



## HAWAI'I STATE LEGISLATURE

STATE CAPITOL  
415 SOUTH BERETANIA STREET  
HONOLULU, HAWAI'I 96813

**Via Email**

December 1, 2020

The Honorable Ron Menor, Chair  
The Honorable Tommy Waters, Vice Chair, and Members  
Committee on Zoning, Planning and Housing  
City Council  
Honolulu, Hawaii 96813

RE: Resolution 20-315, Approving a Conceptual Plan for an Interim Planned Development – Transit (IPD-T) Project for the Ala Moana Plaza Development Project

Dear Chair Menor, Vice Chair Waters, and Members:

Thank you for the opportunity to submit testimony regarding Resolution 20-315, Approving a Conceptual Plan for an Interim Planned Development – Transit (IPD-T) Project for the Ala Moana Plaza Development Project ("Project").

The Project proposes significant increases in the tower height limit from 100 feet to 400 feet and density from 2.5 Floor Area Ratio (FAR) to 7.0 FAR. The Project adds needed 583 rental units, 20 percent to be set aside for families earning no more than 80 percent of the area median income for Honolulu, for 45 years. The Project also is required to add 220 parking spaces, 10 car-share spaces, and 20 bikes share stations to the community.

The neighbors in the area of the proposed project have expressed concerns that need to be considered. We held a virtual town hall meeting with our community residents on September 28, 2020. About 80 people participated, and raised a number of concerns, including sea level rise, traffic, safety, view corridors, minimal community benefits (e.g., the limited number of affordable units and parking spaces), and the lack of a park or open green space. There was substantial testimony offered to the Department of Planning and Permitting about the permit application and the Ala Moana/Kaka`ako Neighborhood Board No. 11 adopted a resolution (attached) regarding this project.

The developer for the project indicated that the project is consistent with the Ala Moana Transit Oriented Development (TOD) Plan, which is pending adoption by the City Council (Resolution 20-223). With the cost overruns and other problems with the rail project as well as the leadership transitions in the City and County of Honolulu and the City's projected financial shortfalls, it is unclear whether the rail project will continue to Ala Moana Center. The City recently canceled the procurement of the public private partnership for the completion of the rail project to Ala Moana. The City also requested that the Federal Transit Authority approve a one year extension of its Capital Investment Grant to develop a new

plan. If the rail project does not continue to Ala Moana, it is not certain whether the TOD Plan would apply.

Therefore, **we respectfully request that this resolution be deferred until the City Administration and City Council make a categorical decision concerning the future of the rail project and whether it will extend to the Ala Moana Center.** At this time, it appears that the TOD Plan is incomplete since the Ala Moana station is not guaranteed to be developed. We recommend that the community, the City Administration and the City Council defer consideration of the Project in the context of the long-term vision for the Ala Moana area.

Thank you for your consideration of our recommendation.

Sincerely,



---

SHARON Y. MORIWAKI  
Senator, Senate District 12



---

SCOTT K. SAIKI  
Speaker of the House, Representative,  
House District 26

## **Kaka'ako-Ala Moana Neighborhood Board No. 11**

### **DRAFT RESOLUTION**

**September 2020**

**Agenda Item 7.1 (revised draft 9/16/20)**

### **RESOLUTION REGARDING PROPOSED ALA MOANA PLAZA**

WHEREAS, the Ala Moana/Kaka'ako Neighborhood Board No. 11 does not entirely dispute Brookfield Properties, a Canada-based real estate investment and development firm that acquired the majority ownership of Ala Moana Mall in or about 2018, and the right to develop their properties, including placing affordable housing within the existing height and density limitations between 100 to 250 feet; and

WHEREAS, Brookfield Properties' latest development proposal of the Ala Moana Plaza that seeks to increase (by more than four times) the current height limits (100 feet) to allow for the building of a 400-foot tower with 595 rental units – 119 units (about 20%) of which would have an 80 percent Area Median Income (AMI) restriction for 30 years, and 225 parking spaces, does not take into thoughtful consideration the local property owners within the vicinity who are already living and invested in their respective luxury properties; and

WHEREAS, concerns have been raised about the project's impacts on existing residences, its impact on public infrastructure, the low number of affordable units and short time restrictions, and the proposed community benefits; and

WHEREAS, the proposed development seeking to obtain the Transit Oriented Development (TOD) exception of raising of the existing height requirements to allow for a 400-foot tower, would obstruct the ocean and mountain plane views for existing units in the local area such as Uraku Tower Hawaii that was built in 1990, and Moana Pacific that was built in 2007; and

WHEREAS, current property owners and investors at the Uraku Tower Hawaii, Moana Pacific, and other residential buildings in the area that were granted what appeared to be the last exemption of the TOD height limitation of up to 400 feet, enjoy and appreciate the ocean views towards Magic Island and Ala Moana Park, as well as the height limits on the neighborhood side of Ala Moana Mall that were zoned for buildings at 100 feet; and

WHEREAS, since the one-time exemption was granted for Moana Pacific to be built at 400 feet, the Honolulu City Council has proposed limitations to TOD height restrictions to 100 feet (note: although the Honolulu City Council has not formally adopted the TOD plan, it is used as a guideline to restrict obstructive views for existing properties). As a result, since 2007 to present, current Moana Pacific and Uraku Tower Hawaii owners, residents and investors have enjoyed some security that their scenic views of the surrounding natural environment and property value would be protected and appreciate in value overtime; and

WHEREAS, Moana Pacific and Uraku Tower Hawaii owners, residents, and investors, along with the local residents in the Ala Moana/Kaka'ako community have voiced their concerns and dissatisfaction with the proposed Brookfield Properties development since it is being built without regard for the impact on the interest of the neighborhood or other existing property owners and is designed to be built with regard only for its own interest; and

WHEREAS, the Revised Ordinances of Honolulu (ROH) Section 21-2.110-2 provide the City Council with the discretion to approve the conceptual plans for Interim Planned Development-Transit projects, in whole or in part, with or without conditions or modifications, by resolution; and

WHEREAS, these conditions may require demonstrable contributions towards community benefits in exchange for flexibility on allowable project uses, density, height, setbacks, and other requirements; and

WHEREAS, development proposals are evaluated for impacts on existing public and private infrastructure such as sewer, traffic, first responder services; the Honolulu Rail Project; and

WHEREAS, development proposals are evaluated for impacts on existing private infrastructure such as view planes, shadows, and wind circulation patterns; and

WHEREAS, the proposed Ala Moana Plaza development project's internal traffic management study centered only on its property and failed to take into account the existing residential properties and the newer developmental properties currently being built in and around the dense location surrounding Kona Street, Piikoi Street, and Kapiolani Boulevard, and how the Honolulu Rail will add additional burden to the existing infrastructure in the neighborhood (additional traffic congestion, schools, sanitation, first responders such as law enforcement/emergency medical services, etc.); and

WHEREAS, the Honolulu City Council's adopted TOD base zoning is currently at 100 feet; and now therefore

BE IT RESOLVED that the Ala Moana/Kaka'ako Neighborhood Board No. 11 urges that that Honolulu City Council consider the following items prior to issuance of the Interim Planned Development-Transit (IPD-T) Permit:

1. The Ala Moana/Kaka'ako Neighborhood Board No. 11 supports the local community in limiting the building structure to its existing base zone of 100 to 250 feet with an 80 percent Area Median Income (AMI) restriction for a minimum of 30 to a maximum of up to 99 years; and
2. Brookfield Properties should demonstrate that their internal transportation study and infrastructure is sufficient to accommodate the proposed development; and
3. Brookfield Properties' iconic glass shape towers that span wall-to-wall to provide floor to ceiling views of the surroundings from within the units will not impact the views and visibility of traffic or surrounding facilities during the peak hours of sunlight; and
4. Brookfield Properties should demonstrate, as good neighbors, that their proposed development will enhance community benefits such as a greater percentage of affordable units with a longer time restriction, and not devalue existing properties such as Moana Pacific, Uraku Tower Hawaii, and other residences due to their TOD height exemption of up to 400 feet; and
5. The project should incorporate a tree canopy along the street edges, as possible; and

BE IT RESOLVED that copies of this resolution are transmitted to the appropriate City agencies and elected officials.