

JOSH GREEN, M.D.
GOVERNOR

RIKI FUJITANI
INTERIM EXECUTIVE DIRECTOR



STATE OF HAWAII
SCHOOL FACILITIES AUTHORITY
75 AUPUNI STREET, STE. BASEMENT
HILO, HAWAII 96720

House Committee on Housing

Friday, February 9, 2024
10:00 a.m.
Hawai'i State Capitol, Room 312

House Bill 2091, Relating to School Impact Fees

Dear Chair Evslin, Vice Chair Aiu, and Members of the Committee:

The School Facilities Authority (SFA) **supports the intent** of House Bill 2091, which would repeal school impact fees and transfer unencumbered balances of the school impact fee subaccounts to the school facilities special fund.

Funds collected from school impact fees have historically been difficult to use because the amounts collected are typically not enough to cover a single project under the narrow allowable uses. Further, the SFA is still developing systems to collect, manage, and expend school impact fees, which makes using the fees even more challenging. The Department of Education currently administers school impact fees.

One of the areas of focus for the SFA is developing workforce housing for educators. The existence of school impact fees actually adds another challenge to that effort.

Because the fees collected have not been enough to build a school, the uses are strictly limited, and the fees hinder the development of housing, it may not make sense to continue to dedicate time and resources to their collection and administration.

Thank you for this opportunity to testify.

Sincerely,

Riki Fujitani
Interim Executive Director



STATE OF HAWAII
DEPARTMENT OF EDUCATION
KA 'OIHANA HO'ONA'AUAO
P.O. BOX 2360
HONOLULU, HAWAII 96804

Date: 02/09/2024

Time: 10:00 AM

Location: 312 VIA VIDEOCONFERENCE

Committee: House Housing

Department: Education

Person Testifying: Keith T. Hayashi, Superintendent of Education

Title of Bill: HB 2091 RELATING TO SCHOOL IMPACT FEES.

Purpose of Bill: Repeals school impact fees. Transfers unencumbered balances of the school impact fee subaccounts to school facilities special fund.

Department's Position:

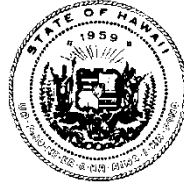
The Hawaii State Department of Education (Department) offers comments on HB 2091.

Hawaii's school impact fee law, Hawaii Revised Statute (HRS) Sections 1601-1612, provides funding for new school facilities in designated areas where the construction of new housing directly increases student enrollment. Other than direct appropriations from the Legislature, school impact fees are the only other source of funding and in some cases, land dedication to support the development of new school facilities for the Department.

The Legislature created school impact fees in 2007, with various amendments over the years to clarify its intent. HRS Section 302A-1603 (a) (3) specifies that anyone who develops new residences in a school impact fee district must pay impact fees. Although the Department recognizes the importance and need to reduce the cost of housing, the repeal of school impact fees would limit funding resources and the dedication of land required to address the impacts on school facilities generated by new residential developments.

Thank you for this opportunity to provide comments on HB 2091.

JOSH GREEN, M.D.
GOVERNOR



HAKIM OUANSAFI
EXECUTIVE DIRECTOR

BARBARA E. ARASHIRO
EXECUTIVE ASSISTANT

STATE OF HAWAII
HAWAII PUBLIC HOUSING AUTHORITY
1002 NORTH SCHOOL STREET
POST OFFICE BOX 17907
HONOLULU, HAWAII 96817

IN REPLY, PLEASE REFER TO:

Statement of
Hakim Ouansafi, Executive Director
Hawaii Public Housing Authority

Before the
HOUSE COMMITTEE ON HOUSING

Friday, February 9, 2024
10:00 AM – Room 312, Hawaii State Capitol

In consideration of
HB 2091
RELATING TO SCHOOL IMPACT FEES

Honorable Chair Evslin and members of the House Committee on Housing, thank you for the opportunity to provide testimony on House Bill (HB) 2091.

The Hawaii Public Housing Authority (HPHA) is in **support** of HB 2091 which would repeal school impact fees. Transfers unencumbered balances of the school impact fee subaccounts to school facilities special fund.

With thousands of low-income families on our public housing waiting lists, the HPHA understands firsthand how desperately the State needs to expand its affordable housing inventory. All of the HPHA's planned redevelopment projects include affordable rental units and therefore require gap financing. While we understand the importance of school impact fees, they can exacerbate this gap and may hurt the feasibility of developing State-owned affordable housing projects. Any increase to the total cost of redevelopment can increase the developer fee. Additionally, some of the gap financing will be requested from the Legislature and would essentially result in the reallocating of State funds between two State entities.

The HPHA appreciates the opportunity to provide testimony to the Committee in support of this measure. We thank you very much for your dedicated efforts.

OFFICE OF HOUSING
KE KE'ENA HO'OLĀLĀ KŪKULA HALE
CITY AND COUNTY OF HONOLULU

530 SOUTH KING STREET, ROOM 306 • HONOLULU, HAWAII 96813
PHONE: (808) 768-4675 • FAX: (808) 768-4242 • WEBSITE: www.honolulu.gov/housing

RICK BLANGIARDI
MAYOR
MEIA



DENISE ISERI-MATSUBARA
EXECUTIVE DIRECTOR
PO'O HO'OKO

KEVIN AUGER
DEPUTY DIRECTOR
HOPE PO'O

February 8, 2024

2024-HOU-007

The Honorable Luke Evslin, Chair
The Honorable Micah Aiu, Vice-Chair
and Members of the House Committee on Housing
Hawai'i State Capitol
415 South Beretania Street
Honolulu, Hawai'i 96813

Dear Chair Evslin, Vice-Chair Aiu, and Committee Members:

SUBJECT: Testimony in Support of HB2091 – Relating to School Impact Fees
Hearing: Friday, Feb. 9, 2024, 10:00 a.m. at the State Capitol, Room 312

The Office of Housing **strongly supports** proposed House Bill 2091 to repeal school impact fees.


School impact fees add thousands of dollars to the cost of developing residential housing units. These fees are ultimately passed on to renters and buyers of these units, which in turn lead to higher rents, sales prices, and in some cases, can render affordable housing projects financially infeasible.

As the Auditor's Report points out, these fees have not led to the construction of new schools; millions of dollars of collected fees went unspent and there is no clear evidence that school impact fees serve their original intended purpose or provide a clear benefit to the community.


We support the removal of additional fees that adversely affect the delivery of urgently needed affordable housing for our community and we urge your committee to pass Bill 2091 to repeal these fees.

Thank you for the opportunity to testify on this matter.

Sincerely,


FOR! KEVIN AUGER
Denise Iseri-Matsubara
Executive Director

APPROVED:


Michael D. Formby
Managing Director

TAX FOUNDATION OF HAWAII

126 Queen Street, Suite 305

Honolulu, Hawaii 96813 Tel. 536-4587

SUBJECT: MISCELLANEOUS, Repeal School Impact Fees

BILL NUMBER: HB 2091

INTRODUCED BY: EVSLIN, AIU, CHUN, KAHALOA, KILA, MIYAKE, TAKENOUCI, YAMASHITA

EXECUTIVE SUMMARY: Repeals school impact fees. Transfers unencumbered balances of the school impact fee subaccounts to school facilities special fund.

SYNOPSIS: Repeals Part VI, Subpart B, of Chapter 302A, HRS, which imposes school impact fees.

Makes conforming amendments.

EFFECTIVE DATE: July 2, 2024.

STAFF COMMENTS: For background and our perspective on this subject, we are reprinting here our Weekly Commentary to be published on Feb. 11, 2024:

Hoarding School Impact Fees

By Tom Yamachika, President

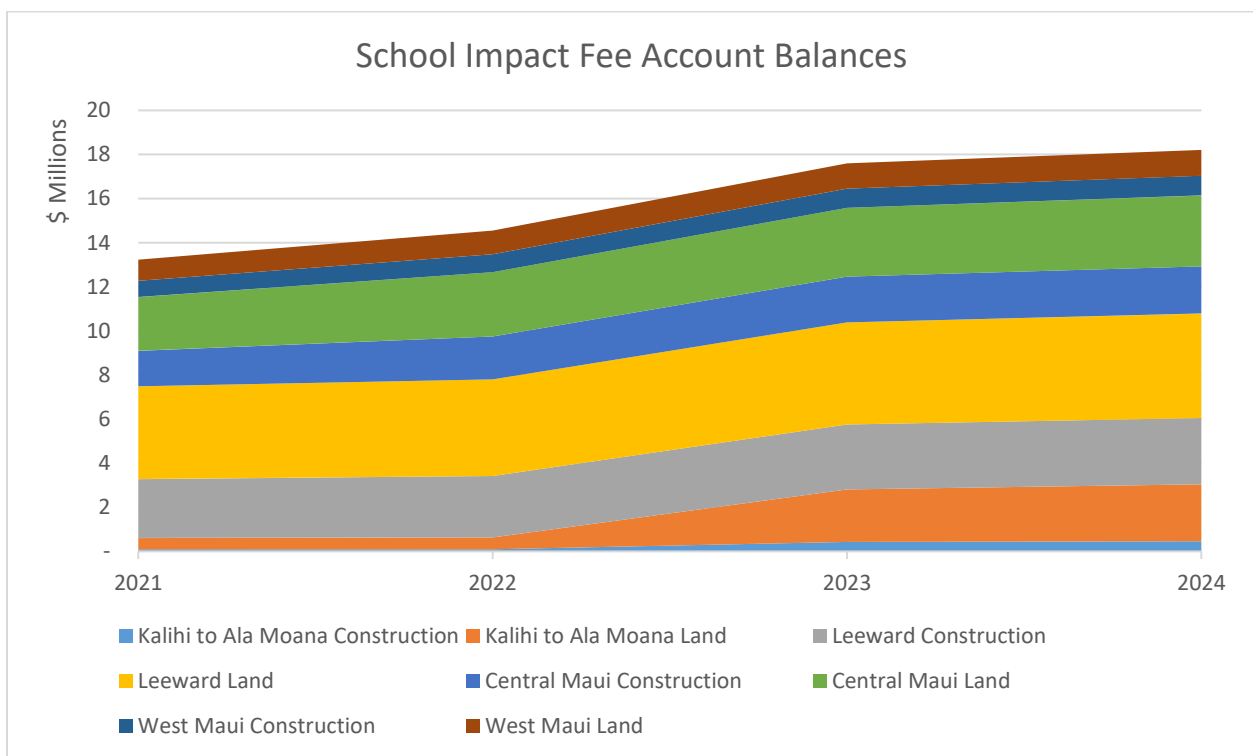
Here in Hawaii, our Department of Education is unique in several respects. In most states, K-12 education is handled by localities such as towns and counties and is largely funded by property tax. Our DOE, however, is [descended from royalty](#) – it was established by King Kamehameha III in 1840 – and it now runs education statewide. No property tax is used to fund education; our state constitution now says that the property tax is the exclusive kuleana of the counties.

The DOE also is unique in that it is the only state agency with the power to impose a tax. (Even the Department of Taxation only administers and enforces taxes imposed by laws enacted by the legislature.) The tax that DOE imposes is called the school impact fee. [We have written about it before](#). Basically, developers of housing projects are required to provide land for school facilities depending on the number of kids that the projects are expected to house and the amount of capacity (or lack thereof) in the schools that now serve those projects. Builders in the same districts that are too small to be expected to provide land are required to cough up some money instead. In addition, all home builders or buyers must pay a construction cost fee.

Currently, there are four school impact fee districts: two on Oahu and two on Maui. The most recent one is known as the Kalihi to Ala Moana school impact district, and it basically follows the path of the Skyline rail project once it hits urban Honolulu.

Five years ago, the State Auditor, in [Report No. 19-13](#), found that “the school impact fee law has been of questionable ‘impact.’” It allows DOE to collect money, but not that much. As of the end of 2018, DOE had collected \$5.3 million – at a time when it cost \$80 million, approximately, to build one elementary school. Also, the Auditor found that while the DOE was able to spend a few million dollars out of “fair share contributions,” which is what developers and DOE negotiated before the school impact fee law was enacted in 2007, zero – not one thin dime – was spent out of the impact fees collected. Only one (1) person at DOE was assigned to implement the impact fee – apparently an indication of how important it is within DOE.

We examined the school impact fee fund balances between fiscal 2021 and 2024 and found that the cumulative balances swelled from \$13 million to \$18 million.



Source: [Department of Education](#)

Maybe these monies are not enough to build a whole school, but there is surely enough here to take care of some new or replacement facilities. But it looks like none of it is being used. Each of the fund balances is steadily increasing. If some of it was being spent, we would expect some dips in the balances over time – there don't seem to be any.

Someone needs to get on the ball here. We don't think developers and other taxpayers gave money to DOE just for that money to sit around doing nothing. Legislators don't appropriate money to DOE [just to see the appropriations lapse in a few years](#). Don't

Re: HB 2091

Page 3

hoard that money, use it for the public good! King Kamehameha III would not be happy with the current state of affairs.

Digested: 2/7/2024

**Testimony of EAH Housing | Hawai`i Region
RELATING TO HB2091**

**February 09, 2024 at 10:00 AM
Written Testimony Only**

House Committee on Housing

Chair Luke Evslin, Vice Chair Micah Aiu, Members Darius Kila, Lisa Kitagawa,
Tyson Miyake, Richard Onishi, Chris Todd, and Lauren Matsumoto

SUPPORT

As we consider ways to address the pressing need for affordable housing in Hawaii, it is essential to recognize the effect that school impact fees have on housing development. These fees exacerbate the financing gap, hindering the feasibility of developing affordable housing projects.

The costs associated with school impact fees can quickly become burdensome, ultimately increasing the overall costs of housing projects. By eliminating the school impact fees, we can ensure that all funding for a project is directed towards building housing for local families.

Eliminating school impact fees reduce the costs associated with producing affordable housing and will also have a cumulative effect in reducing the need to utilize other state financing resources to produce affordable housing. This approach aligns with the state's goal of delivering more cost effective affordable housing units for its residents.

In conclusion, eliminating school impact fees on affordable housing projects is a step towards addressing the housing crisis in Hawaii. By removing this financial barrier, we can accelerate the development of affordable housing units for local families to have access to safe, affordable housing options.

Thank you for the opportunity to provide written testimony in support of HB2091.



Karen Seddon
Regional Vice President
EAH Housing

EAH Housing is a non-profit corporation founded with the belief that attractive affordable rental housing is the cornerstone to sustainable, healthy, and livable communities.

Feb. 9, 2024, 10:00 a.m.
Hawaii State Capitol
Conference Room 312 and Videoconference

To: House Committee on Housing
Rep. Luke A. Evslin, Chair
Rep. Micah P.K. Aiu, Vice-Chair

From: Grassroot Institute of Hawaii
Ted Kefalas, Director of Strategic Campaigns

RE: TESTIMONY IN SUPPORT OF HB2091 — RELATING TO SCHOOL IMPACT FEES

Aloha Chair Evslin, Vice-Chair Aiu and Committee Members,

The Grassroot Institute of Hawaii would like to offer its support for [HB2091](#), which would repeal school impact fees.

This is a sensible measure that would help reduce the costs associated with the development of residential housing.

Those costs are generally passed on to the buyers or renters, thereby contributing to the high cost of housing in Hawaii. They may even discourage housing construction or make development of low-cost housing infeasible for homebuilders.

It is no coincidence that school impact fee waivers were included in Gov. Josh Green's emergency order streamlining housing construction. In fact, the first action taken by the Beyond Barriers Working Group established by the order was to approve a school impact fee waiver for a 52-unit rental project in downtown Honolulu.

The school impact fee for that area is \$3,864 per unit, which would have added \$200,928 to the project's construction costs.¹

¹ Andrew Gomes, "[Housing panel makes first development decision.](#)" Honolulu Star-Advertiser, Jan. 3, 2024.

Adding such fees to the cost of building affordable housing simply makes such projects less attractive to developers.

Meanwhile, the negative effect of school impact fees on housing growth is not offset by a commensurate benefit to local schools.

The collection and administration of the state Department of Education’s impact fee program received sharp criticism from the Hawaii State Auditor, who noted that between 2007 and 2018, the DOE collected only \$5,342,886 in impact fees² — an insignificant amount compared to the \$80 million or more required to build a new school.

The auditor’s report also warned that Hawaii’s school impact fees may violate the constitutional requirement that there be a “nexus” between proposed new units and the need for more classroom capacity.³

By repealing school impact fees, HB2091 would help reduce the cost of residential construction and eliminate one of the factors contributing to Hawaii’s high housing prices.

Thank you for the opportunity to testify.

Ted Kefalas
Director of Strategic Campaigns
Grassroot Institute of Hawaii

² [“Audit of the Department of Education’s Administration of School Impact Fees: A Report to the Governor and the Legislature of the State of Hawai‘i,”](#) Office of the Auditor, State of Hawaii, Sept. 2019, p. 6.

³ [Ibid](#), p. 14.



Martin M. Q. Nguyen, MRED
Managing Principal
CA DRE #02074177
HI RB-24080

February 8, 2024

Representative Luke A. Evslin
Committee on Housing
State of Hawai'i House of Representatives
415 South Beretania Street, Room 312
Honolulu, Hawaii 96813

RE: TESTIMONY IN SUPPORT OF HB 2091 RELATING TO SCHOOL IMPACT FEES

Aloha Chair Evslin, Vice Chair Aiu, and Committee Members,

I am submitting testimony in my capacity as principal of Centre Urban Real Estate in **SUPPORT** of HB 2091 relating to school impact fees with the intent to reduce the cost of housing. Centre Urban is a commercial real estate investment, development, and advisory firm active in Honolulu and Southern California, with a specific focus on impactful multifamily and mixed-use projects.

We are currently working on creating housing under City & County of Honolulu Ordinance 19-8, otherwise known as "Bill 7", which is a preeminent example of common-sense collaboration between the public and private sectors to solve one of the most pressing issues of our generation: creating more housing. However, as we are all aware, the turbulence in the economy, historically high interest rates, and elevated construction costs are leading to many housing projects that were formerly feasibly to be shelved and the positive impacts to the community deferred. Every day that these housing units are shelved is another day where more and more of our neighbors are moving away, some who will never return to Hawai'i.

We are pursuing a sixty-nine unit Bill 7 project for residents under 80% AMI in the Kalihi-Ala Moana School Impact Fee District, which imposes a school impact fee of \$3,864 per unit. For workforce housing projects like ours, which are already in a precarious situation from a financing standpoint, having the relief from the burden of \$266,616 - as HB 2091 proposes - would provide support necessary to help get closer to the finish line and create more housing.

The housing crisis in Hawai'i has reached a point where inaction is not a choice. Our best and brightest are leaving for the Mainland and may never return home. In my personal experience, as a kama'āina who moved away and have had the opportunity to return home, I know that housing is a major hurdle to those who have the benefit to even consider doing so. It all starts with housing and housing is an everything problem. By allowing time for the development of much needed workforce housing, this creates the opportunity for our kama'āina to choose to stay or return home.

Thank you for the opportunity to contribute to this important dialogue. If there are any questions or concerns, please reach me at martin@centre-urban.com to discuss.

Sincerely,

A handwritten signature in black ink, appearing to read "Martin M. Q. Nguyen".

Martin M. Q. Nguyen, MRED
Managing Principal

Centre Urban Real Estate Hawaii, LLC



February 8, 2024

Representative Luke Evslin, Chair
Representative Micah Aiu, Vice Chair
Members of the Committee on Housing

RE: **HB 2091– RELATING TO SCHOOL IMPACT FEES**
Hearing date – February 9, 2024 at 10:00 A.M.

Aloha Chair Evslin, Vice Chair Aiu, and members of the committee,

Thank you for allowing NAIOP Hawaii to submit testimony with **SUPPORT ON HB 2091– RELATING TO SCHOOL IMPACT FEES**. NAIOP Hawaii is the Hawaii 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.

HB 2091 seeks to repeal school impact fees to reduce the cost of housing. Based on a report by the State auditor, the legislature has determined that the collection of school impact fees have not been utilized for the construction of new schools and there is a substantial amount of collected fees that remain unused in a special fund.

NAIOP Hawaii is supportive of HB 2091 which will help decrease the cost of affordable housing. While we understand the need for school impact fees, however, it is evident that Hawaii residents are in desperate need of housing, and eliminating school impact fees will play a vital role in continuing the development of much-needed housing units. By freeing housing developments from the obligation to pay the school impact fee, Hawaii can create more housing opportunities for our essential workforce.

The costs of school impacts can become costly and increase the construction of housing projects. Repealing the school impact fees for housing projects will further streamline construction of units and ensure that all funding for a project is focused towards building housing for local families. Accordingly, NAIOP Hawaii supports all tools which get homes built for our residents. Thank you for the opportunity to testify on this measure.

Mahalo for your consideration,

A handwritten signature in black ink, appearing to read "Reyn Tanaka".

Reyn Tanaka, President
NAIOP Hawaii



Housing Hawai'i's Future
PO Box 3043
Honolulu, HI 96802-3043

February 9, 2024

TO: Chair Evslin and members of the Hawai'i State House Housing Committee
RE: HB 2091 - RELATING TO SCHOOL IMPACT FEES.

Dear Chair and Committee Members,

My name is Sterling Higa, and I serve as executive director of Housing Hawai'i's Future, a nonprofit creating opportunities for Hawai'i's next generation by ending the workforce housing shortage.

On behalf of Housing Hawai'i's Future, I write in support of HB 2091, repealing school impact fees.

It's hard not to talk about school impact fees without getting histrionic, but I'll try.

I refer you to the State Auditor's Report No. 19-13, "Audit of the Department of Education's Administration of School Impact Fees."¹ Please read it, as the audit is justification enough.

To be blunt, school impact fees are:

- **a burden on homeowners and renters,**
- **probably unconstitutional, and**
- **sitting in a fund gathering dust.**

In any given year, you might give deference to the DOE when they send testimony and try to thug you into keeping this bad law on the books. Many legislators take departments at their word that they'll try harder next year.

But this is the same DOE that has \$2B in unspent CIP money. That's \$2 with *NINE ZEROS* after it.² 🙄

This is not an organization with a track record of spending money effectively.

The idea that we're adding thousands of dollars to the cost of building housing and depositing those thousands of dollars into a dust-gathering fund managed by an organization as dysfunctional as the DOE is one of those ideas that makes me think we're living in a Kafka novel. Or worse, Gogol.

Seriously, friends. Just repeal school impact fees. Housing will be less expensive, the DOE will have less money to waste, and we can turn our focus to other issues.

Thank you,

A handwritten signature in black ink that reads "Sterling Higa".

Sterling Higa
Executive Director
Housing Hawai'i's Future
sterling@hawaiisfuture.org
+1 (808) 782-7868

¹ <https://files.hawaii.gov/auditor/Reports/2019/19-13.pdf>

² <https://www.civilbeat.org/2024/01/hawaii-doe-faces-roadblocks-delays-in-spending-2-billion-for-school-facilities/>

HB-2091

Submitted on: 2/7/2024 5:12:30 PM

Testimony for HSG on 2/9/2024 10:00:00 AM

Submitted By	Organization	Testifier Position	Testify
Seth Kamemoto	Individual	Oppose	Written Testimony Only

Comments:

Please enlighten the public on the cases referred to here: “In some cases, high impact fees can result in a project becoming financially untenable and the units are never built.” I personally cannot think of a single (affordable housing) project where this was the case. Affordable housing projects can use 201H-38 to exempt **any** law (including this fee) to “help” make the project more financially tenable, yet I can’t find a recent example where any project needed to do this to make the numbers work on a 201H project.

On the contrary, the Keawalau affordable housing project currently proposed in Waipahu is proud of its contribution to supporting our schools. On its website, www.keawalau.com, under “Benefits for Waipahu Residents” is “The proposed community will generate more than \$1.9 million in new school fees to support local education”.

I implore the legislature to resist the urge to cherry-pick from the cited Auditor Report No. 19-13 and instead try to assess the report as a whole. On page 3 of the report, the auditor hints that the fee might actually be too low: “However, the amount does call into question whether the law, as written, will generate enough fees to adequately mitigate the impact of new residential construction on DOE facilities.”

This implies that there is, in fact, an impact of new residential construction on DOE facilities that could be mitigated through increased application and improved management of the School Impact Fee. While it’s clear from the Auditor Report that the School Impact Fee program is lacking, it doesn’t mean that it should be completely repealed. Nowhere in the Recommendations section of the report does the auditor recommend repealing the fee entirely.

Instead of completely repealing the School Impact Fee, maybe adding specific clauses that, for example, could allow affordable housing projects to exempt or reduce the fee if it can be shown that either the fee isn’t necessary for the project (due to existing facilities and demographics) or that it would, in fact, overburden the specific project to the point of untenability.

Thank you for your consideration,
Seth Kamemoto

HB2091: RELATING TO SCHOOL IMPACT FEES

House Committee on Housing

Feb. 9, 2024; 10:00 am

I am a public interest attorney and lecturer in law in Affordable Housing. I offer this testimony to **OPPOSE HB2091** and a blanket repealing of school impact fees.

1. **Housing development projects which designate only half of their units to a family of four with an income of \$183,400, (140%AMI) with the rest built for higher incomes as market or luxury units can already qualify to waive all impact fees under 201h, along with nearly every other fee or zoning regulations.**

The legislature has already granted sweeping exemptions in 201h to all fees, including school impact fees, and all regulations including zoning, density and height limits in exchange for housing development projects to set aside only half of their units to a very wide affordability range of 140%AMI. Over the years, projects repeatedly use 201h to request and receive exemptions from not just school impact fees. School impact fee assessments are not what make housing unaffordable or out of reach for local families. Instead, our broad definition of 'affordable' dilutes our subsidies and offers incentives exactly like these impact fee waivers to far too many development projects. The results are our programs no longer target the development of truly affordable housing for individuals with more median incomes.

2. **An audit raising concerns on DOE management of impact fees does not mean impact fees should be repealed completely to benefit any and all development.**

In 2007 an audit report¹ found that 'in-lieu' fees for affordable housing, a type of impact fee paid by developers, were never used to build even one unit of affordable housing. Additionally, the same audit in 2007 found over 6,119² units of affordable housing that developers were required to build were still outstanding. Some of those affordable housing units are still not built. Despite this audit showing developers skipping out on affordable housing, cash-in-lieu regulations themselves were not blamed or repealed. While the cash-in-lieu program under audit was not a state managed program, it illustrates the way that 'affordable housing' and the management or sometimes mismanagement of incentive programs should be about problem solving. We need our legislature to tailor regulations to support truly affordable housing and target our incentives and fee waivers, not offer them to every development program or repeal programs based on critical findings.

Mahalo for the opportunity to testify.

Deja Ostrowski, Esq.

¹ See 'Audit of the City's Management of Unilateral Agreements, 2007 available at: https://www.honolulu.gov/rep/site/oca/oca_docs/affordable_housing_final_report.pdf

² See Id, Exhibit 2.2, page 25

HB-2091

Submitted on: 2/8/2024 1:50:10 PM

Testimony for HSG on 2/9/2024 10:00:00 AM

Submitted By	Organization	Testifier Position	Testify
Brett Kurashige	Individual	Oppose	Written Testimony Only

Comments:

1. I am opposed to HB2091 which would essentially repeal School Impact Fees entirely for any type of housing project, including 201H-38 affordable housing projects which can use 201H-38 to exempt *any* law (including laws that mandate the School Impact Fees) to “help” make the development project more financially tenable.
2. In my opinion, the State of Hawaii absolutely needs proposed housing developments (whether they are so-called "affordable" projects or non-affordable projects) to pay their fair share towards that proposed development's assessed impact on State Department of Education facilities (ie, schools). To do otherwise would be detrimental to our keiki, their families, and our community, in general.
3. HB2091's pursuit of what is essentially a blanket exemption to long-standing development impact fees and development review "guardrails" that have served/protected our community's overall well-being and have also encouraged developers/landowners to work closely with the community (from the initial conceptual design phase) is not in the best interest of the State of Hawaii, and serves as a "give-away" that benefits private housing developers/landowners and their stakeholders at the expense of the community.
4. In the cited Auditor Report No. 19-13, page 3, the Auditor noted that assessed School Impact Fees might actually be TOO LOW: “However, the amount does call into question whether the law, as written, will generate enough fees to adequately mitigate the impact of new residential construction on DOE facilities.” Auditor Report No. 19-13 (including its Recommendation section) does not call for repeal of the School Impact Fee whatsoever.