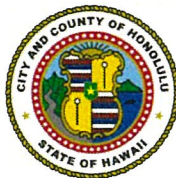


DEPARTMENT OF PLANNING AND PERMITTING
KA 'OIHANA HO'OLĀLĀ A ME NĀ PALAPALA 'AE
CITY AND COUNTY OF HONOLULU

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August 22, 2025

2025/ELOG-1281(FK)
GEN-2025-20

Ms. Tracy Tonaki
Division President
D.R. Horton Hawai'i LLC
130 Merchant Street
Suite 112
Honolulu, Hawai'i 96813

Dear Ms. Tonaki:

SUBJECT: Department of Planning and Permitting (DPP)
Response to the Ho'opili 2025 Annual Report
Docket No. A06-771

The City and County of Honolulu DPP is in receipt of the 2025 Annual Report for Docket No. A06-771, Ho'opili, dated July 3, 2025. The annual reports are a vital tool in the DPP's assessment on the gradual or complete fulfillment by the Petitioner and/or Owner to each of the conditions in this Docket. To that end, you may find the DPP requesting further substantiation or additional information to complete our assessment as explained under each condition enumerated below.

1. Agriculture and Phasing of Development.
We acknowledge that Aloun Farms (Phases 16A and 42) and Aloun (Phase 16B) were notified 180 days prior to termination of farming activities in anticipation of affordable housing development.
2. Ho'opili Urban Agriculture Initiative.
 - a. Civic Farms: Satisfaction of this condition was predicated on the May 23, 2013 letter from Russell S. Kokubun of the State Department of Agriculture. In that letter, Mr. Kokubun states that land designated for Civic Farms pursuant to Condition No. 2 will be restricted through covenants recorded against such parcels to agricultural production and uses and activities directly accessory to agricultural production. Please

provide copies of these covenants or other documentation that the covenants for the 203 acres were recorded.

- b. Steward Farms: The Ho'opili Urban Gardens (HUG) program featuring edible landscaping throughout single-family grew from 65 acres in 2024 to 74 acres in 2025 according to this year's annual report. To date, there has been no determination how this is calculated. Please provide documentation as to how the size of the HUG is calculated. Ideally, the list of all homeowner lots involved in this program should be provided with specific square footages of edible landscaping on each lot. Again, an agriculture-friendly covenant is to be provided. Please provide a copy of this covenant as well as the promotional and sales material that explicitly references the purpose and intent of Steward Farms.
3. Compliance with Hawai'i Revised Statutes, § 205-3.5, Relating to Agricultural Uses on Adjacent Agricultural Land.
The sample disclosures as provided in Exhibit 2 of the 2024 Annual Report is suggested language for fulfilling this condition. Please provide a copy of the actual mortgage document where the language of both these disclosures is stated.
4. Affordable Housing.
No change or refinement needed in reporting how the Petitioner and/or Owner is fulfilling this condition.
5. Public School Facilities.
While, the Education Contribution Agreement for Ho'opili was signed on November 5, 2009, can the Petitioner and/or Owner provide a summary update in the annual reports about the implementation and execution towards completing and fulfilling this agreement? In other words, how are things progressing?
6. Water Resources.
Please provide proof of Honolulu Board of Water Supply approval and acceptance of all constructed potable and non-potable water systems when complete.
7. Water Conservation Measures.
Please provide the palette of endemic, indigenous, and drought-tolerant plantings that D.R. Horton uses throughout the Ho'opili master-planned community.

8. Wastewater.
Sewer Master Plans have been previously submitted and approved by the DPP. It would be helpful in the annual reports to have a status report showing the wastewater facilities that were planned, their stage of completion, date of inspection, and if the facilities or parts of the system have been submitted for acceptance and dedication. This provides a measure as to the fulfillment of this condition.
9. Notification of Potential Nuisances.
Same comments as made under Condition No. 3. Rather than samples of what could be said, please provide a copy of the actual mortgage documents where these statements are made.
10. Transportation.
 - a. This level of detail and confirmation with substantiation of effort and results should be provided under every condition going forward. In future annual reports, please maintain this summary as ongoing fulfillment of this condition along with any updates that occurred to report during the previous year.
 - b. Traffic Impact Analysis Reports (TIAR) are to be updated periodically as the number of dwelling units reach certain milestones in completion of this master-planned community. This schedule should be provided in the annual reports. As mentioned in Petitioner and/or Owner's response in Condition No. 10c, an updated TIAR is being prepared, so Condition No. 10b will be fulfilled when that is submitted to the DPP. Future annual reports should state when those were submitted and a brief summary of what has been updated.
 - c. Please include the results of the updated TIAR as it pertains to this condition: i.e., i) adjustments in the sequencing and timing for when the traffic improvements are to be built and/or scheduled to correspond to the adjusted phasing and development; ii) the construction status and projected timeline for the SkyLine rail transit project; and iii) any additional mitigation required as a result of these changes.
 - d. The annual reports should provide a list of all traffic improvements that mitigate local or direct project-generated and/or related traffic impacts and the funding provided by the Petitioner and/or Owner as their fair share. This should then be updated annually.

- e. A formal Memorandum of Agreement dated March 3, 2020 with the State Department of Transportation (DOT) to mitigate impacts to the State transportation facilities within the master-planned community is attached to the 2020 Annual Report.
 - f. For the 2025 Annual Report, please describe the coordination the Petitioner is undertaking with the DOT, the DPP, and the Department of Transportation Services to ensure that all traffic impacts are adequately addressed and properly mitigated.
11. Stormwater.
- a. Please provide the documentation that corroborates that the Petitioner and/or Owner has met this condition of providing a master drainage plan to the State Department of Health (DOH), the State Office of Planning and Sustainable Development, and the DPP. This should include a letter of consent by the Navy allowing drainage onto its properties or a specific explanation of strategies to be employed so that drainage onto Navy lands is not necessary.
 - b. Please provide a descriptive summary of the non-point pollution sources and how the incorporated low impact development practices for capturing onsite stormwater are being reused in the Petition Area's landscaping or on-site. Should any of these low impact development practices prevent the dedication of drainage facilities to the City and County of Honolulu, run-off onto affected State highway facilities, downstream properties and receiving gulches, streams, and estuaries, please describe other practices employed to capture non-point source pollution.
12. Archaeological Survey.
- The annual reports should list the conditions recommended and approved by the State Historic Preservation Division (SHPD) and whether the SHPD has found the Petitioner's preservation measures to be successfully implemented. A copy of the written confirmation to the State Land Use Commission (LUC) should also be provided in the annual report.
13. Previously Unidentified Burials and Archaeological and/or Historic Sites.
- Upon finding these historic resources during construction, please describe the SHPD approved mitigative measures taken to date as well as any during the reporting year.

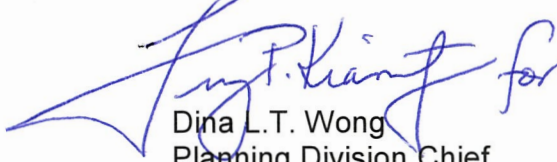
14. Established Access Rights Protected.
To corroborate that no established access rights have been identified, please identify the sources for your conclusion and what cultural practitioners or community groups have been consulted throughout the development.
15. Civil Defense.
The DPP acknowledges that two of the three solar-powered civil defense sirens have been installed and the third installed in a later phase of development. The 2026 annual report should include a map the locations of the installed and planned sirens. Ideally, a letter confirming that the Hawai'i Emergency Management Agency was consulted in the location of the sirens.
16. Integrated Solid Waste Management Plan (ISWMP).
The DPP acknowledges that an ISWMP was prepared by the Petitioner and/or Owner and submitted to the State DOH and the Department of Environmental Services (ENV) in August 2017. The annual reports should include written acknowledgement of receipt and/or acceptance by the DOH and the ENV. As the Petitioner and/or Owner alludes to complying with this condition, the annual report should document to what it extent it is implementing the ISWMP and how it is assisting in the planning and promotion of solid waste recycling facilities.
17. Best Management Practices.
Please provide a description of the best management practices deployed for each proposed land use to minimize runoff from construction and vehicle operations, reduce or eliminate solid erosion or ground water pollution, and formulate dust control measures during and after development.
18. Infrastructure Deadline – Within 10 Years.
This level of explanation is exemplary to describe fulfillment of this condition and should remain in future annual reports as well with any update to round out the ten years
19. Infrastructure Deadline – Within 20 Years.
As noted for Condition No. 18, this level of explanation detailing the completion of the backbone infrastructure should be provided in each annual report. Subsequent annual reports should update in detail the additional progress made that year.

20. Ho'opili Sustainability Plan.
The 2025 Annual Report loosely lists various sustainable technologies, strategies, and measures, that could be added to single-family homes at Ho'opili. However, there is no quantification as to whether these have been installed. Please provide measurable data that can be used to substantiate whether progress has been made towards implementing the Ho'opili Sustainability Plan. Please make reference to where the DPP may find a copy of the Ho'opili Sustainability Plan as well.
21. Compliance with Representations to the Commission.
No change or refinement needed in reporting how the Petitioner and/or Owner is fulfilling this condition.
22. Notice of Change of Ownership.
No change or refinement needed in reporting how the Petitioner and/or Owner is fulfilling this condition.
23. Annual Reports.
No change or refinement needed in reporting how the Petitioner and/or Owner is fulfilling this condition.
24. Release of Conditions.
No change or refinement needed in reporting how the Petitioner and/or Owner is fulfilling this condition.
25. Notice of Imposition of Conditions.
It is not enough to say in the annual reports that this condition is satisfied without documentation or substantiation. Please provide: a) a copy of the recorded statement with the State of Hawai'i Bureau of Conveyances that the Petition Area is subject to the conditions imposed by the LUC; and b) evidence that a copy was filed with the LUC. If these documents were provided in earlier annual reports, please state which one and continue to provide that citation in future annual reports.

Ms. Tracy Tonaki
August 22, 2025
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Please provide the information requested above within thirty (30) days of the date of this correspondence so we may close out the annual report for this year. Should there be any questions, please contact Franz Kraintz, Community Planning Branch Chief at (808) 768-8046 or via email at fkraintz@honolulu.gov.

Very truly yours,



Dina L.T. Wong
Planning Division Chief

DLTW:tc

cc: Daniel E. Orodenker, State LUC