

DEPARTMENT OF PLANNING AND PERMITTING
KA 'OIHANA HO'OLĀLĀ A ME NĀ PALAPALA 'AE
CITY AND COUNTY OF HONOLULU

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January 28, 2025

The Honorable Stanley Chang, Chair
and Members of the Committee on Housing
Hawai'i State Senate
Hawai'i State Capitol
415 South Beretania Street
Honolulu, Hawaii 96813

**Subject: Senate Bill No. 25
Relating to Reduction in Housing**

Dear Chair Chang and Committee Members:

The Department of Planning and Permitting (DPP) **opposes** Senate Bill No. 25, which authorizes a county to reduce the number of housing units that may be built within any portion of the county only if the county increases the number of housing units that may be built elsewhere in the county, such that there is no net loss in residential capacity.

While the City supports policies that will stimulate housing production, this Bill's language is confusing and misleading – it appears to give counties discretion with the word “authorizes,” but upon closer read it is a mandate. A county would only be allowed to reduce the number of housing units in one portion of the county, if it increases the number of units that may be built elsewhere. This Bill does one define a “portion” of a county. Would it be based on the City's defined development plan areas or subareas, or would it be on a smaller-scale such as census blocks? Also, this Bill shifts the focus from the City's long-range planning framework, which considers a myriad of inter-related topics other than just housing, to a mathematical equation of the net increase or decrease in housing units.

Furthermore, pursuant to Ordinance 25-2, the City will significantly increase development capacity in residential zoning districts by allowing one accessory dwelling unit and one ohana unit in addition to the principal dwelling unit on most zoning lots, effective September 30, 2025. Ordinance 25-2 also makes changes to the B-1

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(Neighborhood Business District) and B-2 (Community Business District) to allow multi-unit dwellings, subject to meeting other requirements of the Land Use Ordinance.

Lastly, with increasing hazards due to climate change, e.g., sea level rise and wildfires, counties need to address the potential downzoning of properties due to the growing risk to public health and safety. To do so, the City should not be required to upzone other portions of the county or expand the community growth boundary as defined in our development plans and which is a key element of our directed growth policy.

To this end, we respectfully ask that Senate Bill No. 25 be held in committee.

Thank you for the opportunity to testify.

Very truly yours,



Dawn Takeuchi Apuna
Director Designate