

CLIMATE CHANGE COMMISSION
CITY AND COUNTY OF HONOLULU

925 DILLINGHAM BOULEVARD, SUITE 257 • HONOLULU, HAWAII 96817
PHONE (808) 768-2277 • EMAIL ccc@honolulu.gov • INTERNET www.resilientoahu.org



KIRK CALDWELL
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VICTORIA KEENER, PH.D., CHAIR
ROSIE ALEGADO, PH.D., VICE CHAIR
BETTINA MEHNERT, FAIA, LEED AP
MAKENA COFFMAN, PH.D.
CHARLES FLETCHER, PH.D.

August 27, 2020

The Honorable Ron Menor, Chair
and Members
Committee on Zoning, Planning and Housing
Honolulu City Council
530 South King Street, Room 202
Honolulu, Hawaii 96813

Dear Chair Menor and Councilmembers:

SUBJECT: Bill 2 (2020) – Relating to Off-Street Parking and Loading

The City and County of Honolulu ("City") Climate Change Commission ("Commission") strongly supports Bill 2, which promotes the reduction of greenhouse gas emissions by right-sizing parking requirements and enabling additional mobility options. As the Commission, we emphasize how this bill will help reduce Honolulu's greenhouse gas (GHG) emissions. Bill 2 can be considered one of O'ahu's climate mitigation strategies as its provisions encourage low-greenhouse gas modes of transportation and reduce the reliance on single-occupancy vehicles. Bill 2 aligns with several other plans and policies, including the O'ahu Bike Plan, Pedestrian Plan, Complete Streets, and the State's goal of carbon neutrality by the year 2045. Bill 2 also aligns with the City's *Ola Resilience Strategy* (2019), as it directly addresses the following actions:

- Action #8: Increase Housing Affordability by Reducing Parking Requirements
- Action #24: Expand Electric Vehicle Charging Infrastructure Island-Wide
- Action #25: Accelerate Carbon-Free New Mobility Options

Parking requirements directly subsidize cars, increase traffic congestion, air pollution, raise housing costs, and prevent walkability (American Planning Association, 2020). Bill 2 aims to reduce parking requirements for residential, commercial, and other land use types. The Commission supports measures such as those in Bill 2 that reduce vehicle miles traveled (VMT). Transportation contributes about 45 percent of O'ahu's GHG emissions, with ground transportation representing almost half of transportation emissions (CCSR, 2020). Per the Commission's brief (June 2018), it is important that the City and County of Honolulu take bold steps to reduce greenhouse gas emissions in the face of a rapidly changing climate.

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Reducing parking requirements often incentivizes consumers to downsize the number of excess cars they may own or pursue other forms of less greenhouse gas intensive transportation, such as transit, bicycling and walking. Bill 2 moves a step further by supporting multimodal transportation in several ways. The bill articulates a design for parking that creates safer pedestrian environments. For example, by prioritizing access to a parking lot from the rear, as opposed to the front, and requiring active uses to "wrap" multi-story parking structures. Bicycle parking design requirements allow for additional forms of bicycle racks, and a new requirement for hotels ensures multi-modal access for employees and guests. Bill 2 also supports car sharing, ride hailing services and deliveries, which can support a lifestyle of not owning a vehicle. For example, the bill proposes new requirements for larger properties to include dedicated off-street space for ride hailing services and deliveries. In addition, an applicant's minimum parking requirement can be reduced by replacing the parking spaces for car sharing, bicycle parking, motorcycle parking, and a bike sharing program.

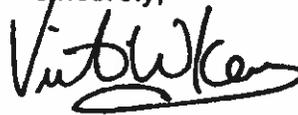
As a co-benefit, eliminating parking requirements can substantially lower housing costs. It is estimated that the average cost per space for parking structures in the U.S. is approximately \$24,000 for above ground parking and \$34,000 for underground parking (Gabbe & Pierce, 2016). In Honolulu, the construction costs per space are \$48,000 for underground parking and \$25,000 for above ground parking, making it the highest among other U.S. cities (Shoup, 2018). These costs for parking spaces are ultimately passed on to consumers, regardless of whether they own a vehicle (Shoup, 2018). Eliminating parking requirements allows developers more flexibility in determining the actual parking market needs of buyers relative to limited land resources.

Another significant element of Bill 2 is that it requires "unbundled" parking, which means that people will not be required to rent or purchase a parking space with their residential or commercial unit. This is notable for the approximately 40% of O'ahu households that own or regularly access only one car (HEPF, 2010) and may be overpaying for unnecessary off-street parking under existing conditions. Unbundling can also increase access to parking for those who need it, as well as offering flexibility for building owners who could more easily repurpose unused parking spaces to higher value uses.

Lastly, parking lots create impervious surfaces that exacerbate both flooding and the heat island effect (Bronin, 2018). Bill 2 addresses these two issues by increasing the number of trees in parking lots, from one tree per 10 parking spaces, to one tree per six parking spaces, with three feet being the required minimum width of the tree. Applicants have the option of installing tree boxes specifically designed to treat stormwater runoff, which can alleviate flooding.

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Thank you for the opportunity to submit comments in support of Bill 2 (2020). The Climate Change Commission recognizes that the details of specific policies in Bill 2 are still in-progress but supports the overall intent and urges you to support passage of the bill pending additional discussion with stakeholders. Should you have any questions, please feel free to contact the Climate Change Commission at ccc@honolulu.gov.

Sincerely,


Victoria Keener, Ph.D.
Chair, Climate Change Commission

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