

After construction, motor vehicles coming to and from the proposed development will result in a long-term increase in air pollution emissions in the project area. However, computer modeling conducted for the Proposed Action indicates that during worst-case conditions, at full build out in 2015, project-related traffic would result in higher carbon monoxide concentrations compared to the without-project scenario at some locations, but would remain well within air quality standards. With the project and with the eventual Kualaka`i Parkway extension to Roosevelt Avenue, worst-case carbon monoxide concentrations were estimated to remain the same or increase only slightly at some locations compared to conditions without the Parkway extension. Implementing mitigation measures for traffic-related air quality impacts are deemed unnecessary by the consulting meteorologist.

Depending on demand levels, long-term impacts on air quality are also possible due to indirect emissions associated with a development's electrical power and solid waste disposal requirements. Based on estimated demand levels and emission rates involved, any impacts are anticipated to be very likely negligible. Nevertheless, incorporating energy conservation design features within the proposed development could serve to further reduce associated impacts.

8.11 NATURAL HAZARDS

Natural hazards include events such as hurricanes and tropical storms, high winds, tsunamis, floods, earthquakes, soil slippage, and volcanic eruptions.

The State of Hawaii has been exposed to the damaging effects of hurricanes twice in the past 30 years; Iwa in 1982 and Iniki in 1992. While Iwa impacted both the eastern coastal areas of Kauai and the western coast of O`ahu, Iniki's impacts were generally confined to Kauai. Continual improvements in forecasting make it possible to predict the likely course of a hurricane or tropical storm up to three days in advance with some, but not complete, certainty. This capability provides area residents with sufficient time to take appropriate actions. But the prediction of hurricanes and tropical storms further into the future is not possible. The project area is no more or less vulnerable to the destructive winds and torrential rains associated with these storms than other areas of O`ahu or the state.

High winds can result from hurricanes, tropical storms, and the juxtaposition of high-pressure and low-pressure areas relative to the Hawaiian Islands. They can occur at virtually any time over the course of the year. The period from June 1st to December 1st is considered to be hurricane season in the Central Pacific. But tropical cyclones can form during the winter months and are called Kona Storms if they located east or southeast of the islands. High winds associated with varying pressure gradients typically occur in the January to March period but are not restricted to those months. The damaging effects of high winds are usually not associated with the winds themselves, but rather, with airborne debris.

The recent devastating tsunami in Japan in early 2011 served as a potent reminder how vulnerable the Hawaiian Islands are to earthquake-induced tsunami around the edge of the Pacific Ocean. Damaging ocean surges can occur for several hours after having travelled thousands of miles across the ocean. Tsunami waves can inundate coastal regions several hundred yards inland.

Flooding in the subject area is discussed in the next section.

The Hawaiian Islands are susceptible to earthquakes that are typically associated with volcanic activity. The island of O`ahu is situated within Seismic Hazard Zone 2A (on a scale of 1 to 4 with 4 being the most severe). In 2009, electrical power on the island of O`ahu was disrupted for nearly a day as the result of a magnitude 6+ earthquake whose epicenter was located just offshore the Kohala coast of the Big Island.

On a large scale, soil slippage or subsidence in Hawai`i is usually associated with volcanic or seismic activity. On a smaller or localized scale, soil slippage can take the form of mudslides or rock falls typically occurring during or after periods of heavy rain.

Volcanic activity in the Hawaiian Islands is presently confined to the active craters at Kilauea and Mauna Loa on the Big Island of Hawai`i. Hazards associated with volcanic eruptions include lava inundation, exposure to tephra (airborne volcanic debris), and high volumes of gas emissions.

Potential Impacts and Mitigation Measures

As the result of Hurricane Iniki, building codes statewide were revised to include more stringent measures to improve the ability of new structures to withstand hurricane force winds, and provisions for retrofitting existing structures. Construction of the project will be consistent with these codes. The measures will also mitigate the impacts of high winds during non-hurricane events.

The subject property is situated approximately two miles inland from the coastline and is not located within an identified tsunami inundation zone. No direct impacts from tsunami are anticipated.

As is the case with hurricanes, earthquake impacts will be mitigated through compliance with the Uniform Building Code adopted and enforced by the City and County of Honolulu.

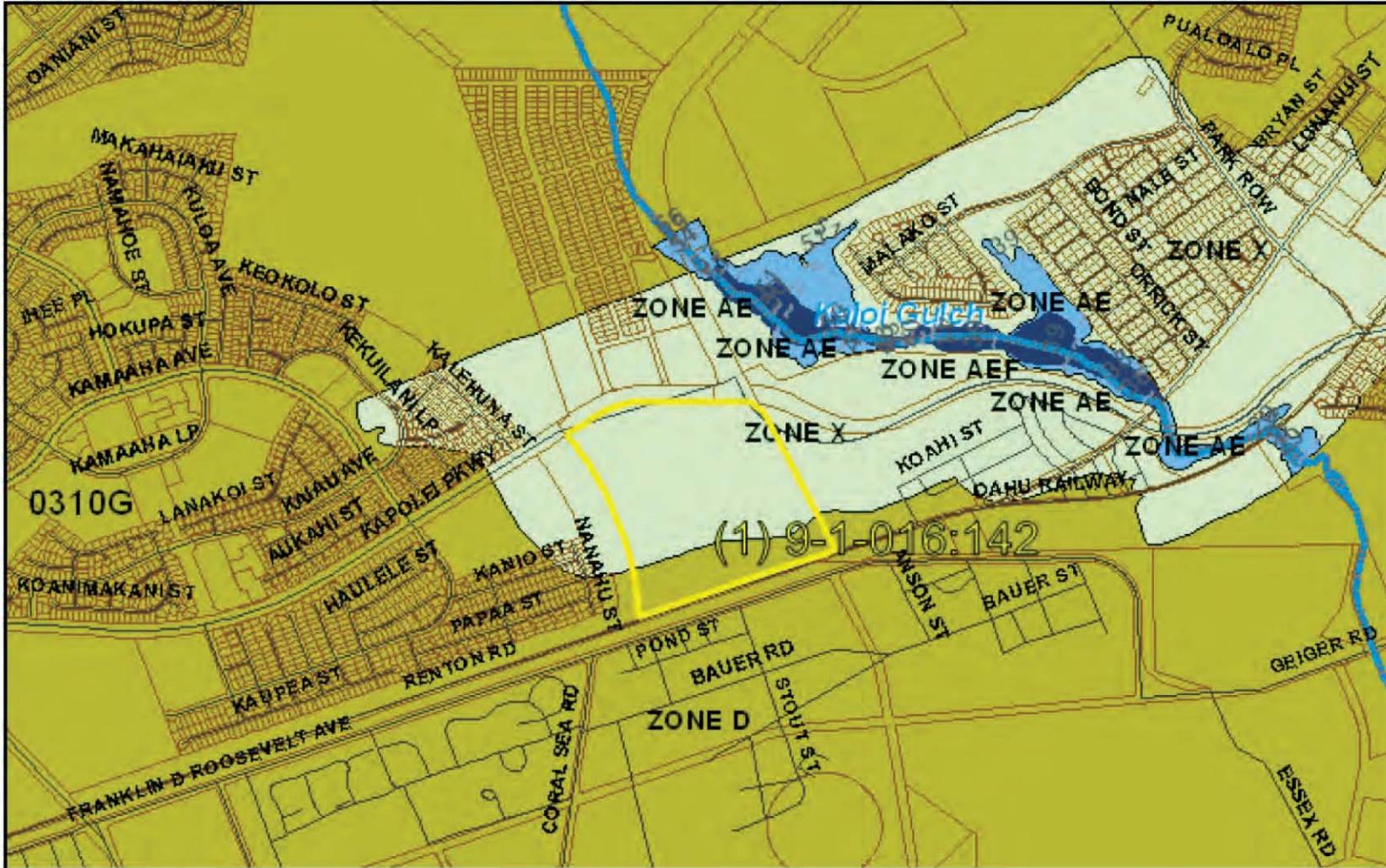
The project area is on flat land that is not susceptible to landslides or rock fall. No significant adverse impacts from these natural hazards are anticipated.

As there is no volcanic activity on the Island of O`ahu, the subject property will not be directly impacted by the hazards directly associated with volcanoes. However, the project area may experience the indirect impacts of volcanic emissions (known locally as vog), but these impacts are not anticipated to be significant.

8.12 FLOOD AND DRAINAGE CONDITIONS

As depicted in Figure 15, the Federal Emergency Management Agency's Flood Insurance Rate Map (FIRM) classifies the majority of the subject property as Flood Zone X. A relatively narrow strip of the subject property along its southern boundary is designated as Flood Zone D. Land in Flood Zone X is subject to inundation by the 500-year flood. A designation of Flood Zone D means that the potential for flooding is undetermined.

The East Kapolei area, including the subject property, is impacted by regional storm runoff from a portion of the Kaloι Gulch drainage basin and the Hunehune Gulch drainage basin.



FIRM Legend

- Zone AE
- Floodway
- Zone X
- Zone D

Source: Hawaii NFIP.
<http://gis.hawaiiinfip.org/fhat>.
 Accessed August 17, 2011

FIGURE 15 FIRM MAP

Construction of Kanehili Street and Kualaka`i Parkway resulted in the diversion of flow from Kaloi Gulch to a new channel below Farrington Highway. Flow from Hunehune Gulch and sheet flow from the UHWO property is diverted under Kualaka`i Parkway to detention basins.

Storm runoff from the subject property that does not flow into and collect in the barrow pit flows into the Lower Kapolei Channel along the western boundary and subsequently into the Coral Pit in Kalaeloa.

Potential Impacts and Mitigation Measures

Runoff generated within the project site typically remains on site in existing pits and depressions, sheet flows to the Kapolei Lower Channel to the southeast, or sheet flows to the adjacent property in the north/northeast. The Kapolei Lower Channel flows northeast to southwest parallel to Roosevelt Avenue and ultimately discharges into a depression on the western side of Fort Barrette Road near its intersection with Roosevelt Avenue, a feature commonly referred to as the “coral pit.”

9 ASSESSMENT OF THE EXISTING HUMAN ENVIRONMENT, POTENTIAL IMPACTS AND MITIGATION MEASURES

Ka Makana Ali`i is a mixed use regional center proposed to serve Leeward O`ahu, especially the `Ewa Plain. It responds to the needs of a growing community. Located at the heart of `Ewa, it will be convenient to residents of `Ewa Beach, Ewa Villages, and the Gentry subdivisions, as well as to the Kapolei area. It will complement the UH West O`ahu campus and Kroc Center by providing a spine of public uses in the middle of `Ewa, and hence encouraging further development of the `Ewa urban area.

9.1 ARCHAEOLOGICAL RESOURCES

An Archaeological Inventory Survey with backhoe testing was conducted by Pacific Legacy for the proposed project and is presented in Appendix H. Following are the results of the survey.

The `Ewa Plain of Honouliuli Ahupua`a has a long and complex history, which is apparent from archival research and archaeological investigations carried out in the last 30 years. Archival research has allowed a glimpse of the varied life ways on the plain. Peripheral areas, especially those bordering Pearl Harbor, offered rich natural resources for fishing and gathering and the perfect matrix for fruitful agriculture in pre-Contact times. Yet, central plain areas presented scant resources needed for survival. Traditional accounts echo this disparity in `Ewa Plain resources. Local mythology and lore suggest that the entire region is has been the backdrop for legendary tales and the home of many mystical beings as well as *ali`i*. Archaeological investigations have shown that much of the area’s cultural resources have been disturbed by sugar plantation activities. However, the most common features in this area are agricultural features and sinkholes containing archaeological and paleontological resources. Due to historic sugar cane and sisal cultivation activities as well as plantation related infrastructure development, features such as these have likely been covered with sediment, encapsulating them and obscuring their locations. The area’s more recent past is also significant in understanding the region’s economic evolution as well as local cultural dynamics and identities.

The surface survey yielded no archaeological sites. Rather, the project area exhibited signs of continuous disturbances in the form of construction excavations, bulldozing, and dumping. Further, there appeared to be a significant amount of modifications to the land in the form of jumps, tracks, roads, and berms, to help facilitate modern off-roading for off-road vehicles (ORV) and all-terrain bicycles, which are likely non-authorized activities.

While no archaeological sites nor true sinkholes were encountered during this investigation, test excavations revealed that the project area, omitting the borrow pit and other previously excavated areas, is overlain with 0.45 to more than 3.7 meters of sediment relating to modern construction and/or sugar cane cultivation. This is contrary to the previous assumption that the current substrate was all ready graded down to the *karst* bedrock, or within 8 inches of the karst. Further, the study was able to discern areas that appear to have relatively deep layers of modern fill, and conversely, areas where the natural strata are relatively shallow.

A total of 62 test trenches were excavated, revealing varying strata throughout the project area. Trench depths ranged from ca. 20 inches (ca. 0.5 meters) to ca. 12 feet, 2 inches (ca. 3.7 meters), with 54 of the 62 trenches revealing the karst layer. During trench testing, a single trench appeared to reveal a sinkhole in the base of excavation and was hand excavated down only 0.45 meters before reaching the karst layer. This depression was ruled out as being a sinkhole due to its shallow nature. In another test trench, the karst surface was found to be < 0.3 meters deep and appeared to be undisturbed and encapsulated under the topsoil. A test scrape was subsequently performed in the vicinity, which revealed that the top surface of karst was not a flat horizon, but rather, an undulating and irregular surface with many natural depressions. This caused some confusion as to what may or may not be a sinkhole. Two darkly colored depressions in the base of the test scrape that appeared to be sinkholes were hand excavated, but were found to contain only a thin layer of alluvium (< 0.2 meters). Thus, no sinkholes were encountered during the testing phase.

Neither sinkholes nor cultural materials were encountered during the subsurface testing. Nonetheless, the current stratigraphy of the project area has been comprehensively recorded to provide a better understand the land's varying topography and past land use as well as providing information on which to generate an accurate monitoring plan.

Potential Impacts and Mitigation Measures

Given the lack of finding any archaeological resources or even finding evidence of sinkholes within the project area, the consulting archaeologists concludes that no further archaeological work is necessary within this area. However, in the event that limestone bedrock (*karst*) is encountered during construction activities, the Applicant acknowledges that work in this area should halt and a qualified archaeologist should be summoned to the site to monitor excavations in the limestone areas. If any filled and buried sinkholes are encountered during these construction excavations, they should be archaeologically investigated to determine if they contain potentially significant archaeological deposits, including human burials. If at any time during construction potentially significant archaeological remains are encountered, work in the immediate vicinity should halt and the State Historic Preservation Division should be contacted.

9.2 CULTURAL RESOURCES

A Cultural Impact Assessment (CIA) was conducted for the proposed project by Pacific Legacy and is presented in Appendix I. Following is a summary of its findings.

To carry out the Ka Makana Ali'i CIA, archival research was conducted followed by community consultations to identify cultural practices, cultural resources, and beliefs associated with the area. Cultural practices are typically customs relating to subsistence, commerce, residency, agriculture, recreation, religion, spirituality, and collection of cultural resources, which may be carried out by Hawaiian practitioners or practitioners from other ethnic groups. Further, cultural resources, such as natural features, archaeological sites, and collectable materials associated with these types of customs, as well as traditional cultural properties and historic sites are also subject to this CIA.

Archival research has revealed that, in general, the Ewa Plain in which the proposed mixed-use complex is to be built on has a long and interesting history. From the archaeological record, traditional stories and myths, and Historic documents attributed to the vast area, it is evident that these lands have been the stage to many significant acts in the long drama of Oahu's pre- and post Contact history. However, no previous archaeological research has been conducted on the project area. Oral traditions and Historical references to the specific area do not exist prior to its use as cane field, when it is shown on a 1939 Ewa Plantation Map as Field No. 46 (see Figure 9 in Appendix I). It is possible, that a major feature of pre-Contact and early Contact Honouliuli, the Kualaka'i Trail, cut across or passed near to the project area according to the Malden (1825) map featuring the south coast of Oahu (see Figure 6 in Appendix I). This prominent trail once connected Honouliuli Village to the coastal settlements of Oneula and Kualaka'i, and would have been crucial to life on the Ewa Plain and its coast. It is likely that the probability of encountering subsurface archaeological deposits increases with proximity to where ancient trail was located.

Furthermore, the project area borders the historic OR&L Railroad to the north. This historic railway, in operation from 1889 to 1947, was placed in the National Register of Historic Places in 1975. The project area borders the historic narrow gauge OR&L right-of-way to the north. After 1947, the railway was sold to the US Navy, which used the stretch of track from Lualualei Ammunition Depot to the West Loch Ammunition Depot until the end of 1968. The Navy did not use the tracks daily, but maintained them to industry standards. The Hawaiian Railway Society, founded in 1971, began the process, with the help of Hawai'i's congressional delegation, to have the remaining stretch of track place on the National Historic Register. At that time, there were four public roadway crossings: Ft. Weaver Road, Renton Road extension (formerly the entrance to the Ewa Marine Corps Airbase), Fort Barrette Road, and Kalaeloa Boulevard. These roads became part of the historic fabric of the right-of-way at that point.

The railway no longer serves as the backbone of Oahu's economy, instrumental in U.S. military operations on Oahu, nor the main mode of transportation for Oahu's citizens to seek services, work, shop, and play far from home. Nevertheless, today it is a vital and tangible means to experience the period in which Hawai'i transitioned from an autonomous island nation to an island brimming with an eclectic group of immigrants and entrepreneurs; to an island under U.S. territorial rule and subsequently a major economic and U.S. military hub for the entire Pacific region. Thus, the OR&L railway is itself a cultural resource for those who identify themselves

with or have connections to bygone plantation and military cultures as well as those who seek to experience such an important period in the region's history.

No archaeological features were positively identified within the project area during this assessment or in the Archaeological Inventory Survey and Backhoe Testing prepared in concordance with this CIA. Evidence of cultural activities occurring in the project area prior to sugarcane cultivation (before ca. 1939) are now either obliterated by past agricultural and/or construction activities or encapsulated under plantation era soils.

Ethnographical evidence supports the possibility that cultural practices occurred on the property prior to the large-scale cultivation of sugar cane. Sinkholes in the general area were utilized as natural planters for *kalo* (taro, dry-land variety), temporary shelters, storage features, and sources of water. However, no sinkholes were found onsite during the archaeological inventory survey. According to one interviewee, some portions of the project area were used by Hawaiians for a variety of activities. For example, the lands may have been planted in *'ulu* (breadfruit), *liliko'i* (passion fruit), *niu* (coconut), and two types of *mai'a* (banana). Additionally, birds were trapped for feathers in or near to the project area, including the *ae'o* (*Himantopus mexicanus knudseni*), *i'iwi* (*Vestiaria coccinea*), *'apapane* (*Himatione sanguine*), and the *mamo* (*Drepanis pacifica*). The interviewee also recalls the existence of at least one *ahu* (shrine) in the general area, which was dedicated to agriculture. This *ahu 'aina* was made of stacked waterworn basalt boulders and cobbles, likely collected from a nearby stream bed, that stood up to five feet tall and possibly as wide as it was tall with a circular plan view. On these *ahu*, devotees, including the interviewee, would leave offerings to show appreciation for these natural resources and respect for the divine. However, the *ahu 'aina* was destroyed many years ago, sometime during the initial preparation of the land for sugarcane cultivation.

It has not been demonstrated that any cultural practices have been ongoing from the pre-Contact era or Historic era to the present. As the majority of the project area has been heavily disturbed by agricultural and construction activities prior to this CIA, contemporary cultural practices taking place in the project area were limited to the gathering of *'uha loa* (*Waltheria indica*) for traditional Hawaiian medicine and *'alae* (red clay) for coloring salt, medicine, dye, and spiritual purification. A total of three cultural practitioners were documented as gatherers of these cultural resources: an interviewee and his two *lā'au lapa'au* students. Although these resources exist in localities outside of this project area, the location is desired for its easy access, abundance of the resources, and the lack of pesticide sprays in its interior. The proposed development will undoubtedly impact these activities.

Additionally, three of the four interviewees state that the general area of central „Ewa Plains is the land of the “Wandering Spirits” and “Night Marchers.” One interviewee claims that these restless spirits become a problem for many recent developments in the area and has performed many “clearings” to rid public buildings, businesses, and residences of unwanted spirits.

Potential Impacts and Mitigation Measures

In total, two Native Hawaiian cultural resources have been identified as being potentially impacted by the proposed project: *'uha loa* (*Waltheria indica*) for traditional Hawaiian medicine and *'alae* (red clay) for coloring salt, medicine, dye, and spiritual purification. An interviewee and his two *lā'au lapa'au* students were the only cultural practitioners to be currently collecting these resources from the area. Obviously, the subject development and cultural resources, such as *'uha loa* and *'alae*, will not likely be able to occupy the same space at the same time.

Fortunately, these resources are not endangered and can be found in other, albeit less convenient, locations. *‘Uha loa* is readily available commercially and therefore can easily be incorporated into landscaping at the project.

Another concern raised by cultural informants is about the scarcity of fresh water in the general area. This is a growing concern for the entire *ahupua‘a* of Honouliuli with the rapidly escalation of new homes and businesses. One interviewee suggests that the new development use native, drought-tolerant plants in its landscaping to ensure that local agriculture and aquaculture projects aimed at increasing our independence from outside commodities will be successful. The Applicant concurs. At this point in time, the landscaping plan is anticipated to include a mix of drought tolerant plants and exotic.

Furthermore, there is the concern about unsettled spirits that remain in the area causing unwanted paranormal activities to plague the new development or, conversely, surrounding localities being haunted by the displaced spirits. Some informants fear that archaeological sites and burials, also cultural resources, possibly contained in sinkholes and concealed by plantation era soils may be damaged or lost during ground disturbing activities related to the project’s construction. It is a common belief that the disturbance of archaeological sites and burials can also upset spirits or cause bad fortune to befall those who have caused the disturbance. To address this, cultural informants recommend that efforts should be made to bless the groundbreaking at Ka Makana Ali`i formally as well as at the grand opening of the mixed-use complex. As discussed in the section above, after extensive surface and sub-surface surveys, no sinkholes, archaeological sites, or burials have been located on the property. Therefore, the likelihood of disturbing sinkholes during construction is greatly reduced.

In regards to concerns about potential archaeological sites and burials, an archaeological monitoring plan will be prepared prior to the commencement of construction. Further, if archaeological sites are encountered during the construction of Ka Makana Ali`i, interpretive cultural displays at the project will incorporate artifacts (to the extent possible), archival photos, artistic renderings, and traditional accounts to educate its patrons of Ewa Plain’s colorful past.

Other cultural informants, specifically those currently living in nearby Varona Village, fear that the new development may be further cause to displace them from their plantation era homes. Those informants associated with the Hawaiian Railway Society have similar fears of proposed roadways conflicting with existing tracks and switching yard - ultimately displacing them from their current location. Communications with these groups will help dispel misconceptions and begin a healthy discourse regarding the proposed project.

9.3 COMMUNITY CONCERNS AND SOCIAL IMPACTS

A socio-economic impact analysis of the proposed project was prepared by Belt Collins Hawaii, Ltd. and is presented in Appendix J. As part of the socio-economic analysis, community residents were interviewed to identify both their general concerns and their specific concerns related to the proposed project. (The interview protocol is presented in Appendix J.)

9.3.1 General Community Concerns

In interviews, local stakeholders discuss traffic congestion immediately as a regional problem. The slow process of designing and building Kualaka,i Parkway (long known as the North-South Road) over two decades has fueled a widely-held sense that the area’s needs are not a priority for

State and County agencies. Next, the poor condition of older roadways has led to fatalities (of pedestrians as well as automobile passengers).

Many „Ewa residents have expressed strong support for the new rail transit system. However, some residents of eastern „Ewa have argued that the new system should be re-aligned to serve their communities as well as the west.

Concerns have also been expressed about the proposed residential development at Ho`opili (which is presently under consideration at the State Land Use Commission at the time of this writing.)

Local community stakeholders have long pressed for development of new schools and have greeted innovative schools warmly. However, by the time new schools are built, they typically serve a large population and soon include portable structures as well as permanent facilities. Kapolei schools are on a multi-track calendar, to allow them to serve a large student population.

Continued operation of the Waimānalo Gulch Sanitary Landfill for the City and County of Honolulu has long been contested by stakeholders from Kapolei and from the Wai„anae Coast. The landfill and trucks carrying refuse to it are identified as sourced of trash and dust affecting residential areas and the ocean. Both Mayor Hannemann and Mayor Carlisle have supported planning for an alternative site and measures to decrease waste going to the landfill, while expanding the existing landfill.

Crime and vandalism have been problems in Kalaeloa and at the western edge of „Ewa Beach. These areas were not well patrolled for many years. Homeless campers occupied areas in Kalaeloa near the ocean. These have been evicted, but much of the district is undeveloped land covered by brush. Transitional housing for homeless veterans and families has been developed in old Navy facilities in the urbanized part of the district. These are supported by service agencies and a shuttle service.

After the closure of Naval Air Station Barbers Point, area residents have sought to keep several facilities open for community use. These include a childcare center and bowling alley in the Downtown area, along with sports fields near the northern edge of the Kalaeloa District. Pride Field, across Roosevelt Avenue from the project site, is heavily used for baseball and softball.

9.3.2 Project Specific Concerns

Both interviewees and community groups listening to presentations about Ka Makana Ali`i expressed concern that it would create or add to traffic congestion. Questions were raised concerning construction traffic during rush hour periods and about eventual growth in traffic as Ka Makana Ali`i becomes a retail and entertainment destination. Pedestrian safety was of concern, given the size and location of the project.

Some interviewees saw the project as leading to further development of the Kalaeloa District. While they welcomed investment, they had questions about a future extension of Kualaka„i Parkway. This future road would cross tracks used by the Hawaiian Railway Society and could affect traffic on Roosevelt Avenue and other roads within Kalaeloa.

When the project was introduced to the two regional Neighborhood Boards, questions were raised concerning the following:

- The project's location on DHHL property: some view the use of DHHL land for commercial uses when Hawaiians in the beneficiary pool do not have leases as inappropriate. (However, DHHL leases lands for commercial and industrial use to fund the homestead program.)⁸
- Whether the project would fund or support a road link between Kapolei Parkway and Roosevelt Avenue. (The State Legislature has allocated funds to build an extension of Kualaka,,i Parkway to Roosevelt Avenue. The Ka Makana Ali'i project does not make that link necessary.)
- Whether water and sewer lines were in place to support the project. (They were.)
- Whether the project would increase water use. (Past plans for the site already allowed for the use of water equivalent to that needed to support approximately 34 households.)
- Whether the project would involve "green" buildings. (Plans include sustainable design for some of the buildings.)
- How the project would affect the Hawaiian Railway Society. (The State Department of Transportation and the developer will be working with the society to resolve problems.)
- Whether the project would respond to the spectrum of residents' needs. (The response indicated that medical care and childcare could be part of the project, as well as retail stores, if justified by demand.)

Interviewees largely viewed the project as benefitting the region. They saw a commercial center as offering new shopping opportunities. They expected that the project operators would be able to co-operate with nearby institutions.

9.3.3 General Social Impacts

Construction will involve temporary impacts: dirt, fugitive dust, noise and traffic congestion due to large loads. These have been irritants for Ewa residents in the past. All of these can be limited by using best practices, and are subject to State and County rules that limit impacts on neighbors. Before construction begins, the developer will work out plans to mitigate impacts on the community. For example, open areas will be watered to limit dust on a regular basis, and the general contractor will probably be expected to offer a telephone contact, to hear about and respond to neighbors' problems quickly.

When the first phase opens, the project will offer stores and services that are convenient for the immediate neighborhood. It will provide residents of East Kapolei and areas along Kapolei Parkway an alternative to trips to more congested shopping centers. It should also benefit residents of housing areas in Kalaeloa.

As Phase Two is developed, the center will provide more stores and services. It will combine offices with retail and entertainment areas, and hence become an important employment center. It will serve the larger region, not just its immediate neighborhood.

⁸ The responses provided here mostly paraphrases of ones recorded in Neighborhood Board minutes. No response was recorded to the comment about the use of DHHL lands; the comment shown here is based on the Department's stated policies.)

The community institutions on Kualakaʻi Parkway will work together to bring residents to the central corridor, increasing the appeal of each of these facilities. The University of Hawaiʻi West Oʻahu, the Kroc Center and Ka Makana Aliʻi are likely to increase demand for each other, simply by making it more convenient to visit any one of these. (In other words, these will have a cumulative impact, increasing and reinforcing demand for each facility.) Again, the project could increase travel along the rail transit line to the terminus next to the Kroc Center, if a shuttle or bus service links the terminus with the regional commercial center.

In interviews, some stakeholders looked forward to partnerships between the project and surrounding institutions. Collaboration on community activities should be mutually beneficial, and seems likely to occur.

UHWO, the Kroc Center and the project will all contribute, over time, to change island and regional residents' views of ʻEwa as a whole. First, these all serve the region, not just a subarea. Second, they work to make ʻEwa, not just the City of Kapolei, the “second city” of Oʻahu. Until recently, non-residential development in the region was concentrated in the west; residents of subdivisions along Fort Weaver Road had little reason to view Kapolei as serving them. Road connections between the two sides of the DP area were few and in poor repair, so access was also difficult. Nowadays, improved connections and new attractions make Kualakaʻi Parkway into a central corridor for the entire region. With its commercial and entertainment venues, Ka Makana Aliʻi can serve as a “gathering place” for people from all parts of ʻEwa.

The project's impacts on its neighbors to the south will emerge over time. First, any entry from Roosevelt Avenue to Ka Makana Aliʻi will cross the Hawaiian Railway Society tracks. Crossing gates or the like will be needed when trains run along the route. The project's impacts would be generally limited to the driveways needed to link the property to Roosevelt Avenue.

There is concern by the Railway Society and the State Historic Preservation Division of DLNR about the project's potential impacts upon the historic railroad. The Railway Society owns the property occupied by a museum and the railroad base yard. According to the Society, the track and switch layout is compressed to the limits allowed by the American Railway Engineering and Maintenance of Way Association due to limited space. In addition, if the project's driveways crossing to Roosevelt Avenue are too close the base yard, they may disrupt switching operations. According to the Railway Society, if the close proximity of the Phase 2 driveway might result in the gate frequently closing because of base yard activity, even if a train is not passing the driveway.

It should be noted that the OR&L easement, within which the historic railway is located, has been designated as a pedestrian and bicycle path; designated the Pearl Harbor Historic Trail (PHHT). The Master Plan for the PHHT depicts the proposed pedestrian and bicycle path on the makai side of the railroad tracks in the vicinity of the proposed project. Thus, any pedestrian access from the Pearl Harbor Historic Trail to the subject property must cross the railway tracks.

Next, extension of Kualakaʻi Parkway to Roosevelt Avenue – a link for which the Hawaii State Legislature has already set aside funds – will cross tracks used for switching rail cars in the Railway Society yard; these are used more often than the tracks leading west. Ka Makana Aliʻi's developers have not proposed this connection, as it would not be needed to develop the center or to mitigate its impacts on regional traffic.

Location of a mixed use regional center next to the Kalaeloa Community Development District will increase the appeal of that area for residents, both of existing and eventual neighborhoods. Again, that impact is cumulative and would depend on new roadway connections, both between Kalaeloa and the rest of the region and within Kalaeloa.

The project will generate a continuing cash flow for DHHL to support its work on behalf of native Hawaiians. This is an important objective for the Department, which has relied in recent years on payments from the State for past land takings – payments which will cease in a few years. Development of commercial space on DHHL lands in Kapolei and elsewhere offers a long-term financial basis for the Department, and hence for Native Hawaiian communities. The Ka Makana Ali'i project will include entertainment and recreation facilities, such as a cineplex and health club. It may include play areas for children, but will probably not have facilities for outdoor sports. As the project is not anticipated to generate a significant impact in terms of resident population growth, it is not anticipated that the project will have a measurable impact upon existing recreational facilities or result in a significant demand for new recreation facilities

9.3.4 Schools

The Ewa Development Plan Area includes eleven public elementary schools, three middle schools, and two high schools, as shown in Table 4. The school population has grown quickly. The Department of Education (DOE) has opened new schools in recent years, and has organized schedule and programs so that schools such as Kapolei Middle School can operate with high enrollments.

The National Guard operates the Youth ChalleNge program for at-risk youth, helping them earn high school diplomas in a structured program, at a site in the Kalaeloa redevelopment area. Nearly 200 cadets graduate each year.

Private schools in the area include Island Pacific Academy in Kapolei, Friendship Christian and Lanakila Baptist in Ewa Villages, and Messiah Lutheran and Our Lady of Perpetual Help in Ewa Beach.

Table 4: Public School Enrollment, Ewa Development Plan Area

School	2010-2011 Enrollment
Barbers Point Elementary	401
Ewa Beach Elementary	507
Ewa Elementary	1,003
Holomua Elementary	1,382
Iroquois Point Elementary	718
Kaimiloa Elementary	610
Kapolei Elementary	1,043
Keoneula Elementary	847
Makakilo Elementary	502
Mauka Lani Elementary	563
Pohakea Elementary	565

Ewa Makai Middle	587
Ilima Intermediate	777
Kapolei Middle	1,424
Campbell High	2,639
Kapolei High	2,107

SOURCE: Hawai'i State Department of Education, enrollment data posted at <http://doe.k12.hi.us/reports/enrollment.htm>

Additional schools are proposed for sites in the UH West O`ahu lands, the Ho`opili project, and the DHHL East Kapolei Phase II project, **including a new middle school, and a new elementary school adjacent to the Kroc Center.** When residential development occurs in the Kalaeloa Community Development District, additional schools would be needed in that area.

University of Hawai'i West O`ahu enrolls some 1,306 students at its Pearl City campus (as of mid-2011). The university will move to its new site in fall 2012. The campus is designed for eventual enrollment of 7,600 students.

Potential Impacts and Mitigation Measures

As a commercial project, Ka Makana Ali`i will not generate a school population. It will serve a growing regional population, and will provide jobs for adults and young people from the region.

9.3.5 Parks and Recreation

The `Ewa *Development Plan* area includes beach parks, neighborhood parks, community parks, and space for regional park development. The developed park acreage totals approximately 211.6 acres.⁹ Nearby, in Central O`ahu, the City and County of Honolulu has created regional parks (Central O`ahu Regional Park) and a soccer facility serving the entire island (Waipio Peninsula Soccer Park). See Figure 10 for the location of parks in relationship to the proposed development.

New recreational facilities are planned for the Kroc Center, just inland from the project site, the UH West O`ahu campus, and when permitted, the Ho`opili project to the northeast.

The Salvation Army is developing the Kroc Center. It will have approximately 100,000 square feet under roof, including a theater and gymnasium. A pool and fields for outdoor activities will also be developed. It will be located within the DHHL portion of the East Kapolei lands, *mauka* of the project. It will be a major community recreational facility, on a scale found nowhere else in Hawai'i.

Plans for the UH West O`ahu property show playfields and a gymnasium.

The Ho`opili project, if eventually developed, could have both passive and active park space. Project plans suggest that extensive bike trails will be incorporated into the project design.

⁹ Department of Land and Natural Resources, *Statewide Comprehensive Outdoor Recreation Plan*. Honolulu, HI, 2003.

The Kalaeloa Community Development Area includes a regional park, beach parks, a golf course, and stables. Hundreds of acres have been identified as appropriate for redevelopment as open space, to include a cultural preserve.

Potential Impacts and Mitigation Measures

The Ka Makana Ali`i project will not add to recreational demand in the region.

Development of the subject property as a regional commercial center will have no significant impact upon recreational resources in the region. The property was originally proposed as a regional sports complex in the 1998 East Kapolei FEIS. However, the subsequent relocation of the proposed UH West O`ahu campus to the northern end of the East Kapolei property has undermined the feasibility of developing a sports complex on the subject property. Many of the facilities originally proposed for the subject property are now proposed to be included on the UH West O`ahu campus.

9.3.6 Medical Facilities

„Ewa is served by a single hospital, Hawaii Medical Center – West, founded as St. Francis Medical Center West. It has 102 beds. It is located on Fort Weaver Road. The Kaiser and Queens health systems have clinics in Kapolei.

The Emergency Medical Services Division, City and County of Honolulu Emergency Services Department, has 19 ambulance units and two rapid response paramedic units located on O„ahu. The project site is in the region serviced by the Makakilo ambulance unit. Honolulu Fire Department units also commonly respond to emergency calls.

With continuing residential development in the region, demand for medical services can be expected to increase.

Proposed senior residential areas (Franciscan Vistas in „Ewa Villages; Leihano in Kapolei) may make nursing care available to residents and some neighbors.

The proposed Ho„opili development would include a commercial area near the Hawaii Medical Center – West hospital. Medical offices could be located there if demand warrants.

Potential Impacts and Mitigation Measures

The project may include medical offices or clinics. While it will increase the visitor population in „Ewa slightly, and visitors will rely upon local medical services and facilities during their stay, it is not expected that the project will have a significant impact on demand for medical services.

9.3.7 Police Protection

The Honolulu Police Department (HPD) has a district headquarters in the City of Kapolei. For O„ahu as a whole, the department has 2.3 officers for every 1,000 residents.¹⁰ District 8 of the City and County of Honolulu Police Department covers most of the „Ewa *Development Plan* area and all of the Wai„anae Coast. (Part of „Ewa near Waipahu is included in District 3).

The Kalaeloa Redevelopment District is patrolled in part by private security services. The Honolulu Police Department responds to calls from that area. (The Navy withdrew its security patrols after the closure of Barbers Point Naval Air Station in 1996. Vandalism and theft of

¹⁰ HPD statistics for 2009, posted at <http://www.honolulu.gov/download/HPD2009annualreportstats.pdf>.

property from unprotected buildings occurred. By 2004, as many as 100 people were living in cars and tents near Nimitz Beach until HPD and representatives of other City agencies conducted a sweep of the area.)

A West O`ahu Security Coalition has recently formed. It brings together private security firms and local businesses as partners with HPD to increase public safety (personal communication, Major Raymond Ancheta, HPD, July 2011).

With population growth in the region, demand for public safety services is likely to rise over time. However, road improvements have reduced traffic congestion in parts of the region. Kualaka`i Parkway provides a new central corridor, connected to new H-1 interchange and major East-West roadways (Farrington Highway and Kapolei Parkway). Traffic congestion, and hence traffic control duties for HPD, is now more likely on Fort Barrette Road and at the west end of Kapolei.

Potential Impacts and Mitigation Measures

As a mixed use regional center, Ka Makana Ali`i will have on-site security patrols to assure customers' safety. Also, by developing a site near the Kalaeloa Redevelopment Area the project will improve accessibility and hence security for the region.

The project's location adjacent to two major new roads will not likely create major traffic control problems for HPD. The traffic study of the project indicates that it will not cause a significant reduction in level of service on the surrounding roadways.

During construction, cement trucks will be able to reach the site from Makakilo Quarry via Kualaka`i Parkway. As a result, project construction is likely to pose little problem for traffic control, even during peak traffic periods. Currently the project site has no immediately adjacent neighbors, and it can be reached by Roosevelt Avenue in Kalaeloa as well as by Kapolei Parkway and Kualaka`i Parkway.

9.3.8 Fire Protection

Battalion 4 of the Honolulu Fire Department (HFD) covers Waipahu, `Ewa, and the Wai`anae Coast. HFD has stations in Makakilo (No. 35) and on the west side of Kapolei (No. 40). A new station is under construction by the Kapolei Parkway/**Kinoiki Street** intersection. It is planned to house both an engine and ladder company, and to have space for emergency supplies and for training facilities.¹¹

Brush fires have been a serious concern in Leeward O`ahu, notably along the Wai`anae Coast. In 2007, O`ahu's largest recorded brush fire burned for nearly a week above Waialua on the North Shore. Parts of the Kalaeloa Redevelopment Area have burned due both to dry conditions and to arson.

Potential Impacts and Mitigation Measures

The project will be built to current fire control standards, with access to structures via roadways large enough to meet Fire Department standards.

With development of the property and improved access for fire control vehicles to the Kalaeloa Redevelopment Area, the risk of brush fires in the region will decrease.

¹¹ J. Goolsby, "New Fire Station Slated for Kapolei." *Midweek*. July 28, 2010.

9.3.9 Extent Any Public Agency Would Be Impacted

Development of the subject property will result in increased demand for police, fire, and emergency related services. As no residential units are proposed, the project will not result in a direct impact upon the region's population, and will therefore not have a primary impact upon public agencies such as schools or hospitals. The proposed hotel units will result in a potential secondary impact upon the need for additional hospital services for any guests that may require them during their stay.

9.4 ECONOMIC RESOURCES

The socio-economic impact analysis' key findings pertaining to the economy and fiscal resources are summarized below.

9.4.1 Historic Economic Setting

The proposed project is located at the center of the „Ewa plain, the southwest part of the island of O„ahu. The „Ewa region has been slated for urban development for decades. The City and County of Honolulu identifies „Ewa as a Development Plan area, like the Primary Urban Center, but unlike the five regional “Sustainable Communities Plan” areas that make up the rest of the island.¹² While several commercial areas are located in the region, the largest ones serving „Ewa – Pearlridge and Ala Moana – are to the east.

Urbanization of the region has long been planned. Development along the western side of the region began with the funding of the H-1 Interstate Highway in the 1960s. Next, Makakilo and the James Campbell Industrial Park were established. The State of Hawaii created Barbers Point Kalaeloa Harbor as a commercial harbor supplementing Honolulu harbor. As “the secondary urban growth area” on O„ahu, Kapolei was designated as a city in the 1977 General Plan, and was to include the full range of urban land uses. The Villages of Kapolei were master planned by the State housing development agency, and then built by private developers. The Estate of James Campbell and its successor companies began development of the Kapolei city center in the early 1990s, and have leased or sold large parts of the area to the west for commercial projects. Ko „Olina is being developed as a resort area.

In the 1990s, most new development in „Ewa was residential. Suburban growth spread down the major north-south roadways: Fort Weaver Road in the east, Fort Barrette Road in the west. New commercial development began with the Kapolei Shopping Center, which opened in 1992. Additional commercial areas have been built nearby. Commercial development along Fort Weaver Road has been slow, although residential development has continued steadily for nearly twenty years. Even during the current recession, new housing development has continued. Most of O„ahu's new housing development is located in „Ewa.¹³

¹² The „Ewa Development Plan (DP) area (City and County of Honolulu) includes two Neighborhood Board Areas: „Ewa (Number 24) and Makakilo/Kapolei/Honokai Hale (No. 34). The „Ewa Development Plan area and the „Ewa judicial district (State of Hawaii) are distinct. The latter includes much of Central O„ahu. It will not be discussed in this report. All references to „Ewa as a region in the remainder of this report are to the DP area.

¹³ Data for 2009 and 2010 compiled for City and County of Honolulu *Development Plan Annual Report*. Personal communication, Michael Watkins, planner, DPP (July 2011).

Many of the large residential projects in `Ewa still have large increments to be built. At the northeast and northwest corners of the region, the Ho`opili and Makaīwa Hills developments have been proposed not yet granted development approvals. Similarly, residential and commercial uses on UHWO land have been proposed in concept, but have not yet been designed or permitted. Redevelopment of the Kalaeloa District, immediately south of the project site, could eventually involve some 6,500 additional residential units. As of 2009, approximately 21,750 housing units have been built, out of a potential total of nearly 60,000 units.

The `Ewa DP area has been planned to be self-sufficient, with a mix of homes and commercial, industrial and civic facilities. It includes visitor units at Ko `Olina and, in time, Ocean Pointe. Unique land uses, serving the whole island, include a general aviation airport and a water park. Many `Ewa DP area residents commute to work in Honolulu and at Pearl Harbor. With regional growth (and continuing congestion of the H-1 Interstate Highway making long-distance commuting difficult), the number and variety of jobs in the `Ewa DP area are expected to increase.

9.4.2 Population, Housing and Employment

Between 1990 and 2010, the region's population increased by 135%. This growth is clear in Table 5, when historic DP area counts and recent ZCTA totals are compared.¹⁴ The population is young when compared to the island wide population and few people live in group quarters or non-family households (as shown in Table 6). Households in `Ewa are larger, in general, than the statewide average. Homeownership is more prevalent than elsewhere in Hawaii. Rental units are found throughout the region as well. Notably, when the Navy withdrew from the area in the mid-1990s, rental housing in both Kalaeloa and Iroquois Point – now the “Waterfront at Pu`uloa” area – became available for rent by civilians. Even though `Ewa is seen as a new development area, where subdivisions have replaced cane fields, the density of settlement is already much higher than the statewide average.

Table 5: Recent Population Growth in `Ewa

	`Ewa DP Area	Both ZCTAs	`Ewa Beach ZCTA 96706	Kapolei ZCTA 96707
Population				
1990	42,931			
2000	68,718	68,928	43,874	25,054
2010		101,547	62,730	38,817
Housing Units				
1990	11,722			
2000	20,804	20,838	12,961	7,877
2010		30,780	18,319	12,461

NOTES: The Development Plan (DP) Area geography is used by the City and County of Honolulu, but not the State of Hawaii. It is close to the combined Zip Code Tabulation Areas (ZCTAs) shown above. ZCTAs are Census areas, based on the Postal Service's zip code geography, but the Census is not obligated to correspond fully to that

¹⁴ DP area demographics and projections are developed by the Department of Planning and Permitting, City and County of Honolulu. The 2010 counts are not yet posted. Because the DP areas do not overlap neatly with census tracts in the Waipahu area, the ZCTA figures seem the most useful current Census counts for the region.

geography, or to reflect changes in zip code areas. While Barbers Point has a separate zip code, it is included in the 96707 ZCTA.

In the next few years, new institutions along Kualaka,,i Parkway will provide a center for the DP area, serving both east and west:

- The Honolulu High Capacity Rail line will run from a station beside the Kroc Center to Honolulu. It is planned to be fully operational by 2019. Trains may run from its western terminus to locations such as Pearl Harbor and the Honolulu Airport before the tracks extend to Ala Moana in Honolulu. (Eventually, the line could be extended to Kalaeloa and the City of Kapolei, and to Waikiki and the University of Hawai,,i at Mānoa.)
- The University of Hawai,,i West O,,ahu is slated to move all operations to its Kapolei campus as of the fall 2012 semester. The new campus will serve up to 7,600 students in time.
- The Kroc Center will provide recreational, meeting and worship facilities. At 200,000 square feet, it will be the largest recreational center in Hawai,,i. It is to open in 2011. It is located next to the terminus of the rail line.
- A community center for Department of Hawaiian Homelands (DHHL) residents and a separate commercial facility are planned by the Kapolei Community Development Corporation. The commercial facility will be located across Kapolei Parkway from the Ka Makana Ali`i project.

With rapid population growth in ,,Ewa, traffic congestion has been a serious problem. The construction of Kualaka,,i Parkway, improvements to the H-1 highway interchange at Makakilo, and the opening of a new interchange at Kualaka,,i Parkway along with widening of Fort Weaver Road has addressed the problem. Planned improvements to Fort Barrette Road and the Kapolei Interchange Complex will be needed to reduce congestion in the western side of the area. Rush hour traffic to and from Honolulu via H-1 remains slow and is expected to become slower.¹⁵

¹⁵ Oahu Metropolitan Planning Organization. *Oahu Regional Transportation Plan 2035*. Honolulu, HI, 2011. As noted in the plan, both the new rail system and job growth in ,,Ewa will tend to limit, but not reverse, increased traffic congestion along the highway.

Table 6: Demographic and Household Characteristics, 2010

	State of Hawaii	Combined ZCTAs	'Ewa Beach ZCTA 96706	Kapolei ZCTA 96707
Population				
Total Population	1,360,301	101,547	62,730	38,817
Share under 18	22.3%	28.8%	28.8%	28.9%
Share 18 to 64	63.4%	63.0%	62.5%	63.7%
Share 65 and over	14.3%	8.2%	8.7%	7.4%
Median Age	38.6	NA	32.9	32.8
Share in				
Family Households	82.8%	91.8%	92.7%	90.3%
Non-family Households	14.1%	7.2%	6.9%	7.7%
Group Quarters	3.2%	1.0%	0.3%	2.0%
Housing				
Housing Units	519,508	30,780	18,319	12,461
Vacant Share	12.4%	7.1%	5.4%	9.7%
Occupied Units	455,338	28,584	17,331	11,253
Owner-Occupied Share	57.7%	67.8%	67.9%	67.7%
Share of Households				
Family Households	68.9%	82.3%	82.3%	82.2%
Non-family Households	31.1%	17.7%	17.7%	17.8%
Average Household Size	2.89	3.52	3.61	3.38
Owner-Occupied	3.02	3.64	3.75	3.48
Rental Units	2.72	3.25	3.3	3.18
Density of Settlement				
Persons per square mile	212	NA	3,661	895

SOURCE: U.S. Census data available on American FactFinder (www.census.gov) or through DBEDT (http://hawaii.gov/dbedt/info/census/Census_2010/SF1/DEC_10_SF1_GCT_ZIPCODE.xls).

When Naval Air Station Barbers Point closed in 1996, a direct route between 'Ewa Beach and Kapolei (along Geiger Road, Franklin D. Roosevelt Avenue, and Fort Barrette Road) was opened. More recently, segments of Kapolei Parkway have been completed, making that drive possible along roads built to current standards.

In Kalaeloa, near-term initiatives include a headquarters for the Federal Bureau of Investigation, now under construction, and three different solar projects, capable of producing some 15 megawatts of energy. Other recreational, commercial and residential areas have been planned, but are not now being developed, largely due to the high cost of infrastructure that would meet current standards. Further development within the district will depend on improvements in its roadways and utilities.

Much new housing for residents of O'ahu will be built in Ewa, so the DP Area population is expected to grow much faster than that of the City and County as a whole. Job growth is also projected for the region. (see Table 7)

Table 7: Population and Employment Projections, 2010 to 2035

	2010	2015	2020	2025	2030	2035
POPULATION						
Development Plan Subareas:						
Ewa Villages	5,650	6,227	6,403	6,550	6,677	6,834
Ewa Gentry/West Loch	26,458	27,315	27,411	27,440	27,447	27,490
Ewa Beach/Iroquois Pt	17,972	17,860	17,670	17,464	17,260	17,072
Ocean Pointe	6,652	7,981	8,783	9,235	9,657	10,117
Kalaeloa/Campbell Ind Park	1,381	1,690	3,147	5,057	7,484	10,534
Ko Olina/West Kapolei	3,942	4,766	6,750	7,697	8,344	9,040
City of Kapolei	756	3,339	4,804	6,418	7,469	8,577
Villages of Kapolei	14,012	14,422	14,462	14,466	14,465	14,471
East Kapolei	809	4,382	11,803	18,605	26,421	32,886
Makakilo/Makaiwa Hills/Kunia	16,872	19,252	21,868	24,789	26,108	27,535
Ewa Development Plan Area	94,504	107,234	123,101	137,721	151,332	164,556
O'ahu Total	911,841	941,847	969,467	994,632	1,017,576	1,038,317
Ewa share of Island Total	10%	11%	13%	14%	15%	16%
JOBS						
Development Plan Subareas:						
Ewa Villages	1,485	1,480	1,459	1,485	1,557	1,639
Ewa Gentry/West Loch	3,591	4,007	4,020	4,235	4,501	4,758
Ewa Beach/Iroquois Pt	3,302	3,429	3,432	3,484	3,620	3,759
Ocean Pointe	1,233	2,517	2,600	2,799	3,006	3,139
Kalaeloa/Campbell Ind Park	7,951	10,714	13,430	17,124	20,303	23,296
Ko Olina/West Kapolei	2,623	4,000	4,618	4,810	5,081	5,287
City of Kapolei	13,591	16,730	18,899	20,774	22,116	23,112
Villages of Kapolei	3,138	2,843	2,731	2,794	3,024	3,301
East Kapolei	6,855	13,857	17,801	21,764	25,658	29,558
Makakilo/Makaiwa Hills/Kunia	2,407	3,087	3,984	4,825	5,225	5,585
Ewa Development Plan Area	46,176	62,664	72,974	84,094	94,091	103,434
O'ahu Total	561,684	597,183	621,115	643,963	666,194	688,380
Ewa share of Island Total	8%	10%	12%	13%	14%	15%

SOURCE: Allocation by City and County of Honolulu Department of Planning and Permitting of County population and employment projected by DBEDT. Projections were made in mid-2009, and take into account the recession felt as of 2008. Sub-areas are shown in Figure 2-3 in Appendix J.

While little population growth is projected for Ewa Beach/Iroquois Point and the Villages of Kapolei, all other sub-areas will see significant growth in both residents and jobs. A small visitor population has been projected for Ocean Pointe, and a larger one for Ko Olina.

Commercial development is part of the largest projects slated for „Ewa. Ho„opili includes a planned commercial area next to Waipahu that may include medical offices, and a second commercial area on Kualaka„i Parkway. The University of Hawai„i at West O„ahu site includes lands for commercial and residential development. These will be expected to support further expansion of the University. A new shopping center has long been planned for Fort Weaver Road. A new Safeway store is to be built soon. Near Kapolei Shopping Center, a WalMart store is now under construction. At the western end of the DP area, Kapolei Commons is still being developed and additional commercial areas are planned for Makaīwa Hills.

Potential Impacts and Mitigation Measures

Following is a summary of the key findings presented in the socio-economic impact study (Appendix J).

9.4.3 Population Impacts

The project will provide jobs that may appeal to local residents. Office space in the project will help island firms to locate or expand activities in „Ewa. No direct resident population impact is anticipated, since few or no employees will need to move from outside O„ahu to fill positions at Ka Makana Ali'i.

When firms establish offices or stores in a new commercial area, many current employees must commute from other neighborhoods. Over time, the project's workforce will likely be drawn increasingly from „Ewa, since jobs will be convenient for local residents. Also, the regional center will be an amenity for residents, offering a wide range of goods and services.

Consequently, while the project is likely to have little or no impact on resident population, it may contribute to housing demand in the „Ewa region, and may make the region more attractive to some residents of other parts of the island.

The hotel component of the project introduces a new facility for non-residents. It will serve travelers on business or visiting family and friends in the region, and will be designed as less upscale than the major hotels in Waikiki and Ko „Olina. One market served by these hotels will be sport teams attending tournaments or similar events at the Waipi„o Peninsula Soccer Park or Central O„ahu Regional Park. Major tournaments bring teams from other islands in Hawai„i and from the U.S. Mainland. It is reasonable to expect that hotels near the major sports venues will benefit visiting teams and their supporters, especially ones from the Neighbor Islands.

Presumably, many of the hotel guests would come to the area in any event, staying in resort hotels or with family and friends. The hotels at Ka Makana Ali'i will make it easier for some travelers to come to „Ewa and for others to extend their stays. With some 500 rooms, the hotels can be expected to house, on average, some 700 persons.¹⁶ If approximately 20 percent of these were attracted to stay because of the new facilities, the impact would be an increase of the visitor population by 140 persons.¹⁷ This is small, both in comparison with the number of tourists on O„ahu (80,324 in 2009)¹⁸ and with the resident population of „Ewa (over 100,000 by 2010), and therefore does not amount to a significant impact

¹⁶ This assumes average occupancy of 70% of available rooms, and two persons per room.

¹⁷ The 20 percent figure is a high estimate of the likely new visitor impact. It is intended to include both new visits and potentially longer visitor stays.

¹⁸ Hawaii Tourism Authority, *2009 Annual Visitor Research Report*. Honolulu, HI. 2010.

9.4.4 Economic Impacts

Table 8 shows calculations of construction jobs and wages derived from estimated construction cost. Construction work on a project is not permanent, so these job impacts are counted in person-years, i.e., full-time jobs for a year.

Construction of Phase 1 would generate about 190 direct person-years of work; construction of Phase 2 would involve approximately 1,470 person-years. The total employment impact of Phase 1 construction is approximately 550 person-years, while the total impact of Phase 2 construction is nearly 4,280 person-years of work.

Direct construction jobs include on-site work and work in contractors' yards and offices. The actual number of workers at a job site varies from day to day, depending on the type of work to be done. (If a construction project involves 60 person-years of direct work over 18 months, the average number of direct jobs would be 40 per year. However, many workers could be present in some phases, and few at others.) Indirect jobs are located at suppliers' places of business, while induced jobs are found throughout the island, wherever workers spend their wages.

Table 8: Construction-Related Employment and Wages

	Phase 1	Phase 2	Combined
Construction Cost (Million \$s)	\$40.0	\$310.0	\$350.0
Construction-Related Jobs (Person-Years)			
Direct	189	1,468	1,657
Indirect and Induced	363	2,812	3,175
Total	552	4,280	4,832
Construction-Related Wages (Million \$s)			
Direct	\$13.0	\$100.6	\$113.5
Indirect and Induced	<u>\$16.3</u>	<u>\$126.1</u>	<u>\$142.3</u>
Total	\$29.2	\$226.6	\$255.9

NOTES: Construction costs estimates supplied by Hawaii DeBartolo LLC.

Direct construction jobs estimated from ratio of excise tax base for construction to annual job count for 2009. Direct construction jobs include on-site jobs and ones at yards and headquarters needed to support firms' work on construction. Indirect jobs are jobs in firms supplying materials and services to direct construction firms; induced jobs are jobs supported by spending of the workforce in direct and indirect jobs. The ratio of indirect and induced jobs to direct jobs is estimated from the State's Input-Output model, as recently updated to take into account 2007 Economic Census data. All construction employment estimates are in "person-years," i.e., full-time jobs for a year. The actual number of workers on a construction site will vary depending on the phase of work.

Wages are estimated from the average wages in construction (for direct jobs) and all covered employment (for indirect and induced jobs) in the City and County of Honolulu in 2009. Average wages have been increased to mid-2011 dollars in line with increases in the Consumer Price Index for Honolulu.

SOURCES: DBEDT, *State of Hawaii Data Book, 2009*; *Hawaii State 2007 Input-Output Model; Quarterly Statistical and Economic Report, Second Quarter 2011*; Hawaii State Department of Labor and Industrial Relations, *Employment and Payrolls in Hawaii, 2009*.

Once Ka Makana Ali`i opens, it will offer permanent jobs in retail, eating and drinking establishments, and hotels. Office space will house a range of businesses. Project management, maintenance and security work will be needed as well. Table 9 provides an estimate of the number of these permanent jobs on-site, once each phase of the project is completed, along with the indirect and induced jobs associated with them. More than 3,900 direct jobs will eventually be located at Ka Makana Ali`i.

Direct operations jobs continue year after year, and so do the indirect and induced jobs associated with them. The calculations show employment with build-out and occupancy of each phase of the project. These levels will be reached over several years' time.

Table 9: Operations-Related Employment

COMPONENT OF PROJECT	DIRECT JOBS (1)		Both Phases	INDIRECT AND INDUCED JOBS (2)	TOTAL
	Phase 1	Phase 2			
Retail	400	1,340	1,740	886	2,626
Eating and Drinking	200	640	840	361	1,201
Entertainment		50	50	28	78
Offices		870	870	901	1,771
Hotel		380	380	372	752
Project Administration, Maintenance	10	25	35	29	64
Total	610	3,305	3,915	2,578	6,493

NOTES:

- (1) Employment estimated on the basis of estimated gross square footage for various uses.

Retail	varies: from 2 to 3.5 per 1,000 sq. ft
Eating and Drinking	3.15 per 1,000 sq. ft
Entertainment	1.3 per 1,000 sq. ft
Offices	4 per 1,000 sq. ft
Hotel	0.75 per hotel room
 - (2) Indirect and induced jobs estimated from Hawaii State Input Output tables based on a model developed and refined by DBEDT, incorporating 2007 Economic Census data. For this analysis, office jobs were assigned to the "other professional services" industrial category.
- SOURCES: DBEDT, *Hawaii State Data Book, 2009*; *Hawaii State Input-Output Model, 2007*.

Operations-related wages can be estimated from average salaries in different industries. (See Table 10.) The amounts shown are for annual wages once each phase of the project is built out. Wages will likely increase in each phase as it is developed and spaces within the commercial center are filled.

Table 10: Operations-Related Wages

	Industry	Annual Wages Associated with Project (Million \$s)		
		Phase 1	Phase 2	Both Phases
Direct Jobs				
Retail	Retail	\$11.5	\$38.7	\$50.2
Eating and Drinking	Eating/Drinking	\$4.8	\$15.3	\$20.1
Entertainment	Arts and Entertainment		\$1.3	\$1.3
Offices	Average of Covered Employment		\$39.0	\$39.0
Hotel	Accommodation	\$0.0	\$9.1	\$9.1
Project Administration, Maintenance	Administrative, Support Services	<u>\$0.3</u>	<u>\$0.8</u>	<u>\$1.1</u>
Direct Jobs Total		\$16.6	\$104.1	\$120.7
Indirect and Induced Jobs	Average of Covered Employment			\$115.6

NOTES: Wages estimated from 2009 averages, adjusted to 2011 in line with the Consumer Price Index.

SOURCE: Department of Labor and Industrial Relations, *Employment and Payrolls in Hawaii, 2009*; DBEDT, *Quarterly Statistical and Economic Report, Second Quarter, 2011*.

The project will provide jobs that may appeal to local residents. Office space in the project will help island firms to locate or expand activities in ʻEwa. No direct resident population impact is anticipated, since few or no employees will need to move from outside Oʻahu to fill positions at Ka Makana Ali`i.

When firms establish offices or stores in a new commercial area, many current employees must commute from other neighborhoods. Over time, the project's workforce will likely be drawn increasingly from ʻEwa, since jobs will be convenient for local residents. Also, the regional center will be an amenity for residents, offering a wide range of goods and services.

Consequently, while the project is likely to have little or no impact on resident population, it may contribute to housing demand in the ʻEwa region, and may make the region more attractive to some residents of other parts of the island.

The hotel component of the project introduces a new facility for non-residents. It will serve travelers on business or visiting family and friends in the region, and will be designed as less upscale than the major hotels in Waikiki and Ko ʻOlina. One market served by these hotels will be sports-teams attending tournaments or similar events at the Waipiʻo Peninsula Soccer Park or Central Oʻahu Regional Park. Major tournaments bring teams from other islands in Hawaiʻi and from the U.S. Mainland. It is reasonable to expect that hotels near the major sports venues will benefit visiting teams and their supporters, especially ones from the Neighbor Islands.

Presumably, many of the hotel guests would come to the area in any event, staying in resort hotels or with family and friends. The hotels at Ka Makana Ali`i will make it easier for some travelers to come to ʻEwa and for others to extend their stays. With some 500 rooms, the hotels can be expected to house, on average, some 700 persons.¹⁹ If approximately 20 percent of these were attracted to stay because of the new facilities, the impact would be an increase of the visitor population by 140 persons.²⁰ This is small, both in comparison with the number of tourists on

¹⁹ This assumes average occupancy of 70% of available rooms, and two persons per room.

²⁰ The 20 percent figure is a high estimate of the likely new visitor impact. It is intended to include both new visits and potentially longer visitor stays.

O,ahu (80,324 in 2009)²¹ and with the resident population of ,Ewa (over 100,000 by 2010), and therefore does not amount to a significant impact.

9.4.5 Fiscal Impacts

Fiscal impacts consist of the revenues and costs for government agencies due to a project. Revenues can be estimated from information about construction and operations of the project, taken with current tax structures. Costs may arise if a project introduces new populations, new calls for service, or new demands for maintenance. Some of these can be quantified, e.g., the cost of supporting a new resident or visitor population, based on recent government spending. Others are not easily estimated, both because costs are not easily associated with a single project and because it is far more difficult to break out specific operations costs than capital improvement costs.

A commercial project responds to demand from the public. It does not generate spending so much as accommodate increased spending in the economy or provide a new location for spending that would go elsewhere if the project were not built. Hence the operations of stores and firms located at Ka Makana Ali'i are not counted here as generating new public revenues. Construction of the project clearly involves new spending, and hence new tax revenues. Similarly, some hotel guests at the project arguably would not come to O,ahu if the project were not built. Both revenues and costs associated with this visitor population growth are treated as project impacts.

Revenues: Public revenue streams associated with the project include transportation impact fees, construction-related taxes, property taxes, and taxes on visitor spending.

The ,Ewa Transportation Impact Fee program (Revised Ordinances of Honolulu Chapter 33A) was created to help develop roadways serving the region in a period of rapid growth. Developers contribute to the program at the time that building permits are obtained, in amounts determined by the type of new development (residential, retail, office, industrial, hotel or timeshare) and the number of units or area being built. Since it became law, road construction costs have increased sharply. Therefore, the current fee structure based on a model of 2020 regional transportation demand and input from developers is now under review and a new fee structure is being developed by the City and County,. Table 11 estimates transportation impact fees according to the current program. A future program to be proposed to the City Council is likely to include higher fees and an escalator clause (so fees rise along with construction costs). Consequently, the fee estimate in Table 11 is likely to be much less than the fees that would be charged in the future.

²¹ Hawaii Tourism Authority, *2009 Annual Visitor Research Report*. Honolulu, HI. 2010.

Table 11: Estimate of Transportation Impact Fees for the Project

Project Components			
Retail / Entertainment		Gross SF	927,572
Office		Gross SF	217,000
Hotel		Units	500
Transportation Impact Fee			
Retail	per	1,000 Gross SF	\$4,053
Office	per	1,000 Gross SF	\$3,403
Hotel	per	Unit	\$1,003
Fees for Ka Makana Ali'i			
Retail			\$3,759,449
Office			\$738,451
Hotel			\$501,500
Total			<u>\$4,999,400</u>

Construction spending will generate revenues from excise and income taxes as estimated below in Table 12. The City and County of Honolulu collects a share of the excise taxes levied on O,ahu to cover the cost of the rail transit system. It is assumed here that the County surcharge would still be in force throughout the time of project construction.

Once the site is improved, the City and County of Honolulu will begin to collect property taxes based on the value of the land for commercial use and on the value of the improvements to the land. Table 13 includes calculations of the property taxes levied by the City and County on the property, once each Phase is developed and opened. It shows that taxes on Phase 1 of the project would amount to about \$700,000 annually, while taxes on the fully developed project would approach seven million dollars annually. (As DHHL land not in productive use, the land is currently not taxed, so all property taxes on the project are a net impact.)

Lease payments to DHHL will constitute an additional revenue source for the State. These have been set for the first 25 years of the lease. The cumulative ground rent over the first 25 years will amount to \$141,846,800 – for an annual average ground rent of \$5,673,872. For the following 40 years, the rent will be renegotiated based on an independent appraisal process prior to the commencement of the 26th, 36th, 46th and 56th years.

Table 12: Construction-Related Revenues

	Phase 1	Phase 2	Combined
Construction cost (1)	\$40	\$310.0	\$350.0
Construction-related Wages (2)	\$29	\$226.6	\$255.9
Excise Taxes To State (3)			
<i>On Construction</i>	\$2	\$12.6	\$14.2
<i>On Spending by Workforce (4)</i>	\$1	\$5.7	\$6.5
Excise Taxes to City and County of Honolulu (3)			
<i>On Construction</i>	\$0	\$1.4	\$1.6
<i>On Spending by Workforce (4)</i>	\$0	\$0.6	\$0.7
Income Taxes			
<i>Corporate (5)</i>	\$0	\$0.5	\$0.6
<i>Personal (6)</i>	\$2	\$13.8	\$15.6
Total Revenues from Construction Spending			
<i>State of Hawaii</i>	\$4	\$32.6	\$36.8
<i>City and County of Honolulu</i>	\$0	\$2.0	\$2.3

NOTES:

- (1) Estimated by DeBartolo Hawaii LLC.
- (2) From Table 3-1 in Appendix J.
- (3) The State collects General Excise Tax (4%) and, on Oahu, an additional tax for transit (.5%). Act 247 of 2005 directs the State to retain 10% of the County surcharge for administration costs. Hence the State share of excise taxes is 4.05%, while the City and County share is 0.45%
- (4) Excise tax is calculated on disposable income, estimated as 62.6% of wages (from historical spending rates).
- (5) Corporate income tax estimated (from historical rates) as 0.17% of revenues (data from 2000).
- (6) Personal income tax estimated as 6.1% of taxable income (from 2005 data).

SOURCES: Hawaii State Department of Business, Economic Development and Tourism, 2005; Hawaii State Department of Taxation, 2001, 2008

Table 13: Annual Real Property Tax Revenues, Ka Makana Ali'i

	Phase 1	Phase 2	Combined
Land Area (acres)	19.78	47.45	67.23
Land Value			
Estimated value/sq. ft. \$22.00			
Value of Property (Million \$s)	\$19.0	\$45.5	\$64.4
Cost of Improvements (Million \$s) (1)	\$36.0	\$279.0	\$315.0
	\$55.0	\$324.5	\$379.4
Real Property Tax			
Commercial Rate (2) \$12.40			
Annual Tax (Million \$s)	\$0.7	\$4.0	\$4.7

NOTES:

- (1) Estimated as 90% of construction cost.
- (2) Rate per \$1,000 value of land or improvements. Currently, rates for hotel, commercial and industrial properties are all the same. Current rate is for the 2011-2012 tax year.

SOURCES: Honolulu Real Property data downloaded and analyzed by Belt Collins Hawaii from Hawaii Information Service, Inc. City and County of Honolulu, Department of Budget and Finance, Real Property Assessment Division.

New visitors will provide the State and County with tax revenues, while also generating costs for the provision of public services to an additional population. Table 14 estimates direct tax revenues once the hotels are built and occupied.

Table 14: Annual Tax Revenues on Direct Visitor Spending

Persons		
New visitor population (1)		
Rooms		500
Average persons/room		2
Average occupancy (of rooms)		70%
Average number of guests at hotels		700
Share of guests who would not come to O'ahu without the project	up to	<u>20%</u>
High estimate of new visitors		140
Revenues (2)		
	<u>2009 \$</u>	<u>2011 \$</u>
Average daily visitor spending per person, O'ahu, 2009	\$174.20	\$182.27
Average spending on lodging per person, 2009	\$65.50	\$68.53
Annual excise tax on visitor spending, new visitors		
State of Hawaii (4.05%)		\$377,209
City and County of Honolulu (0.45%)		\$41,912
Annual Transient Accommodations Tax, new visitors (2)		
State of Hawaii (55.2%)		\$296,511
City and County of Honolulu (19.8%)		\$58,581

NOTES:

- (1) Estimates of occupancy, guests per room and share of guests who are new visitors developed by Belt Collins Hawaii.
- (2) Average visitor spending for visitors on O,ahu, 2009, from Hawaii Tourism Authority, *Annual Visitor Research Report 2009*. TAT and GET levels, and State and County share of each are calculated on the basis of current practice.

SOURCES: DBEDT, *State of Hawaii Data Book 2009*; Hawaii Tourism Authority, *Annual Visitor Research Report 2009*

Costs: The cost of public services provided to new visitors can be estimated on the basis of average costs, i.e., total costs allocated to all users equally. Tables 15 and 16 show calculations for average costs per visitor (based on government spending in earlier years, adjusted to 2011

dollars). Table 17 applies those calculations to the new visitors associated with the project once it is fully occupied.

Table 15: Average Cost of Public Service Provision to Visitors, State of Hawai'i

	FY 2008 spending (\$1,000s)	Spending for residents or all?	Visitor share
General expenditure, by function:			
General government	537,541	All	\$387
Education	\$3,040,223	Residents	--
Public welfare	\$1,857,473	Residents	--
Health	\$863,914	All	\$622
Highways	\$406,795	All	\$293
Public safety	\$411,152	All	\$296
Natural resources	\$103,596	All	\$75
Culture and recreation	\$110,404	All	\$75
Urban redevelopment, housing	255,783	Residents	--
Economic development and assistance	\$149,075	Residents	--
Debt service	\$478,735	All	\$345
Other and unallocable	\$5,880	All	\$4
Total	\$8,220,571	Total Adjusted to 2011	\$2,098 \$2,206

NOTES: Average cost calculated for resident or de facto population, depending on function. Spending is for most recent year for which expenditures reported by function in Data Book.

State of Hawaii Population, mid-2008:

 Residents 1,287,481

 De Facto 1,387,888

Total resident share adjusted to 2011 in line with increase in Consumer Price Index (5.17%)

SOURCE: DBEDT, *State of Hawaii Data Book 2009; Quarterly Statistical and Economic Report, Second Quarter, 2011.*

Table 16: Average Cost of Public Service Provision to Visitors, City and County of Honolulu

	FY 2003 Spending (\$1,000s)	Spending for residents or all?	Visitor share
General expenditure, by function:			
General government:	\$115,067	All	\$124
Public safety:	\$246,109	All	\$266
Highways	\$13,831	All	\$15
Mass transit	\$150,523	Residents	--
Miscellaneous	\$101,655	All	\$110
Sanitation	\$265,331	All	\$287
Health and human resources	\$52,007	All	\$56
Culture and recreation	\$62,260	All	\$67
Urban redev. and housing	\$22,275	Residents	--
Utilities and other enterprises	\$22,557	All	\$24
Capital outlay	\$193,722	All	\$209
Debt service	\$120,332	All	\$130
Total	\$1,365,669	Total	\$1,289
		Adjusted to 2011	\$1,681

NOTES: Average cost calculated for resident or de facto population, depending on function. Spending is for most recent year for which expenditures reported by function in Data Book.

City and County of Honolulu Population, mid-2003:

Residents	888,026
De Facto	925,595

Total resident share adjusted to 2011 in line with increase in Consumer Price Index (30.46%)

SOURCE: DBEDT, *State of Hawaii Data Book 2009; Quarterly Statistical and Economic Report, Second Quarter, 2011.*

Additional costs associated with new demand for public services and maintenance of public utilities may well be generated because the project adds to the urban area on the island. These are not further calculated here.

Table 17: Annual Cost of Public Services for New Visitors Staying at the Project's Hotels

Costs		
Average annual cost of public services per visitor		
State of Hawaii		\$2,206
City and County of Honolulu		\$1,681
Average annual cost, new visitors at project		
New visitors at project	140	
State of Hawaii		\$308,853
City and County of Honolulu		\$235,386

NOTES: Average cost per visitor calculated in Tables 15 and 16. Annual cost based on new visitor share estimated in Table 14.

Net Fiscal Impact: The revenues and costs estimated above result in large net benefits for both the State of Hawaii and the City and County of Honolulu, as summarized in Tables 18 and 19. The major cash flow for the State general fund is the one-time tax revenue flow associated with construction. The City and County will also collect revenues during construction, through the transportation impact fee and excise taxes. For the City and County of Honolulu, new property tax revenues provide continuing annual revenue streams in the millions of dollars. DHHL will collect lease rent annually. For both, the State and the City and County, new costs will arise above all once the project has been largely built, and new visitors come to stay at the hotels. The net impacts shown here for annual cash flows cover the years after the project is fully built out, and visitor-related costs have stabilized.

The calculations shown here demonstrate that both the State of Hawaii and the City and County of Honolulu will gain significant benefits from the Ka Makana Ali'i project. Even though some additional costs may arise that have not been estimated here, it is clear that the net fiscal benefit associated with the project far outweighs likely costs.

Table 18: Net Fiscal Impact of the Project for the State of Hawai'i

Costs	
Average annual cost of public services for visitors attracted by the project	\$308,853
Revenues	
One-time revenues:	
Associated with construction	\$36,846,764
Continuing Revenues (Annual)	
DHHL lease payments	\$5,673,872
Income from visitor spending	\$540,883
Continuing Net Revenues (Revenues > Costs)	
Annual, after build out	\$5,905,902

Table 19: Net Fiscal Impact of the Project for the City and County of Honolulu

Costs	
Average annual cost of public services for visitors attracted by the project	\$235,386
Revenues	
One-time revenues:	
Associated with construction	\$2,296,054
Transportation Impact Fee	<u>\$4,999,400</u>
	<u>\$7,295,455</u>
Continuing Revenues (Annual)	
Revenues from Visitor Spending	\$100,493
Real Property Tax revenues	\$4,704,905
Continuing Net Revenues (Revenues > Costs)	
Annual, after build out	\$4,570,013

9.5 EXISTING INFRASTRUCTURE ENCUMBRANCES

Three utilities cross the project site in the northwest corner. Approximately 630 feet of an 8-foot wide by 5-foot high concrete box drain is within the project site, aligned parallel to Kapolei Parkway, which discharges into the Kapolei Lower Channel. This box drain is within a 20-foot wide drainage easement in favor of DHHL with a flowage easement in favor of the City and County of Honolulu (City).

A Board of Water Supply (BWS) 16-inch diameter non-potable water line routed beneath Kapolei Lower Channel enters the subject property approximately 110 feet south of the northwest property corner. The line angles north, parallels the western boundary and crosses into the Kapolei Parkway right-of-way about 50 feet east of the northwest property corner. A 20-foot wide easement for the portion of the water line within the project site is in the process of being granted to BWS.

A 24-inch diameter Navy water line paralleling the Kapolei Lower Channel crosses into the subject property about 15 feet south of the northwest property corner. The Navy water line extends about 15 feet into the subject property then turns north, crossing into the right-of-way and across Kapolei Parkway. The line is within an approximately 750-square foot rectangular easement.

Four easements encumber the property along its eastern boundary. Hawaiian Electric Company (HECO) has a 75-foot wide easement for overhead transmission lines, with the property boundary being the eastern limit of the easement. Within the 75-foot HECO easement are two adjacent BWS easements on the east side, and a City sewer line easement on the west side. Both BWS easements are for non-potable water lines. A 16-inch diameter line is within a 20-foot wide easement, and a 20-inch diameter line is installed in an adjacent 10-foot wide easement to the

east. The sewer easement is 20-feet wide, with the western edge of the easement aligned with the western limit of the HECO easement. The sewer easement accommodates a 42-inch diameter gravity sewer line and associated sanitary manholes.

9.6 INFRASTRUCTURE

Existing water, sewer, and drainage systems in the site area are presented in Figure 16.

9.6.1 Water Demand, Storage and Transmission

DHHL and UHWO have made regional potable water system improvements for **storage and transmission** within East Kapolei that have been dedicated to the BWS. A 12-inch diameter potable water main was installed by DHHL as part of the Kapolei Parkway extension fronting the site. This main is part of the BWS 215-foot service zone.

The BWS 20-inch diameter and 16-inch diameter non-potable water lines provide R1 recycled water from the Honouliuli Wastewater Treatment Plant to the West Loch Golf Course and the Villages of Kapolei, respectively.

Potential Impacts and Mitigation Measures

Based on the BWS Water System Standards for domestic consumption, the average daily water demand, including irrigation, for the property is 201,000 gallons per day (gpd). Based on the use of non-potable water for landscape irrigation and the criteria stated in the “Ewa Non-Potable Water Master Plan”, the total estimated potable water demand is approximately 144,700 gpd.

The fire flow requirement for a large shopping center is 4,000 gallons per minute (gpm) under the BWS Standards. BWS has confirmed their off-site infrastructure is capable of providing the requisite flow in accordance with their Standards. On-site fire protection will require a dedicated, 12-inch diameter, looped fire main. Two stub-out connections to the 12-inch diameter potable main in Kapolei Parkway were provided for the project as part of the Kapolei Parkway extension improvements. One of these connections will also provide domestic water service to the site.

A dual sourced landscape irrigation system is proposed for the project. Potable irrigation would be utilized for the plantings within 50 feet of buildings and other occupied spaces, accounting for approximately 20 percent of the total landscape area. The remaining 80 percent of planting beyond the 50-ft building perimeters would be irrigated with non-potable water. The total landscape irrigation demand is estimated at 78,000 gpd, comprised of 62,000 gpd of non-potable and 16,000 gpd of potable water. A 4-inch diameter stub-out connection to the 16-inch non-potable water main in Kapolei Parkway extension was provided for the project.

BWS indicated that both potable and non-potable water would be available for the project, with payment of the current water system facilities charges. **That determination will be revisited by the BWS during its review of the project's applications for building permits.** Due to the storage system improvements made by DHHL, the project will need to pay only the portion of the facilities charges associated with resource development and transmission. The project is expected to pay its prorata share of the cost of storage improvements to DHHL.



LEGEND

- Reclaimed Water Line
- Water Line
- Sewer Line
- Drain Line
- Catch Basin

FIGURE 16 UTILITY PLAN



9.6.2 Wastewater Disposal

The City sewerage system serves the project area. The 42-inch diameter sewer main located along the western side of the 75-foot wide HECO easement, conveys wastewater to the Kapolei Interceptor Sewer and thence to the Honouliuli Wastewater Treatment Plant for processing and reuse as R1 water. The interceptor sewer was designed and constructed to serve developments within the Kapolei region. Construction was financed by the State of Hawai*i*, the Estate of James Campbell, Ko Olina Intangibles LLC (Ko Olina Resort), and Finance Realty (Kapolei Knolls), with each contributor provided a wastewater flow allocation in the interceptor. Under the Kapolei Interceptor Sewer Allocation and Usage Agreement, HHFDC has a peak flow allocation of 11.346 million gallons per day (MGD), which needs to be further allocated to their originally owned lands in the region, including the subject property.

An 18-inch diameter stub out from the sewer main into the project site was provided as part of the original construction. The stub-out was installed to serve the sports complex originally planned for the site.

Potential Impacts and Mitigation Measures

The City has granted a conditional approval to connect to their sewer system in December 2008. Based on the proposed use of a 6-inch water meter, the project will require an allocation of 87 equivalent single-family dwelling units (ESDU). The project must obtain the requisite ESDU allocation and pay the applicable Wastewater System Facility Charges before a connection will be allowed. Re-filing of a sewer connection application for the project was done in July 2011.

Connection of the project to the 42-inch diameter sewer main will be through the existing 18-inch diameter stub-out located at the southeast corner of the property. The 18-inch diameter sewer has adequate capacity and is at an elevation to serve most, if not all, of the site, by gravity. A second connection to an existing manhole about 450 feet south of Kapolei Parkway is also proposed. If pumping of wastewater is necessary, it is likely that the on-site pumping station would be within the underground parking garage. Such a pumping station would be privately owned and privately maintained by the mixed use regional center tenants.

9.6.3 Electrical

HECO currently has 138 kilovolt (kV), 46 kV and 12.47 kV facilities supported on wood and/or metal poles along the eastern and southern boundaries of the project site. The 138 kV facilities serve as the main transmission lines for HECO's system, interconnecting the 3 HECO-owned generating plants, several private generating plants, including the City's H-Power facility, and switching stations situated throughout the island. From these switching stations, the 46 kV facilities are connected to substations that step the 46 kV sub-transmission voltage down to the 12.47 kV distribution voltage which, in turn, connect to the HECO-owned distribution transformers that provide electric service to the general public. The existing HECO substations located closest to the project site are the Kamokila Substation, located on Makakilo Drive near its intersection with Farrington Highway; the `Ewa Nui Substation, located along Farrington Highway near the future Kualaka`i Parkway intersection; and Ft. Weaver Substation, located along the existing OR&L right-of-way at the boundary between the `Ewa Villages Development and the `Ewa by Gentry Development. The recent Kapolei Parkway construction provided underground conduits crossing the roadway to the property for future electric service.

Potential Impacts and Mitigation Measures

Development of the project is anticipated to add an approximate 20-megawatt (MW) load to HECO's system. The Kapolei area is being heavily developed and HECO has coordinated with the major landowners to identify substation sites to serve the region. To provide electric service to Phase 2 of the project, HECO intends to develop a new substation, tentatively named Kapolei Substation, on a parcel of land owned by HECO (tax map key 9-1-015:118) and located opposite the Kapolei Lower Channel at the southwestern corner of the subject. To support the proposed substation development, HECO has submitted an application to the Public Utilities Commission for permission to expend funds in excess of \$2.5M dollars to build the Kapolei Substation. The Consumer Advocate's Office has indicated that it has no objections to the proposed substation development. It is understood that development of HECO's 120 MW bio-diesel generating plant as well as the relatively recent proliferation of localized alternate energy interconnections with HECO's distribution system will facilitate the accommodation of the anticipated project loads.

9.6.4 Telecommunications

Under an agreement with DHHL, Sandwich Isles Communications (SIC) is the sole provider of telecommunications service, i.e., telephone, cable television and broadband, to all developments on DHHL lands. Under this agreement, SIC uses U.S. Department of Agriculture Rural Utility Service loans to construct their underground infrastructure and cable plant.

SIC is currently providing service to two residential subdivisions in the Villages of Kapolei Development, and to Kanehili. SIC has also completed construction of a switching station on the site of DHHL's new office building located directly north of the project site.

Potential Impacts and Mitigation Measures

SIC will extend telecommunications service south across Kapolei Parkway to provide service to the project.

9.7 SITE DRAINAGE

The site is undeveloped with scattered scrub brush, but had been used for construction staging, stockpiling, and quarrying by DHHL. The original site topography was relatively flat, with a slight slope in the southeasterly direction. A quarry/borrow pit is located along the southeast end of the site, parallel to Roosevelt Avenue. The pit is approximately 1,200-foot long parallel to Roosevelt Avenue, by 550-foot wide, with elevations in the range of 54.0 to 12.0 above mean sea level (MSL). There is another excavation near the center of the site that was the beginning of foundation excavations for a sports stadium originally planned for the site. Numerous stockpiles are located between the borrow pit and stadium excavation, the largest of which totals about 150,000 cubic yards at the time of this report preparation (see Figure 17).

Runoff generated within the project site generally flows in a southerly direction into the existing pits and depressions or into the Kapolei Lower Channel. Runoff contained in the sumps percolates or evaporates. Runoff generated in the north/northeast portion of the site sheet flows off site into the adjacent property. A berm along the southeast boundary directs runoff to the southern-most corner of the property, which discharges to the Lower Channel through a 24-inch diameter culvert.

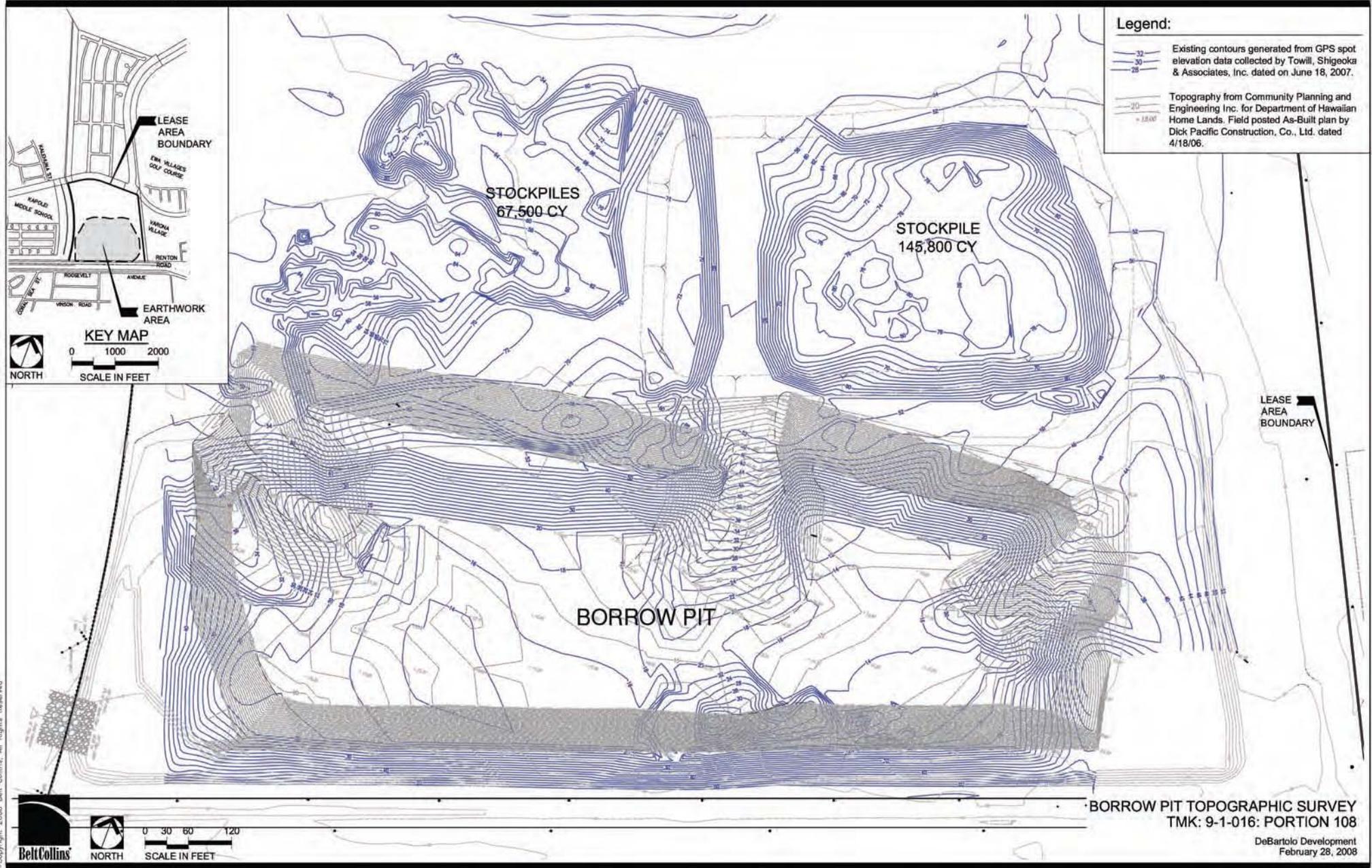


FIGURE 17 - STOCKPILE / BORROW PIT

The 100-year water surface elevation in the Lower Channel at Kapolei Parkway is 52.30 feet above MSL. This elevation is referenced in the *Drainage Master Plan for East Kapolei I Development*, November 2006 (Drainage Master Plan), prepared by Community Planning and Engineering, and conditionally accepted by the City in a letter dated November 20, 2006, and as established in the *Kapolei Parkway Bridge & 18" Relief Sewer – Kama'aha Avenue* project.

The conditionally accepted Drainage Master Plan concludes that the downstream drainage facilities, consisting of the Barbers Point Naval Air Station Coral Pit and the Kapolei Lower Channel with dry wells, have adequate capacity to accommodate the net increase in storm water runoff from the developed commercial property.

Potential Impacts and Mitigation Measures

In accordance with the Drainage Master Plan, the project will drain to the Kapolei Lower Channel. Based on the on-site drainage master plan prepared for the project and accepted by the City, multiple piped drain systems generally aligned in the east-west direction are proposed to collect surface runoff and discharge collected flows directly to the Kapolei Lower Channel. The proposed discharge pipes range in size from 72-inches to 24-inches in diameter constructed with outlet headwalls. The estimated total discharge from the project site under the 10-year 1-hour rainfall event is about 280 cubic feet per second.

The proposed project drainage system will have no adverse impacts to existing neighboring properties. Hydraulic analysis of the planned drain system indicates the anticipated runoff generated from the project can be discharged to the Lower Channel in compliance with the City Storm Drainage Standards.

Off site runoff is planned to be either diverted away from the project site or routed through the on-site drainage system. The proposed Kapolei Parkway Extension along the *mauka* boundary will intercept and convey runoff to the Kapolei Lower Channel.

The Makakilo Gulch/Kaloi Gulch water shed boundary will be adjusted to include the Kualaka'i/Kapolei Parkway intersection and proposed extension. The Drainage Master Plan for the project computed a net volume increase of 17.49 acre-feet (ac-ft) in storm water runoff. The water shed boundary adjustment under the project will add 8 acres to the Makakilo Gulch water shed resulting in a net volume increase of 18.33 ac-ft.

The regional downstream drainage facilities have adequate capacity to accommodate storm water runoff from the project as proposed. The project is consistent with the land use identified in the East Kapolei I Drainage Master Plan. Computations show the total volume of runoff to the Coral Pit is 1,245.27 acre-feet, well under the 1,675 ac-ft/day capacity identified in Appendix B of the East Kapolei I Drainage Master Plan.

10 ALTERNATIVES TO THE PROPOSED ACTION

Two alternatives to the Proposed Action were considered during the preparation of this environmental assessment: No Action; and development of the Regional Sports Complex originally proposed for the subject property. A residential alternative was not considered because the property has been designated for commercial use by the DHHL pursuant to its **Kapolei Regional Plan**. Residential development would be inconsistent with the agency's long range planning for the region.

Implementation of the No Action Alternative would result in the property being left vacant and abandoned. This is inconsistent with the DHHL Master Plan for East Kapolei that identifies the subject property as a significant source of future revenue generation for the agency's beneficiaries. In addition, abandonment of the subject property would result in it becoming a nuisance for surrounding development. The vacant property with its dirt stockpiles and excavated pits would likely generate fugitive dust during the summer and fall months, much to the detriment of neighboring properties. The vacant property would continue to serve as a habitat for mammalian pests and it could become an attractive target for nefarious human activities.

Implementation of the previously proposed Regional Sports Complex is deemed to be impractical given the decision of the UH to relocate its West O`ahu campus from the property mauka of the H-1 Freeway to its current site along Kualaka`i Parkway mauka of the subject property. Sports facilities to serve the UH campus would be best located on the UH property. Development of the subject property with sports facilities would be unnecessary, if not a redundant expenditure of limited State fiscal resources.

In addition to the two land use alternatives considered, alternative designs and site plans for the property have been prepared since the inception of the current project five years ago. The Proposed Action represents the culmination of this design process. Variations in the location of specific buildings, and the design and character of the proposed development have been considered. The Proposed Action represents what is considered to be the most feasible development given the market demand, economic conditions, and the physical requirements of prospective tenants.

11 SECONDARY AND CUMULATIVE IMPACTS

Secondary and cumulative impacts resulting from the Ka Makana Ali,i project include:

- Construction jobs and associated economic benefits throughout the island economy.
- Development of a neighborhood commercial center, that will serve nearby subdivisions along Kapolei Parkway and beyond, provides a convenient alternative to larger centers at some distance, thereby helping to reduce traffic impacts and reverse traffic patterns.
- Location of a wide range of commercial jobs in „Ewa, increasing residents' opportunities to live and work in the same region.
- Introduction of a new visitor amenity; hotels catering to local residents and their guests, which will help to reduce visitor travel between Kapolei and existing resort areas.
- Synergy with new community facilities along Kualaka,i Parkway – the University of Hawai,i West O,ahu campus, the Kroc Center, and the terminus of the new rail transit line – that will help to increase demand for each of these facilities.
- A cumulative impact on the region: development of facilities for residents along the central corridor will help to bring together residents from the separate communities of eastern and western „Ewa.
- Significant contributions to revenues for the State of Hawaii and the City and County of Honolulu.
- Lease rent paid to the Department of Hawaiian Homelands that will help that agency serve beneficiaries and add to the stock of housing for Native Hawaiians.

12 UNRESOLVED ISSUES

The traffic study conducted for the Proposed Action demonstrates that the proposed first phase of development only requires vehicular access points on Kapolei Parkway and Roosevelt Avenue. The second phase of development will require an additional two-lane access road (one lane in each direction) extending south from Kapolei Parkway to an entrance point about midway down the property's eastern property boundary. The Proposed Action does not generate enough traffic to warrant the extension of Kualaka`i Parkway from Kapolei Parkway south to Roosevelt Avenue. Construction of the extension is a matter of regional demand for improved access from Roosevelt Avenue to the H-1 Freeway rather than local demand for access to Ka Makana Ali`i. DeBartolo is committed to bearing its fair share of responsibility and will do so by constructing the two lanes needed to extend Kualaka`i Parkway to the project's eastern property entrance. **The design of the full Kualaka`i Parkway extension from Roosevelt Avenue to Kapolei Parkway and the timing of its construction are presently unresolved.** The issue is complicated by a number of factors that are beyond the control of Hawaii DeBartolo LLC, including:

- The ultimate design of the extension and its phasing depend upon decisions by the State DOT. Will it be a two-lane roadway, or will it require four, or even six, lanes? The extension's design must respond to projected demand generated by future development of projects within Kalaeloa and Ocean Pointe which will benefit from a direct connect to H-1.
- The likely alignment of a future extension would impact not only the subject property, but also the City-owned property abutting it to the east side. However, the City wishes to trade that property to the DHHL in return for a property in Waipahu owned by DHHL that the City proposes to use as a base yard for the proposed rail transit system. Although several years in the offing, the trade has not yet taken place. **Whoever becomes the ultimate owner of the property may wish to participate in discussions concerning the design and phasing of the Kualaka`i Parkway extension.** Design and phasing of the roadway cannot proceed until the property ownership issue is resolved.
- **The matter of who maintains the Kualaka`i Parkway extension is also unresolved.** Will it be owned by the DHHL or the DOT, or will it be ultimately transferred to the City?
- The Kualaka`i Parkway Extension project is not presently included on the list of projects that are formally recognized by the City's Ewa Impact Fee Ordinance. This means that under present policy, whoever builds a portion or all of the extension will receive no credit for its investment under the ordinance. Thus, there is no incentive to construct it among the parties who would most benefit from it. The Ewa Impact Fee Ordinance is currently under review and its official project list will, as a result, eventually be updated. However, whether the extension project is included is unknown at this time. Hawaii DeBartolo LLC, as the planned lessee of the DHHL property, does not have standing, and therefore has not been invited to participate in the Ewa Impact Fee Ordinance discussions. It will be up to the parties at the table (the DHHL, the HCDA representing Kalaeloa, Ocean Pointe, and the DOT, among others) to make a decision about the future of the extension.

Over the past five years, Hawaii DeBartolo LLC has been waiting for these issues to be resolved. Rather than continue to wait, Hawaii DeBartolo LLC now wishes to proceed with its

development and will construct that portion of the extension (two lanes to its entrance) that its traffic study demonstrates is its responsibility. The determination does not in any way preclude or constrain decision making by other parties on the above issues.

Other unresolved issues include:

- Hawaii DeBartolo LLC is presently initiating discussions with the Hawaiian Rail Society concerning a design solution for driveways to cross the OR&L tracks at the property's southern boundary. Similar track crossings have been accommodated at Fort Barrette Road at Kalaeloa and at Ko Olina Resort. It is believed that the OR&L operations will compliment the mixed use regional center by increasing the public profile and awareness of an attraction for local residents and visitors that has already existed for twenty years. The final design solution has not yet been determined but will need to be resolved before the opening of Phase 1 of Ka Makana Ali`i.
- The DPP is presently updating the 1997 `Ewa Development Plan. A Public Review Draft of its proposed update was published several years ago and included reference to a community commercial center at the intersection of the North-South Road and Kapolei Parkway. Since receiving public comments on its Public Review Draft, the department has been making additional revisions to the document. A Revised Draft of the Ewa DP was transmitted by DPP to the Honolulu Planning Commission in October 2011. The Planning Commission will hold public hearings and then forward its recommendations to the Honolulu City Council. It is presently not known if the Revised DP will ultimately have a substantive effect upon planning for Ka Makana Ali`i. However, as discussed above, because the project will be constructed on lands owned by the DHHL, it is exempt from having to comply with City land use regulations. Although it would appear that the revised `Ewa Development Plan may not have any substantive impact on the proposed project due to this exemption, it remains to be seen how the City wishes to address the proposed development for the purposes of mapping and impact analysis in the context of its own long-range planning.
- The City's future plans for the Honolulu rapid transit project include an eventual extension of the rail line south from the Kroc Center station, past the Ka Makana Ali`i project, to Kapolei. However, that extension is presently targeted for construction at some time after 2019 when the third phase of the rail system extending from the Kroc Center to Ala Moana Center is completed. According to the present Ka Makana Ali`i development schedule, construction of the regional mixed use center will have been completed several years before any plans to extend the rail line to Kapolei are implemented. The specific location and timing of a future extension past the regional mixed use center property is unknown.

13 DETERMINATION, FINDINGS, AND SUPPORTING REASONS

HAR, §11-200-12, establishes thirteen significance criteria that agencies shall use in evaluating an action's impacts. An applicant or an agency must determine whether an action may have a significant impact on the environment, including all phases of the project, its expected consequences both primary and secondary, its cumulative impact with other projects and its short- and long-term effects. The HAR establish "significance criteria" to determine whether significant environmental impacts will occur as a result of the proposed action. An action shall

be deemed to have a significant impact on the environment if it meets any of the following criteria:

Pursuant to subparagraph 12, ...an action shall be determined to have a significant effect on the environment if it:

- (1) *Involves an irrevocable commitment to loss or destruction of any natural or cultural resource;*

Discussion: The subject property contains no unique, significant, or critical natural habitat. In fact, it is generally characterized as an extensively disturbed area. Its redevelopment will not result in the loss or destruction of any natural or cultural resource.

The SHPD has previously approved an archaeological inventory survey and the archaeological mitigation plan for the project area and all necessary data recovery work has been completed. No ongoing cultural practices were identified relative to the project site and the reservoir site.

- (2) *Curtails the range of beneficial uses of the environment;*

Discussion: The range of beneficial uses of the property's environment is guided by the County's General Plan, which identifies the general region as the site of the City's Secondary Urban Center. The property was reclassified from the State Agricultural land use district to the State Urban land use district in 1999 in anticipation of its development. The 1997 'Ewa Development Plan identified the subject property for residential development. However, the Public Review Draft of the Revised Development Plan identifies the subject property for regional commercial development.

Thus, the proposed project is consistent with the planned beneficial use of the area. The proposed project increases the range of beneficial uses for the environment by the region with a significant source of new employment opportunities and increased connectivity with surrounding roads, infrastructure, services, and public facilities.

- (3) *Conflicts with the state's long-term environmental policies or goals and guidelines as expressed in chapter 344, HRS, and any revisions thereof and amendments thereto, court decisions, or executive orders;*

Discussion: The stated purpose of Chapter 344 is to establish a state policy that will encourage productive and enjoyable harmony between people and their environment, promote efforts that will prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of humanity, and enrich the understanding of the ecological systems and natural resources important to the people of Hawaii,ⁱ The proposed project complies with the policies, goals and guidelines of Chapter 344. The project proposes to create a master planned mixed-use commercial development that will be integrated with regional transportation network and infrastructure systems, and improve the quality of life for residents by providing new employment opportunities within the greater 'Ewa region. This development represents a significant contribution to the potential to reverse outward bound traffic during peak morning hours and inbound traffic during peak afternoon hours, both of which will be beneficial to the well-being of area residents.

(4) *Substantially affects the economic or social welfare of the community or State;*

Discussion: Development of the property for commercial mixed use purposes is consistent with the City and County's desire to focus growth in the `Ewa region. The project will have positive impacts on the social welfare of the `Ewa community by providing new employment opportunities for area residents. The proposed project will also have positive impacts on the economic welfare of the community and the State through the creation of a diverse range of new land uses, including business-oriented hotels, to serve the growing `Ewa region.

(5) *Substantially affects public health;*

Discussion: The proposed project is anticipated to have negligible impact on public health. Infrastructure systems necessary for the project have already been constructed and comply with applicable State, DOH, and County standards and regulations.

(6) *Involves substantial secondary impacts such as population changes or effects on public facilities;*

Discussion: The proposed project does not include a residential component. Located at the center of the rapidly growing East Kapolei community, the proposed project will have a direct beneficial impact upon surrounding residents as the source of new employment opportunities. No significant adverse secondary or cumulative effects are anticipated.

(7) *Involves a substantial degradation of environmental quality;*

Discussion: The proposed project will involve extensive ground disturbance, including clearing, grubbing, and grading of the property. The site development activities are necessary for the development. Grading and construction activities will be required to comply with applicable regulations. However, no substantial degradation of environmental quality is anticipated because all construction and development activities will be performed in conformance with existing regulations and environmental controls.

(8) *Is individually limited but cumulatively has considerable effect upon the environment or involves a commitment for larger actions;*

Discussion: The proposed project involves no commitment for a larger or long-term action. With a construction-phasing schedule **estimated to be approximately 4-6 years**, its rapid development will benefit the community almost immediately. The proposed project will have a beneficial impact upon the economy by providing a source of new employment and new tax revenues.

(9) *Substantially affects a rare, threatened, or endangered species, or its habitat;*

Discussion: No rare, threatened, or endangered species or related habitats have been identified on the subject property.

(10) *Detrimentially affects air or water quality or ambient noise levels;*

The proposed project will generate increased motor vehicle use in the area, which may affect air quality but not significantly. Ambient noise levels will be impacted in the proposed project area during construction, but will be short term in nature. As there are no significant ground water

resources in the immediate area, and the project is situated approximately two miles from the coastline, no significant adverse impacts upon water quality are anticipated.

(11) *Affects or is likely to suffer damage by being located in an environmentally sensitive area such as a flood plain, tsunami zone, beach, erosion-prone area, geologically hazardous land, estuary, fresh water, or coastal waters;*

Discussion: The subject property is situated within a Zone 2a of the seismic volcanic hazard zone (on a scale of 1 to 4 with 4 representing the most hazardous and 1 being the least hazardous), which covers all of O'ahu. Proposed structures in the development will conform to all relevant building code requirements, including applicable seismic design standards. The property is not located within a flood plain and is too far from the shoreline to be affected by storm wave or tsunami inundation. No sensitive environmental resources are associated with the subject property.

(12) *Substantially affects scenic vistas and view planes identified in county or state plans or studies;*

Discussion: The subject property is not identified as a scenic vista or part of a significant view plane on county or the state plans or studies.

(13) *Requires substantial energy consumption.*

Discussion: Energy consumption will be increased in relation to the proposed commercial development. The proposed project's design will include features to conserve energy and water usage.

For the above stated reason, a determination of No Significant Impact is anticipated for the Proposed Action.

14 CONSULTED PARTIES AND PARTICIPANTS IN THE EA PROCESS

Prior to publication of the Draft EA, representatives of DeBartolo have consulted with the following agencies and organizations in the preparation of this environmental assessment:

State:

- Department of Hawaiian Home Lands
- Office of the Governor
- State Department of Transportation
- Hawaii Community Development Authority

City and County of Honolulu:

- Department of Planning and Permitting (including planning and site development divisions)
- Board of Water Supply
- Department of Transportation Services

Makakilo, Kapolei & Honokai Hale Neighborhood Board

Ewa Neighborhood Board

Private Organizations:

Hawaiian Railway Society

Kapolei Rotary Club

West Oahu Economic Development Association

Leeward Oahu Transportation Management Association

The Kroc Center

DHHL Residential Communities

DHHL Residents Association

On September 8, 2011, the Office of Environmental Quality Control published a notification of the availability of the Draft EA in its *Environmental Notice*. A copy of the Draft EA was sent to the following parties for review and comment. Underlining denotes those parties who responded with a comment letter. The comment letters together with responses prepared by the EA author on behalf of the applicant are presented in Section 16 below.

Federal Government

U.S. Fish and Wildlife Service

State Government

Department of Agriculture

Department of Accounting and General Services

Department of Business, Economic Development and Tourism

DBEDT – Energy Division

DBEDT – Office of Planning

Department of Defense

Department of Education

DOE – State Library

DOE – Kapolei Public Library

DOE – Ewa Beach Public and School Library

Department of Hawaiian Home Lands

Department of Health

DOH – Office of Environmental Quality Control

Department of Human Services

Department of Labor and Industrial Relations

Department of Land and Natural Resources – Land Division

DLNR – Engineering Division

DLNR – Historic Preservation Division

Department of Transportation

Hawaii Housing, Finance and Development Corporation

Office of Hawaiian Affairs

University of Hawaii Environmental Center

City and County of Honolulu

Board of Water Supply

Department of Community Services

Department of Design and Construction

Department of Environmental Services

Department of Facility Maintenance

Department of Planning and Permitting

Department of Parks and Recreation

Department of Transportation Services

Ewa Neighborhood Board #23

Kapolei-Makakilo-Honokai Hale Neighborhood Board #34

Elected Officials

Governor Neil Abercrombie

State Senator Will Espero

State Senator Mike Gabbard

State Representative Karen Awana

State Representative Rida Cabanilla

State Representative Kymberly Pine

Councilman Tom Berg

Citizen Groups, Individuals and Interested Parties

Ewa by Gentry Community Association

Ewa Villages Homeowners Association

Hawaiian Railway Society

Hoakalei Community Association

Haseko

Honolulu Star-Advertiser

Ocean Pointe Community Association

Villages of Kapolei

15 REFERENCES

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16 COMMENTS AND RESPONSES

Following are the nineteen comments received from consulted parties together with the applicant's written responses in order of the date the comment letters were received.

NEIL ABERCROMBIE
GOVERNOR



DWIGHT TAKAMINE
DIRECTOR

AUDREY HIDANO
DEPUTY DIRECTOR

STATE OF HAWAII
DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS
830 PUNCHBOWL STREET, ROOM 321
HONOLULU, HAWAII 96813
www.hawaii.gov/abor
Phone: (808) 586-8844 Fax: (808) 586-0099

September 8, 2011

Ms. Linda Chinn, Administrator
Land Management Division
Department of Hawaiian Home Lands
P.O. Box 1879
Honolulu, HI 96805

Dear Ms. Chinn:

This is in response to your request for comments dated September 6, 2011 on the Draft Environmental Assessment for the Ka Makana Ali'i Conceptual Master Plan project located in Ewa on the island of Oahu. The Department of Labor and Industrial Relations has no comments, and we foresee no impact on our existing or proposed programs.

Should you have any questions, please call me at 586-8844.

Sincerely,

Handwritten signature of Audrey Hidano in blue ink.

AUDREY HIDANO
Deputy Director

C: Afapaki Nahale-a, Chairman, DHHL
Lee Sichter

LEE SICHTER LLC

45024 MALULANI STREET #1, KANEOHE, HAWAII 96744
PH. (808) 382-3836; FAX. (808) 234-0872; WEB. WWW.LEESICHTER.COM

November 28, 2011

Ms. Audrey Hidano
Deputy Director
Department of Labor and Industrial Relations
State of Hawaii
830 Punchbowl Street, Room 321
Honolulu, Hawaii 96813

Dear Ms. Hidano:

**Response to Comment
Ka Makana Ali'i Conceptual Master Plan
Draft Environmental Assessment**

I am writing on behalf of the Department of Hawaiian Home Lands in response to your comment letter to the Department of Hawaiian Home Lands dated September 8, 2011 regarding the above project. Thank you for participating in the public and agency review process for the Ka Makana Ali'i project. We acknowledge your conclusion that the project will have no foreseeable impacts on existing or proposed DLIR programs.

Very truly yours,

Handwritten signature of Lee Sichter in blue ink.

Lee Sichter

cc: L. Chinn
E. Nellis

DEPARTMENT OF PARKS & RECREATION
CITY AND COUNTY OF HONOLULU

1000 Uluohia Street, Suite 309, Kapolei, Hawaii 96707
Phone: (808) 768-3003 • Fax: (808) 768-3053
Website: www.honolulu.gov

PETER B. CARLISLE
MAYOR



September 15, 2011

GARY B. CABATO
DIRECTOR

ALBERT TUONO
DEPUTY DIRECTOR

LEE SICHTER LLC

45024 MALULANI STREET #1, KANEOHE, HAWAII 96744
PH. (808) 382-3836; FAX. (808) 234-0872; WEB. WWW.LEESICHTER.COM

November 28, 2011

Mr. Gary Cabota, Director
Department of Parks & Recreation
City and County of Honolulu
1000 Uluohia Street, Suite 309
Kapolei, Hawaii 96707

Dear Mr. Cabota:

**Response to Comment
Ka Makana Ali'i Conceptual Master Plan
Draft Environmental Assessment**

I am writing on behalf of the Department of Hawaiian Home Lands in response to your comment letter to the Department of Hawaiian Home Lands dated September 15, 2011 regarding the above project. Thank you for participating in the public and agency review process for the Ka Makana Ali'i project. We acknowledge your determination that the proposed project will not impact any of your department's programs or facilities. As requested, we have removed your department from the project's list of consulted parties for the remainder of the environmental review process.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Lee Sichter".

Lee Sichter

cc: L. Chinn
E. Nellis

Ms. Linda Chinn, Administrator
Land Management Division
Department of Hawaiian Home Lands
P.O. Box 1879
Honolulu, Hawaii 96805

Dear Ms. Chinn:

Subject: Draft Environmental Assessment
Ka Makana Ali'i Conceptual Master Plan

Thank you for the opportunity to review and comment on the Draft Environmental Assessment for the Ka Makana Ali'i Conceptual Master Plan.

The Department of Parks and Recreation has no comment, as the proposed project will not impact any program or facility of the department. You may remove us as a consulted party to the balance of the EIS process.

Should you have any questions, please contact Mr. John Reid, Planner, at 768-3017.

Sincerely,

A handwritten signature in black ink, appearing to read "Gary B. Cabato".
GARY B. CABATO
Director

GBC:jr
(432841)

cc: Mr. Lee Sichter, Lee Sichter LLC
Mr. Alapaki Nahale-a, Chairman, Department of Hawaiian Home Lands

BOARD OF WATER SUPPLY

CITY AND COUNTY OF HONOLULU
830 SOUTH BERETANIA STREET
HONOLULU, HI 96843



September 20, 2011

PETER B. CARLISLE, Mayor

RANDALL Y. S. CHUNG, Chairman
DENISE M. C. DE COSTA, Vice Chair
THERESA C. HARJOTO
DUANE R. MIYASHIRO
ADAM C. WONG

WESTLEY K.C. CHUN, Ex-Officio
GLENN M. OKIMOTO, Ex-Officio

DEAN A. NAKANO
Acting Manager

Ms. Linda Chinn, Administrator
Land Management Division
Department of Hawaiian Home Lands
State of Hawaii
P.O. Box 1879
Honolulu, Hawaii 96805

Dear Ms. Chinn:

Subject: Letter Dated September 6, 2011 Requesting Comments on the Draft
Environmental Assessment for Ka Makana Ali'i Conceptual Master Plan,
TMK: 9-1-16: 142

Thank you for the opportunity to comment on the proposed project.

The existing water system is adequate to accommodate the proposed development. However, please be advised that this information is based upon current data and, therefore, the Board of Water Supply (BWS) reserves the right to change any position or information stated herein up until the final approval of your building permit application. The final decision on the availability of water will be confirmed when the building permit application is submitted for approval.

When water is made available, the applicant will be required to pay our Water System Facilities Charges for resource development and transmission.

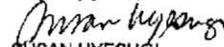
The on-site fire protection requirements should be coordinated with the Fire Prevention Bureau of the Honolulu Fire Department.

The non-potable water requirements and pressures should be coordinated with our Water Resources Division at 748-5900.

The proposed project is subject to BWS Cross-Connection Control and Backflow Prevention requirements prior to the issuance of the Building Permit Applications.

If you have any questions, please contact Robert Chun at 748-5443.

Very truly yours,


SUSAN UYESUGI
Program Administrator
Customer Care Division

cc: Mr. Alapaki Nahale-a, Department of Hawaiian Home Lands
Mr. Lee Sichter, Lee Sichter, LLC

LEE SICHTER LLC

45024 MALULANI STREET #1, KANELOE, HAWAII 96744
PH. (808) 382-3836; FAX. (808) 234-0872; WEB. WWW.LEESICHTER.COM

November 28, 2011

Ms. Susan Uyesugi
Program Administrator
Customer Care Division
Board of Water Supply
City and County of Honolulu
630 South Beretania Street
Honolulu, Hawaii 96843

Dear Ms. Uyesugi:

**Response to Comment
Ka Makana Ali'i Conceptual Master Plan
Draft Environmental Assessment**

I am writing on behalf of the Department of Hawaiian Home Lands in response to your comment letter to the Department of Hawaiian Home Lands dated September 20, 2011 regarding the above project. Thank you for participating in the public and agency review process for the Ka Makana Ali'i project. Following are responses to your comments in the order they were presented in your letter.

We acknowledge that the existing water system is adequate to accommodate the proposed project based on current data and that a final decision regarding the availability of water must be confirmed at the time the project's building permit application is submitted for approval.

We acknowledge that the applicant will be required to pay the requisite Water System Facilities Charges.

We acknowledge that on-site fire protection requirements should be coordinated with the Honolulu Fire Department's Fire Prevention Bureau.

We acknowledge that non-potable water requirements and pressures should be coordinated with the Water Resources Division.

Finally, we acknowledge that the Ka Makana Ali'i project is subject to BWS Cross-Connection Control and Backflow Prevention requirements prior to the issuance of building permits.

NON AFFRANCARE
CONTINUIRE



PATRICIA McMANAMAN
Director
PAIKAU BRANDT
779.374.0400-102

Very truly yours,

Lee Sichter

STATE OF HAWAII
DEPARTMENT OF HUMAN SERVICES
Recruitment & Support Services Division
500 Mililani Street, Suite 608
Honolulu, Hawaii 96813

September 27, 2011

Reference: 11-0329

cc: L. Chin
E. Nellis

Mr. Lee Sichter
Lee Sichter, LLC
45-024 Malulani Street, #1
Kaneohe, Hawaii 96744

Dear Mr. Sichter:

Thank you for your letter dated September 6, 2011 requesting a review of the Draft Environmental Assessment (DEA) for the proposed project: Ka Makana Alii Conceptual Master Plan on the island of Oahu, Ewa District, TMK. 9-1-0-8-142. The Director of the Department of Human Services (DHS) has referred your letter to me for a response.

After a review of the DEA, we do not have any comments or recommendations to approve the project. Since this is a commercial project and not anticipated to generate a significant impact in terms of residential population growth and in turn will not generate an increase in school population, we do not foresee any impact on the need for child care services for children under kindergarten-age in the community at this time.

If you have any questions or need further information, please contact Ms. Kathy Oonikubo, Child Care Program Specialist, at (808) 586-7068.

Sincerely,

Julie Morha
Acting Division Administrator

cc: Patricia McManaman, Director
Linda Chin, DHHL Land Management Division Administrator
Alapaki Nahaie-a, DHHL Chairman

LEE SICHTER LLC

46024 MALULANI STREET #1, KANEHOHE, HAWAII 96744
PH. (808) 382-3836; FAX. (808) 234-0872; WEB. WWW.LEESICHTER.COM

November 28, 2011

Ms. Julie Morita
Acting Division Administrator
Benefit, Employment & Support Services Division
Department of Human Services
State of Hawaii
820 Miiilani Street, Suite 606
Honolulu, Hawaii 96813

Dear Ms. Morita:

**Response to Comment
Ka Makana Ali'i Conceptual Master Plan
Draft Environmental Assessment**

I am writing on behalf of the Department of Hawaiian Home Lands in response to your comment letter dated September 22, 2011 regarding the above project. Thank you for participating in the public and agency review process for the Ka Makana Ali'i project.

We acknowledge your determination that the proposed project will not generate a significant impact in terms of residential population growth and, in turn, an increase in school population, including child care services for under kindergarten-age children in the community.

Very truly yours,



Lee Sichter

cc: L. Chinn
E. Nellis



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STATE OF HAWAII
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES
P O BOX 211 2000 ALI'IPAHIA HONOLULU HI

5/22/11

SEP 23 2011

TO: Ms. Linda Chinn, Administrator
Land Management Division
Department of Hawaiian Home Lands

FROM: Bruce A. Coppa
State Comptroller



SUBJECT: Ka Makana Ali'i Conceptual Master Plan

Thank you for the opportunity to provide comments for the subject project. This project does not impact any of the Department of Accounting and General Services' projects or existing facilities in the general area, and we have no comments to offer at this time.

If you have any questions, please call me at 586-0400 or have your staff call Mr. Alva Nakamura of the Public Works Division at 586-0488.

cc: The Honorable Alanaki Nahale a, DHHI,
Lee Sichter LLC

LEE SICHTER LLC

45024 MALULANI STREET #1, KANEHOE, HAWAII 96744
PH. (808) 382-3836; FAX. (808) 234-0872; WEB. WWW.LEESICHTER.COM

November 28, 2011

Mr. Bruce A. Coppa
State Comptroller
Department of Accounting and General Services
State of Hawaii
P.O. Box 119
Honolulu, Hawaii 96810-0119

Dear Mr. Coppa:

**Response to Comment
Ka Makana Ali'i Conceptual Master Plan
Draft Environmental Assessment**

I am writing on behalf of the Department of Hawaiian Home Lands in response to your comment memorandum dated September 23, 2011 regarding the above project. Thank you for participating in the public and agency review process for the Ka Makana Ali'i project.

We acknowledge your determination that the proposed project will not impact any of your department's projects or existing facilities in the general area.

Very truly yours,



Lee Sichter

cc: L. Chin
E. Nellis

WEL ASSOCIATES
CORPORATION



KATHRYN S. MATAYOSHI
SUPERINTENDENT

STATE OF HAWAII
DEPARTMENT OF EDUCATION
P.O. BOX 2360
HONOLULU, HAWAII 96801

OFFICE OF THE SUPERINTENDENT

September 23, 2011

Mr. Lee Sichter
Lee Sichter LLC
45024 Malulani Street, #1
Kaneohe, Hawai'i 96744

Dear Mr. Sichter:

Subject: Draft Environmental Assessment for the Ka Makana Ali'i
Conceptual Master Plan, Ewa, Oahu, TMK 9-1-016-142

The Department of Education (DOE) has reviewed the Draft Environmental Assessment for the Ka Makana Ali'i Conceptual Master Plan.

The subject property lies very close to Kapolei Middle School. Noise and dust mitigation and appropriate safety measures should be implemented during construction due to the proximity of Kapolei Middle School. The DOE would also like to be apprised of the impact the proposed project will have on Kapolei Middle School's traffic patterns, both during construction and on completion.

The DOE requests that the applicant's consultants coordinate their construction schedules with the principal of Kapolei Middle School.

Thank you for the opportunity to provide comments. If you have any questions, please call Jeremy Kweok of the Facilities Development Branch at 377-8301.

Very truly yours,



Kathryn S. Matayoshi
Superintendent

KSM:jmb

cc: Alapaki Nahale-a, Chairman, Department of Hawaiian Home Lands
Dana Kobashigawa, Principal, Kapolei MS
Randolph G. Moore, Assistant Superintendent, OSFSS

LEE SICHTER LLC

45024 MALULANI STREET #1, KAPOLEI, HAWAII 96744
PH. (808) 382-3836; FAX. (808) 234-0872; WEB. WWW.LEESICHTER.COM

November 28, 2011

Superintendent Kathryn S. Matayoshi
Department of Education
State of Hawaii
P.O. Box 2360
Honolulu, Hawaii 96804

Dear Superintendent Matayoshi:

**Response to Comment
Ka Makana Ali'i Conceptual Master Plan
Draft Environmental Assessment**

I am writing on behalf of the Department of Hawaiian Home Lands in response to your comment letter dated September 23, 2011 regarding the above project. Thank you for participating in the public and agency review process for the Ka Makana Ali'i project.

We acknowledge your request that noise and dust mitigations, together with appropriate safety measures, be implemented during construction to minimize potential impacts upon the neighboring Kapolei Middle School. As requested, we will keep your department apprised of the proposed project's anticipated impacts on Kapolei Middle School's traffic patterns. To that end, the project's construction manager will coordinate construction schedules with the Kapolei Middle School principal, Ms. Dana Kobashigawa.

Very truly yours,



Lee Sichter

cc: L. Chinn
E. Nellis

NEW ASSIGNMENT
DATE: 11/28/11



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
HISTORIC PRESERVATION DIVISION
KAHUNHEWA BUILDING
601 KAPOKILA BLVD, KAPOLEI HI 96761

MELISSA E. JILL, CL
DIRECTOR
HISTORIC LAND AND NATURAL RESOURCES
DIVISION
1000 KALANIANA'OLANI BLVD, SUITE 200
HONOLULU, HI 96813
TEL: (808) 541-1111
FAX: (808) 541-1111
WWW.DLN.RIS.HAWAII.GOV

DATE: October 03, 2011 LOG: 2011.2615
TO: Lee Sichter LLC DOC: 11108502
45 024 Malulani Street, Unit 1 Architecture
Kaneohe, HI 96744
SUBJECT: Section 5E-42 Historic Preservation Review
Project: Draft EA for Ka Makana Ali'i Conceptual Master Plan
Permit # (None)
Owner: Department of Hawaiian Home Lands
Location: Bounded by Kapolei Parkway on the north and the Oahu Railway and Land
Company Right of Way (ROW) on the South
Tax Map Key: (1)9-1-016-142

This letter is in response to the *Ka Makana Ali'i Conceptual Master Plan Draft Environmental Assessment* (prepared by Lee Sichter LLC for the Department of Hawaiian Home Lands (DHHL), dated August 23, 2011). The land is under lease to developer Hawaii DeBarbode LLC by landowner DHHL. The project is to develop this 6.7 acre property into a regional shopping center/office complex/hotel. Included would be 1,000,000 square feet of leasable space and approximately 2,500 parking spaces. The developer would work with the City and County of Honolulu to both connect the property with the new rapid transit initiative and rework bus routes to the new complex. Over 1,800 parking spaces would be created underground. The area of potential effect would be the parcel; roadways/potential roadways makai, Diamond Head and makai, the Oahu Railway and Land Company, Ltd. ROW, the Hawaiian Railway Society (HRS) baseyard, and Ewa Fields complex.

The site was used as ranchland in the 19th century and was part of the Ewa Sugar Plantation until agriculture ended at this site about thirty years ago. The adjacent railroad was the vehicle for economic development, turning this barren area green, providing employment to thousands, and contributing to Hawaii's ethnic diversity.

The Draft EA needs modification in order to be more useful.

- Figure 3, the Conceptual Site Plan, does not identify the particular buildings, making Section 2.7 Relationship Among Land Uses hard to follow.
- There is no illustration showing the location of the underground parking garage.
- Section 2.14.7 Vehicular Access, erroneously states that only DHHL and the City and County of Honolulu would be the two affected landowners for an extension of North South Road (Kunikaia Parkway) to Roosevelt Avenue. The State of Hawaii Department of Transportation owned ORRL line and the Hawaiian Railway Society property would also be affected. In addition, extension of the North South Road would impact development plans by Hunt Corporation makai of Roosevelt, and plans by the State Historic Preservation Division (SHPD), National Park Service and the Advisory Council for Historic Preservation to preserve the historic US Marine complex at Ewa Field because the Road/parkway could be potentially extended still further makai.

As the Ka Makana Ali'i parcel was previously vacant, the Architectural Branch of SHPD has no concerns within the lot. We do have concerns, however, with the potential impact of the development along the makai side where it

interfaces with the historic Oahu Railway and Land Company, Ltd., railway ROW (which is listed on the National Register of Historic Places) as now utilized by the Hawaiian Railway Society.

As illustrated by the Railway Society during a site visit on Saturday, September 17, 2011, the distance along the railroad ROW near the project is so short that the possible three (3) new crossings (two by the shopping center, one by the North South Road) added to the existing crossing on Fort Barrette Road could become a long single stop gauntlet for the trains. The number of incursions to the rail line is unacceptable and would hamper Hawaiian Railway Society operations; the development would alter the historic rural landscape of the railroad ROW; and future construction of the North South Road would bisect the Railway Society's painstakingly built base yard.

SHPD therefore does not concur with your Finding of No Significant Impact (FONSI) based on the adverse impacts to the historic railroad.

There are a number of adverse and potential adverse impacts to the historic resource by this undertaking. Given that the design drawings provided are conceptual, we will address only Phase One specifically at this time. We are adamantly opposed to the rail crossing at Roosevelt Avenue at the southwest corner of the development that appears to be a service entrance. We would suggest that the Kapolei Parkway access at the northwest corner of the development service all the Phase I buildings with a drive extending along that western boundary of the project in order to eliminate the necessity to cross the railroad tracks at that southwest location.

We feel there is a missed opportunity for this development to view the railroad as an asset in the project and design both the center and any crossings to protect and take advantage of this unique historic resource.

According to EA Section 13: Consulted Parties and Participants in the EA Process, SHPD was not included in your list of consulted agencies and organizations. Please note that according to HRS 6E-42:

§6E-42 Review of proposed projects. (a) Before any agency or officer of the State or its political subdivisions approves any project involving a permit, license, certificate, land use change, subdivision, or other entitlement for use, which may affect historic property, aviation artifacts, or a burial site, the agency or officer shall advise the department and prior to any approval allow the department an opportunity for review and comment on the effect of the proposed project on historic properties, aviation artifacts, or burial sites, consistent with section 6E-43, including those listed in the Hawaii register of historic places.

Any questions should be addressed to Ross W. Stephenson, SHPD Historian, at (808) 692-8028 (office), (808) 497-2233 (cell) or ross.w.stephenson@hawaii.gov.

In the event that historic resources, including human skeletal remains, lava tubes, and lava blisters/bubbles are identified during construction activities, all work should cease in the immediate vicinity of the find; the find should be protected from additional disturbance; and the Nona Neboa at the State Historic Preservation Division should be contacted immediately at (808) 692-8029.

Mahalo for the opportunity to comment.



Angie Westfall
Architecture Branch Chief, Hawaii Historic Preservation Division

LEE SICHTER LLC

45024 MALULANI STREET #1, KANEHOHE, HAWAII 96744
PH. (808) 382-3836; FAX. (808) 234-0872; WEB. WWW.LEESICHTER.COM

November 28, 2011

Ms. Angie Westfall
Architecture Branch Chief
Hawaii Historic Preservation Division
Department of Land and Natural Resources
State of Hawaii
601 Kamokila Boulevard
Kapolei, Hawaii 96707

Dear Ms. Westfall:

Response to Comment Ka Makana Ali'i Conceptual Master Plan Draft Environmental Assessment

I am writing on behalf of the Department of Hawaiian Home Lands in response to your comment memorandum dated October 3, 2011 regarding the above project. Thank you for participating in the public and agency review process for the Ka Makana Ali'i project. Following are our responses to your comments in the order they were presented in your letter.

- 1) Each of the buildings in Figure 5 is identified by a large bold letter. The text of Section 2.7 has been revised to reference the buildings by letter.
- 2) Figure 5 has been revised to depict the general layout of the proposed underground garage.
- 3) Section 2.14.7 (now Section 2.14.3) has been revised to clarify that the decision to construct an extension of Kualaka'i Parkway rests with the State Department of Transportation, which will be obligated to coordinate with the two property owners, the DHHL and the City and County of Honolulu, and in consultation with the SHPD and the Hawaiian Railway Society. The statement was not intended to discuss impacts.

Section 2.14.6 has been amended to clarify that the State DOT owns the OR&L easement. This section has also been amended to expand the discussion of the project's impacts upon the Hawaiian Railway Society's operation of the historic railroad. We agree that extension of Kualaka'i Parkway to Roosevelt Avenue and beyond would impact the Hawaiian Railway Society's base yard, the Hunt Corporation lands makai of Roosevelt Avenue, and, depending upon the final alignment, the plans by

the State Historic Preservation Division, the National Park Service, and the Advisory Council for Historic Preservation to preserve the US Marine complex at Ewa Field. However, we must be very clear about this: the possible future extension of Kualaka'i Parkway to Roosevelt Avenue and beyond is NOT proposed as part of the lessee's (Hawaii DeBartolo LLC) proposed action. If the State decides to extend the parkway, the extension project would require a separate environmental assessment pursuant to Chapter 343, HRS. The possible future extension of the parkway is beyond the scope of the Ka Makana Ali'i project. As discussed in the Ka Makana Ali'i project's Draft EA, an extension of Kualaka'i Parkway to Roosevelt Avenue and beyond is not needed to mitigate the impacts of the proposed project on traffic. Future traffic projections with the proposed regional mixed use project in place indicate that the existing roadway network can accommodate the project. The lessee is proposing to extend a two lane driveway from the 3-way intersection of Kapolei Parkway and Kualaka'i Parkway to the eastern project entrance about midway down the eastern property boundary. The proposed driveway does not, however, need to be extended any further south to accommodate the Ka Makana Ali'i project.

As discussed in the Draft EA, the lessee has initiated discussions with the Hawaiian Railway Society to resolve its concerns about the regional mixed use center's two driveways crossing the railroad track to intersect Roosevelt Avenue.

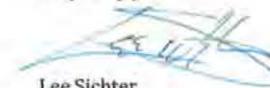
- 4) We acknowledge your objection to the presence of any crossings to Roosevelt Avenue but we do not agree that the crossings constitute a significant adverse impact to the historic railroad. As discussed above and in the Draft EA, the extent of the project's impacts upon the Hawaiian Railway Society's operations will be limited to two crossings over a single railroad track that would be mitigated with traffic gates and signals. Similar design solutions are present at Fort Barrette Road and at Ko'o Olina Resort. We believe that the contemporary operations of an historic railway must be integrated into the activities of contemporary society, and that they can be so done without compromising the historic integrity of the railway.

As we have received a comment from DPP that the EA must also address the Pearl Harbor Historic Trail Master Plan, we are now trying to navigate the apparent difference of opinion between the City and the State regarding the provision of track crossings between Renton Road and Fort Barrette Road. The lessee (Hawaii DeBartolo LLC) will work with the respective agencies to address the conflicting authorities and do its best to mitigate the extent of possible impacts.

Contrary to your assertion, the Draft EA clearly states the lessee views the historic railroad operation as an asset to the proposed action and is looking forward to a mutually beneficial and complimentary relationship.

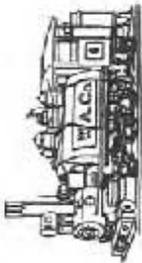
- 5) As required by law, Section 13 of the Draft EA lists the parties that were consulted during the preparation of the assessment. The lessee (Hawaii DeBartolo LLC) understands and has acknowledged its obligation to include the State Historic Preservation in the consultation process. The distribution of the Draft EA for review and comment by the SHPD constituted the first step in engaging the division in consultation. As no permit, license, land use change, subdivision, or any other entitlement for use has yet been granted for the Ka Makana Ali'i project, the lessee is in full compliance with the requirements under Section 6E-42. The lessee has advised that it looks forward to continuing discussions with the SHPD and the DOT with regard to the proposed railway crossings as part of the ongoing consultation process.
- 6) Acknowledged.

Very truly yours,



Lee Sichter

cc: L. Chinn
E. Nellis



Hawaiian Railway Society

A Chapter of the National Railway Historical Society
1511, Box 60342, East Station, San Francisco, CA 94160
(415) 681-5161 or Hawaiianrailway.com

October 1, 2011

Lee Sichter, LLC
45024 Makulani Street #1
Kane'ohe, Hawaii 96744

Dear Mr. Sichter,

The Hawaiian Railway Society (HRS) submits for your review suggested changes and comments to the Draft Environmental Assessment for Ka Makani Aie'i, dated August 23, 2011.

Page #14...Section 2.8...Paragraph 5

Phase 1 will include a service road between the project and Roosevelt Ave.

No mention of crossing OR&L tracks.

Page #18...Section 2.8...Paragraph 3

Phase 2 will include a second major access to Roosevelt from the project.

No mention of crossing OR&L tracks.

Page #20...Section 2.14.1...Paragraph 6

Renton Road is four lanes divided from E. Weaver Rd to Roosevelt Ave.

Renton Road is not 4 lanes divided from Kapolei Parkway to Roosevelt, but a rural undivided road. The HRS owns a section of this road from the railroad tracks to Roosevelt Avenue.

Page #24...Section 2.14.5...Paragraph 1

The Phase 1 service road to Roosevelt Ave. would be de-emphasized in favor of major signalized entrance tied to phase 2.

The HRS strongly recommends paving Renton Road on the mauka side of the OR&L tracks to connect with Phase 1 and Phase 2 entrances, thus eliminating the need to cross the tracks at Roosevelt. Since there are no pending plans to improve Roosevelt, extending Renton Road would have the same impact. We also suggest that the State DOT get on with the already approved, yet stalled plans to improve Fort Barrett Road to 2 lanes each way to where it crosses the tracks approaching Roosevelt.

Page #26...Section 2.14.6...Paragraph 1

As stated in our August 29, 2011 letter sent to parties involved, The HRS opposes any extension of Kaulaika'i Parkway beyond that already stated in the Hawaii DeBarredo LLC project.

Page #27...Section 2.14.11...Paragraph 1

The OR&L Right of Way is on the National Register of Historic Sites and Places. The OR&L was commissioned by King David Kalakaua in 1889 as a common Carrier. The OR&L provided passenger and freight service from Honolulu Depot out through the leeward coast and all the way across the North Shore to Kahuku. The OR&L also served the central part of Oahu up to Waialua. The OR&L transported raw sugar from plantation mills along the OR&L line to Honolulu Harbor for shipment to the C&H Sugar refinery in California, hauled pineapples from central Oahu to the canning plants in Honolulu, provided a direct link to military bases including Pearl Harbor, Schofield, Heber's Point and others. It also provided a link to communities cropping up along the right of way.

Page#83...Section # 2... Paragraph 4

The first two sentences are ok. Please insert our comments below between the second and third sentences.

The project area borders the historic narrow gauge OR&L right of way to the north. The historic railway, in operations from 1889 to 1947, was sold to the US Navy and they used the stretch of track from Lualaba's Ammunition Depot to the West Lock Ammunition Depot until the end of 1968. The Navy did not use the tracks daily, but maintained it to industry standards. The HRS, founded in 1971, began the process, with the help of our congressional delegation, to have the remaining stretch of track put on the National Register of Historic Places. This was accomplished in 1975. At that time there were four public roadway crossings, E Weaver Road, Renton Road exL (formerly the main entrance to Fava Marine Corp Airbase), Fort Barrett Road and Kaulaika Highway. These roads became part of the historic fabric of the right of way at that point.

Page #88...Section 8.3.3... Paragraph 5

The HRS owns the property our Museum/Asseved is on. Due to the limited space, our track and switch layout is already compressed to the limits allowed by the American Railway Engineering and Maintenance of Way Association specs for railroad operations

Page #'s 55-56...Appendix 1... Section 6.5... Paragraphs 4 and 5

Delete... around the entire island (sentence one, paragraph 4)

Delete... and then back down through Waialua to Waipahu (sentence three, Par 4)

add... and with a branch line from Waipahu to Waialua.

I think the correct name for the North/South extension is Kaulaika'i Parkway not Kaulaika Road. (Paragraph 5)

If you have any questions or concerns about the above response, please contact me at 808-681-5161.

Sincerely,

Robert Vauchmesol
President, Hawaiian Railway Society

LEE SICHTER LLC

45024 MALULANI STREET #1, KANEHOE, HAWAII 96744
PH. (808) 382-3836; FAX. (808) 234-0872; WEB. WWW.LEESICHTER.COM

November 28, 2011

Mr. Robert Yatchmenoff, President
Hawaiian Railway Society
P.O. Box 60369
Ewa Station
Ewa Beach, Hawaii 96706

Dear Mr. Yatchmenoff:

**Response to Comment
Ka Makana Ali'i Conceptual Master Plan
Draft Environmental Assessment**

I am writing on behalf of the Department of Hawaiian Home Lands in response to your comment letter dated October 1, 2011 regarding the above project. Thank you for participating in the public and agency review process for the Ka Makana Ali'i project. Our responses follow in the order your comments were presented in your letter.

- 1) Revised as requested.
- 2) Revised as requested.
- 3) Revised as requested.
- 4) We've reviewed your recommendations regarding Repton Road and have determined it not to be a feasible option and not consistent with DPP and HDDT's regional roadway plans. With regard to Roosevelt Avenue, we are advised that the City has long-term plans for improving it to City standards. Improvements to Fort Barrette Road are beyond the scope of our project. The lesson will continue to work with you to identify mutually beneficial measures to mitigate impacts upon the historic railroad.
- 5) We acknowledge your opposition to the extension of Kualaka'i Parkway beyond the Ka Makana Ali'i driveway to Roosevelt Avenue. The proposed action does not require such an extension.
- 6) Revised as requested.
- 7) Revised as requested.
- 8) Revised as requested.
- 9) The requested changes to the description of your interview presented in the Cultural Impact Assessment have been revised as requested.

We sincerely appreciate the Society's concerns about the Ka Makana Ali'i project's potential impacts upon the existing railway tracks and railroad museum/base yard that lie adjacent to the project's southern property boundary.

Very truly yours,



Lee Sichter

cc: L. Chinn
E. Nellis

NEIL ABERCROMBIE
GOVERNOR

MAJOR GENERAL GARRYLL D. N. WONG
DIRECTOR OF CIVIL DEFENSE

EDWARD T. TEIXEIRA
VICE DIRECTOR OF CIVIL DEFENSE



STATE OF HAWAII
DEPARTMENT OF DEFENSE
OFFICE OF THE DIRECTOR OF CIVIL DEFENSE
3949 DIAMOND HEAD ROAD
HONOLULU, HAWAII 96816-4495



PHONE (808) 733-4500
FAX (808) 733-4287

LEE SICHTER LLC

45024 MALULANI STREET #1, KANEHOE, HAWAII 96744
PH. (808) 382-3836; FAX. (808) 234-0872; WEB. WWW.LEESICHTER.COM

November 28, 2011

October 4, 2011

Ms. Linda Chinn, Administrator
Land Management Division
Department of Hawaiian Home Lands
State of Hawaii
P. O. Box 1879
Honolulu, Hawaii 96805

Dear Ms. Chinn:

Ka Makana Ali'i Draft Environmental Assessment (DEA)
Conceptual Master Plan TMK: 9-1-016:142, Ewa, Oahu

Thank you for the opportunity to comment on the subject project.

As acknowledged and restated in the DEA, the proposed regional mixed-use center development parcel is located within areas designated Flood Zone X and Flood Zone D. As a portion of the project is subject to possible but undetermined flood risks, we strongly recommend the implementation of flood mitigation measures, as appropriate, during the planning and design phases of the development. In addition, the incorporation of design elements to mitigate the effect of high-wind events on structures should also be considered for this development.

We defer to the appropriate State and federal agencies as to the protection of any cultural, historical, and archeological elements of the property.

If you have any questions, please call Ms. Havinne Okamura, Hazard Mitigation Planner, at (808)733-4300, extension 556.

Sincerely,

EDWARD T. TEIXEIRA
Vice Director of Civil Defense

c: Lee Sichter LLC, Consultant ✓

Mr. Victor G. Gustasson
Interim Vice Director of Civil Defense
Office of the Director of Civil Defense
Department of Defense
State of Hawaii
3949 Diamond Head Road
Honolulu, Hawaii 96816-4495

Dear Mr. Teixeira:

Response to Comment
Ka Makana Ali'i Conceptual Master Plan
Draft Environmental Assessment

I am writing on behalf of the Department of Hawaiian Home Lands in response to your comment letter to the Department of Hawaiian Home Lands dated October 4, 2011 regarding the above project. Thank you for participating in the public and agency review process for the Ka Makana Ali'i project.

We acknowledge your recommendation concerning the implementation of flood mitigation measures as appropriate during the planning and design stages of the development. Design elements to mitigate the effect of high-wind events on structures will also be considered for the proposed development.

Very truly yours,

Lee Sichter

cc: L. Chinn
E. Nellis



TOM BERG
COUNCIL MEMBER
 Chair of the Committee on Parks and Cultural Affairs
 HONOLULU CITY COUNCIL - DISTRICT I



TOM BERG
 COUNCIL MEMBER
 HONOLULU CITY COUNCIL - DISTRICT I
 PH: (808) 769-5001
 FAX: (808) 769-5011
 EMAIL: tberg@honolulu.gov

Oct 5, 2011

Linda L. Ching@hawaii.gov
 Mr. Alapaki Nahale-a, Chairman
 Linda Ching, Administrator
 Dept. of Hawaiian Home Lands
 91-5420 Kapolei Parkway
 Kapolei, HI 96707

Dear Mr. Nahale-a,

Thank you very much for allowing comments on the DHHL Ka Makana DeBartolo Shopping Center Environmental Assessment.

http://oeqo.doh.hawaii.gov/Shared%20Documents/EA_and_EIS_Online_Library/Oahu/2011/8/2011-09-08-DEA-Ka-Makana-Alii-Conceptual-Master-Plan-in-Ewa.pdf

Attached are photos and renderings that are in the DHHL Ka Makana DeBartolo Shopping Center Environmental Assessment (see email.)

The Hawaiian Railway Society are opposed to the numerous roadway crossings and crossing gates and have apparently discussed their concerns with DHHL, SHPD, and DeBartolo recently, indicating that the railway is on the National Historic Register and if the roadways are put in as planned, they could be possibly tied up all day with train cars going back and forth within the railway yard.

This classic 1880's narrow-gauge railway, which goes back to the era of King Kalākaua, has enormous visitor attraction potential. Chopping it into pieces with way to many grade crossings will create an operational nightmare and destroy this great historic treasure.

Ewa Plantation Villages, has been previously recommended by noted historians to be a National Landmark and made a federally recognized Historic District. We need to continue to move forward with preservation plans for the Managers Mansion and maintain the unique historic character of Ewa Villages which make it an historic and architectural treasure.

The MCAS Ewa Field area is currently undergoing a significant historic reevaluation by the Navy, National Park Service, SHPD, and various local consulting parties as part of a Federal Section 106 process. The evaluation of Ewa Field as a December 7, 1941 battlefield, could likely lead to a National Register listing and possible future nomination as a National Battlefield, National Landmark and become part of the WWII Valor in the Pacific National Monument. This is how previous Pearl Harbor battle sites have been treated, and MCAS Ewa Field meets all of the NPS American Battlefield Protection Program criteria.

The DHHL DeBartolo EA has various visual examples of what the proposed DeBartolo hotel complex might look like and indicates it could be a high rise hotel up to 120 feet high, blocking the historic view plane from Ewa Field of the Waianae Mountains where the main Japanese Kate bombers and Zero fighters approached from to attack Ewa Field and Ewa Vi Iage.

The DeBartolo renderings show various types of hotel structures- long and low, twin towers etc. It would seem that a final design has not been determined so there appears to be time to reevaluate a possible 120 foot high hotel structure.

Attached is a rendering of the new FBI building currently under construction near Fort Barrett road. When you drive by it seems to look extremely high already, but is actually just four stories. This seems like an appropriate maximum height for a building in this area, especially being by the Kalaheo civil aviation airport and Honolulu International Airport approach path.

Also attached is a rendering of what the area might look like in approximately 10-15 years with a rail transit station nearby. Note that nearly all the buildings are no higher than four stories. This seems an appropriate height for the development of the Ewa Plains area as tall buildings cast long shadows, and a tall DeBartolo hotel would be casting long morning and afternoon shadows over adjacent areas, blocking their views and sunlight.

It is important to remember also that Kalaheo-John Rogers Field has an airport operations area that is under the Honolulu International Airport instrument landing approach path. The Federal Aviation Administration Instrument Landing System beacon is located right next to the former MCAS Ewa Field runway, which means large heavy commercial jets are approaching inbound to Honolulu and coming over this location at around 2-3000 feet, maybe less.

Underneath that same HNL approach path are civil and Coast Guard aircraft in the John Rogers Field Kalaheo airport control area which extends up to 1500 feet. Often small planes and helicopters are coming through the Ewa Field area and in the vicinity of the DHHL DeBartolo complex approaching Kalaheo airport at 600 feet (and sometimes less.)

If DeBartolo proposes to construct a hotel up to 120 feet high in this same area, near the Hawaiian Railway yard this would both block the view of the Waianae Mountains from Ewa

Field, but also be a possible aviation hazard. To try and mitigate this the building would likely have to be wired up with flashing lights to warn away low flying aircraft.

It should be realized also that aircraft traffic all day and in the evening could be a constant annoyance to hotel guests in a tall building that is close to these air traffic lanes with both heavy commercial HNL inbound jets coming over at 2000 feet while smaller JRF (Kalaeloa) aircraft are flying underneath them at around 500 feet- all passing right by and over this high rise hotel in the middle of two different airport approach paths.

I believe out of caution and awareness of the nearby historic sites- Hawaiian Railway, Ewa Plantation Village and MCAS Ewa Field- that any planned DeBartolo hotel structures should ideally be kept much lower- at around four to five stories. The hotel would better serve the community and Ewa Plains history with a long, low structure rather than a high rise structure.

A roadway connection option for DeBartolo, which has already dug very deep underground parking areas, is to come out *under* the railway line and join to Roosevelt Avenue, which could provide further access to Coral Sea Rd. Coral Sea Road should become a four lane parkway in the future, and there is already an existing right-of-way which could allow it to be connected to Kapolei Parkway. This should be the preferred connectivity route- not an extension of Kualaka'i - NS Rd to Roosevelt.

MCAS Ewa has it's own unique history that ties in directly with the Ewa Plantation Community and the nearby O.R. & L. Railway, going back to the 1920's when it was Ewa Mooring Mast airfield, built for a Navy airship program. It was a base that started very small, saw renewed development as a US Marine Corps airfield in 1940-41, and then exploded outward once the Pacific War began on December 7, 1941. It was a continuous work in progress as more runways, buildings, hangers and taxiways were needed to handle large-scale WW-II fighter aircraft training and Pacific air logistics that supported the successful Pacific Island Campaigns.

NAS Barbers Point also has it's own unique history, and was completely designed from scratch, before the Pacific War even started, to be in a much larger and permanent diamond pattern design with two massive runways, with heavy fortified concrete buildings and huge Alfred Kahn aircraft hangers. It was the sudden start of WW-II that caused NAS Barbers Point construction to be delayed and all efforts put into making MCAS Ewa fully operational. By 1942, SeaBee Construction units, based in a large community on MCAS Ewa, and using Coral Sea Road as their major North-South transit highway, and Roosevelt Road as their major East-West transit highway, built NAS Barbers Point. These two distinctly different base histories should be factored into all Kalaeloa planning schemes with the realization that one area is better suited for open space and recreational use, while the other area was intentional designed to be an urban community with major airport, from the very beginning of their conception.

I strongly agree with the January 21, 2011 comments submitted by Brian Turner, Esq. Regional Attorney, Western Office, National Trust for Historic Preservation (NTHP) on the Draft Kalaeloa Administrative Rules.

The National Trust for Historic Preservation was chartered by Congress in 1949 as a private nonprofit organization for the purpose of furthering the historic preservation policies of the United States and facilitating public participation in the preservation of our nation's heritage. 16 U.S.C. § 468. With the support of NTHP members nationwide, the National Trust works to protect significant historic sites and to advocate historic preservation as a fundamental value in programs and policies at all levels of government. The Trust has nine regional offices around the country, including a Western Office in San Francisco which is specifically responsive to preservation issues in Hawaii.

"I am particularly concerned, along with NTHP attorneys concurrence, that the HCDA Kalaeloa Master Plan indicates that an extension of the Kualaka'i Parkway is slated to run directly through historic Ewa Field which is located within the Kalaeloa District. This former runway was the site of intense fighting on December 7, 1941 where American Marines fought back against Japanese warplanes. Tangible evidence of the battle in the form of strafing marks is still apparent in concrete pavers on the airfield and a battlefield survey is currently underway."

I strongly urge, along with the NTHP attorneys advice and consultation, that HCDA reconsider the proposed placement of the Parkway and plan to participate in the Federal and State review process to ensure that adverse impacts to the site are avoided."

In 2009, three Oahu neighborhood boards passed resolutions urging full preservation of historic MCAS Ewa Field as a park and museum to attract visitors to the location to benefit the local economy of Ewa West Oahu. The Hawaii State Legislature also passed a very similar resolution advocating the same preservation and heritage tourism concept for Ewa West Oahu.

1925 Ewa Mooring Mast Field is one of the very oldest historic aviation sites and airfields in the State of Hawaii. National Park Historian Daniel Martinez calls the December 7, 1941 Ewa Field "Sacred Ground." The National Park Service is considering officially making MCAS Ewa Field part of the new WW-II "Valor in the Pacific" National Monument.

Significant oral history testimony has been collected from Ewa Village residents, many of whom are still alive, detailing the extensive air and ground battle over and around Ewa Field and Ewa Village on December 7, 1941.

Note also that developers of the Navy golf course, the Geiger Road re-alignment and the installation of the FAA navigation beacon all carefully avoided infringing upon the original 1941 December 7th airfield. This was because all of the Navy land use planners and civil engineers knew then the site was very historic and important to save. This was not a coincidence, this was by design.

In December of 2010 a Face Book CAUSE was set up to advocate preservation of the Ewa Field battlefield and object to a roadway through the area. Within two weeks, over 1000 people had joined the Save Ewa Field cause nationwide. This is an indication, that American Battlefields are considered as "Sacred Ground" to most mainland US residents, who are by the way, major visitors to Hawaii, and any construction through MCAS Ewa will be meet with significant amounts of bad national publicity and public rancor among veterans groups.

SHPD and the National Advisory Council on Historic Preservation have engaged in several discussions with the Navy and property grantees about historic resources on the former base. The Navy on October 28, 1998 (Ser 233/3957) agreed to include protective covenants to ensure preservation and appropriate treatments of historic properties within former MCAS Ewa.

An MCAS Ewa Historic District has been proposed in a Navy contracted cultural resource survey. This district comprising 75 aircraft revetments built in 1942, should be incorporated into all future Kalaeloa planning. The exact boundaries and historic significance are available through SHPD files and Navy BRAC documents.

Two Historic Districts have been proposed in Navy contracted cultural resource surveys for NAS Barbers Point - A WW-II Housing Area and Central Core Historic District. These two districts should be incorporated into all future Kalaeloa planning. The exact boundaries and historic significance are available through SHPD files and documents.

Future Thoroughfares

The Kalaeloa Master Plan should intelligently use the existing historic MCAS Ewa base arterial roadways, expand them to four lanes and keep interior traffic LOCAL, which better fits the great descriptions of what Kalaeloa is supposed to be- a community encouraging slower 25 mph speeds, bikeways, etc. There is absolutely no reason to create a new roadway connection with the existing Saratoga Avenue and extend it across historic MCAS Ewa land and connect it with Geiger Road.

The extension of Geiger Road directly across and through the historic Ewa Field December 7 battlefield is completely unnecessary and will never be needed as a roadway route because Geiger Road was intelligently aligned and connected to today's Roosevelt Avenue in the 1940's during the original design of the base. Traffic has flowed very smoothly on this same existing right-of-way for six decades since, allowing transit from Ewa all the way down Roosevelt to today's Kalaeloa Blvd- which is currently blocked off and should be reopened.

When the traffic eventually does increase, the answer is to make Geiger and Roosevelt four lanes- and not create a totally unneeded parallel roadway a couple of hundreds yards away in an important historic site which will only invite lawsuits.

There is also the major North-South historic right-of-way- Coral Sea Road, which could be expanded to be a significant four lane parkway and North-South connector- which it was in fact originally designed to be, and which could well satisfy the transit needs to reach the Ewa Coast beach parks and also serve as a second access roadway to the Haseko development allowing connection to Keoneula Blvd.

Currently, the segment of Kapolei Parkway between Kamokiiia Boulevard and Fort Barrette Road is not yet completed but will be constructed by the City & County of Honolulu. When this Kapolei Parkway segment is in place it will provide a continuous connection between Kalaeloa Boulevard and Geiger Road. The completion of the missing segment of Kapolei Parkway will have a substantial effect on the traffic volumes on Franklin D. Roosevelt Avenue, as some Ewa-Diamond Head traffic would divert from the existing two-lane road to the six-lane parkway. Kapolei Parkway is the preferred East-West commuter route while Franklin D. Roosevelt Avenue will serve well as an additional future four lane East-West transit route within Kalaeloa-Barbers Point communities.

Also noted from my staff research on historic preservation is the fact that the Department of Transportation Act (DOT Act) of 1966 includes a special provision - Section 4(f) - which stipulates that the Federal Highway Administration (FHWA) and other DOT agencies cannot approve the use of land from publicly owned parks, recreational areas, wildlife and waterfowl refuges, or public and private historical sites unless the following conditions apply:

There is no feasible and prudent alternative to the use of land. The action includes all possible planning to minimize harm to the property resulting from use.

Section 4(f) of the Department of Transportation (DOT) Act of 1966 was set forth in Title 49 United States Code (U.S.C.), Section 1653(f). A similar provision was added to Title 23 U.S.C. Section 138, which applies only to the Federal-Aid Highway Program.

In closing, please continue to engage and inform my office and the Ewa Plains community for further public input as your plans progress forward.

Mahalo and thank you for allowing me to comment on this very important Council District 1 development project.

Aloha,

TOM BERG
Councilmember – District 1
Ewa Beach, Kapolei, Waianae Coast



FIGURE 8 - CONCEPTUAL SITE PLAN

KA MAKANA ALI'I I
 Kapolei, Oahu





FIGURE 11 - VIEW TO THE NORTHWEST

A





FIGURE 19 - Conceptual Illustration - East Kapolei Station



LEE SICHTER LLC

45024 MALULANI STREET #1, KANEHOE, HAWAII 96744
PH. (808) 382-3836; FAX. (808) 234-0872; WEB. WWW.LEESICHTER.COM

November 28, 2011

Honorable Councilmember Tom Berg
Honolulu City Council – District 1
City and County of Honolulu
Honolulu Hale
530 South King Street
Honolulu, Hawaii 96813

Dear Councilmember Berg:

Response to Comment Ka Makana Ali'i Conceptual Master Plan Draft Environmental Assessment

Thank you for participating in the public and agency review process for the Ka Makana Ali'i project. I am writing on behalf of the Department of Hawaiian Home Lands in response to your comment letter to the Department of Hawaiian Home Lands dated October 5, 2011 regarding the above project. Following are our responses to your comments in the order they were presented in your letter.

- 1) The lessee is aware of the Hawaiian Railway Society's concerns about the potential impact of access driveways crossing the rail line and is endeavoring to resolve them.
- 2) The proposed regional mixed use center project will have no impact upon the Ewa Plantation Villages or any preservation plans being considered for them by the City or the State.
- 3) The potential future nomination of the Ewa Field as a National Battlefield or its listing on the National Historic Register are beyond the scope of the proposed regional mixed use center. Construction and operations of the Ka Makana Ali'i project will have no significant adverse impact upon the existing runways or aircraft aprons at Ewa Field.
- 4) Please be advised that the hotel structures will not obscure the Waianae Mountain range when viewed from the closest portions of the Ewa Field and will not be visible from the portions of the field furthest away. The existing 100-foot poles supporting the HECO 138kv transmission lines that border Kualaka'i Parkway provide a helpful visual reference. There are four of these large white poles that parallel the eastern boundary of the project site; the first is very near Roosevelt Avenue and the fourth is just mauka of the intersection of Kualaka'i Parkway and Kapolei Parkway.

When viewed from the makai side of the MCAS Ewa Pride Baseball field, the top of the fourth pole barely reaches a point midway up the foothills of the Waianae range. Thus, the entire upper half of the range and its majestic ridgeline are easily visible. Moving further makai, the top of the fourth pole can no longer be seen. The hotel building (Building H on the project's site plan -- Figure 5) is very near Kapolei Parkway, and therefore generally in line with the fourth HECO pole. If a hotel structure is built to a height 20 feet above the top of the fourth pole, it will have virtually no impact upon views of the Waianae range. The entire upper half of the range and all the ridgeline would be above the top of the hotel structure.

(However, please be advised that despite the lessee's desire to preserve the option to build to the allowable height, the lessee is considering a lower profile for the buildings, or the order of three, four or five stories.

- 5) Planning for the proposed development took into account the flight paths of both Kalaheo General Aviation Airport and Honolulu International Airport. The Federal Aviation Administration (FAA) has established a 120-foot easement over the northern two thirds of the property, meaning that no structures in that area can exceed 120 feet in height, which is why the hotel towers are located where they are. They will not conflict with flight patterns from either airport. The structures at Ka Makana Ali'i will not be built without FAA approval and they would not have been proposed if they were in conflict with FAA restrictions. As a point of fact, the flight pattern approach to Honolulu International Airport is several miles makai of the subject property; approaching planes typically fly directly over Campbell High School in Ewa Beach.
- 6) As discussed in Section 7.9 of the Draft EA, the planned hotel structures are situated outside of the 60 DNL (Day-Night Average Sound Level) aircraft noise contour associated with aircraft from both Honolulu International and Kalaheo General Aviation airports. Commercial land uses outside of the 60 DNL contour are considered to be acceptable under the land use compatibility guidelines of the State Department of Transportation – Airports Division. Thus, the proposed hotel buildings will not be negatively impacted by aircraft related noise.
- 7) The possible future extension of Kualaka'i Parkway to Roosevelt Avenue and beyond is NOT proposed as part of the lessee's (Hawaii DeBartolo LLC) proposed action. If the State decides to extend the parkway, the extension project would require a separate environmental assessment pursuant to Chapter 343, HRS. Any alternative design solutions to mitigate potential impacts of the parkway extension would need to be addressed in that document.

The possible future extension of the parkway is beyond the scope of the Ka Makana Ali'i project. As discussed in the Ka Makana Ali'i project's Draft EA, an extension of Kualaka'i Parkway to Roosevelt Avenue and beyond is not needed to mitigate the impacts of the proposed project on

traffic. Future traffic projections with the proposed regional mixed use project in place indicate that the existing roadway network can accommodate the project. The lessee is proposing to extend a two lane driveway from the 3-way intersection of Kapolei Parkway and Kualaka'i Parkway to the eastern project entrance about midway down the eastern property boundary. The proposed driveway does not, however, need to be extended any further south to accommodate the Ka Makana Ali'i project. Any decision to extend the Kualaka'i Parkway to Roosevelt Avenue and beyond must be made by the State.

8) We sincerely appreciate the rich history of the Ewa Field and NAS Barbers Point. The proposed project will have no significant adverse impacts upon the historical character of those facilities because it involves no physical impacts to those properties. All development related activity associated with Ka Makana Ali'i will be restricted to the 67-acre subject property.

9) Your letter contains a lengthy discussion about the HCDA Master Plan for Kalaheo. However, as the proposed regional mixed use center is proposed on land owned by the Department of Hawaiian Home Lands and is situated mauka of Roosevelt Avenue, the HCDA has no decision making authority concerning the Ka Makana Ali'i project and the project does not fall within the jurisdiction of the Kalaheo Master Plan or the HCDA. Neither the DHHL, nor its lessee, Hawaii Defiantolo LLC, have any influence or control over decisions regarding regional roadway improvements pertaining to Kalaheo or made by the HCDA.

10) Because no federal funds are involved in the construction of a driveway that must cross the railroad tracks, we are advised that Section 4(f) of the 1966 Transportation Act is not applicable. The lessee's goal in implementing driveway crossings is to ensure that there will be no significant harm to the physical or historical character of the historic rail line.

Very truly yours,

 Lee Sichter

cc: L. Chinn
 E. Nellis



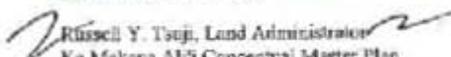
STATE OF HAWAII
 DEPARTMENT OF LAND AND NATURAL RESOURCES
 LAND DIVISION
 POST OFFICE BOX 671
 HONOLULU, HAWAII 96809

October 5, 2011

MEMORANDUM

TO: 

- DLNR Agencies:
- Div. of Aquatic Resources
 - Div. of Boating & Ocean Recreation
 - Engineering Division
 - Div. of Forestry & Wildlife
 - Div. of State Parks
 - Commission on Water Resource Management
 - Office of Conservation & Coastal Lands
 - Land Division - Oahu District
 - Historic Preservation

FROM:  Russell Y. Tsuji, Land Administrator
 SUBJECT: Ka Makana Ali'i Conceptual Master Plan
 LOCATION: East Kapolei, Island of Oahu; TMK: (1) 9-1-016:142
 APPLICANT: Lee Sichter LLC on behalf of DHHL

Transmitted for your review and comment on the above referenced document. We apologize for the short notice; however, we would appreciate your comments on this document by October 10, 2011.

If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact Darlene Nakamura at 587-0417. Thank you.

Attachments

- We have no objections.
- We have no comments.
- Comments are attached.

Signed: 
 Date: 

cc: Central Files

LEE SICHTER LLC

45024 MALULANI STREET #1, KANEHOE, HAWAII 96744
PH: (808) 382-3836; FAX: (808) 234-0872; WEB: WWW.LEESICHTER.COM

November 28, 2011

Mr. Russell Y. Tsuji, Land Administrator
Land Division
Department of Land and Natural Resources
P.O. Box 621
Honolulu, Hawaii 96809

Dear Ms. Hidano:

**Response to Comment
Ka Makana Ali'i Conceptual Master Plan
Draft Environmental Assessment**

I am writing on behalf of the Department of Hawaiian Home Lands in response to your memorandum dated October 5, 2011 regarding the above project. We acknowledge that your division has no comments. Thank you for participating in the public and agency review process for the Ka Makana Ali'i project.

Very truly yours,



Lee Sichter

cc: L. Chinn
E. Nellis

DEPARTMENT OF TRANSPORTATION SERVICES
CITY AND COUNTY OF HONOLULU

600 SOUTH KERRIS HALL BUILDING
HONOLULU, HAWAII 96813
WWW.GOV.HI/HONOLULU/TRANSPORTATION/DEPARTMENT/INDEX.HTML

TECHNICAL
DIVISION



WAYNE Y. KISHIOKA
DIRECTOR
GENERAL, P.E.
1941 YERGEN

October 7, 2011

IP9/11-422/80R

Mr. Lee Sichter
Lee Sichter LLC
45-324 Malulani Street, No. 1
Kaneohe, Hawaii 96744

Dear Mr. Sichter:

Subject: Draft Environmental Assessment (DEA) Ka Makana Ali'i Conceptual Master Plan; Tax Map Key ("MK): E-1-015-142

This responds to your letter of September 8, 2011, requesting our comments concerning this proposed project.

Our Traffic Engineering Division (TED) has the following comments.

- Regarding page 14, Section 2.8 Project Construction and Phasing – For the Phase I off-site scope of work, the Kinohi Street/Kepelei Parkway intersection should be specifically identified by their names. Also, the document incorrectly states that the intersection is a signalized intersection.
- Regarding page 20, Section 2.14.1 Existing Roadway Network – The DEA should discuss the jurisdiction of the various area roadway networks.
- Regarding page 27, Section 2.14.7 Vehicular Access – The DEA should clarify the statement that "limited on-street parking will be permitted in some areas."
- Regarding page 27, 2.14.9 Bikeways – Figure 5 does not support the statement that "the site development will include the incorporation of bikeways from the surrounding area to and through the site."
- The Kualakai Parkway extension should intersect Kapelei Parkway as close to perpendicular as possible and pertinent maps should reflect this.

Mr. Lee Sichter
Page 2
October 7, 2011

- The DEA should discuss short-term traffic impacts during construction and proposed mitigating measures.
- All planned streets should comply with current City street standards.

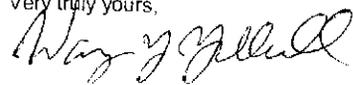
Our Public Transit Division (PTD) has the following comments:

- Your DEA should include a description of the impact of your project on Public Transit services during construction and as a result of population. Streets and roadways that are identified as potential transit routes should be designed and constructed to the appropriate standard for heavy transit vehicles.
- Construction notes should include the following note regarding transit:

"This project may affect bus routes, bus stops, and paratransit operations, therefore, the Contractor shall notify the Department of Transportation Services, Public Transit Division at 768-8396 and Oahu Transit Services, Inc. (bus operations: 848-4578 or 852-6016 and paratransit operations: 454-5041 or 454-5020) of the scope of work, location, proposed closure of any street, traffic lane, sidewalk, or bus stop and duration of project at least two weeks prior to construction."

Thank you for the opportunity to review this matter. Should you have any further questions, please contact Michael Murphy of my staff at 768-8359.

Very truly yours,



WAYNE Y. YOSHIOKA
Director

cc: Mr. Alapaki Nahale-a, Chairman, DHHL
Ms. Linda Chinn, Administrator, Land
Management Division, DHHL
Mr. Timothy Hata, Planner, DPP

LEE SICHTER LLC

45024 MALULANI STREET #1, KANEHOHE, HAWAII 96744
PH. (808) 382-3836; FAX. (808) 234-0872; WEB. WWW.LEESICHTER.COM

November 28, 2011

Mr. Wayne Y. Yoshioka, Director
Department of Transportation Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813

Dear Mr. Yoshioka:

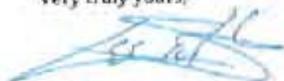
Response to Comment
Ka Makana Ali'i Conceptual Master Plan
Draft Environmental Assessment

I am writing on behalf of the Department of Hawaiian Home Lands in response to your comment letter dated October 7, 2011 regarding the above project. Thank you for participating in the public and agency review process for the Ka Makana Ali'i project. Following are our responses to your comments in the order they were presented in your letter.

- The document has been revised to correct the description of the Kinoiki Street/Kapolei Parkway intersection and to identify the intersection names for Phase 1 offsite improvements.
- The discussion under Section 2.14.1 has been revised as requested.
- The discussion under Section 2.14.7 (now Section 2.14.3) has been expanded to include the clarification you requested. The reference to "limited on-street parking will be permitted in some areas" references the few locations within the village where parallel parking stalls have been provided. These stalls will help promote a feeling of "main street" retailing and provide some convenient spaces directly adjacent to shopping and dining opportunities. There are approximately 150 parallel and diagonal parking spots contemplated. This reference does not apply to any of the adjacent City or State roadways.
- New figures (7b and 8b) have been added to the environmental assessment to depict the incorporation of bikeways within the project site.
- We are advised that the State Department of Transportation has recently decided to accept responsibility for the design, execution, and construction of the extension of Kualaka'i Parkway to Roosevelt Avenue. The design of its intersection with Kapolei Parkway has previously been approved by the DOT.

- Thus, to our knowledge, the intersection design presented in the Ka Makana Ali'i environmental assessment represents the most current effort by DOT.
- A discussion of short-term traffic impacts during construction has been added to the Draft EA under a new section (Section 2.14.12).
 - It is proposed that all roadways within the proposed project will function as internal driveways and will be privately built and maintained, and will be, therefore, exempt from City street standards.
 - The discussion under Section 2.14.11 has been expanded to include the project's anticipated impacts upon public transit services.
 - Your requested transit notice will be added to all construction notes.

Very truly yours,



Lee Sichter

cc: L. Chinn
E. Nellis

DEPARTMENT OF COMMUNITY SERVICES
CITY AND COUNTY OF HONOLULU
10 SOUTH KING STREET, SUITE 300 • TECHNICAL SERVICES DIVISION • HONOLULU, HAWAII 96813



October 7, 2011

HELENA LARSEN
MAYOR

SAMUEL E. H. MOKU
DIRECTOR

BRIDGE T. HERRING
DEPUTY DIRECTOR

RECEIVED
LAND MANAGEMENT
DIVISION
2011 OCT 12 AM 10:54

Ms. Linda Chinn, Administrator
Department of Hawaiian Home Lands
P.O. Box 1879
Honolulu, Hawaii 96805

Dear Ms. Chinn: *Linda*

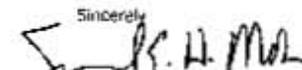
Subject: Response to Draft Environmental Assessment
State of Hawaii Department of Hawaiian Home Lands
Ka Makana Ali'i Conceptual Master Plan

Thank you for providing us with the opportunity to review and comment on the subject Draft Environmental Assessment (EA). At this time, we have determined that the subject project will have no adverse impact on the projects and programs of the City and County of Honolulu's Department of Community Services.

However, we would like to bring to your attention the National Environmental Policy Act (NEPA), 42 United States Code (USC) §4321 et seq., that subjects recipients of Federal funding to consider how their actions may affect the environment. Although similar in nature to the State of Hawaii's Chapter 243 Hawaii Revised Statutes (HRS) Environmental Assessment, NEPA documentation emphasizes the purpose and need of the project, analyzes alternatives and their advantages and disadvantages, and evaluates compliance with Federal Regulations and statutes including, but not limited to, Section 106 of the National Historic Preservation Act, Section 7 of the Endangered Species Act, Section 404 of the Clean Water Act, Executive Order 12898 (Environmental Justice), and Executive Order 11990 (Wetland Protection).

Therefore, if you are considering the use of Federal funds for construction in this project, we strongly suggest that you direct your consultant to consider NEPA analysis in your environmental compliance documents.

In closing, we look forward to receiving the supplemental information and appreciate the opportunity to provide comments. In addition, we eagerly anticipate reviewing your Final EA when it becomes available. Questions regarding this matter may be directed to Michael Shirohina at 766-7751.

Sincerely,

Samuel E. H. Moku
Director

SEHM:ig

LEE SICHTER LLC

45024 MALULANI STREET #1, KANEHOE, HAWAII 96744
PH. (808) 382-3836; FAX. (808) 234-0872; WEB. WWW.LEESICHTER.COM

November 28, 2011

Mr. Samuel E. H. Moku, Director
Department of Community Services
City and County of Honolulu
715 South King Street, Suite 311
Honolulu, Hawaii 96813

Dear Mr. Moku:

**Response to Comment
Ka Makana Ali'i Conceptual Master Plan
Draft Environmental Assessment**

I am writing on behalf of the Department of Hawaiian Home Lands in response to your comment letter to the Department of Hawaiian Home Lands dated October 7, 2011 regarding the above project. Thank you for participating in the public and agency review process for the Ka Makana Ali'i project.

We acknowledge your determination that the proposed project will not impact any of your department's programs or facilities. We also acknowledge the need for a NEPA-level analysis for environmental documentation pertaining to any construction projects utilizing federal funding. However, in this instance, no federal funds are anticipated for construction of the proposed project.

Very truly yours,



Lee Sichter

cc: L. Chien
E. Nellis

DEPARTMENT OF FACILITY MAINTENANCE
CITY AND COUNTY OF HONOLULU

1000 South King Street, Suite 715, Honolulu, Hawaii 96813
Phone: (808) 733-2643 • Fax: (808) 769-3781
Website: www.cc.hawaii.gov



October 12, 2011

W. H. H. LA'AU
SAYO

WESTLEY K. C. CHUN, Ph.D., P.E., CEE
DIRECTOR & CHIEF ENGINEER

COLLETTA K. SIMONS
CHIEF OF STAFF

PHOTOGRAPHY BY
DORIS L. BROWN

Mr. Lee Sichter
Lee Sichter, LLC
45 024 Malulani Street, #1
Kaneohe, Hawaii 96744

Dear Mr. Sichter:

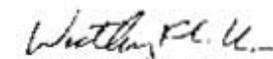
Subject: Ka Makana Ali'i Conceptual Master Plan

Thank you for the opportunity to review the subject plan dated September 6, 2011 and provide the following comments:

1. All roadways for City maintenance shall meet City standards and 2009 MUTCD Retroreflectivity Standards for street signs.
2. Due to no funding for maintenance from DHHHL, we request no medians with vegetation, trees or irrigation systems.
3. Any non-pavement improvements intended for City maintenance will require a maintenance agreement.

Should you have any questions, please contact Lan Yorlita, Assistant Chief of the Division of Road Maintenance, at 768-3600.

Sincerely,



Westley K.C. Chun, Ph.D., P.E., CEE
Director and Chief Engineer

LEE SICHTER LLC

45024 MALULANI STREET #1, KANEHOE, HAWAII 96744
PH. (808) 382-3836; FAX. (808) 234-0872; WEB. WWW.LEESICHTER.COM

November 28, 2011

Mr. Westley K. C. Chun, Director and Chief Engineer
Department of Facility Maintenance
City and County of Honolulu
1000 Uluohia Street, Suite 215
Kapolei, Hawaii 96707

Dear Mr. Chun:

**Response to Comment
Ka Makana Ali'i Conceptual Master Plan
Draft Environmental Assessment**

I am writing on behalf of the Department of Hawaiian Home Lands in response to your comment letter dated October 12, 2011 regarding the above project. Thank you for participating in the public and agency review process for the Ka Makana Ali'i project. Following are our responses to your comments in the order they were presented in your letter.

We acknowledge that any roadways designated for City maintenance will be required to meet City design standards and 2009 MUTCD Retroreflectivity Standards for street signs.

We acknowledge your concerns about the availability of funding for median landscape maintenance. If any median landscaping is included in the project, its maintenance will be privately funded.

Finally, we acknowledge the need for a maintenance agreement with the City for any non-pavement improvements intended for City maintenance.

Very truly yours,



Lee Sichter

cc: L. Chlan
E. Nellis

DEPARTMENT OF DESIGN AND CONSTRUCTION
CITY AND COUNTY OF HONOLULU

550 SOUTH KING STREET, 11TH FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8400 • Fax: (808) 776-4567
Web site: www.ccshd.hawaii.gov



PETER D. GARIBOLDI
Mayor

COLLEEN D. LAM, P.E.
Director

LEONAL A. KAHINGA, P.E.
Deputy Director

October 12, 2011

Mr. Lee Sichter
Lee Sichter LLC
45024 Malulani Street #1
Kaneohe, Hawaii 96744

Dear Mr. Sichter:

Draft Environmental Assessment Ka Makana Ali'i Conceptual Master Plan

Thank you for the opportunity to review and comment on this project. The Department of Design and Construction has no comments.

Should there be any questions, please contact me at 768-8400.

Sincerely,



Collins D. Lam, P.E.
Director

CDL:pg(432824)

LEE SICHTER LLC

45024 MALULANI STREET #1, KANEHOHE, HAWAII 96744
PH. (808) 382-3836; FAX. (808) 234-0872; WEB. WWW.LEESICHTER.COM

November 28, 2011

Mr. Collins D. Lam, P.E., Director
Department of Design and Construction
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813

Dear Mr. Lam:

Response to Comment
Ka Makana Ali'i Conceptual Master Plan
Draft Environmental Assessment

I am writing on behalf of the Department of Hawaiian Home Lands in response to your comment letter dated October 12, 2011 regarding the above project. Thank you for participating in the public and agency review process for the Ka Makana Ali'i project. We acknowledge that your department has no comments on the proposed project.

Very truly yours,



Lee Sichter

cc: L. Chinn
E. Nellis

DEPARTMENT OF LAND AND NATURAL RESOURCES ENGINEERING DIVISION

DL/HirleandNakunoua
HEF:DEAKa Makana Ali'i Kapolei
Oahu, 862

COMMENTS

- (X) We confirm that the project site, according to the Flood Insurance Rate Map (FIRM), is located in Zones D and X. The National Flood Insurance Program does not have any regulations for developments within Zones D and X.
- () Please note that the project site, according to the Flood Insurance Rate Map (FIRM), is located in Zone
- () Please note that the correct Flood Zone Designation for the project site according to the Flood Insurance Rate Map (FIRM) is
- () Please note that the project must comply with the rules and regulations of the National Flood Insurance Program (NFIP) presented in Title 44 of the Code of Federal Regulations (44CFR), whenever development within a Special Flood Hazard Area is undertaken. If there are any questions, please contact the State NFIP Coordinator, Ms. Carol Ferra Stern, of the Department of Land and Natural Resources, Engineering Division at (808) 567-0427.

Please be advised that 44CFR indicates the minimum standards set forth by the NFIP. Your community's local flood ordinance may prove to be more restrictive and that the project may not meet the minimum NFIP standards. If there are questions regarding the local flood ordinance, please contact the applicable County NFIP Coordinator's below:

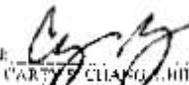
- () Mr. Robert Szymanski at (808) 768-2097 or Mr. Marie Szeles at (808) 768-8098 of the City and County of Honolulu, Department of Planning and Permitting.
- () Mr. Frank DeMarco at (808) 961-6242 of the County of Hawaii, Department of Public Works.
- () Mr. Karzon Cecilia at (808) 270-7771 of the County of Maui, Department of Planning.
- () Ms. Wynne Ushigoro at (808) 241-4880 of the County of Kauai, Department of Engineering.

- (X) The applicant should include water demands and infrastructure required to meet project needs. Please note that projects within State lands requiring water service from the Honolulu Board of Water Supply system will be required to pay a resource development charge, in addition to Water Facilities Charges for transmission and daily storage. The applicant should provide the water demands and calculations to the Engineering Division so it can be included in the State Water Projects Plan Update.
- (X) The applicant should provide the water demands and calculations to the Engineering Division so it can be included in the State Water Projects Plan Update.

() Additional Comments: _____

() Other: _____

Should you have any questions, please call Ms. Nicole S. Agoston of the Planning Branch at 867-0258.

Signed: 
CARTER LIANG, PROFESSIONAL ENGINEER
Date: 10/12/11

LEE SICHTER LLC

45024 MALULANI STREET #1, KANEHOE, HAWAII 96744
PH. (808) 382-3836; FAX. (808) 234-0672; WEB. WWW.LEESICHTER.COM

November 28, 2011

Mr. Carty S. Chang
Chief Engineer
Engineering Division
Department of Land and Natural Resources
State of Hawaii
P. O. Box 621
Honolulu, Hawaii 96809

Dear Mr. Chang:

**Response to Comment
Ka Makana Ali'i Conceptual Master Plan
Draft Environmental Assessment**

I am writing on behalf of the Department of Hawaiian Home Lands in response to your comment memorandum dated October 12, 2011 regarding the above project. Thank you for participating in the public and agency review process for the Ka Makana Ali'i project.

The information you requested concerning water demands and infrastructure requirements to meet the project's needs is presented in Section 8.6.1 of the Draft Environmental Assessment. As stated in the EA, the Board of Water Supply indicated that both potable and non-potable water were available for the project at the time a request for determination was submitted. The infrastructure needed to provide water to the project is already in place, having been installed by the Department of Hawaiian Home Lands as part of the Kapolei Parkway extension project. Also, as stated in the EA, due to the storage system improvements made by the DHHL, the proposed project will need to pay only the portion of the facilities charges associated with resource development and transmission. The project is expected to pay its prorata share of the cost of storage improvements in the DHHL.

Very truly yours,



Lee Sichter

H. LEE KAHUMUHE
GOVERNOR



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
808 P. INDIAN BOWL STREET
HONOLULU, HAWAII 96813-0097

GLENN M. OKIMOTO
DIRECTOR

Deputy Directors
JACQUELINE S. GIBBY
TAKELI H. HONOLUA
MARGARET COLLETT
JAMES J. JENSEN

DIRECTOR DEPUTY

STP 8.0610

October 20, 2011

TO: THE HONORABLE A. APAKI NAHALE-A
CHAIRMAN, HAWAIIAN HOMES COMMISSION
DEPARTMENT OF HAWAIIAN HOME LANDS

FROM: GLENN M. OKIMOTO, PH.D.
DIRECTOR OF TRANSPORTATION *Glenn Okimoto*

SUBJECT: KA MAKANA ALI' CONCEPTUAL MASTER PLAN -- DRAFT
ENVIRONMENTAL ASSESSMENT (DEA)

Thank you for requesting the State Department of Transportation's (DOT) review of the subject project. DOT understands the Department of Hawaiian Home Lands (DHHL) is committed to lease 67 acres to the developer, Hawaii DeBartolo LLC, who proposes a regional mixed use center that will include approximately 1,400,000 square feet of leasable area. The project will include a variety of uses such as commercial office space, two or more large retail anchors as well as smaller boutique stores, a cinema, a gym, two hotels, numerous restaurants and other dining establishments, and entertainment facilities. In addition to approximately 2,67' at grade parking spaces, there will be approximately 1,826 underground parking spaces.

DOT previously commented on the project and offers the following further comments.

DOT Highways

1. DOT remains concerned about the local and regional traffic impacts related to the development of the proposed mixed use project.
2. The master plan for Ka Makana Ali'i is stated as being conceptual in nature because the physical character of the proposed development will be ultimately shaped by the outcome of the development and the separate lease agreements between Hawaii DeBartolo LLC and the project's future tenants. As such, the site plans presented in the conceptual master plan are subject to revision and modification as the project progresses and lease negotiations are concluded.
3. The June 2011 Traffic Evaluation (TE) in Appendix B of the DEA was previously provided to the DOT Highways Division along with a request for accesses to Kuailekai Parkway and Roosevelt Avenue. Highways Division comments on the TE were provided to the traffic

- consultant in letter HWY-PS 2.9276 dated August 16, 2011 (copy attached). The traffic consultant responded with a letter dated September 7, 2011, acknowledging DOT's concerns. DOT comments in the HWY-PS 2.9276 letter remain valid and will need to be addressed in a revised TE, covering both Phases of the project, to be included in a submittal to DOT for review and approval.
4. The review of the revised Traffic Evaluation (TE) used to support the proposed project will thus be conditioned on and subject to the need for necessary supplements or updates as changes and refinements in the development plans occur, or should the project, or portions thereof, be included in any subsequent land use or zoning application.
 5. A detailed development plan for the subject project, including each phase or portions thereof, if incremental developments occur, shall accompany the revised TE, and any subsequent updated TE. The development plan shall show the layout of the area or increment, and include types of units and spaces, sizes, uses, number of floors and parking.
 6. Section 11 – Unresolved Issues, states that after waiting five years for the Kualakai Parkway extension to be completed, the developer has decided not to continue waiting and will proceed with developing the project along with constructing a portion of the extension (two lanes to the project entrance) that the TE states is the developer's responsibility. The 2035 Oahu Regional Transportation Plan (ORTP) identifies the Kualakai Parkway as a six-lane roadway. The developer's plan to construct the two-lane portion of the Kualakai Parkway extension to the project site entrance should take into consideration the proposed plan for a six-lane roadway.
 7. Section 2.14.8, Pedestrian Access, refers to Figure 8 presenting the pedestrian circulation plan. While Figure 8 shows the conceptual site plan it does not appear to clearly show any pedestrian circulation plan for the development. Pedestrian circulation should be identified better.
 8. Section 2.14.9, Bikeways, refers to Figure 5 as showing the incorporation of bikeways. Figure 5 (similar the Figure 8 noted above) does not appear to provide a clear designation of where the bikeways are located. Bikeways should be identified better.
 9. The discussion of transportation in the DEA is very fragmented and contains numerous inconsistencies with the description of roads, the name of the developer, as well as what the development is being referred to as. The DEA must be corrected accordingly.
 10. The developer shall fund the planning, design, and construction of all traffic improvements required to mitigate project generated and/or related traffic impacts in accordance with the revised TE, and any subsequent updated TE, as approved by the DOT. All required traffic improvements for each phase of the project shall be constructed in accordance with the timing and schedule as recommended within the TE that is approved by DOT, and shall be completed prior to the occupancy of any building or premises within that respective phase.
 11. Further coordination is necessary between all affected parties in order to address the issues involving the Kualakai Parkway extension and any other project related transportation impacts. This includes the traffic consultant for the developer continuing work with DOT Highways Division to ensure that all traffic impacts are adequately addressed and properly mitigated.

DOT Airports

12. The subject project lies directly under a primary approach/departure route to Kalaheo Airport for both military helicopters and light civil aircraft. Although the majority of civil air operations occur during daylight hours, most military flight activity is at night, subjecting the subject project with repeated aircraft noise events and overflights throughout the day.
13. The subject project also lies within the 55-60 DNL noise contour. The proposed commercial use as described for the project, is compatible with DOT Airports Division land use for noise compatibility. However, if any use, or portion thereof changes in the future, DOT needs to be informed as soon as possible to determine whether the new use is compatible with DOT Airports Division land use for noise compatibility.
14. The commercial premises in the project that may contain noise sensitive uses, areas, or activity should be properly designed and constructed to address the effects of airport and aircraft activity.
15. DOT acknowledges that the developer will be filing a Federal Aviation Administration (FAA) Form 7460-1 Notice of Proposed Construction or Alteration.

If there are any questions or the need to meet with DOT Highways Division staff and/or DOT Airports Division staff, please contact Mr. David Shimokawa of the DOT Statewide Transportation Planning Office at telephone number 831-7976.

Attach.

c: Lec Sichter LLC
Ms. Linda Chinn, DHHL



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

August 16, 2011

GLENN M. OKIMOTO
DIRECTOR

Deputy Directors
JADE T. BUTAY
FORD N. FUCHIGAMI
RANDY GRUNE
JADINE URASAKI

IN REPLY REFER TO:
HWY-PS
2.9276

Mr. Randall M. Urasaki
Page 2

HWY-PS
2.9276

August 16, 2011

assure the fourth leg of the Kualakai Parkway and Kapolei Parkway intersection meets all required design and safety standards.

2. The traffic evaluation does not specify the proposed sizes for the office building, hotel, and movie-theater. The proposed sizes of these facilities must be estimated and included in order to verify that the trip generation analysis is accurately representing the proposed project's potential impacts.
3. The trip distribution analysis for Phases 1 and 2 (Figures 8 and 11 respectively), shows that there will be no project generated trips to and from the adjacent residential communities at the intersection of Kapolei Parkway and Kamaaha Avenue. Clarification must be provided to explain this analysis.
4. The traffic evaluation does not provide any analysis on pedestrian or bicycle movement in and around the project site. A thorough analysis must be provided to assure proper safety measures are in place for the pedestrian, cyclists and public transportation users visiting the proposed project.
5. The traffic evaluation and included figures do not provide any details on who will be constructing the Kualakai Parkway extension to Roosevelt Avenue as shown in the provided site plans, nor does it provide any details of the schedule or funding for construction. Further discussions with appropriate agencies will be necessary to determine these issues.
6. The proposed site plans show two additional access points on the Kualakai Parkway extension. Clarification of these additional access points must be provided to HDOT for review. Both proposed access locations are unacceptable due to the short separation distance between the proposed accesses and also to the intersection of Kualakai and Kapolei Parkway.
7. The proposed east and west access locations on Roosevelt Avenue in addition to the proposed intersection with the extension of Kualakai Parkway create too many potential traffic conflict points with the active historic railroad and multi-use path. Access to Roosevelt Avenue should be minimized to prevent these potential traffic issues.
8. Any access locations allowed on Roosevelt Avenue must be designed and constructed to include active railroad crossing devices. In addition, all access points and required roadway improvements to Roosevelt Avenue shall be designed and constructed in accordance with City and County of Honolulu design standards/requirements. Furthermore, the roadway improvements to Roosevelt Avenue should be continuous throughout the entire frontage of the project site.

Mr. Randall M. Urasaki
Vice President
PB Americas, Inc.
1001 Bishop Street, Suite 2400
Honolulu, Hawaii 96813

Dear Mr. Urasaki:

Subject: Ka Makana Alii Shopping Center – Request for Access
State Route No. 8930 – Kualakai Parkway
8940 – Roosevelt Avenue
Oahu, Ewa, Kapolei, TMK: (1) 9-1-016:142

Thank you for the opportunity to review the Ka Makana Alii Traffic Evaluation dated June 2011 and letter dated June 21, 2011 requesting access to Roosevelt Avenue and Kualakai Parkway. In reviewing the description of the proposed project, it is our understanding that this will be a mixed-use development which will include an office building, hotel, movie theater, and approximately 900,000 square feet (SF) of retail commercial space. Construction of the proposed project will be conducted in two phases; Phase 1 will consist of approximately 200,000 SF of retail commercial space on the western portion of the project site, and Phase 2 will include approximately 700,000 SF of additional retail commercial space along with an office building, hotel, and movie theater.

In consideration of the location of the proposed project being at the intersection of Kualakai Parkway and Kapolei Parkway, and the continued growth of the Ewa-Kapolei area, the State of Hawaii Department of Transportation (HDOT) has concerns with the potential project related impacts to HDOT facilities within the area. Therefore, we have the following comments:

1. The sharp/acute angle in the alignment of the proposed Kualakai Parkway Extension at its intersection with Kapolei Parkway presents concerns for potential operational and safety issues at the intersection. Further discussion with HDOT will be necessary to

Mr. Randall M. Urasaki
Page 3

August 16, 2011

HWY-PS
2.9276

Further discussion will be necessary to address the aforementioned concerns prior to the granting of any access to State roadways.

If you should have any questions, please contact Mr. Gary Ashikawa, Systems Planning Manager, Highways Division, Planning Branch at 587-6336.

Very truly yours,



GLENN M. OKIMOTO, Ph.D.
Director of Transportation

LEE SICHTER LLC

45024 MALULANI STREET #1, KANEHOE, HAWAII 96744
PH. (808) 382-3836; FAX. (808) 234-0872; WEB. WWW.LEESICHTER.COM

November 28, 2011

Mr. Glenn M. Okimoto, Ph.D.
Director of Transportation
Department of Transportation
State of Hawaii
869 Punchbowl Street
Honolulu, Hawaii 96813-5097

Dear Dr. Okimoto:

**Response to Comment
Ka Makana Ali'i Conceptual Master Plan
Draft Environmental Assessment**

I am writing on behalf of the Department of Hawaiian Home Lands in response to your comment memorandum to Chairman Nahale-a, dated October 20, 2011 regarding the above project. Thank you for participating in the public and agency review process for the Ka Makana Ali'i project. Following are responses to your comments in the order they were presented in your memorandum.

1. We acknowledge your department's concerns and endeavor to continue providing updates to the Revised Traffic Evaluation Report as required.
2. We will keep your department apprised of any substantive changes to the site plans as the project proceeds.
3. As requested, DOT comments will be addressed in the revised Traffic Evaluation covering both phases of the project to be submitted by the project's traffic consultant for your department's review and approval.
4. Acknowledged.
5. Acknowledged. If incremental developments occur, we will provide updated development plans as requested.
6. The entrance design into the project can be coordinated to interface with the future extension of Kualaka'i Parkway.
7. Figure 8 has been revised to better represent pedestrian circulation in the proposed development.
8. Figure 5 has been revised to clarify the incorporation of bikeways within the proposed development.
9. The discussion of transportation in the Draft EA has been revised to address your concerns and the necessary corrections and revisions have been made.

DEPARTMENT OF PLANNING AND PERMITTING
CITY AND COUNTY OF HONOLULU
KULUKEHU PUELE I KAUAU - HONOLULU, HAWAII
KULUKEHU PUELE I KAUAU - HONOLULU, HAWAII
KULUKEHU PUELE I KAUAU - HONOLULU, HAWAII

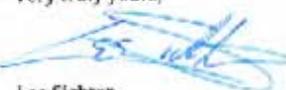


October 25, 2011

2011:ED-8;TH

10. Acknowledged.
11. Acknowledged.
12. Acknowledged.
13. The DOT Airports Division will be advised of any changes to the commercial use of the property in the future, as requested.
14. Acknowledged.
15. Confirmed.

Again, mahalo for participating in the environmental review process.

Very truly yours,

Lee Sichter

cc: L. Chian
E. Nellis

ATTENTION:
HONOLULU

HONOLULU TO SAC
HONOLULU
HONOLULU TO SAC
HONOLULU

Mr. Atapaki Nahale-a, Chairman
Department of Hawaiian Home Lands
5115420 Kaheol Parkway
Kapolei, Hawaii 96707

Dear Mr. Nahale-a:

Subject: Draft Environmental Assessment (DEA) for the Ka Makana Ahi
Conceptual Master Plan, Fwa, Oahu, Tax Map Key: O-1-018-142

We have reviewed the subject DEA and believe that development of the project may potentially have significant environmental and socio-economic impacts on the Fwa region, especially on Kulewa and East Kapolei. The Department of Planning and Permitting (DPP) believes a regional project of this scale would require significant public investment in infrastructure at a time when public resources are severely challenged. Additionally, development of the project at its proposed location in East Kapolei conflicts with the City's General Plan objective of creating Oahu's Second City in Fwa with its nucleus in the City of Kapolei.

Additionally, the DFA is deficient in a number of areas as explained below. Therefore, we recommend that the applicant provide a more detailed analysis and disclosure of the project's likely social, environmental and economic impacts on the Fwa region.

1. In Section 1.1, the DFA does not seem to indicate the trigger of Chapter 343, HRS. This should be clarified. Because the proposed development will be ultimately shaped by the separate lease agreements between Hawaii DeBartolo LLC and the project's future tenants, the Department of Hawaiian Home Land (DHHL) as the applicant may want to indicate its commitment to mitigation of project impacts.
2. Section 1.7 should be revised by providing an expanded discussion of surrounding land uses. For instance, other major surrounding uses include the City's Honolulu Wastewater Treatment Plant (WWTP) to the east, the DHHL's Phase I and II to the north and northeast, and the future master planned community of Honoapi to the northeast. Additionally, Figure 4 should be enlarged because its current size is too small to adequately show regional land uses surrounding the project site.
3. In Section 2.2 (Page 8), the DEA states that "The regional population has been growing at high rates in recent years, and is projected to grow by more than 11 percent every five years through 2035." The DPP asserts that this statistic grossly overstates the rate of population growth projected by the City as stated in the DPP's Fiscal Year 2009 Annual Report (published August 2010). Our data shows that the five-year population growth

rates for Ewa are a 2.7 percent increase from 2010 to 2015, 3.0 percent from 2015 to 2020, 2.4 percent from 2020 to 2025, 2.0 percent from 2025 to 2030, and 1.7 percent from 2030 to 2035. You may access the FY 2009 Annual Report from our website at www.honolulu.gov/planning/dpar2009.pdf.

4. Page 9 of the DEA briefly discusses previous market studies prepared for other retail and office projects in Ewa that indicate the need for the various uses proposed by the project. However, all of the cited market studies and vacancy studies that the DEA claims support commercial development in Ewa were prepared prior to the 2008 financial crash.

Therefore, a current market study should be prepared for the project to justify the need for adding 1.4 million square feet of leasable space to the Ewa commercial real estate market. At a minimum, the new market study for this project should provide:

- a. A listing of all existing and proposed competing shopping centers, office projects, and visitor unit projects in Ewa with acreage, existing and potential square footage of leasable space or visitor units.
 - b. An analysis of the competition the proposed mixed use commercial sites adjacent to the University of Hawaii West Oahu (UHWO) campus and in the proposed Ho'opili will pose on the proposed project with their locational advantages for capturing customers. The DEA (on Page 9) indicates that it will provide "an immediate (neighborhood) market" for Ka Makana Alii.
 - c. An analysis of what the impact of the expected completion in 2019 of the first phase of the elevated rail transit system linking stations in East Kapolei with downtown Honolulu will have on the competitive advantage of those sites over Ka Makana Alii.
 - d. Historical and projected absorption rates for retail and office space in Ewa.
 - e. An analysis of the likely market for the project's two 250-room hotels given the lack of typical Hawaii resort amenities, the close proximity of Honouliuli WWTP, and the project's location within the 1984 Naval Air Station Barbers Point Baseline Air Installation Compatibility Use Zone.
5. In the discussion in Section 2.4, the project fails to successfully interface and connect with the public streetscape. While the project theme of Hookupu focuses attention at the core of the site, it results in a site plan that is inward-turning. The project needs to also address its surrounding streets and neighbors. The project framework and sense of place need to include the edges and community transitions and not be based primarily on architectural design and the internal main streets. Therefore, attention should also be given to how the project adds to building a community rather than a project with little or no context of its surroundings.
 6. Figure 8 in Section 2.14.8 fails to depict the pedestrian circulation and connections to and from other properties. This section should be revised to evaluate how to best route neighboring pedestrians and cyclists to and into the site. Drive-thru lanes adjacent to

walkways are generally contradictory to creating a pedestrian-friendly environment and frontage.

7. The word "Transportation" in the heading, "Transportation Elements," is misspelled on Page 19 (Section 2.13).

Additionally, Figures 5 and 8 are referenced as illustrations for pedestrian and bicycle circulation. However, Figures 5 and 8 do not provide an accurate illustration regarding pedestrian and bicycle access to and from the surrounding community or circulation within the project.

8. A Draft Environmental Impact Statement (DEIS) should be considered due to the size of this development and the potential regional impacts associated with traffic. The DEIS should include a Traffic Impact Analysis Report (TIAR) in lieu of the traffic evaluation contained in the DEA, which only provides an analysis of intersections in the immediate vicinity of the project along Kapolei Parkway. A build-out in 2015 for both phases of the project appears unlikely at this point. The proposed TIAR should be adjusted accordingly to reflect a more realistic timeframe. In addition, we will be recommending that an updated TIAR be prepared prior to the commencement of Phase 2.

The traffic evaluation in the DEA should be expanded to include a detailed analysis and design of each vehicular and major pedestrian access point during the various stages of the project and the relative impacts associated with traffic at each location. Our concern is the limited amount of access points being proposed and whether they can adequately accommodate the anticipated volume of traffic. This is based on existing shopping centers of comparable size where congestion occurs along the surrounding street system if an adequate number of access points are not provided.

The Kualaka'i Parkway extension makai of Kapolei Parkway is planned to eventually extend through Kalaeloa to Ocean Pointe and Ewa Beach, and expected to carry a substantial volume of traffic. Therefore, its design as part of the project should use best design practices to provide for optimal roadway efficiency at full build out. This should be achievable since there are currently no physical constraints, such as existing buildings.

The modified Kualaka'i Parkway design as described in the DEA will have inherent operational challenges and create a dangerous intersection for the motoring public and pedestrians.

A timeline of the anticipated construction and occupancy of each major building should be provided and updates to the TIAR will be requested in anticipation of needed infrastructure and roadway improvements. It is anticipated that construction of the roadways surrounding the project will be fully completed and functional prior to the completion of the shopping center in Phase 2.

We note that the trip generation tables for both phases of the project in the traffic evaluation (Appendix B) are blank. Also, figures on traffic volumes for project related traffic and total traffic volumes should be reexamined (i.e., project related traffic is higher than the total traffic volume).

9. Section 2.14.11 of the DEA should be revised by expanding the discussion on transit. If the proposed project is intended to be integrated with the City's rapid transit project and reduce automobile usage in the region, then this section and other relevant sections should include a more detailed discussion on how the project will incorporate mass transit, including the City's bus system. Additionally, this section should be revised to conceptually locate the future transit station and show a future touchdown area onsite.

This section should also be revised to disclose that on the mauka-side of the OR&L right-of-way, there is an additional 50-foot building setback per the Ewa Development Plan (DP).

Consultation with the Honolulu Authority for Rapid Transportation should begin immediately to assure the accommodation of the future rapid transit alignment and station in your project plans.

10. The DEA provides a lengthy discussion of State plans and policies but does not include a discussion of the project's conformance or consistency with the City's General Plan. Therefore, this section should include a discussion of the project's conformance to relevant objectives and policies of the General Plan.
11. Section 6 (Page 62) of the DEA does not provide an adequate discussion about the proposed project's relationship to the Ewa DP. This section should be expanded to discuss the following issues:
- How the proposed project conforms to or is consistent with the long range vision for Ewa and relevant key elements of Ewa's vision (Section 2.1).
 - The proposed project's potential impact on views and vistas and to the existing OR&L right-of-way and historic railway line which abuts the proposed project to the south (Section 3.4).
 - The proposed project's potential impact on existing and planned residential communities (Section 3.6) such as the Villages of Kapolei, Ewa Villages, Kalaeloa, and East Kapolei. For existing and planned residential communities (Section 3.6.3), the Ewa DP encourages developing communities with higher density housing along the transit corridor and around six transit nodes, transit ready streets that also accommodate pedestrian and bicycle travel. The project site is located at one of the six transit nodes (Ewa DP Urban Land Use Map).
 - The 67-acre project would make it a regional commercial center (more than 50 acres) which is not planned for the project site according to the Ewa DP. Nonetheless, the developer should follow the Ewa DP's policies, principles, and guidelines for planned commercial centers in Section 3.7.1.
 - The DEA states that the "...Ewa Development Plan designated the property for Low and Moderate Residential Development...". However, the current Ewa DP designates the project site as "High Density Residential." This section should reflect the correct land use policy designation.

- It is correct that the project site is designated for urban expansion during the 1997-2005 time frame according to the Ewa DP's Phasing Map. However, Figure 10 in the DEA is not the Phasing Map. Therefore, this section should include the Ewa DP Phasing Map as a separate Figure.
12. Section 6 of the DEA states that "In October 2008, the DPP released a Public Review Draft in fulfillment of a statutory requirement to periodically revise and update the Ewa Development Plan." Furthermore, the DEA states that "it was determined by the City that a second Public Review Draft would be prepared in response to comments received."
- The DPP wants to clarify that at no time were there plans to issue a second Public Review Draft. In fact, the City has completed its Ewa DP Review Report and transmitted a proposed revised Ewa DP to the Planning Commission in October 2011.
- Additionally, the DEA erroneously states that "the first Public Review Draft identified the general area of the Hawaii DeBartolo, LLC project as the site of a Regional Commercial Center." In fact, the 2008 Public Review Draft did not support a Regional Commercial Center at the site. It supports development of a Community Commercial Center "near the intersection of Kapolei Parkway and North South Road" and "medium density mixed use commercial development within a quarter-mile radius of the proposed transit stations" which includes the area around the proposed transit station adjacent to the project site.
13. Section 6, paragraph 2 of the DEA discusses the project site's reclassification from State Agricultural to Urban Districts under Land Use Commission (LUC) Docket No. A99-728. Since this paragraph deals with Chapter 205, Hawaii Revised Statutes, this discussion should be placed in a separate section and not included in the discussion of the Ewa DP. Furthermore, this section should disclose whether the applicant will file a petition with the LUC to modify or delete any conditions that tie the site to a sports complex.
14. Section 6.3.1 provides a brief discussion regarding how the project conforms to the Ewa DP's policies regarding views. This discussion should be incorporated with an expanded discussion of the Ewa DP mentioned above.
15. The DEA's discussion on zoning is inadequate and should be expanded because Section 6.2 of the DEA left out key parts of the Land Use Ordinance (LUO) that define the purpose and intent of the business mixed use districts and define all development standards for BMX-3 and BMX-4 districts. Although the DHHL can exempt the project from City zoning requirements, the DEA states that the project proposes using BMX-3 Community Business Mixed Use and BMX-4 standards. Whether or not the DHHL exempts the project from City zoning requirements or not, this section should be revised to disclose all development standards for BMX-3 and BMX-4 districts if they are to be used.
- Furthermore, it should be disclosed that if the DHHL intends to exempt itself from county zoning standards, then they should state this intention in a letter to the DPP so we may document it for the project. If DHHL submits a letter exempting itself from zoning

regulations, the DPP will not review permits for zoning compliance but will still review permits for building code compliance and any other requirements relevant to building permit issuance. However, if such a letter is not received from DHHL, then the DPP is required to review all permits for the project against whatever zoning standard(s) are applicable.

In Section 6.2, the discussion should indicate that the BMX-4 District is intended for the downtown area and not intended for general application.

16. Please clarify: Section 6.2.1 states that Figure 4 shows Phases 1, 2, and 3; however, Figure 4 shows what is described as regional land uses, but does not show phases of the project. Additionally, elsewhere in the DEA, the project is described as having only two phases.
17. Section 6.2.2 of the DEA should be reviewed and revised because there seems to be conflicting statements and percentages regarding how much of the site will consist of impervious surfaces and how much will be retained in open space. For your information, parking areas are usually considered impervious surfaces.
18. This section should include a discussion on the project's consistency with the Pearl Harbor Historic Trail Master Plan (2001).
19. The proposed façade at the Kualaka'i frontage (Figure 11) should incorporate display windows and entrances to present an inviting and pedestrian-friendly frontage.
20. The discussion of potential impacts and mitigation measures for residents of Varona Villages and for the Hawaiian Railway Society (Page 85) is incomplete. This section should be revised to identify appropriate mitigation measures beyond providing "communications" and "holding discussions."
21. Section 8.7 (Site Drainage): Please provide a plan view showing all stockpiles, excavation areas, (including borrow pits) described in this section (Appendix G, Figure 16 indicates 4 stockpiles, 3 excavated areas, and 1 borrow pit). For more information, please contact Don Fujii of our Civil Engineering Branch at 768-8107.
22. A Drainage Master Plan for East Kapolei that includes the project area was prepared by Belt Collins and submitted to the DPP in October 2007, but was not referenced. The East Kapolei Drainage Master Plan cited in Section 8.7 of the DEA is based on the City's drainage standards that have since been revised. Please review all calculations and verify the hydrologic data calculated is still valid for the DEA's scope.

This section should discuss any anticipated adverse impacts related to the proposal of an underground parking structure in terms of flooding and possible intrusion into the aquifer zone.

This section should also discuss the applicability of City and State storm water quality requirements and how it will be addressed. Note that the City's storm water quality requirements are currently being revised to incorporate Low Impact Development methods (i.e., retention, infiltration, bio-retention, etc.) to treat on-site runoff. For more information, please contact Leonard Furukawa of our Civil Engineering Branch at 768-8105.

23. Section 9 of the DEA should include a third alternative which should reflect the continuation of Kualaka'i Parkway straight through the site into Kalaeloa and to Ewa Beach. This would reflect best traffic design practice for optimal roadway efficiency. Although this alternative would create another easement over the OR&L right-of-way, it should not impact the Hawaiian Railway Society's base yard which will be impacted by the proposed realignment of Kualaka'i Parkway.

Thank you for the opportunity to comment on this matter. Should you have any questions, please contact Tim Hata of our staff at 768-8043.

Very truly yours,



David K. Tanoue, Director
Department of Planning and Permitting

DKT:js

cc: Mr. Lee Sichter, Lee Sichter, LLC

EA-EIS/2011/Ka Makana AIII DEA/2011ed8

LEE SICHTER LLC

45024 MALULANI STREET #1, KANEHOE, HAWAII 96744
PH. (808) 382-3836; FAX. (808) 234-0872; WEB. WWW.LEESICHTER.COM

November 28, 2011

Mr. David K. Tanoue
Planning Director
Department of Planning and Permitting
City and County of Honolulu
650 South King Street, 7th Floor
Honolulu, Hawaii 96813

Dear Mr. Tanoue:

Response to Comment Ka Makana Ali'i Conceptual Master Plan Draft Environmental Assessment

Thank you for participating in the public and agency review process for the Ka Makana Ali'i project. I am writing at the request of the Department of Hawaiian Home Lands in response to your comment letter dated October 25, 2011 regarding the above project. Following are our responses to your comments in the order they were presented in your letter.

DPP Introductory comment: The proposed project will have many beneficial socio-economic impacts on the Ewa region and the Draft Environmental Assessment clearly demonstrates that no significant adverse impacts will result from the construction or operation of the Ka Makana Ali'i (KMA) project. Infrastructure investments by the Department of Hawaiian Home Lands have facilitated the development of its East Kapolei property including the 403 residential lots contained in its Kanehiki development, as well as the Kalanika'ole Building that serves as the headquarters for the department. As discussed in Draft EA, nearly all of the regional infrastructure needed to support the DHHL's East Kapolei developments have been completed or are near completion.

The KMA project benefits from the culmination of these efforts. Agreements and/or tentative approvals for connecting the KMA project to regional infrastructure have already been concluded. In its September 20, 2011 comment letter on the project, the Board of Water Supply concludes that, "The existing water system is adequate to accommodate the proposed development." The City's Parks Department states in its September 15th comment letter that the project will not impact any of the department's programs or facilities. The State's Department of Human Services in its September 22nd comment letter concludes that "...Since this is a commercial

project and not anticipated to generate a significant impact in terms of residential population growth..." It will not generate an increase in school populations. In short, the public investment you are concerned about has already been completed. The KMA project responds to infrastructure improvements that were first contemplated in 1999 with the original East Kapolei development proposal by the Housing and Community Development Corporation of Hawaii and then implemented by the Department of Hawaiian Home Lands together with the HCDCII.

The KMA project will benefit the entire population of Ewa, which is consistent with the General Plan's Economic Activity Objective A, Policies 1 and 2. As a mixed use regional center, the KMA project will offer amenities unlike any provided elsewhere in Ewa. However, the project is not a population generator. It will augment existing and planned Kapolei developments rather than undermine them. Because the project is being proposed on land that was reclassified to the State Urban District in 1999, it is consistent with the Economic Activity Objective C, Policy 6. We do not believe that Economic Activity Objective C, Policy 1 of the General Plan which states: "Direct major economic activity and government services to the primary urban center and the secondary urban center at Kapolei" should be interpreted to mean that other existing urban areas in Ewa should be allowed to remain vacant or unused. The subject property has been designated for a regional sports complex. Replacing one regional use with another is not inconsistent with the General Plan. The KMA project responds to the residential growth that has occurred in Ewa for the past 20 years. And in so doing, it is consistent with Physical Development and Urban Design Objective A "...to ensure that all new developments are timely, well-designed, and appropriate to the areas in which they will be located," and Policy 7 that calls for new commercial areas to be well related to their markets and suppliers, and to residential areas and transportation facilities.

DPP Identified Deficiencies:

1. The so-called trigger for the document is presented in the discussion under Section 3 of the Draft EA. The original 1999 Final EIS for the East Kapolei project was triggered by the use of government funds and government lands. The project site continues to be owned by the State. The proposed project will be privately funded. Hence, the use of government funds is no longer a trigger. However, because an access driveway from the project to Konevick Avenue must cross the OR&E railway, which has been placed on the National Historical Register, the potential impact upon the registered site also becomes a trigger. As discussed in Section 4.6 of the Draft EA, the DHHL must secure an approval from the State Land Use Commission for a change in the property's designated use. As the original use (a regional sports center) was discussed in the East Kapolei Final Environmental Impact Statement, the EA has been prepared to support the Department's motion for the requested change of the land use designation to a Regional Mixed Use Center. The EA has been prepared to determine whether or not the proposed change will

result in significant adverse impacts. The document concludes that it will not.

2. Section 1.7 has been revised as requested. However, we have elected not to reference Ho'opili because at the time of this writing, the proposed project has not been granted Urban reclassification by the State Land Use Commission and remains zoned for agricultural use. Figure 4 has been enlarged as requested.
3. The figure given in the text – average growth exceeding 11% -- is based on DPP's projections. The question at issue is how to describe the projected growth. The project's economic consultant, Dr. John Kirkpatrick, advises that the percentages to which you refer in your letter are actually annual growth rates during the five-year periods, while the EA reported an average five-year period growth rate. The underlying numbers are the same. The phrasing used in the DEA conveys the rapid growth expected in 'Ewa to the general public, and may do so more effectively than would annual growth rates.
4. The proposed use of the property was determined by DHHL. The market information included in the Draft EA supports that determination. As the property owner, DHHL has not requested further market information from the lessee.
5. We acknowledge your recommendations concerning KMA's interface with the public streetscape. The lessee has participated in several meetings with your staff since the publication of the Draft EA to address this and other issues. Hawaii DeBartolo LLC has conceived this project to be fully integrated into the surrounding community of East Kapolei. The project's design is fluid and is responding to the community as the surrounding sites become more developed, and as the design team learns more about the area, its history and culture. The design is envisioned to be a progressively planned urban design that creates a village center, the celebration of the Ho'okupu, with surrounding walk-able, pedestrian/bicycle-friendly streets and pathways.
6. Your concerns about pedestrian access and drive-thru lanes are acknowledged. New figures (7a and 8a) have been added to the environmental assessments to present proposed pedestrian circulation patterns in the project's Phase 1 and Phase 2, respectively. The following design concepts have been added to the text of Section 2.4 of the environmental assessment to address the project's perimeter interface with the community and pedestrian/bicycle access to and within the site:
 - a. The streets surrounding the project are major thoroughfares servicing Kapolei and Ewa Beach with multiple lanes of traffic in both directions. A sidewalk currently shown adjacent to the street is proposed to be deleted and moved inward toward the site. The relocated pathway will be a multi-use sidewalk and bikeway that will meander in a gentle serpentine layout around the site. A lushly landscaped zone directly adjacent to the street will buffer the heavy traffic on the road and allow pedestrians and bicyclists to safely travel

to, from, and around the project site. The pathway is proposed to encircle the site on the Mauka, Diamond Head and Makai boundaries of the site. The pathway on the Makai boundary will be proposed to link with the historical trail adjacent to the OR&L railway.

- b. The bikeway is also proposed that will bisect the site along the project's major bisecting vehicular thoroughfare. This bikeway/walkway will conform closer to the internal street layout, but will still be landscaped and marked for safe pedestrian/bicyclist travel.
- c. Bike shelter parking kiosks will be situated at selected intervals along the pathway providing covered bike racks, water stations, and community information boards. These kiosks will help to bring pedestrian level structures close to the roads and provide foreground elements for the retail stores and commercial properties in the background.
- d. Along the perimeter of the site, there will be dedicated areas for local neighborhood vendors who, on a seasonal basis, will be permitted to sell specialized wares (lei, local craft/art, seasonal items, etc). This would be on a rotating basis and vendors would have guidelines for display, advertising, etc. Vendors would be selected so as not to have direct competition with similar small businesses found within the project. The addition of these vendors is inspired by the vendors found along the sides of roads in Hawaii selling different items. Like the bike shelter kiosks, these spaces will engage the project perimeters, and allow a vibrant pedestrian activity to be a foreground element that will help to bring additional customers to explore and experience the inner village.
- e. The building facades along the perimeter of the project will have fenestration and additional entries where possible to provide interaction with the street and pedestrian/bicycle pathways. For facades requiring larger expanses of solid wall, the walls will be treated with a combination of design elements that will help to bring the massing down and help to engage the perimeter. These will possibly include:
 - i. Green screens/trellis elements
 - ii. Roof structures over entries/exits
 - iii. Earth tone color palette
 - iv. Decorative banding and reveals with motifs
- f. The facades along the Makai boundary are adjacent to the OR&L historic rail line and trail. It is proposed that these facades be architecturally treated with period-appropriate architectural features,

artist-inspired murals/motifs, and appropriately landscaped in order to give pedestrians, bicyclists, drivers, and rail users a pleasant experience that is fitting for this area.

7. The typographical error has been corrected. New figures (7a, 7b, 8a and 8b) have been added to provide more information concerning pedestrian and bicycle circulation.
8. As disclosed in the Draft EA, a Finding of No Significant Impact (FONSI) is anticipated. The size of a particular project is not relevant to the significance criteria presented in Section 11-200-12, HAR. However, the lessee's traffic consultant, PB Americas, advises us that the Traffic Evaluation included in the Draft EA is already consistent with the general requirements of a TIAR. The State Department of Transportation ("DOT") has requested a revised Traffic Evaluation report that is being prepared and will be provided upon its completion. With regard to the phasing of the project, we wish to reassure you that the proposed build-out remains realistic, based upon the development experience of the DHHL's lessee, Hawaii DeBartolo LLC.

The Traffic Evaluation has been expanded to provide the additional information you have requested concerning vehicular and pedestrian access points.

With regard to Kualaka'i Parkway, we must emphasize that the extension of the Parkway is not part of the proposed project's first phase. Any decisions regarding the ultimate design and/or timing of a Kualaka'i Parkway extension are beyond the scope of the KMA project. We note your concerns about the design of the four-way intersection, but do not agree with them. The proposed intersection design complies with traffic safety standards. Pursuant to a joint meeting between DPP and DOT staff which a representative of Hawaii DeBartolo LLC attended on November 16, 2011, it is now our understanding that the DOT has accepted responsibility for the ultimate design, execution, and construction of an eventual extension of Kualaka'i Parkway to Roosevelt Avenue. Thus, that project will require a separate environmental assessment pursuant to Chapter 343.

A timeline for the anticipated construction and occupancy scheduled is clearly presented in the Draft EA in the form of a phasing program. It is the lessee's objective to ensure that the project components are developed concurrently with abutting roadway mitigations.

For the record, development in the Ewa region has evolved significantly from what was anticipated by the 2000 Ewa Development Plan. Both East Kapolei and Kalaeloa have emerged as new growth areas that are exempt from many City regulations. At the same time, an awareness of the potential significance of the Ewa Field has also emerged which calls into question the practicality of linking Kualaka'i Parkway to Ocean Pointe in the manner originally

envisioned. The Draft EA for KMA demonstrates that an extension of Kualaka'i Parkway to Roosevelt Avenue is not generated by the project. Based upon the DOT's recent decision to proceed with the Kualaka'i Parkway extension, it is apparent that the State is committed to the project, and that it will be taking the lead in resolving design related issues.

Matters concerning missing data and incorrect data have been resolved and the Traffic Evaluation report has been corrected.

9. Section 2.14.7 has been revised to include the transit-related information that you have requested. We respectfully have decided not to include a reference to the Ewa Development Plan's OR&L setback requirement (please see the discussion under item 11 below for further explanation). DHHL reserves the right to exempt itself from this and any other provision of the Ewa DP. Discussion of the future extension of the rapid transit system makai of the Kroc Center has been added to the list of Unresolved Issues. The lessee has initiated discussions with the Honolulu Authority for Rapid Transportation as requested.
10. Section 3 has been expanded to include a discussion of the project's consistency with the Oahu General Plan.
11. Section 3 has been expanded to include a discussion of the specific issues pertaining to the Ewa Development Plan as requested. However, it is important to note that the DHHL is engaged in its own regional planning process that involves a comprehensive effort to coordinate planning of its properties with the surrounding community. This planning process has included the preparation of the Kapolei Regional Plan and the recent efforts to prepare an Oahu Island Plan. The DPP has been invited to participate in these processes. Thus, there are multiple regional-oriented planning processes involved, and despite DPP's acknowledgement that DHHL is exempt from complying with the Ewa DP, please be assured that all of DHHL's efforts in Kapolei and elsewhere on O'ahu are conducted in accordance with a regional master plan.
12. Erroneous statements related to the Ewa DP Public Review Draft and the Ewa DP Review Report have been corrected.
13. Paragraph 2 under Section 6 was provided for contextual purposes to provide an historical perspective. As requested, a new section pertaining to Chapter 205 has been added.
14. The discussion pertaining to the Ewa DP's policies regarding views has been relocated to the new section addressing the project's relationship to the Ewa DP.
15. The discussion regarding zoning in Section 6.2 (now Section 7.3) has been expanded to reference the LUO's development standards for BMX-3 and BMX-4 zones as requested. A new appendix has been added presenting the BMX-3 and BMX-4 development standards. With regard to your advice concerning the need for DHHL to disclose its intention to exempt the proposed project from county zoning standards, we are enclosing a copy of a

letter submitted by DHHL to DPP in 2008 that we believe fulfills DHHL's obligations.

16. References regarding project phasing have been corrected.
17. Statements concerning impervious surfaces and open space have been corrected.
18. A discussion of the project's conformance with the Pearl Harbor Historic Trail Master Plan has been added to the EA.
19. The provision of display windows and entrances along the Kualaka'i façade will be discussed with specific tenants as appropriate.
20. The EA found no significant adverse impacts to Varona Village. Therefore, no mitigation measures are required. With regard to the Hawaiian Railway Society, discussions are continuing and the matter remains unresolved.
21. A new figure (Figure 17) has been added to the EA identifying the location of the stockpiles, excavation areas, and the borrow pit, as requested.
22. The change in the City's drainage standards is acknowledged. Drainage improvements for the DEA scope will be designed in accordance with the current drainage standards. As a point of clarification, the October 2007 report prepared by Belt Collins is the Conceptual Drainage Report for the East Kapolei 1 67-acre Commercial Parcel - Ka Makana Ali'i Shopping Center, and was prepared specifically for the DEA scope. It is not a drainage master plan for East Kapolei. The report was revised and finalized in June 2008.

Basement level construction typically includes provisions for waterproofing and sump pumps to address water intrusion. These are routine building elements and therefore considered a negligible impact. Preliminary geotechnical investigation borings encountered groundwater at depths over 50-ft below the existing surface. The proposed basement will extend approximately 15-ft below the existing surface, well above the groundwater aquifer.

The Drainage Master Plan for East Kapolei 1 Development (Community Planning and Engineering, Nov 2006) demonstrates the project stormwater runoff will be accommodated by the State Housing and Community Development Corporation of Hawaii's Village of Kapolei drainage system. This drainage system will serve as the water quality facility for the project. Reference City and County of Honolulu, Department of Planning and Permitting acceptance letter of the Drainage Master Plan dated November 20, 2006.

It is understood that the City's new requirements for Low Impact Development (LID) are currently being developed, but are not available at this time, and may be applicable to the project once the requirements are formally adopted.

23. Since the preparation of your letter, DOT has accepted responsibility for the design, execution, and construction of the extension of Kualaka'i Parkway to

Roosevelt Avenue. Thus, it would be inappropriate and premature to discuss alternative alignments of the Parkway in the Ka Makana Ali'i environmental assessment, especially given the fact that the eventual extension of the Parkway to Roosevelt Avenue is not part of the Proposed Action. It is our understanding that DOT will be obligated to address the issue of alternative alignments in the environmental assessment that will be required for that project.

Very truly yours,



Lee Sichter

attachment

cc: L. Chinn
E. Nellis

LINDA LINGLE
GOVERNOR
STATE OF HAWAII



STATE OF HAWAII
DEPARTMENT OF HAWAIIAN HOME LANDS
P.O. BOX 1879
HONOLULU, HAWAII 96861

MICAH A. KANE
CHAIRMAN
HAWAIIAN HOMES COMMISSION
KAILANA H. PARK
DEPUTY TO THE CHAIRMAN
ROBERT J. HALL
EXECUTIVE ASSISTANT

June 30, 2008

The Honorable Henry Eng
Director
City & County of Honolulu
Department of Planning and Permitting
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Eng:

Subject: Portion of Tax Map Key No. (1) 9-1-16:108
East Kapolei/Ewa, Oahu

The Department of Hawaiian Home Lands ("DHHL") has selected Hawaii DeBartolo, LLC, a Delaware limited liability company ("DeBartolo") as the qualified bidder to develop a commercial regional shopping center ("Shopping Center") on a portion of the above-referenced Hawaiian home lands consisting of approximately 67.27 acres (the "Property"). DHHL and DeBartolo have entered into an Option Agreement dated June 17, 2008 for the purpose of developing the Shopping Center.

This letter is to inform the City and County of Honolulu's Department of Planning and Permitting ("DPP") that pursuant to DHHL's authority, DHHL exempts the Property from the existing City & County of Honolulu ("City") AG-1 Agricultural land use zoning; and DHHL has determined that the City's BMX-3 Community Business Mixed Use requirement/guidelines to be appropriate for the Property and BMX-4 Central Business Mixed Use requirement/guidelines to be appropriate for up to 81,738 square feet of the Property, in connection with DPP's review of DeBartolo's applications for any necessary permits and approval for the Shopping Center. We understand that the BMX-4 zoning district would permit the Shopping Center, as well as a hotel and commercial office building, as they fall within the uses of a "retail establishment," "hotel," and "office building,"

The Honorable Henry Eng
June 30, 2008
Page 2

respectively, upon the portion of the Property designated as such.

Additionally, DHHL specifically exempts DeBartolo from obtaining (i) a variance, or any other type of permit that may be required by the City for the development of the Shopping Center to a height of one hundred twenty (120) feet and (ii) if necessary, an amendment to the Ewa Development Plan. Accordingly, the Property shall be treated for all purposes as if it is zoned BMX-3 and BMX-4, as appropriate.

Please inform your staff of the contents of this letter so that DeBartolo's application for the necessary permits, licenses, and other approvals in connection with the Shopping Center may proceed as smoothly as possible.

Your assistance is much appreciated. Should you have any concerns or need more information, please call me at 808-620-9501 or have your staff contact Linda Chinn, Administrator of our Land Management Division, at 808-620-9451.

Aloha and mahalo,

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

Micah A. Kane, Chairman
Hawaiian Homes Commission

c: Hawaii DeBartolo, LLC

RECEIVED JUL 14 2008



STATE OF HAWAII
DEPARTMENT OF HEALTH
P. O. BOX 3378
HONOLULU, HI 96801-3378

November 9, 2011

LORETTA J. FUDDY, A.C.S.W., M.P.H.
DIRECTOR OF HEALTH

In reply, please refer to:
BMO/CWB

11009PJF.11

Ms. Linda Chinn
November 9, 2011
Page 2

11009PJF.11

Ms. Linda Chinn
Administrator
Land Management Division
Department of Hawaiian Home Lands
P.O. Box 1879
Honolulu, Hawaii 96805

Dear Ms. Chinn:

**SUBJECT: Draft Environmental Assessment (DEA) For
Ka Makana Ali'i Conceptual Master Plan
Ewa, Island of Oahu, Hawaii
TMK: (1) 9-1-016:142**

The Department of Health, Clean Water Branch (CWB), has reviewed the subject document and offers these comments on your project. Please note that our review is based solely on the information provided in the subject document and its compliance with the Hawaii Administrative Rules (HAR), Chapters 11-54 and 11-55. You may be responsible for fulfilling additional requirements related to our program. We recommend that you also read our standard comments on our website at: <http://www.hawaii.gov/health/environmental/env-planning/landuse/CWB-standardcomment.pdf>.

1. Any project and its potential impacts to State waters must meet the following criteria:
 - a. Antidegradation policy (HAR, Section 11-54-1.1), which requires that the existing uses and the level of water quality necessary to protect the existing uses of the receiving State water be maintained and protected.
 - b. Designated uses (HAR, Section 11-54-3), as determined by the classification of the receiving State waters.
 - c. Water quality criteria (HAR, Sections 11-54-4 through 11-54-8).
2. You may be required to obtain a National Pollutant Discharge Elimination System (NPDES) permit for discharges of wastewater, including storm water runoff, into State surface waters (HAR, Chapter 11-55). For the following types of discharges into Class A or Class 2 State waters, you may apply for an NPDES general permit coverage by submitting a Notice of Intent (NOI) form:

- a. Storm water associated with construction activities, including clearing, grading, and excavation, that result in the disturbance of equal to or greater than one (1) acre of total land area. The total land area includes a contiguous area where multiple separate and distinct construction activities may be taking place at different times on different schedules under a larger common plan of development or sale. This includes areas used for a construction base yard and the storage of any construction related equipment, material, and waste products. An NPDES permit is required before the start of the construction activities.
- b. Hydrotesting water.
- c. Construction dewatering effluent.

You must submit a separate NOI form for each type of discharge at least 30 calendar days prior to the start of the discharge activity, except when applying for coverage for discharges of storm water associated with construction activity. For this type of discharge, the NOI must be submitted 30 calendar days before to the start of construction activities. The NOI forms may be picked up at our office or downloaded from our website at: <http://www.hawaii.gov/health/environmental/water/cleanwater/forms/genl-index.html>.

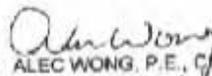
3. For other types of wastewater not listed in Item No. 2 above or wastewater discharging into Class 1 or Class AA waters, an NPDES individual permit will need to be obtained. An application for an NPDES individual permit must be submitted at least 180 calendar days before the commencement of the discharge. The NPDES application forms may be picked up at our office or downloaded from our website at <http://hawaii.gov/health/environmental/water/cleanwater/forms/environmental/water/cleanwater/forms/indiv-index.html>.
4. Please note that all discharges related to the project construction or operation activities, whether or not NPDES permit coverage and/or Section 401 Water Quality Certification are required, must comply with the State's Water Quality Standards. Noncompliance with water quality requirements contained in HAR, Chapter 11-54, and/or permitting requirements, specified in HAR, Chapter 11-55, may be subject to penalties of \$25,000 per day per violation.

Ms. Linda Chinn
November 9, 2011
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11009PJF.11

If you have any questions, please visit our website at:
<http://www.hawaii.gov/health/environmental/water/clearwater/index.htm>, or contact the
Engineering Section, CWB, at (808) 588-4309.

Sincerely,


ALEC WONG, P.E., CHIEF
Clean Water Branch

JF:ml

c: Mr. Alapaki Nahale-a, Department of Hawaiian Home Lands
Mr. Lee Sichter, Leo Sichter LLC
DOH-EPO #11-181 [via email only]

LEE SICHTER LLC

45024 MALULANI STREET #1, KANEHOE, HAWAII 96744
PH. (808) 382-3836; FAX. (808) 234-0872; WEB. WWW.LEESICHTER.COM

November 28, 2011

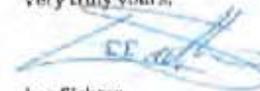
Mr. Alec Wong, P.E., Chief
Clean Water Branch
Department of Health
State of Hawaii
P.O. Box 3378
Honolulu, Hawaii 96801-3378

Dear Mr. Wong:

**Response to Comment
Ka Makana Ali'i Conceptual Master Plan
Draft Environmental Assessment**

I am writing on behalf of the Department of Hawaiian Home Lands in response to your comment letter to Linda Chinn, dated November 9, 2011 regarding the above project. Thank you for participating in the public and agency review process for the Ka Makana Ali'i project. We acknowledge that construction of the proposed project must comply with Chapters 11-54 and 11-55, HAR, as appropriate.

Very truly yours,



Lee Sichter

cc: L. Chinn
E. Nellis

10. Acknowledged.
11. Acknowledged.
12. Acknowledged.
13. The DOT Airports Division will be advised of any changes to the commercial use of the property in the future, as requested.
14. Acknowledged.
15. Confirmed.

Again, mahalo for participating in the environmental review process.

Very truly yours,



Lee Sichter

cc: L. Chinn
E. Nellis

Appendix A

2008 Traffic Evaluation

Draft

Draft

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TRAFFIC EVALUATION

Ka Makana Aii'i

Ewa, Oahu, Hawaii

December 2008

Prepared for:
DeBartolo Development
7001 N. Scottsdale Rd Suite 2055
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Ka Makana Aii'i
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I. INTRODUCTION

The new Ka Makana Ali'i commercial development will be located in the heart of the rapidly growing Ewa plain. This includes the communities of Kapolei, Makakilo, Ko Olina, Ewa, Ewa Beach, and Kalahele. There are many planned developments proceeding through the planning, design, and construction phases in the area such as the East Kapolei residential communities planned by the State of Hawaii Department of Hawaiian Home Lands (DHHL), D.R. Horton's Ho'opili development, the University of Hawaii-West Oahu campus and adjacent development, Gentry Homes' Ewa by Gentry Makai, Haselco's Ocean Pointe, the Hawaii Community Development Authority (HCDA) Kalahele development, and Aina Nui Corporation's Kapolei, West Kapolei, and Makaiwa Hills developments. The proposed Kroc center is located mauka of Ka Makana Ali'i along North-South Road. A map of the area is shown in Figure 1.

Roadway infrastructure is a key concern in the area, and there are several major roadway projects underway to address this concern. The State of Hawaii Department of Transportation (HDOT) is currently constructing North-South Road, a new arterial roadway with a new interchange on Interstate H-1 Freeway. HDOT is also in the design phase for the Fort Weaver Road widening, Fort Barrette Road widening, and the Kapolei Interchange projects. The City and County of Honolulu has recently completed a new segment of Kapolei Parkway between the OR&L Railroad right-of-way to Renton Road and have recently had a bid opening for the segment of Kapolei Parkway between Renton Road and future North-South Road. DHHL will construct the segment of Kapolei Parkway between future North-South Road and the existing segment of Kapolei Parkway in the Villages of Kapolei in the two to three year future.

The purpose of this report is to determine the impact of the Ka Makana Ali'i shopping center on the roadway network and to identify any improvements or mitigation needed to accommodate the development. The shopping center site plan is shown in Figure 2.

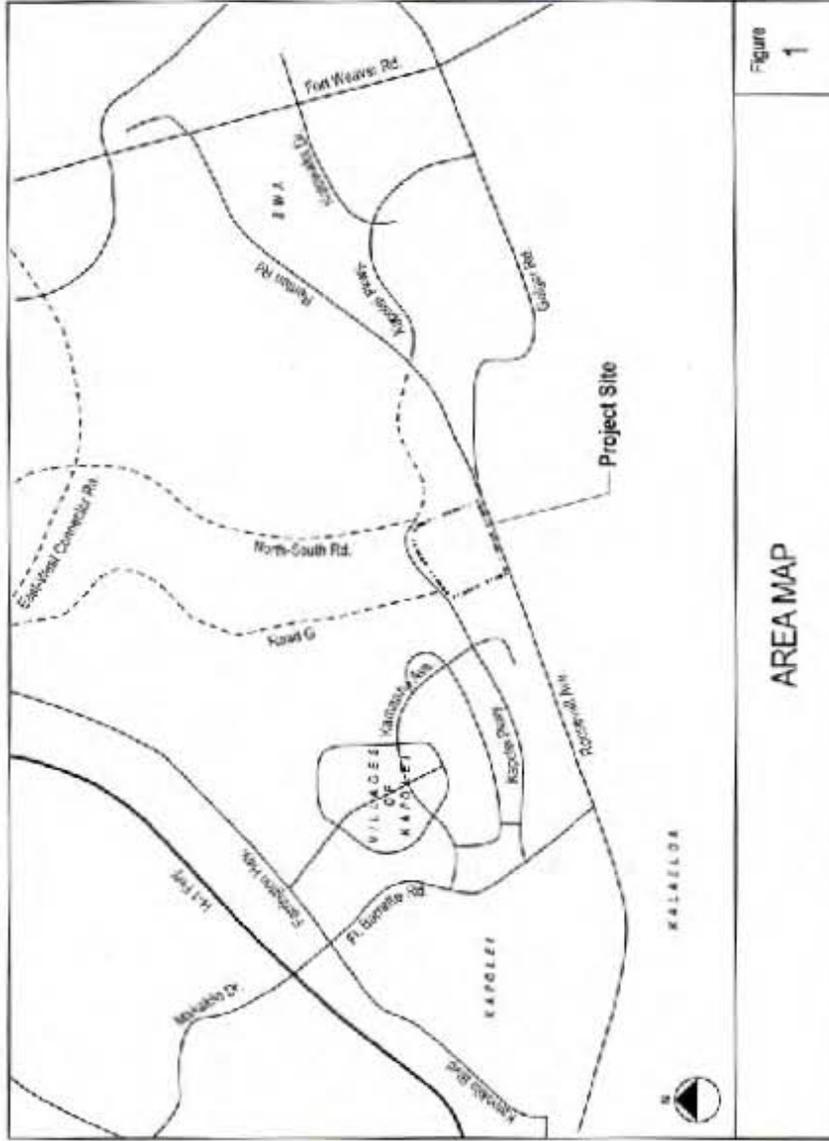


Figure 1

AREA MAP

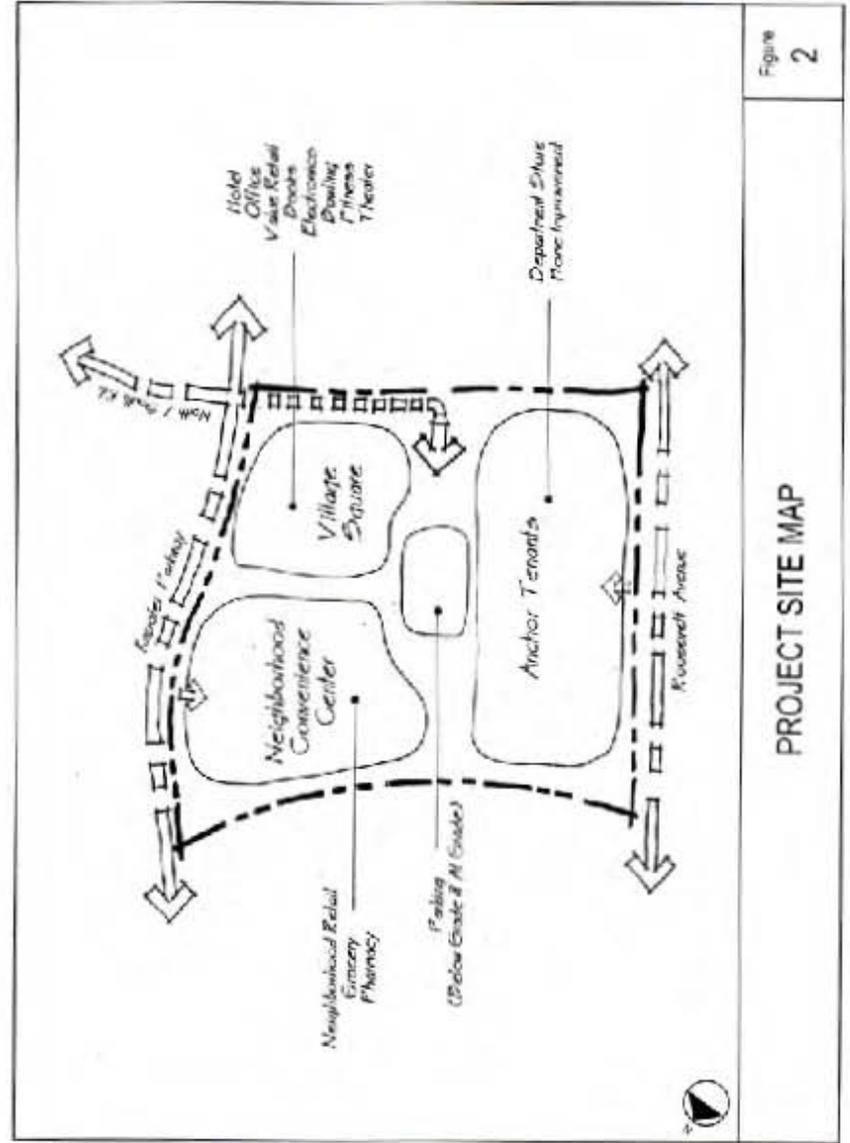


Figure 2

PROJECT SITE MAP

II. EXISTING CONDITIONS

None of the intersections in the vicinity of the project currently exist, so PB obtained existing data at nearby locations to calibrate traffic simulation models. These intersections and their lane configurations are shown in Figure 3.

A. Existing Roadway Network

1. Kapolei Parkway

Kapolei Parkway is a six-lane, divided major arterial roadway. Ultimately it will provide significant east-west mobility between Kapolei and Ewa. Currently, discontinuous segments of Kapolei Parkway are constructed in Kapolei and in Ewa and Ewa Beach. Within the Kapolei area, Kapolei Parkway extends from Fort Barrette Road to the intersection of the future North-South Road near the new HDDL headquarters building.

2. Roosevelt Avenue

Roosevelt Avenue is a collector roadway providing east-west circulation within Kalaheala (former Barber's Point Naval Air Station). Because it connects to Geiger Road in Ewa and because Kapolei Parkway is currently discontinuous, Roosevelt Avenue functions as a de facto connection between Kapolei and Ewa/Ewa Beach via Fort Weever Road. Roosevelt Avenue is a rural, two-lane undivided roadway with exclusive left-turn lanes at some intersections. The posted speed limit on Roosevelt Avenue is 35 MPH in the vicinity of Fort Barrette Road.

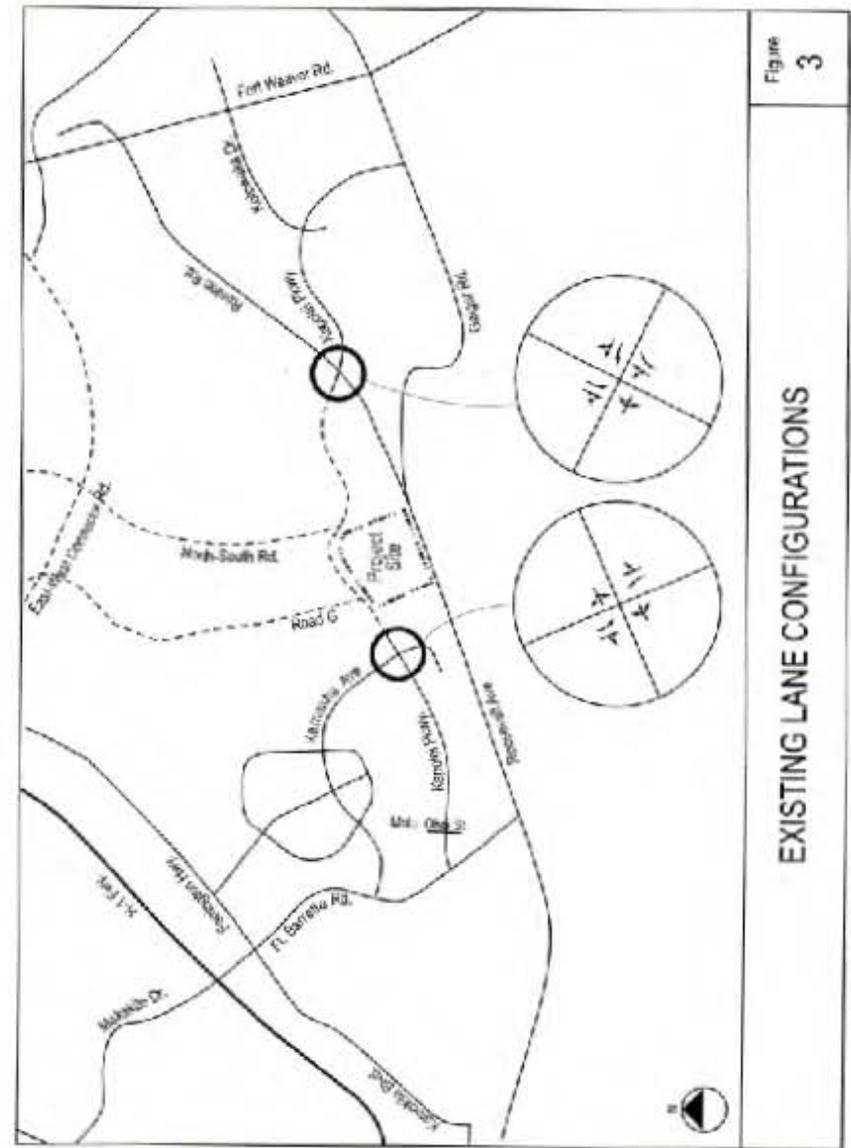


Figure 3

EXISTING LANE CONFIGURATIONS

B. Existing Traffic Volumes

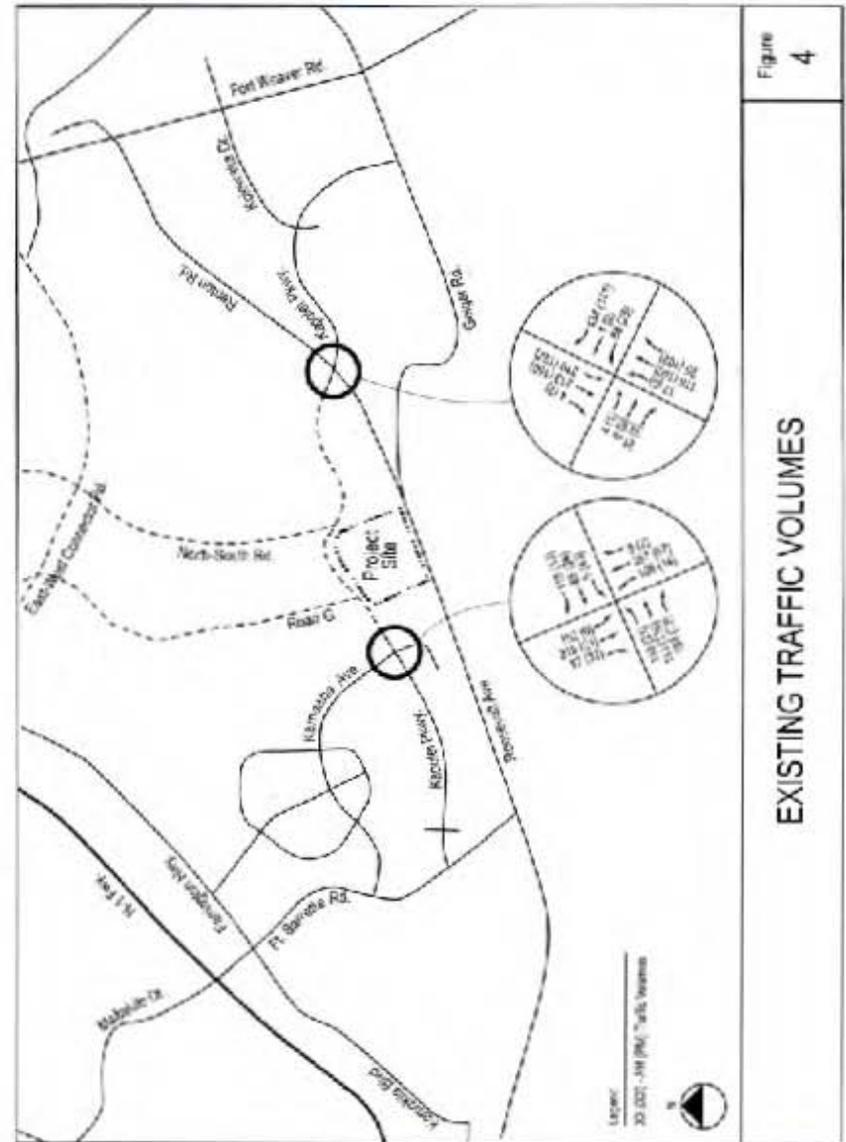
Manual traffic counts were conducted in April, 2008 during the AM and PM peak periods at the following intersections:

- Kapolei Parkway/Kamaaha Avenue
- Kapolei Parkway/Renton Road

This data was supplemented with 2004 and 2007 data at the following intersections:

- Kapolei Parkway/Fort Barretto Road
- Fort Weaver Road/Renton Road

The traffic volumes were then summarized into AM and PM peak hour volumes shown in Figure 4. The AM and PM peak hours were chosen to determine the effect of the shopping center on the periods of maximum congestion on two major Ewa arterials. The study AM and PM peak hours were 7:00-8:00 AM and 4:00-5:00 PM, respectively. Appendix A contains the traffic count data sheets.



C. Existing Traffic Operations

The study area intersections were analyzed using the methodologies for unsignalized intersections outlined in the 2000 Highway Capacity Manual (HCM). Operating conditions at an intersection are expressed as a qualitative measure known as Level of Service (LOS) with letter designations ranging from A through F, with LOS A representing free-flow conditions and LOS F representing over-capacity conditions. Level-of-Service criteria are described in Appendix B. Traffic analysis worksheets are located in Appendix C. The results of the intersection analysis are summarized in Table 1.

Table 1 Summary of Existing LOS and Delay

Intersection	AM Peak		PM Peak	
	LOS	Delay	LOS	Delay
Kapolei Parkway/Kamaaha Avenue	Unsignalized			
Mauka-bound Kamaaha Left	C	17.0	A	7.8
Mauka-bound Kamaaha Through/Right	F	83.0	A	7.8
Makai-bound Kamaaha Left	B	15.2	A	7.2
Makai-bound Kamaaha Through/Right	F	59.5	A	7.2
Waianae-bound Kapolei Left/Through/Right	C	21.0	A	8.2
KKHD-bound Kapolei Left/Through/Right	E	39.1	A	9.0
Kapolei Parkway/Koioiwaka Drive	Unsignalized			
Mauka-bound Koioiwaka Left/Through	C	24.1	B	14.3
Mauka-bound Koioiwaka Right	A	0.9	A	8.7
Makai-bound Koioiwaka Left	D	24.7	C	17.5
Makai-bound Koioiwaka Through/Right	B	12.4	B	11.9
Waianae-bound Kapolei Left	A	7.6	A	7.8
KKHD-bound Kapolei Right	A	8.6	A	7.9
Kapolei Parkway/Renton Road	Unsignalized			
Mauka-bound Renton Left/Through	C	22.7	B	12.2
Mauka-bound Renton Right	A	8.5	A	8.7
Makai-bound Renton Left	F	51.0	C	16.6
Makai-bound Renton Through/Right	C	26.5	B	11.2
Waianae-bound Kapolei Left	A	7.1	A	7.2
KKHD-bound Kapolei Left/Through/Right	A	1.0	A	7.8

Delay is expressed in seconds per vehicle. * Delay exceeds 120 seconds

1. Kapolei Parkway/Kamaaha Avenue

The intersection of Kapolei Parkway and Kamaaha Avenue is an all-way stop controlled intersection. The mauka (toward the mountains, or north in this case) Kamaaha leg leads into the Villages of Kapolei development while the KKHD Kapolei Parkway leg provides access to Kapolei Middle School. During the AM peak hour, the mauka-bound and makai-bound Kamaaha through/right movements operate at LOS F due to volumes exceeding 300 vehicles per lane. Although the Kapolei right of way allows for 6 lanes, the Kapolei Parkway approaches are constrained to a single shared movement lane. As a result, the traffic on Kapolei Parkway in the KKHD-bound direction operates at LOS E. During the PM peak, the intersection operates at LOS A.

2. Kapolei Parkway/Renton Road

This intersection was analyzed as a 4-legged intersection with stop control on the Renton approaches. Currently, due to construction, only construction-related traffic is allowed to use the mauka Kapolei Parkway leg. The makai-bound Renton left turn operates at LOS F due to the high demand for the movement in the AM peak. During the PM peak, all movements operate at LOS C or better.

D. Summary of Existing Operations

Kapolei Parkway is intended to be a major regional arterial but presently consists of only unconnected segments and can only provide limited mobility. As a result, the current traffic volumes are local in nature and drivers don't spend very long on Kapolei Parkway before leaving the roadway. Some of the intersections have failing movements (LOS F) but will no longer fail when all segments of Kapolei Parkway are completed and signalized.

III. PROJECTED 2013 CONDITIONS WITHOUT PROJECT

The base year 2013 represents future conditions within the project area without the Ka Makana Aii shopping center. Projected roadways within the Kapolei/Ewa area are shown in Figure 5. By the projected horizon year of 2013, Kapolei Parkway between Kamaaha Avenue and Renton Road is expected to be completed. In addition, North-South Road is also expected to be complete, connecting H-1 and Farrington Highway to Kapolei Parkway. It was also assumed that the East-West Connector would be constructed. Finally, it was assumed that the North-South Road extension would be constructed.

A. Projected 2013 Network Without Project

1. Kapolei Parkway

Kapolei Parkway is projected to be a 8-lane major arterial connecting Kapolei to Ewa, eventually winding its way makai toward Ewa Beach. The intersections along Kapolei Parkway will typically require signals with protected left turn phases.

2. North-South Road

North-South Road is projected to be a 4-lane major arterial connecting H-1 Freeway to Kapolei Parkway.

3. East-West Connector

The East-West Connector is a major collector roadway which would add system redundancy, providing east-west mobility between North-South Road and Fort Weaver Road.

4. Roosevelt Avenue

Roosevelt Avenue is projected to remain a 2-lane collector roadway which would be deemphasized in the future. Its primary function would be to provide system redundancy as well as serving the Kalaeloa community.

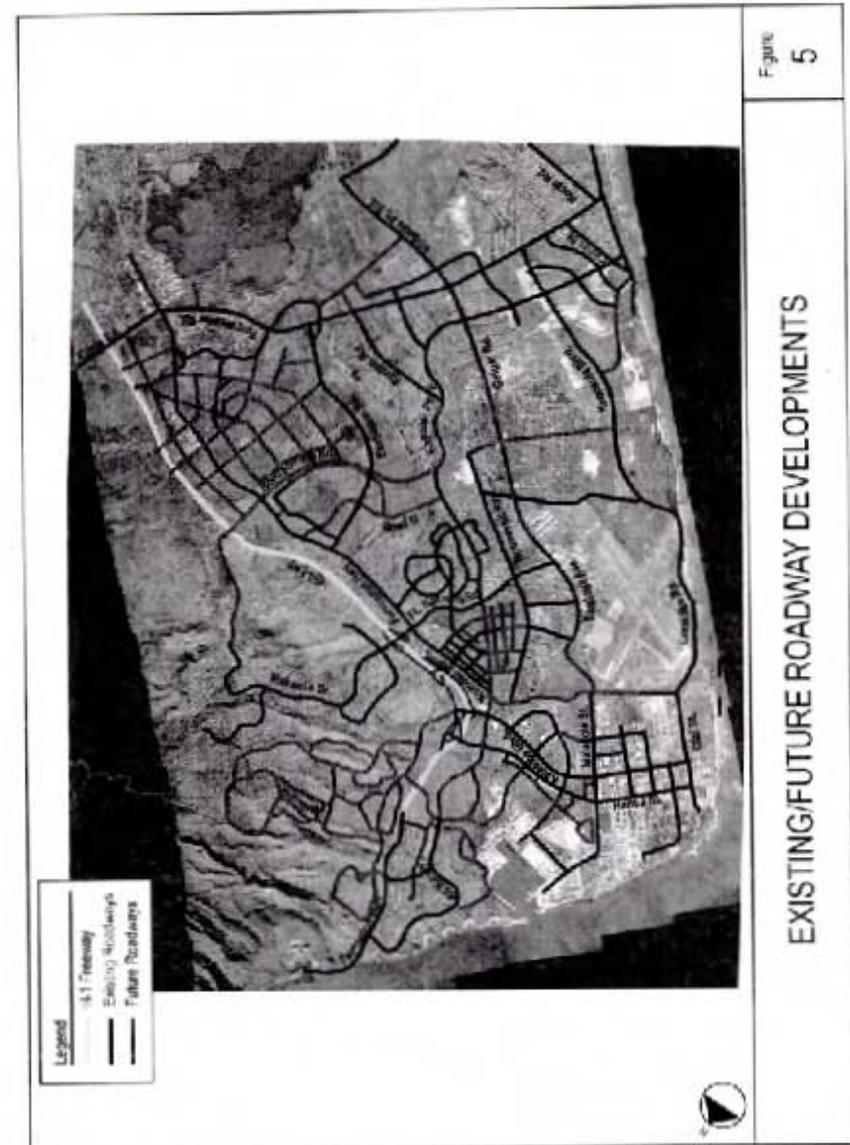


Figure 5

EXISTING/FUTURE ROADWAY DEVELOPMENTS

5. Road G

Road G is a mauka-makai collector that runs through the planned University of Hawaii – West Oahu campus and East Kapolei Phase I, eventually connecting Farrington Highway and Kapolei Parkway. In 2013, it is assumed that it does not yet provide this connection.

Future developments in the Ewa plain are shown in Figure 6. It was assumed that in 2013, East Kapolei Phase I and the Kroc Center would be in place.

D. Projected 2013 Traffic Without Project

The 2013 background traffic was estimated using the following sources:

- HDOT 2006 Traffic Data
- August 2007 University of Hawaii West Oahu Traffic Study

With Kapolei Parkway, North South Road, and the East-West Connector in place, traffic volumes were shifted from North-South Road, Farrington Highway, and Roosevelt Avenue. Furthermore, annual growth was applied. Finally, trips associated with the East Kapolei Phase I and Kroc Center developments were generated using trip generation equations published by the Institute of Transportation Engineers in Trip Generation, Seventh Edition.

The projected 2013 traffic timing movement volumes without project are shown in Figure 7.

C. Projected 2013 Operations Without Project

The projected 2013 intersection levels of service without the Ka Makana All shopping center are shown in Table 2. Because Kapolei Parkway is projected to provide a great deal of regional mobility, a 150-second cycle was assumed. Such a long cycle length has a negative impact on the vehicular delay but would eventually be necessary beyond 2013 in order to process the future Kapolei Parkway through movements.

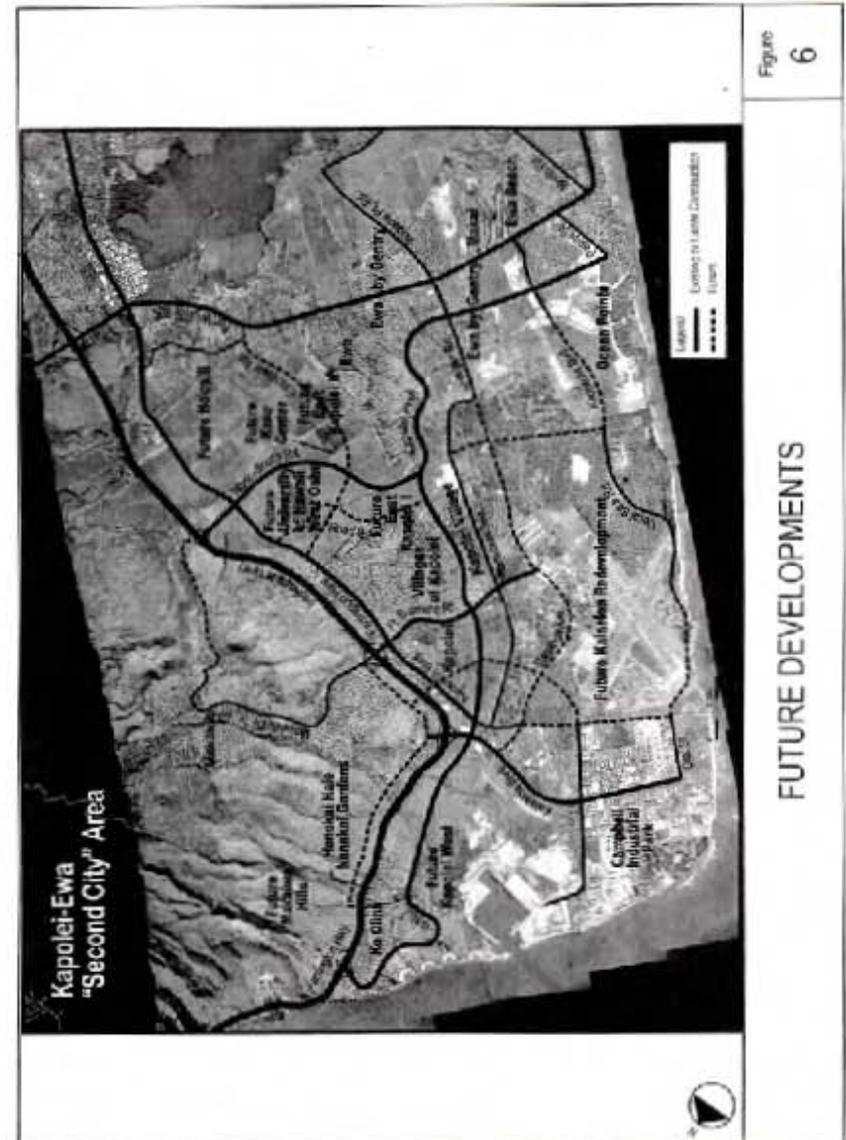


Figure
6

FUTURE DEVELOPMENTS