

DEPARTMENT OF PLANNING AND PERMITTING  
**CITY AND COUNTY OF HONOLULU**

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March 1, 2023

The Honorable Jarrett Keohokalole, Chair  
and Members of the Committee on Commerce and Consumer Protection  
The Honorable Donovan M. Dela Cruz, Chair  
and Members of the Committee on Ways and Means  
Hawaii State Senate  
Hawaii State Capitol  
415 South Beretania Street  
Honolulu, Hawaii 96813

Dear Chairs Keohokalole, Dela Cruz, and Committee Members:

**Subject: Senate Bill No. 463, SD 1  
Relating to Property Development**

The Department of Planning and Permitting (DPP) **strongly opposes** Senate Bill No. 463, SD 1, in its present form.

This Bill requires the counties to require as a condition of approval of a subdivision of land, or approval of a building permit for a building or buildings containing dwelling units, that the subdivider or developer: a) Obtain a street name approval and address; and b) Erect and install mailboxes should the United States Postal Service (USPS) decide to extend its delivery service to the subdivision or buildings.

There are at least three reasons for county opposition. First, the Bill is redundant in regards to the requirement for a street name and address, as the county already has regulations in place for the naming of streets under its Subdivision Ordinance, Chapter 22-8, Revised Ordinances of Honolulu.

Second, the Bill forces the counties to infringe on the USPS authority under the Code of Federal Regulations to approve how and where mail is delivered by imposing on the counties a requirement for the installation of individual lot or unit mailboxes on all subdivisions and buildings requiring county approval.

According to the USPS National Delivery Planning Standards: A Guide for Builders and Developers (Handbook PO-632, July 2020), the USPS "is responsible for establishing the method or "mode" of delivery for all new developments –both residential and commercial.

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The mode of delivery includes the following:

- Type of mailbox you will use.
- Location of the mailbox for each delivery address.”

The Bill’s requirement for individual lot or unit mailboxes will create confusion and conflict with the USPS planning standards, as the Postal Service stated preference is for centralized mailboxes. The counties should not be attempting to preempt USPS requirements.

And third, the Bill by its definitions section, applies to owners of subdivisions as small as two lots, or projects comprising no less than three dwellings, of which perhaps only one may be a new dwelling that requires a county building permit. The Bill will create further permitting delays and conditions the approval of county permits for small family subdivisions and practically every new dwelling that is part of a three-dwelling housing development, on installation of individual mailboxes that the USPS may or may not accept for mail delivery.

Accordingly, we urge that Bill No. 463, SD 1, be held in your committees.

Thank you for the opportunity to testify.

Very truly yours,

A handwritten signature in black ink, consisting of a large, stylized 'D' followed by a long, sweeping horizontal line that extends to the right.

Dawn Takeuchi Apuna  
Director

**LATE**

**SB-463-SD-1**

Submitted on: 2/28/2023 1:55:22 PM

Testimony for CPN on 3/1/2023 9:30:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Andrew Kagemoto	Individual	Support	Written Testimony Only

Comments:

Warm aloha,

Thank you very much Chair Dela Cruz for hearing this important bill. I am very grateful for your leadership and for considering the needs of those of us residing on the neighbor islands.

Certain post offices do not have the capacity to deal with the growing populations they serve. At the Pahoa Post Office on the Big Island, wait times can exceed two hours (it can get even worse during the holiday season). This problem is becoming increasingly urgent as many of those affected by the lack of mail service are Kupuna, who, rely on the US Postal Service to receive/pay bills, get their prescriptions, and correspond with loved ones. Ensuring that all parcels within newly created subdivisions have a mailbox, will reduce the strain on local post offices and bring much needed relief to affected residents throughout the state.

Thank you for the opportunity to testify in SUPPORT of SB463

**LATE**

**SB-463-SD-1**

Submitted on: 2/28/2023 2:35:33 PM  
Testimony for CPN on 3/1/2023 9:30:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Michael Honda	Individual	Support	Written Testimony Only

Comments:

Thank you Chair Dela Cruz for the opportunity to testify in support!  
Mahalo,

M