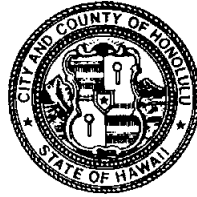


DEPARTMENT OF PLANNING AND PERMITTING
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 7TH FLOOR • HONOLULU, HAWAII 96813
PHONE: (808) 768-8000 • FAX: (808) 768-6041
DEPT. WEB SITE: www.honolulu.gov • CITY WEB SITE: www.honolulu.gov

**LATE
TESTIMONY**

MUFI HANNEMANN
MAYOR



DAVID K. TANOUE
ACTING DIRECTOR
ROBERT M. SUMITOMO
DEPUTY DIRECTOR

February 11, 2008

The Honorable Norman Sakamoto, Chair
and Members of the Committee on Education
and Housing
State Senate
State Capitol
Honolulu, Hawaii 96813

Dear Chair Sakamoto and Members:

**Subject: Senate Bill No. 755
Relating to the Hawaii Community
Development Authority**

The Department of Planning and Permitting respectfully **disagrees** with Senate Bill 755, which authorizes the Hawaii Community Development Authority ("HCDA") to process applications for subdivision and consolidation of land for a planned development project with at least twenty percent of the number of dwelling units in the project reserved for sale or rental to qualified persons as determined by the authority.

Our concern is based on several reasons. First, it would be unnecessarily duplicative of existing City and County permit functions and an inefficient use of government resources to allow another agency the authority to process subdivisions and consolidations of land in this county. The Department of Planning and Permitting has been processing subdivision applications for the past 70 years and currently maintains the most complete record of subdivisions for permit and development purposes. To have another state agency approving subdivisions will create a separate set of records that will not reside with the county. This will add confusion for other government agencies, private landowners, lenders, and the real estate and insurance industries, as there would be a higher possibility of subdivision actions not being acknowledged or recognized by all players, and thereby complicating future real estate transactions.

Second, the purpose of the county subdivision process is to ensure that any lots that are subdivided will conform to an orderly development plan and that county infrastructure and roadways to serve the development are adequate, or otherwise are improved by the developer to county standards. The majority of the roadways in the HCDA's Kakaako and Kalaeloa Districts are county roads, while the county also provides sewer and water utility services. Any subdivision that creates a new proposed county road or creates a demand on existing roads for road widening or improvements, new driveway access, connection to sewer and water utilities,

The Honorable Norman Sakamoto, Chair
and Members of the Committee on Education
and Housing
State Senate
Re: Senate Bill No. 755
February 11, 2009
Page 2

installation or relocation of traffic signals and street lighting, etc., must be reviewed and approved by the county, and therefore, it makes sense for the subdivision application to also be reviewed and approved by the county. We do not see how HCDA can approve subdivisions without involving the county in their review process. And if they cannot process a subdivision application independently from the City, then why create a redundant subdivision process?

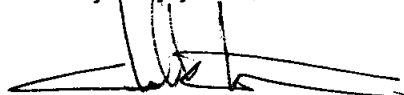
Third, the City and County has the planners, engineers, inspectors and technicians with the necessary expertise, the "know-how" that comes with owning, designing, inspecting, operating, and maintaining infrastructure and public facilities, having the organizational set up, and more important, the time-tested and already well-used processes to review subdivision applications and subdivision-related facilities including roadways, water, sewer, drainage, traffic signals, and street lighting systems, etc. It is not a matter of just "mimicking" the City's subdivision ordinances and rules and regulations, it is also whether HCDA, starting from scratch will have the staffing with the technical qualifications, knowledge of standards, familiarity with engineering calculations, and expertise to review and approve all subdivision-related maps, engineering reports, technical specifications, and plans, without depending on the City to provide such review.

Consequently, the proposed measure is unnecessary and ineffective. If it intends to save time and expedite the subdivision portion of a project, HCDA will not only have to review and approve the subdivision application but also any related improvement plans following engineering codes that normally the City would review. Furthermore, if the City does not retain responsibility to review and approve subdivisions that connect and/or have an impact on county roadways and infrastructure, then HCDA should also be given entire responsibility and assume full liability for all the county roadways and infrastructure within the Kakaako and Kalaeloa Districts.

Accordingly, we respectfully request that Senate Bill 755 be amended to exclude authority for HCDA to process applications for subdivision and consolidation of land.

Thank you for this opportunity to testify.

Very truly yours,



David K. Tanoue, Acting Director
Department of Planning and Permitting