildable-area boundary adjacent to the primary frontage, unless the parking lot is screened by a building.*"

While we can appreciate the aesthetics of this approach, most commercial properties in Honolulu have surface parking to encourage business traffic at the site that is beyond this proposed setback. Requiring a 25-foot setback will discourage development by impacting the ability of a project to maximize the buildable area as well as increase the cost of new development. It will also discourage existing sites from seeking a renovation in order to avoid compliance with this setback.

Please delete Section 21-6.80.

- (2) **Section 21-6.90: Structured parking site planning and design standards.** This section requires that *"[a]ll structured parking within 40 feet of a buildable area boundary adjacent to a street, other right-of-way (such as a bicycle path), or public park must be lined, wrapped, or screened with active floor area, except those in the industrial districts."*

This section significantly impacts the ability of smaller parcels (One Acre or less) to be developed and will lead to less housing being developed. In addition, larger parcels (one acre or more) will be impacted as well particularly parcels adjacent to two or more streets as the excessive 40-foot setback impact will affect two to four sides of a project. In addition, parking structures require certain dimensions to be efficient. This provision would reduce the floor area available for parking resulting in less parking being available, driving up costs and making parking less efficient. In addition, there are several massive cost escalators in this type of construction including:

- Added structural engineering and reinforcing to accommodate the vehicular traffic adjacent to active floor areas compared to the podium model, especially in the higher floors;
- Fire walls/retardation systems installed between the parking and living areas;
- Additional sound insulation;
- Ventilation systems - parking structures that are even partially enclosed accumulate increased carbon monoxide requiring added HVAC systems to maintain air quality.

We request that you delete Section 21-6.90.

- (3) **Section 21-6.100: Unbundled parking.** This section requires *"[o]ff-street parking spaces may be leased or rented through a separate agreement, but may not be sold as condominiumized real estate to individual owners, other than a management company, homeowner's association, or similar entity capable of managing all off-street parking spaces on the site."*

The Staff report (November 20, 2019) references;

"The concept of "unbundling" refers to the separation of the purchase price of a parking space from the price of the dwelling or commercial space. Unbundling gives people the opportunity to decide whether they need a parking space, instead of automatically being forced to purchase or rent one because it exists. Both overall construction costs and the cost of housing and commercial space could be

Chair Ron Menor
Members of the Committee on Zoning
Planning and Housing
May 20, 2020

reduced if parking spaces are unbundled."

As to 801 South Street the Staff report is incorrect. All the stalls within the project were sold to the buyers/owners in the project. Every unit came with one stall deeded to the unit. Additional stalls were made available for purchase (deeded) to buyers/owners of 2-bedroom and 3-bedroom units and those stalls were sold out (with addition demand to purchase more). The 801 South Street association manages the parking stalls on behalf of the unit owners which thereby allow for a daily rental program ("shared parking") to other offsite uses.

Although the "shared parking" program of privately-owned stalls has proven effective at 801 South Street, in Kakaako and near Downtown Honolulu this program should not be a mandated requirement nor does it have any relation to how the "unbundled parking" is defined in Bill 2.

Such a requirement is ill conceived and not consistent with current market demand, which requires at least one parking space per unit, and does not coincide with a fully developed transportation network.

We request that you delete Section 21-6.100.

Bill 2 references that these design standards are in place in Kaka'ako, however current buildings are not all being built to these standards because they have vested with previous laws.

In addition to the proposed amendments, NAIOP Hawaii strongly urges the committee to defer any decisions on this bill during the COVID-19 pandemic. Businesses throughout Hawaii, and especially in Honolulu, are in dire financial circumstances. Ensuring development projects are feasible and are completed is essential to the state's economic recovery. Changing development rules at this point would be detrimental to many projects and negatively impact the state's recovery. Even the committee's action in furthering Bill 2 places more risk on development plans and has the potential to stall a project until the risks are understood. Despite NAIOP Hawaii's recognition that the bill has valuable provisions, none of the provisions are necessary for current development projects. Instead of risking projects that provide much needed revenue for Hawaii's workforce, including construction workers, planners, architects, engineers and other local businesses, the committee should organize a group of stakeholders to develop a workable solution. We strongly urge you to defer this bill until then.

Mahalo for your consideration,

Catherine Camp, President
NAIOP Hawaii

Testimony of
Pacific Resource Partnership

City & County of Honolulu
Committee on Zoning, Planning and Housing
Councilmember Ron Menor, Chair
Councilmember Tommy Waters, Vice Chair

Bill 2 (2020)—LUO Amendment Relating to Off-Street Parking and Loading

Thursday, May 21, 2020
9:00 A.M.
City Council Chamber

Aloha Chair Menor, Vice Chair Waters and Members of the Committee on Zoning, Planning and Housing.

Pacific Resource Partnership (PRP) appreciates the opportunity to present testimony to this Committee and voice its **concerns** regarding Bill 2 (2020), CD1. While PRP supports evolving transportation policies designed to reduce vehicle miles traveled and mitigate transportation-related environmental impacts, we have concerns regarding the economic feasibility and marketability of future developments subject to Bill 2.

Deferring to specific concerns set forth by industry stakeholders, PRP respectfully encourages this Committee to defer this measure to allow those who develop and build Oahu's communities to meet, discuss and share their concerns with representatives of the City and County of Honolulu regarding the policy proposals set forth in Bill 2.

PRP also notes that in light of COVID-19, there are on-going policy discussions regarding the long-term impact of health-related pandemics to evolving transportation policies promoting shared-use principles. These concerns are not expected to be fully resolved in the near term and give further cause to pause and reflect on best transportation practices going forward.

Based on the above, PRP respectfully suggests a deferral in appropriate pending further discussion. We thank you for this opportunity to submit written testimony.



STANFORD CARR DEVELOPMENT, LLC

May 20, 2020

Chair Ron Menor
Vice-Chair Tommy Waters
Members of the City Council
City Council
530 South King Street, Room 202
Honolulu, HI 96813

RE: Testimony for Bill 2 (2020), CD1

The Honorable Chair Menor and members of the Committee;

I appreciate the opportunity to submit testimony relating to Bill 2 (2020), CD1 and commend the City's efforts to promote alternative modes of transportation. However, we are concerned with the concept of unbundled parking.

As a local developer who has built over 5,000 units including Affordable, Reserved and Market Housing, I strongly feel that Section 21-6, JOO: Unbundled Parking will be detrimental to our ability to sell condominium units.

I understand your concerns regarding parking/loading and am more than willing to work with the City and County of Honolulu to implement much needed multi-modal transportation. I appreciate your efforts to facilitate our mission to serve households in need. However, the current reading of this bill, specifically Section 21-6.100: Unbundled Parking will impede our ability to build and sell much needed housing.

In closing, I strongly oppose Section 21-6.100 relating to unbundled parking, Should you have any questions, please feel free to call me at (808) 537-5220.

Sincerely,

STANFORD CARR DEVELOPMENT, LLC



Stanford S. Carr, President



WRITTEN TESTIMONY BEFORE THE
COMMITTEE ON ZONING, PLANNING AND HOUSING
Thursday, May 21, 2020 9:00 A.M.

BILL 2 (2020) proposed CD: LUO AMENDMENT RELATING TO OFF-STREET PARKING AND LOADING.

Aloha Chair Menor and Members of the Committee on Zoning, Planning and Housing:

BOARD OF DIRECTORS

Roxanne Adams, ISA Certified
Arborist, Building & Grounds,
University of Hawaii

Daniel Dinell, President, Trees
for Honolulu's Future

Tom Dinell, FAICP, Emeritus
Professor of Urban &
Regional Planning, University
of Hawai'i at Mānoa

Kevin Eckert, ISA Board Certified
Master Arborist, Arbor Global

Tom Fee, AICP, LEED AP ND,
HHF Planners

Sharon Gi, Commercial Real
Estate Division, Kamehameha
Schools

Matthew Gonser, AICP, CFM,
Office of Climate Change,
Sustainability & Resiliency,
City & County of Honolulu

Travis Ito, Blue Logic Labs

John M. Knox, Ph.D.,
John M. Knox and Associates

Terri Koike, ISA Certified
Arborist, Urban Forestry
Division, City & County of
Honolulu

Wai Lee, Smart Trees Pacific

Robyn Loudermilk, AICP, MURP,
State Planner

Lisa Marten, MPP, DrPH,
Healthy Climate Communities

Daniel Simonich,
ProsPac Holdings Group, LLC

Winston Welch,
The Outdoor Circle

Trees for Honolulu's Future is a non-profit organization with a vision for an appropriately tree-shaded island that preserves and enhances our quality of life, especially in the face of climate change. We advocate for the Right Tree, in the Right Place, receiving the Right Care.

We appreciate the Department of Planning & Permitting, along with Council, in advancing this legislation to comprehensively revise the LUO as it relates to off-street parking and loading. In particular, the Bill's recognizing different modes of transportation, addressing future parking needs more flexibly, and promoting more and larger canopy trees is very positive. Recognizing best practices such as permeable pavers and the mitigation of storm water runoff, as this Bill does, are also great steps forward.

However, we feel that the proposed measure falls short with regard to keeping trees healthy as well as ensuring trees remain. On a very fundamental level, the term "canopy form tree" is not defined and the tree boxes, as specified, will not successfully provide adequate growth space for trees. We want to position the trees, the development, and our city, for success. With that in mind, attached are suggested amendments to address these concerns that we ask be incorporated into the committee draft.

Last year was the hottest year on record for Honolulu. Surface parking lots exacerbate the heat island effect. Trees can help mitigate impacts caused by them, but trees must be given the chance to thrive.

Our arborist experts would be happy to work with the Committee on the amendments as this measure moves forward. Mahalo.

Daniel Dinell
President

HONOLULU is HOT TREES are COOL

Visit us: www.TreesForHonolulu.org Contact us: info@TreesForHonolulu.org Voice/Fax/Text: 808-707-6353
P.O. Box 12051, Honolulu, Hawaii 96828

Underscored, new language, bracketed delete.

RATIONALE: These amendments are necessary in order to ensure that trees, which play a critical role in the health of a City, are planted in conditions where they can thrive and achieve the intended goals. The recommended amendments support policy goals established in 2018 when the City Council unanimously adopted Resolution 18-55 setting the target of 35% tree canopy for urban Honolulu by 2035. Surface parking lots represent a huge opportunity to create and maintain canopy that will help Honolulu reach this policy goal. Additionally, Ola, Oahu's resilience strategy, recognizes the value of trees as part of the overall effort and need to create a sustainable, resilient, city.



Note the dense canopy in the parking area between Manoa Marketplace Safeway and Longs (Area #1). These monkey pod trees thrive because their roots have the space to grow beneath the asphalt in soil that is uncompacted. The adjacent University of Hawaii's Institute of Astronomy parking lot (Area #2) is devoid of trees except on the perimeter. The red arrows indicate islands where trees likely were (or could be), but couldn't be established since their roots would be constrained in a narrow planter well. WHICH do you want for your City? WHICH reduces the heat island effect and accompanying rising temperatures?

RATIONALE: The terms about trees used in the Ordinance need to be defined. In addition, caliper size is only useful to determine the size of tree at planting, not when mature.

SECTION 20. Section 21-10.1, Revised Ordinances of Honolulu 1990 ("Definitions"), is amended to add definitions of "Active floor area," "Bicycle sharing," "Car sharing," "Car sharing spaces," "Canopy Form Tree (Large and Small)," "Electric ready," "Mechanical parking system," and "Shared parking to read as follows:

“Canopy Form Tree (large and small)” means trees with a decurrent (spreading, umbrella-like form) mature crown architecture. A mature tree is one that has attained its natural architecture and produces flowers. “Large Tree” means those that achieve mature crown canopy of at least 40 feet. “Small Tree” means those that achieve mature crown canopy of at least 25 feet.

RATIONALE: These amendments incorporate modern arboriculture best practices. Trees where soils have been compacted to construction engineering standards (>90% compaction) roots cannot penetrate and will surface to damage asphalt and other built improvements. This soil restriction also results in shorter-lived, poorly structured, sometimes unstable and unhealthy trees. The cost of repair and replacement will exceed the higher upfront cost of providing a suitable environment when first developed. Indeed, the City has lead the way with the incorporation of Silva cells in its Waipahu Transit Center Development (see: <https://www.staradvertiser.com/2019/06/10/breaking-news/city-installs-modular-system-to-help-trees-grow-at-waipahu-transit-center/>); we need to encourage more of this type of best practice approach.

Examples of problems when tree roots are not given enough space to expand:

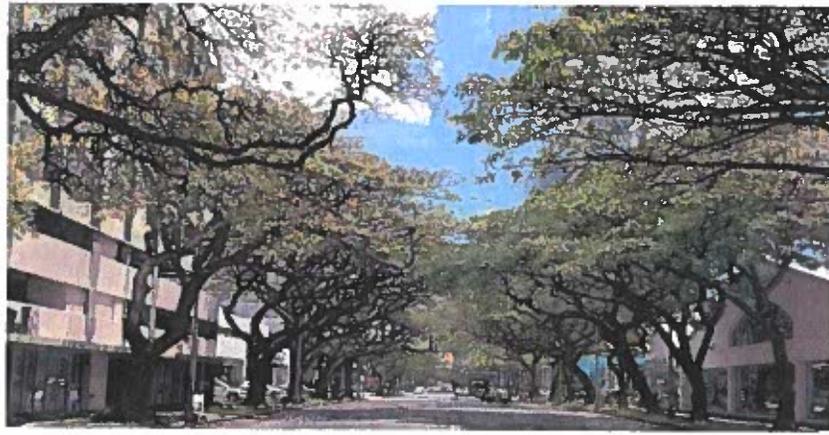


21-6-80(b) Surface parking lot landscaping and screening. Parked vehicles in surface parking lots must be screened from view from all streets and public spaces.

(1) Surface parking lots of five or more parking spaces must provide a minimum five-foot landscape strip adjacent to any adjoining street right-of-way. This five-foot strip must contain a continuous screening hedge a minimum of 42 inches in height with plantings a maximum of 18 inches on center. If the landscape strip is wider than five feet, the hedge may be placed elsewhere within the strip. A minimum 42-inch-high wall or fence may be placed behind the setback line in lieu of a hedge. If a wall or solid fence is erected, either a vine or shrub must be planted at the base of the wall or solid fence on the side fronting the property line. One, large canopy form tree, a minimum of two-inch caliper at planting, must be planted in the landscape strip for each 30 feet or major fraction of adjacent lineal street frontage. (See Figure 21-6.2.)

(2) To provide shade in surface parking lots and minimize visibility of paved surfaces, parking lots with more than five parking spaces must provide one small canopy form tree, a minimum of two-inch caliper at planting, for every six parking spaces or major fraction thereof, or one large canopy form tree of two-inch caliper at planting, for every 12 parking spaces or major fraction thereof (see Figure 21-6.2). Each tree must be located in a planting area or tree well a ~~minimum of 16 square feet in area for 2-inch caliper trees, or a minimum of 25 square feet in area for 6-inch caliper trees~~ with uncompacted, functional soil volume of at least 600 ft³ for small trees, which would be approximately 8 feet in radius from the trunk and 3 feet deep for a symmetrical pit, and 1,000 ft³ for large trees, which would be approximately 11 feet in radius from the trunk and 3 feet deep for a symmetrical pit. The minimum width of an area for a tree is three feet. The tree soil area and parking surface shall be protected by a suspended parking/sidewalk surface using soil panels, structural cells or comparable. The minimum open tree pit immediately surrounding each tree trunk shall be no less than 18 inches in radius for large trees and 8 inches in radius for small trees. If wheel stops are provided, continuous planting areas with low ground cover, and tree wells with trees centered at the corner of parking spaces may be located within the three-foot overhang space of parking spaces (see Figure 21-6.3). Hedges and other landscape elements, including planter boxes over six inches in height, are not permitted within the overhang space of the parking spaces. Trees must be sited so as to evenly distribute shade throughout the parking lot. Trees species shall be selected that are naturally decurrent in form that can achieve a height at the subject site such that lowest scaffold branches are no less than 8 feet above ground level for car parking stalls and 18 feet above ground level for truck access or parking clearance. A tree box specifically designed to treat stormwater runoff may be used within the tree planting area, however, appropriate canopy form trees shall be located using the same soil volume requirements specified above. Tree boxes must be approved for compliance with the rules related to stormwater quality.

(3) All service areas and loading spaces must be screened from adjoining lots in the country, residential, apartment, and apartment mixed use districts by a wall six feet in height.



While not a parking lot condition, the canopy trees along Kapiolani Boulevard are a good example of how canopy trees can be healthy because of soil conditions that allow roots to spread and the tree to grow. The canopy also reduces ambient air temperatures among other benefits.

RATIONALE: Proper care of trees is essential for their health and for the City, the development, residents/patrons to enjoy the benefits trees provide. Nobody would want the trees and irrigation to be added and then not address their ongoing care.

(4) All plant material should be selected for natural water conditions. However, in addition, all landscaping must be provided with an irrigation system to establish the trees. Structural pruning by competent, qualified arborists with clearly demonstrated knowledge and proficiency through experience of the subject pruning practices in conformance with the most recent version of the ANSI A300 Part 1 Pruning Standard shall be conducted until the subject tree has reached its compatible, mature architecture. At that point, pruning shall be restricted to that required to maintain public safety and manage infrastructure conflicts and in conformance with the most recent version of the ANSI A300 Part 1 Pruning Standard. Maintenance pruning shall not be permitted that significantly alters the tree canopy coverage over the designated parking spaces.

RATIONALE: No law is effective without a means to ensure the intent is carried out. The following amendment is modeled after language found in other portions of the ROH. The Director of the Department of Parks & Recreation is the proper authority since the City's Division of Urban Forestry is in that department and has the expert staff to make such determinations.

(5) Tree Removal or Destruction. It is unlawful to remove or otherwise destroy a required tree covered under this section except as provided below:

An assessment by a qualified arborist shall be submitted to the director of parks and recreation or the director's authorized representative along with an application stating the reasons for removal and plan for replacement prior to the removal of any trees. In an emergency situation, where there is imminent danger to life or property, the owner of the tree shall petition for removal to the director of parks and recreation or the director's authorized representative. The director of parks and recreation or the director's authorized representative may grant the removal of such tree upon a finding that such an emergency exists and shall require a plan for replacement.

Any person who violates this Section shall be subject to a fine of not more than \$5,000.00 per tree.

From: CLK Council Info
Sent: Wednesday, May 20, 2020 2:31 PM
Subject: Zoning, Planning and Housing Speaker Registration/Testimony

Speaker Registration/Testimony

Name Jaymen Laupola
Phone 8083939246
Email jmenloa@gmail.com
Meeting Date 05-21-2020
Council/PH Committee Zoning
Agenda Item Bill 2 (2020), Agenda item 7 under For Action.
Your position on the matter Support
Representing Self
Organization
Do you wish to speak at the hearing? No

By removing the minimum parking requirement for developers, Bill 2 will encourage less dependence on vehicle transportation and encourage other more environmentally friendly modes. This will lead to less emissions.

Written Testimony Bill 2 will also un-bundle parking stalls from units and adds provisions for bicycle spaces. Those who do not use vehicle transportation could save money.

Thank you for considering my testimony.
Jaymen Laupola

Testimony Attachment
Accept Terms and Agreement 1

IP: 192.168.200.67

From: CLK Council Info
Sent: Wednesday, May 20, 2020 4:03 PM
Subject: Zoning, Planning and Housing Speaker Registration/Testimony

Speaker Registration/Testimony

Name Scott Dukart
Phone 505-72-0594
Email scottdukart@gmail.com
Meeting Date 05-21-2020
Council/PH Committee Zoning
Agenda Item Bill 2 (2020)
Your position on the matter Support
Representing Self
Organization
Do you wish to speak at the hearing? No

We need to rightsize parking and stop subsidizing vehicle travel. See the high cost of parking here on Vox. https://www.youtube.com/watch?v=Akm7ik-H_7U

Written Testimony

Thank you,
Scott Dukart

Testimony Attachment

Accept Terms and Agreement 1

IP: 192.168.200.67

From: CLK Council Info
Sent: Wednesday, May 20, 2020 4:07 PM
Subject: Zoning, Planning and Housing Speaker Registration/Testimony

Speaker Registration/Testimony

Name Kathleen Rooney
Phone 504-782-6950
Email krooney80@gmail.com
Meeting Date 05-21-2020
Council/PH Committee Zoning
Agenda Item Bill 2 (2020)
Your position on the matter Support
Representing Self
Organization
Do you wish to speak at the hearing? No

Written Testimony

This bill is one of the most important things we can do to help meet our climate goals in transportation and is completely non-coercive. It doesn't require us to fund expensive projects or invest in new option - it just allows us to make better decisions around parking - its supply, its demand, and its price. There is no other affordable housing strategy out that that could increase the number of units built in such a way and potentially reduce rents by \$300/month. And it could do so much sooner than 5 years from now.

Testimony Attachment

Accept Terms and Agreement 1

IP: 192.168.200.67

May 21, 2020
Testimony to the Committee on Zoning, Planning, and Housing
RE: Bill 2 (2020) Amending the Land Use Ordinance Relating to Off-Street Parking and Loading.

My name is Francine Wai and I am testifying in my personal capacity as a private citizen. Specifically, I am testifying in support of the provision in Sec. 21-6.100 relating to Unbundled Parking. At this time, I offer no opinion on the other provisions of the bill, although I may opt to do so in the future.

Sec. 21-6.100 Unbundled parking.

Off-street parking spaces may be leased or rented through a separate agreement, but may not be sold as condominiumized real estate to individual owners, other than a management company, homeowner's association, or similar entity capable of managing all off-street parking spaces on the site.

My support for unbundled parking is based upon two entirely separate, but somewhat intertwined, reasons:

- 1- The unbundled parking provision will increase the availability of accessible parking for persons with disabilities. This bill will not increase the number of stalls, but will improve the availability of the stalls. As the former Executive Director of the State Disability and Communication Access Board, I was faced with the growing difficulty that persons with disabilities face in obtaining accessible parking in residential condominiums. This is due to the fact that parking stalls are sold and deeded to specific units upon purchase. When a person with a disability requires an accessible parking space as a reasonable accommodation under the Federal Fair Housing Act, there is often little to no flexibility in offering a stall to the person because the parking is bundled with a unit. When the Fair Housing Act was enacted, the provisions relating to parking were based upon the assumption that 'management' had the discretion to reallocate or reassign parking as needed or requested by the owners. In fact, the framers of the law, when writing the administrative rules, did not contemplate bundled parking that was not flexible in the allocation. The single most requested (and difficult to fulfill) request for accommodation during my employment tenure was for accessible parking. If parking is not sold as condominiumized real estate to owners, then the association or other management agent has the discretion to allocate, as needed.
- 2- As a private citizen concerned with transportation and mobility in the City, I believe that future homeowners who opt not to own a car for ANY reason, but hopefully to minimize the use of individual cars in favor of public transit or shared rides for environmental reasons, should be rewarded for this action. They should be incentivized by not paying for a parking stall that they are not using and by not generating emissions that are environmentally harmful. Unbundling the parking simply makes parking an amenity that has a separate price to it.

There may be some concerns as to how to manage unbundled parking. However, unbundled parking is very common elsewhere and there are best practices that exemplify how to best allocate parking by management. In addition to my professional (retired) capacity, I was also a Condo Board President for almost a decade and know that the management of parking, however unpopular for management, is actually manageable. I would recommend, however, that the provision in Sec. 21-6.100 allow for "assigned or reserved" parking, but not deeded parking, thus providing some regularity and consistency to residents when parking (i.e., parking would not necessarily be 'first-come-first-serve basis.' I believe that an appropriate management practice should require that once a stall is assigned that it be permitted until such time as the resident chooses to decline the

stall, thus giving a person the assurance that if he/she has been assigned a parking stall then that amenity will not be taken away without cause. I strongly support that the ownership of the stalls be with the association or entity as mentioned in the bill, with income generated placed into the account of the association as a whole to offset costs. I believe this separation will treat parking in residential settings similar to employment, where parking is a separate cost and allocated as needed.

Finally on a related note, the City Council recently passed Bill 25, which in part provided a requirement for a percentage of EV parking stalls in multi-family residential units. There was concern expressed by developers of the cost of such stalls and the uncertainty of the actual need, thus lowering the percentage of EV stalls required from that originally proposed. By unbundling the parking from the units, greater flexibility is provided to the developer and subsequently the management company to create a blueprint that does not tie the EV charging stations/stalls to particular units without knowing who is ultimately going to need an EV stall. In the same manner that one cannot predict which unit will have an owner who has a disability, one cannot predict which unit will have an owner with an EV car. This flexibility of unbundling the parking from the unit allows the developer to bundle (or congregate) the accessible and EV stalls to offer not only maximum flexibility for management to accommodate individual needs, but offers the option (from a wiring perspective) to add more stalls in the future, whether they be accessible or with EV charging stations. By the way, there are design guidelines for accessible EV charging stations and stalls as well. The number of people with disabilities as well as people with EV stalls will only increase in the future and this proposal will better allow a change in configuration in the future as demand changes.

Thank you for the opportunity to testify.

Sincerely,

Francine Wai
francinewai@me.com

From: CLK Council Info
Sent: Wednesday, May 20, 2020 2:19 PM
Subject: Zoning, Planning and Housing Speaker Registration/Testimony

Speaker Registration/Testimony

Name Paul Bernstein
Phone 8083737161
Email paulbernstein2004@yahoo.com
Meeting Date 05-21-2020
Council/PH Committee Zoning
Agenda Item Bill 2 ~~(2019)~~ ²⁰²⁰ CD1
Your position on the matter Support
Representing Self
Organization UH
Do you wish to speak at the hearing? No

Aloha Council Members:

I'm writing in strong support of Bill 2. As the city strives to reduce its greenhouse gas emissions, the implementation of the provisions in Bill 2 will be of great help. Specifically:

1) Bill 2's removal of the minimum parking requirement will lead to fewer parking spots being constructed, which in turn will incentivize people to be less dependent on their personal vehicles. The reduction in vehicles will ultimately lead to less VMT and fewer greenhouse gas emissions.

Written
Testimony

2) Bill 2's requirement builders to unbundle parking spaces from units will reward people who don't have a car or have fewer cars as they no longer would have to purchase a parking space when they purchase a housing unit. As with (1), this measure would help reduce greenhouse gas emissions.

3) Bill 2 provides for increasing the amount of bicycle parking. This measure will help hasten the modal shift away from vehicles to healthier, cleaner sources of travel.

Mahalo nui for your attention to my testimony,
Paul Bernstein

Testimony
Attachment
Accept Terms and Agreement 1

From: CLK Council Info
Sent: Wednesday, May 20, 2020 11:20 PM
Subject: Council/Public Hearing Speaker Registration/Testimony

Speaker Registration/Testimony

Name Matthew Geyer
Phone 8084287754
Email keepoilintheground@gmail.com
Meeting Date 05-21-2020
Council/PH Committee Council
Agenda Item Bill 2
Your position on the matter Support
Representing Organization Self
Do you wish to speak at the hearing? Yes

Aloha City Council,

If you build it, they will come. It is natural for people to use the things that are available to them. When people get a bigger house, they buy more stuff to fill it up.

Written Testimony

The same applies with parking, If you provide more parking spaces, there will be more cars. By encouraging more alternative transportation methods and reducing the required minimum parking spaces, we will encourage more people to use alternative, more environmentally friendly ways of getting where they need to go. This bill will also allow builders to build more units per building, potentially increasing the supply of sorely needed affordable housing.

Sincerely,
Matthew Geyer

Testimony Attachment
Accept Terms and Agreement 1

IP: 192.168.200.67

From: CLK Council Info
Sent: Wednesday, May 20, 2020 4:08 PM
Subject: Zoning, Planning and Housing Speaker Registration/Testimony

Speaker Registration/Testimony

Name Robert E Pearsall
Phone 5103874670
Email replaw2011@gmail.com
Meeting Date 05-21-2020
Council/PH Committee Zoning
Agenda Item Bill 2, CD1
Your position on the matter Support
Representing Self
Organization
Do you wish to speak at the hearing? No
Written Testimony Pleas see attached.
Testimony Attachment
Accept Terms and Agreement 1

IP: 192.168.200.67

From: CLK Council Info
Sent: Thursday, May 21, 2020 8:26 AM
Subject: Zoning, Planning and Housing Speaker Registration/Testimony

Speaker Registration/Testimony

Name Soo Schake
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Meeting Date 05-21-2020
Council/PH Committee Zoning
Agenda Item Bill 2
Your position on the matter Support
Representing Self
Organization
Do you wish to speak at the hearing? No
Written Testimony
Testimony Attachment
Accept Terms and Agreement 1

IP: 192.168.200.67



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HONOLULU CITY COUNCIL COMMITTEE ON ZONING, PLANNING, AND HOUSING
Thursday, May 21, 2020 - 9:00 a.m. – City Council Chamber

Ulupono Initiative Strongly Supports Bill 2 (2020), Relating to Off-Street Parking and Loading.

Dear Chair Menor and Members of the Committee:

My name is Amy Hennessey, and I am the Senior Vice President of Communications & External Affairs at Ulupono Initiative. We are a Hawai'i-focused impact investment firm that strives to improve our island community's quality of life by making our local communities more resilient and self-sufficient through locally produced food; affordable renewable energy and clean transportation; and better management of freshwater and waste.

We strongly support Bill 2 (2020) to revise Chapter 21 of the Revised Ordinances of Honolulu 1990, as amended ("ROH"), also known as the Land Use Ordinance ("LUO"), repealing Article 6 of the LUO (Off-street Parking and Loading) and replacing it with an updated, consolidated version that provides for a more effective and efficient transportation network.

Currently, most of Honolulu's parking regulations are out of date; lack consistency with the City's plans, policies, and other ordinances; and, in some cases, even obstruct affordable housing development promoted in City plans. The proposed amendments will improve housing affordability by allowing "right-sized" parking and reducing the total overall cost of development, while also accelerating use of carbon-light mobility options and a more sustainable transportation network. However, it is important to note what these amendments will not do. They do not affect current on-street or off-street parking that you use as a driver or already own or rent. They do not affect any parking agreements or uses currently authorized that you may already own or rent. The amendments only allow those planning new projects to make more informed decisions, based on the market and development context, about future parking.

One of the most unfortunate side effects of our current parking policies is its contribution to higher housing costs for local families. Parking requirements in residential buildings are estimated to add \$225 per parking spot every month to housing costs. In some expensive areas, that number could easily be \$350 per month, potentially adding up to almost \$5,000 per year for a 2-spot unit.

This remains true even as many residents pay the cost without using the spaces. A recent analysis by Ulupono Initiative examined use of residential parking garages built in the last 20 years across urban Honolulu. Matching the findings from the [Urban Honolulu Parking Master Plan](#), these garages were only 70 percent occupied at peak nighttime demand. Further, the number of parking spots was 2-3 times greater than the number of dwellings. One example is a 380-unit condo in Honolulu with more than 700 spaces, of which almost 200 were empty despite a 95 percent occupancy rate. Two hundred parking spaces could easily be 2-3 floors of expensive wasted space

<https://www.reinventingparking.org/2015/06/how-much-does-one-parking-spot-add-to.html>

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in this tower, just adding to the cost of housing. This proposal doesn't eliminate parking, but rather starts to match supply and demand more effectively as new development occurs, rather than arbitrarily dictating an artificially high supply across the urban core.

A [recent blog post by the Sightline Institute](#) illustrated how significantly parking requirements alter a developer's plans. With current parking requirements in Portland, Oregon, the most profitable proposal is for high-cost townhomes in the range of \$700,000. Removing the requirement allows the developer to propose mixed-income \$280,000 condominiums.² The implications this has to the feasibility of creating more affordable housing is clear and could be duplicated here by allowing the market to dictate parking, not government.

The proposed changes also align with state and federal policies to improve multi-modal transportation networks, reduce vehicle miles traveled (VMT), and develop safer environments. As analyzed in [Transcending Oil: Hawaii's Path to a Clean Energy Economy](#), parking policies reform (including both on-street and off) has the potential to achieve a 29 percent reduction in vehicles miles traveled through non-coercive yet "big impact" means. The result will be less reliance on single-occupancy vehicles, enabling a reduction of future car emissions and increasing the viability of more efficient and safer alternative modes of transportation.

These needed policy updates to how we govern off-street parking will produce all these benefits while helping to make parking more accessible for those who truly do need it — and less necessary for those who don't.

Thank you for the opportunity to testify in support of this bill.

Respectfully,

Amy Hennessey, APR
Senior Vice President, Communications & External Affairs

*Note: Ulupono Initiative values this measure before the Council today and appreciates the opportunity for continued civic engagement; however, we are unable to attend in person due to concerns around COVID-19 and to remain consistent with company policy and government directives encouraging social distancing. Thank you for your understanding.

² <https://www.sightline.org/2019/10/02/in-mid-density-zones-portland-has-a-choice-garages-or-low-prices/>

May 20, 2020

The Honorable Ron Menor, Chair and Members
Zoning, Planning, and Housing Committee
Honolulu City Council

Dear Chair Menor and Committee Members:

Re: Bill 2 (2020) LUO Amendment Relating to Off-Street Parking and Loading

The Natural Resources Defense Council (NRDC) is writing to support Bill 2 (2020) LUO Amendment Relating to Off-Street Parking and Loading. By rightsizing parking regulations to put people first, Bill 2 will make housing more affordable, promote a more sustainable future, and create safer and more vibrant streets.

Honolulu's current parking regulations create a complicated, expensive system that drives up costs for developers and residents alike. Current regulations force developers to build more parking than residents demand; 22% of renter households in central Honolulu do not own cars at all, and almost 60% of renters island-wide have one or no car. Constructing a single parking space costs \$30,000 to \$90,000. This cost is passed on to residents: renters nationally pay on average \$1,700 per year for parking – whether they own cars or not.

By both reducing parking minimums and requiring an “unbundling” system in which people pay for only the parking spaces they will use, Bill 2 lets the free market determine the right amount of parking. These two policies go hand-in-hand to help reduce overall costs to developers and residents. While reducing parking minimums allow **developers** choice in how much parking they build, unbundling ensures that **tenants and buyers** have choice with how much parking they want to use and pay for. Unbundling is a mechanism to ensure cost-savings of a car-free or car-light lifestyle are passed on to consumers, and to more equitably distribute parking costs among those who need and use it. This is particularly the case for low-income residents - who make up 69% of O’ahu households without a car - as well as young adults and kupuna who are increasingly electing not to bear the significant expense of owning a car at all.

Honolulu, like cities across the world, is facing a grave threat from climate change. Transportation is the largest source of greenhouse gas emissions in the country, and cars are a huge part of this. Research has shown that oversupplying parking causes

people to drive more: one study found that a 10-percentage point increase in parking spaces leads to an 8-percentage point increase in driving to work. Bill 2 increases options: People who still want cars can have them, but others will benefit from streets more conducive to riding public transit, biking, and walking. Developers can and will still build parking but are not required to build more than they deem the market will need and pay for. Honolulu is making visionary investments in sustainable transportation, and Bill 2 will help ensure these investments pay off.

Bill 2 contains provisions that will make new parking facilities as people-friendly as possible. Requiring parking to be wrapped with habitable buildings will invigorate streets by making them safer, more pleasant places to walk. This will encourage sustainable transportation, and the rise in foot traffic will be good for local businesses. Permitting shared parking will help relieve pressure on residential neighborhoods with limited street parking. Bill 2 also mandates pick-up/drop-off zones, a smart step in the face of increased activity by businesses like Uber and Grubhub.

Adopting Bill 2 will put Honolulu alongside leading American cities. San Francisco, San Diego, Minneapolis, Seattle, and New York are just a few cities that have successfully taken similar or more intense steps to reform parking regulations. NRDC urges this Council to take this proven step towards making Honolulu a more affordable and sustainable city.

Sincerely,

Amanda Eaken
Director of Transportation
American Cities Climate Challenge
Natural Resources Defense Council

Elizabeth Stampe
City Strategist for Honolulu
American Cities Climate Challenge
Natural Resources Defense Council