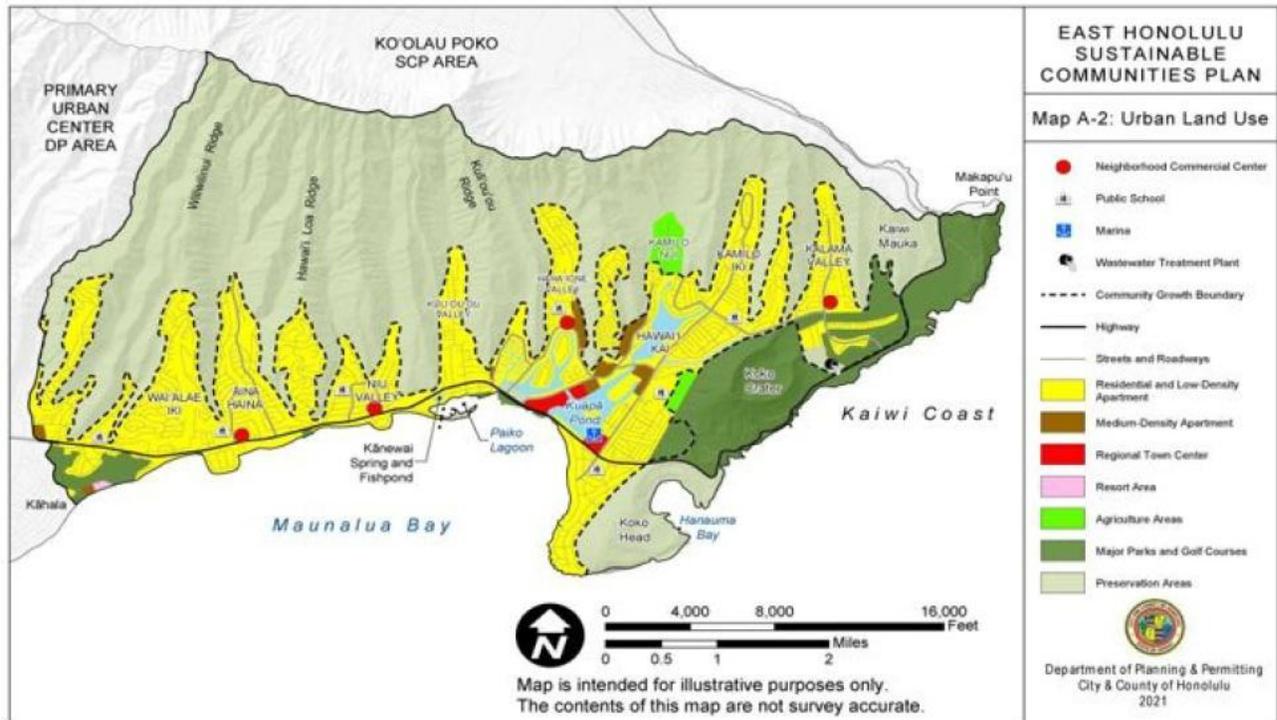


## **East Honolulu Sustainable Communities Plan (EHSCP)**

KSBE'S Maunalua Vision Statement, which guides the planning efforts for all of the Hawai'i Kai lands owned by Kamehameha Schools, is: "Maunalua is a vibrant community connected by kai and wai, where keiki to kūpuna thrive in a sustainable blend of agriculture, housing, commerce, open space, and wahi pana."

Although KSBE has stated that it does not have a plan yet for its leasehold properties covered by its vision for Maunalua, **we hope that KSBE will respect the City's plan that has already been adopted to guide development in Hawai'i Kai, including Haha'ione Valley: the East Honolulu Sustainable Communities Plan** ("EHSCP" or the "Plan"). As described in the Plan's Technical Report Vol. I, it was developed with extensive review and community involvement, including numerous Neighborhood Board presentations, community workshops, and public comments, and changes based thereon, as well as additional public hearings and testimony before the City Council. Enacted pursuant to Charter Section 6-1509 and signed on April 21, 2021 as Ordinance 21-11, the EHSCP provides a self-contained development plan document for East Honolulu. All proposed developments, including zone change applications, will be evaluated against how well they fulfill the vision for East Honolulu enunciated in the EHSCP and how closely they meet the Plan's policies and guidelines set forth to implement that vision.

According to the Preface and Executive Summary, the EHSCP is one of eight community-oriented plans intended to help guide public policy, investment, and decision-making over the next 25 years. The plans for 'Ewa and the Primary Urban Center (PUC) in Honolulu are the two areas to which O'ahu's General Plan directs population growth and development activity over the next 25 years and beyond. The remaining six areas, including the urban fringe area of East Honolulu, are envisioned as relatively stable regions for which public actions will focus on supporting existing populations and have plans entitled "Sustainable Communities Plans." The vision statement and implementing policies for the EHSCP are intended to sustain East Honolulu's character, lifestyle, and economic opportunities while stabilizing East Honolulu's share of O'ahu's population at approximately five percent, or 50,000 (which was 5.2% in 2010). Below is a map of the area from Kahala to Makapuu covered by the EHSCP, with yellow coloring the residential and low-density apartment areas, red representing the Regional Town Center (Hawai'i Kai Towne Center, Hawai'i Kai Shopping Center and Koko Marina Shopping Center), and red dots representing the Neighborhood Commercial Centers, such as the one in Haha'ione Valley on Hawai'i Kai Drive between Pepe'ekeo and Haha'ione Streets.



The EHSCP recognizes that the

present land use pattern and suburban character of East Honolulu began to take shape with the inauguration of the master planned community of Hawai'i Kai (Maunaloa) in 1961. Prior to that time, most of the region was regarded as too far removed from Honolulu to be suitable for large-scale residential development. Building on the momentum that development in Hawai'i Kai (Maunaloa) was creating in the 1960s and 1970s, residential development spread quickly to the valleys of Kamilo Iki and Kalama and to Mariners Ridge. With the development of newer communities at Kamehame Ridge, Hawai'i Loa Ridge, and portions of Wai'alae Iki, most of the ridges and valleys in East Honolulu from Kahala to Kalama Valley have been developed for residential use. In the past three decades, however, the rate of urban growth in East Honolulu has slowed as the availability of suitable development sites has diminished.

Since 1977, the City's policy has been to direct population growth to the primary urban center and to 'Ewa, and there has been substantial investments in roadways, rail, schools, sewer, water systems, and other infrastructure to support this development.

According to the EHSCP, East Honolulu's role in O'ahu's development pattern is:

- Limited development and population growth so that East Honolulu's share of O'ahu's population remains stable at approximately five percent, or 50,000;

- Maintenance as a predominantly residential area characterized by generally low-rise, low-density development; and,
- Moderate growth of business centers, retail and service commercial uses, and satellite institutional and public uses geared to serving the needs of households.

As stated in section 2.1 of the Plan, the Vision Statement for East Honolulu is to be

a safe, clean community with unique landscapes and natural and cultural resources. Each residential neighborhood has its own special quality and sense of place. The suburban development patterns of the 20th century have been modified to provide for more walkable streets and local convenience stores. There is a full range of commercial, medical and legal services to meet the needs of the elderly community members. Agricultural areas have been preserved and are producing food for the East Honolulu community. Community organizations partner with government agencies and develop plans and strategies to adapt and respond to the challenges of climate change, sea level rise, flooding, severe coastal storms, inundation of coastal areas and Kalaniana'ole Highway, and wildfires. Best management practices have been implemented to conserve and recover natural and cultural areas, retain stormwater runoff, replenish valuable ground water reserves, and improve the quality of nearshore ocean waters.

**The Vision to 2040** – Through 2035 and 2040, East Honolulu is projected to experience population stabilization. According to projections by the Department of Planning and Permitting (DPP), East Honolulu's population is expected to remain stable at approximately 50,000, or roughly five percent of O'ahu's total population, which is consistent with the General Plan. The region is expected to experience a growing elderly population and an associated decrease in average household size.

Due to the expected population stabilization, there is not anticipated to be significant demand for additional commercial development or major investments in infrastructure and public facility capacity in East Honolulu. As a consequence, job growth in East Honolulu is expected to be minimal, remaining close to 2010 levels at approximately 10,400 jobs.

To forestall anticipated impacts of climate change, East Honolulu must begin taking active steps to improve resiliency to hurricanes, coastal and inland erosion, inundation, and flooding.

**Beyond 2040** – There will be little residential development capacity available in East Honolulu beyond 2040. Capacity will be limited to infill and redevelopment opportunities. After 2040, the impacts of climate change will become more evident, requiring East Honolulu to actively manage adaptation and improve

resiliency to hurricane winds, coastal and inland erosion, inundation, flooding, and impacts to watersheds.

Section 2.2 of the Plan states

[t]he vision for East Honolulu's future will be implemented through the following key elements:

- 2.2.1 Community Growth Boundary, and Agricultural and Preservation Lands;
- 2.2.2 Adoption of the Concept of Ahupua'a in Land Use and Natural Resource Management;
- 2.2.3 Kaiwi Scenic Shoreline;
- 2.2.4 Ridge-and-Valley Neighborhoods;
- 2.2.5 Mauka-Makai Recreational Access;
- 2.2.6 Protection and Preservation of Natural Areas;
- 2.2.7 Housing Stability and Age-Friendly Communities;
- 2.2.8 Refocus Commercial Centers; and
- 2.2.9 Climate Change Adaptation.

With respect to element 2.2.1, the Plan states, “[t]he Community Growth Boundary is intended to confine most new development to infill sites that are within or adjacent to existing urbanized areas. **Existing homes and property adjacent to new development on infill sites should be protected from adverse effects of the new development.**” One of the six named objectives of the Community Growth Boundary is to “Provide Sufficient Capacity for Projected Population Stability.” **For all of East Honolulu from Hawai'i Kai to Kahala, the Plan has identified 276 new housing units as probable or possible** within the Community Growth Boundary under existing zoning, which is consistent with the DPP's projected population for East Honolulu by 2035-2040 of about 50,000 residents (or approximately five percent of O'ahu's population). **Within Hawai'i Kai itself, only 28 probable units are projected** in Table 2-1 as potential housing within the Community Growth Boundary on lands zoned for residential use. These numbers are considered sufficient to accommodate East Honolulu's housing needs to 2040, especially with population stabilization and the building of accessory dwelling units or “ohana” units.

Key element 2.2.4 relating to Ridge-and-Valley Neighborhoods recognizes that “East Honolulu's residential communities, and their geographic extent, are physically defined by the topography of the region. A series of ridges and valleys serve as natural boundaries separating one community from the next.” One of the neighborhoods is Hawai'i Kai (Maunaloa), which is described as a large, mixed-use master-planned community encompassing “several geographic subareas: the Marina, Haha'ione Valley, Mariners Ridge, Kamilo Nui Valley, Kamilo Iki Valley, Kamehame Ridge, Kalama Valley, and Queen's Beach. Most of these areas have been fully developed except for Queen's Beach, which is zoned preservation but is still within the State Urban District.” This key element further states

The character of existing neighborhoods must not only be protected, but also enhanced through effective design of public and private infrastructure and other community facilities.

East Honolulu's existing communities may need to adapt facilities and services to accommodate the changing composition of the region's population, particularly for the elderly (see section 2.2.7).

Section 2.2.7 relates to the key element of Housing Stability and Age-Friendly Communities, and the Plan recognizes that "the growth rate of East Honolulu's elderly population continues to outpace that of O'ahu as a whole with an estimated 37 percent of East Honolulu's population to be 65 and older in 2040." These changing demographics indicate "an increasing need for geriatric services, including long-term and care home services, alternative transportation modes, and alternative living accommodations for seniors such as retirement communities and group homes" which "may require different housing types and could result in changes to mature neighborhoods through the expansion of existing dwellings or the further addition of 'ohana' units, or accessory dwelling units, on a long-term basis." Although this section states that "residential uses should be allowed as a permitted use above the first floor of parcels zoned B-1 Neighborhood Business District or B-2 Community Business District," it more specifically discusses in section 2.2.8 where such development in Hawai'i Kai should take place.

Section 2.2.8 relates to the key element to "Refocus Commercial Centers" and starts with the statement that "East Honolulu's commercial areas should continue to be oriented primarily to the region's residential community." It recognizes that "[a]ny significant retail and office expansion in this region would countervail the General Plan policy to direct job growth to the Primary Urban Center and Secondary Urban Center. Furthermore, given the small amount of population growth that is forecast for East Honolulu, there is expected to be only modest growth in the demand for commercial land uses to support the communities of the East Honolulu region." The Hawai'i Kai Towne Center is the largest retail complex in East Honolulu, followed by the Koko Marina Shopping Center, then five smaller shopping centers in 'Aina Haina, Niu Valley, Haha'ione Valley, Hawai'i Kai (Maunaloa), and Kalama Valley, which are limited mostly to the communities for which they are named and emphasize food, household products, and personal services. Of these smaller shopping centers, this section notes that

[t]he Kalama Village Center continues to be under-leased, primarily because it serves a very limited market area that is not expected to grow significantly. Consequently, the land presently planned for expansion of this commercial center could be redesignated to serve as a residential or residential-mixed use project. In addition, to meet the need for affordable housing for seniors who are downsizing and for students and young families who are just starting out, residential uses above the first floor should be allowed as a permitted use.

Elsewhere, under section 3.6.3. Planning Guidelines for nonresidential uses, the EHSCP specifically recognizes the Hawai'i Kai Shopping Center as one of the four components of the Regional Town Center, along with the Hawai'i Kai Towne Center,

Koko Marina Shopping Center, and two office buildings, which serve as East Honolulu's regional hub for commercial activities serving both residents and visitors. Although the Hawai'i Kai Shopping Center has a size and tenant mix similar to that of a Neighborhood Commercial Center, it continues to play a supporting role in the Regional Town Center through improvements in physical linkages to the other components of the regional center. The physical linkage can be created by developing "a pedestrian route along the marina and bridges to link the adjacent components to provide convenient access between the two commercial centers and enhance the recreational value of the marina."

True Neighborhood Commercial Centers are defined as the existing centers in 'Aina Haina, Niu Valley, Kalama Village, and Haha'ione Valley. The Plan sees no need to designate additional land for expansion of the Neighborhood Commercial Centers and instead states "market response suggests that land that was originally designated for expansion of the site area of Kalama Village Center should be redesignated for residential or mixed-use (residential and commercial/office). Modest additions of floor area and parking could be made to these centers through redesign of the sites they presently occupy, if needed. These centers should be oriented to serve the local community." **Notably, the EHSCP does not call for mixed use development of the Haha'ione Valley Neighborhood Commercial Center.**

Section 2.2.9 of the Plan relates to the key element of Climate Change Adaptation and recognizes that

East Honolulu communities are especially vulnerable to flooding and sea level rise if the main transportation connection, Kalaniana'ole Highway, become impassible. Access between neighborhoods needs to be maintained and restored in a timely manner after flooding to ensure the safety of residents and the efficiency in distribution of emergency resources and supplies. Additional protections should be made to Kalaniana'ole Highway, particularly in the vicinity of Kuli'ou'ou, to mitigate the anticipated impacts from sea level rise. Climate change and sea level rise increase disaster risk and the cost of disasters. In recognition of this, the City's Office of Climate Change, Sustainability and Resiliency has prepared the [O'ahu Resilience Strategy](#) to guide preparation and recovery from potential disasters. Redevelopment and disaster recovery in East Honolulu will "build back better and smarter" by incorporating adaptive design and resiliency strategies that consider location, structure, and operations plans.

Thus, **the EHSCP recommends that a community resilience center in East Honolulu be established and operated in accordance with the recommendations of the City's [O'ahu Resilience Strategy](#).** In addition to post-disaster response and recovery operations, the center will **provide year-round community services.** (Section 4.8.2; see Section 5 regarding Implementation.)

Section 5.5 of the EHSCP relates to “Review of Zoning and Other Development Applications” and states that “[a] primary way in which the vision of the Plan will guide land use will be through the review of applications for zone changes and other development approvals. **Approval for all development projects should be based on the extent to which the project supports, conforms to and carries out the purposes of the respective policies and guidelines of the Plan.**” (Emphasis added) This section states (emphasis added):

**Projects involving significant zone changes will require an Environmental Assessment (EA) or Environmental Impact Statement (EIS)**, which must include a Project Master Plan when 25 acres or more are involved. This is submitted to the Department of Planning and Permitting (DPP) for review and acceptance prior to initiation of the first zone change application for the project.

...

**A project will be considered to involve a significant zone change if:**

- The application involves a zone change of 25 acres or more to any zoning district or combination of zoning districts, excluding Preservation and Agricultural zoning districts; or
- The project is more than 10 acres and involves a change from one zoning district to a Residential or Country zoning district; or
- **The project is more than 5 acres and involves a change from one zoning district to an Apartment, Resort, Commercial, Industrial, or Mixed Use zoning district; or**
- **The project would have major social, environmental, or policy impacts, or cumulative impacts due to a series of applications in the same area.**

...

**All EA/EIS required for a significant zone change should include a Project Master Plan.**

Additionally, all projects requesting zone changes shall be reviewed to determine if adequate public facilities and infrastructure will be available to meet the needs created as a result of the development, pursuant to EHSCP’s section 5.5.1 “Adequate Facilities Requirement.” Elsewhere, the EHSCP recognizes the following potential constraints on public facilities and infrastructure:

- The only major roadway arterial linking the East Honolulu communities to the Primary Urban Center is Kalaniana’ole Highway and no major road projects are planned as there is no anticipated pressure for development (see 4.1.1.1 and 4.1.1.2);
- There are no plans to extend or expand the bus routes, although frequency and capacity may be increased by switching to a hub-and-spoke system (see 4.1.2);

- BWS does not have plans to develop any groundwater sites in East Honolulu, but projected decreases in rainfall due to climate change will encourage adaptations and redevelopments to conserve potable water (see 4.2.1);
- Sewage treatment in the Hawai'i Kai area is being provided to most homes by private sewer companies, with a minority of homes and the Kamilo Nui agricultural lots being urged to convert from cesspools to sewer or septic tanks (see 4.3.1);
- Because East Honolulu is projected to have limited future population growth, it will not be a major source of island wide future power demand (4.4);
- Several drainage ways have been prone to flooding during more intense rainstorms, particularly Niu Valley, Kuli'ou'ou Valley, and Haha'ione Valley, which experienced severe flooding during the New Year's Eve flood of 1987 (4.6);
- Adequate staffing and facilities for fire, ambulance and police protection must be provided if new development is approved. Moreover, if the development of any new substation is warranted, potentially near an entry to Hawai'i Kai (Maunaloa), there is a preference that it be co-located with other emergency medical and transportation services. (4.8.2.)

**In summary, the EHSCP comprehensively describes the vision and recommendations to implement the vision for East Honolulu, including Hawai'i Kai and Haha'ione Valley. For the Haha'ione Neighborhood Commercial Center covering the JAIMS to 7-11 parcels between Haha'ione and Pepe'ekeo Streets, the EHSCP already recommends that this area be oriented to serve the local community and that any significant zone change would be required to provide an Environmental Assessment (EA) or Environmental Impact Statement (EIS). A "significant zone change" would include a project that is more than five acres and involves a change from one zoning district to an Apartment, Resort, Commercial, Industrial, or Mixed Use zoning district, or a project that would have major social, environmental, or policy impacts, or cumulative impacts due to a series of applications in the same area. Given the extremely limited availability of land zoned for residential use in Hawai'i Kai, East Honolulu's minimal growth in projected population, infrastructure limitations, the climate change challenges in East Honolulu, a zoning change allowing Apartment or Mixed Use development of the Haha'ione Neighborhood Commercial Center would not be consistent with the EHSCP. Moreover, a full service supermarket or multi-story high rise would densify and intensify commercial usage of the area and substantially upset its quiet residential character. Adverse consequences include:**

- **more people and more traffic on Kalaniana'ole Highway and Hawai'i Kai Drive;**
- **an emergency evacuation threat with more people and traffic blocking the only two streets providing access to/from Haha'ione Valley;**
- **increased noise, light, and air pollution;**
- **additional security risks to schoolchildren, pedestrians, and residents;**
- **deterioration of the environment.**

**That is why HARD petitioners have already expressed their opposition to having high rises or more intensified development of the JAIMS and adjoining commercial properties.**

**Proposal:**

**What would be consistent with the EHSCP and HARD'S mission is the preservation of the JAIMS property and trees as a community resiliency center recommended by the Plan to provide year-round community services as well as post-disaster response and recovery given Hawai'i Kai's particular vulnerability if access via Kalaniana'ole Highway is disrupted by flooding, fires, hurricane damage, or other disaster.** Consistent with this concept, we hope that KSBE will retain the JAIMS property for its own educational or cultural programs focused on resiliency, sustainability and how to malama the 'aina. Haha'ione Valley is an ideal living laboratory for this concept due to its mountain to ocean orientation and the community forest sheltering the JAIMS building as well as Honolulu's official bird, the threatened manu-o-ku (white tern).

**If KSBE does not want to extend its own educational or cultural programs to Haha'ione Valley, we respectfully ask that it consider following in the footsteps of other generous benefactors, such as the Weinberg Foundation and the Kroc Foundation, to establish a community center and defray its costs by affordably renting space to house government or nonprofit organizations that share its vision for Maunalua and also are compatible with the EHSCP and with HARD's mission to maintain Haha'ione Valley's safe, peaceful and quiet residential character, healthy environment, outstanding urban tree canopy, and excellent quality of life.**

This is just one possible proposal for the use of the JAIMS property. The adjoining commercial properties have their own challenges that may require different solutions. HARD hopes, however, that KSBE will work transparently with us to find community supported solutions that are compatible with the EHSCP and HARD's mission. Mahalo.