

NEW ALOHA STADIUM ENTERTAINMENT DISTRICT

PROGRAMMATIC FINAL ENVIRONMENTAL IMPACT STATEMENT

April 2022



PREPARED FOR:
STATE OF HAWAII
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES

Appendix L:

EISPN Consultation Response Letters

DEPARTMENT OF PLANNING AND PERMITTING
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 7TH FLOOR • HONOLULU, HAWAII 96813
PHONE: (808) 768-8000 • FAX: (808) 768-6041
DEPT. WEB SITE: www.honolulu.dpp.org • CITY WEB SITE: www.honolulu.gov

KIRK CALDWELL
MAYOR



KATHY K. SOKUGAWA
ACTING DIRECTOR

TIMOTHY F. T. HIU
DEPUTY DIRECTOR

EUGENE H. TAKAHASHI
DEPUTY DIRECTOR

2019/ELOG-1819(FK)

November 8, 2019

Mr. Keola Cheng
Associate Director of Planning
Wilson Okamoto Corporation
1907 South Beretania, Suite 400
Honolulu, Hawaii 96826

Dear Mr. Cheng:

SUBJECT: Environmental Impact Statement Preparation Notice
Proposed New Aloha Stadium Entertainment District
Tax Map Keys 9-9-003: 061, 9-9-003: 055, 070, and 071
Halawa, Ewa District, Oahu, Hawaii

Following review of the Environmental Impact Statement (EIS) Preparation Notice in the September 8, 2019, edition of the Environmental Notice for the New Aloha Stadium Entertainment District ("Project") in Halawa, Ewa District of Oahu, the City and County of Honolulu, Department of Planning and Permitting (DPP), offers the following comments:

1. The Draft EIS should demonstrate how the proposed Project will conform to the objectives, policies, and guidelines of the Oahu General Plan and the Primary Urban Center Development Plan.
2. The Draft EIS should include a discussion on how the Project aligns with the objectives and goals of the Draft Final Halawa Area Transit-Oriented Development (TOD) Plan (Resolution No. 19-237) and the TOD Special District regulations (Ordinance No. 17-54). The Draft Final Halawa Area TOD Plan was created in partnership with City and State agencies and community stakeholders. The site planning, block structure, and relationships between buildings and streets focused on creating a neighborhood that works for residents, visitors, and game-day crowds.

3. Add "Land Uses" to the categories for consideration in the Draft EIS (Section 1.2 of the EIS Preparation Notice). TOD will play an important role in land use decisions, as the entire site is within walking distance of the Halawa/Aloha Stadium rail transit station.
4. The Draft EIS should discuss what common, organizational framework, if any, is used to derive the land use configurations of the three Aloha Stadium Site Master Plan Options.
5. Please include in the Draft EIS a summary of the urban design elements in each option that contribute to: a) community building; b) place-making; c) a strong iconic presence; d) a strong rail transit station to stadium connection; e) protecting public views; and f) safe and secure pedestrian-friendly environment. Discuss how these elements are organized to visually and physically link the development sites to create a unified sense of place.
6. Although the three Aloha Stadium Site Master Plan Options in the EIS Preparation Notice are conceptual, it appears that they focus more on the office and entertainment sector, with minimal residential buildings. The DPP's recent TOD Demand Analysis and Market Projections study indicated little demand for offices (the full study can be viewed at Honolulu.gov/TOD). While the actual mix of uses will likely be up to the selected developer and market, we suggest reviewing those assumptions for the Draft EIS since office and residential have different impacts on traffic, water, wastewater, and other infrastructure.
7. The Draft EIS should provide a discussion of the opportunities for accessibility and connectivity between the Project and adjacent neighborhoods, and commercial centers by all modes of transportation.
8. The connections to the Pearl Harbor Historic Trail and the Arizona Memorial should be explored to improve non-vehicular travel options in the area. Improved pedestrian connectivity and bicycle circulation to these facilities are recommended in the Draft Final Halawa Area TOD Plan.
9. The Draft EIS should include an analysis of how important views will be protected, as well as wind considerations on stadium orientation.

10. The Draft EIS should include more detailed information on the phases of the proposed Project including how many phases there will be, what each phase of the development will consist of, and an estimated timeline.
11. The Draft EIS should include a discussion on if and how the residential component is consistent with the State's goal to increase supply of affordable housing on State-owned lands along the rail transit route.
12. Under the Climate Change category, discussion regarding sea level rise (SLR) should be based upon the State of Hawaii SLR Vulnerability and Adaptation Report and further guidance from the Honolulu Climate Change Commission. Generally, those areas immediately adjacent to the streams and drainage ways that empty into Pearl Harbor near the rail transit stations are within or immediately adjacent to the 3.2-foot SLR Exposure Area, as defined by the State SLR Report. The City and County of Honolulu has established a planning benchmark of 3.2 feet of additional SLR is appropriate for new development by mid-century. A planning benchmark of six feet of SLR is recommended for projects with a life-span beyond mid-century and for critical infrastructure. In both cases, high tide flooding and nuisance flooding may be present and precede global mean sea level rise by decades.
13. The Draft EIS should discuss the disposition of the monkeypod trees in the existing stadium parking lot, specifically whether the Project will require they be removed or maintained for their positive pedestrian and environmental effects. In the event they are removed, the Draft EIS should account for the impact their loss will have on decreasing carbon dioxide absorption and overwhelming already depleted tree stocks at island tree nurseries. If they will be re-planted back on-site, relocation specialists should be consulted regarding their storage, relocation, and post-transplantation best practices to ensure survival.
14. The Halawa Stream crossing the stadium site creates an opportunity for stream corridor improvements. Such improvements are called for within the Draft Final Halawa Area TOD Plan, but have not been described in any of the three options. The Draft EIS assessment should include examination of the potential for habitat regeneration and green infrastructure to improve both localized stream functions and downstream impact, in addition to passive recreational opportunities. Suggested stream improvements might include the removal of channelized walls and

replacement with a soft berm, as well as the addition of a shared pedestrian/bikeway path above the berm. This approach contributes to green infrastructure and could reduce incidence of flooding in downstream residential area, currently in the less than one percent annual flood zone category.

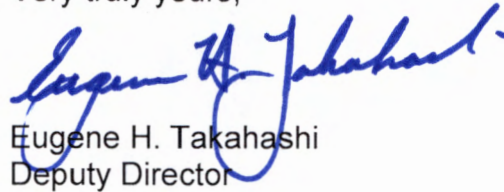
15. The Draft EIS should include a Traffic Impact Analysis Report and Parking Assessment (analyzing possible impacts to surrounding neighborhoods) covering each of the options. A Traffic Management Plan with Traffic Demand Management measures should be provided once a preferred option is chosen. More detailed comments will be provided upon review of the Draft EIS.
16. The Draft EIS should include a narrative describing the Project's post-construction stormwater quality strategic plan pursuant to Section 20-3-50 of the "Rules Relating to Water Quality." The strategic plan shall include a written description of the proposed development, expected activities and pollutants that will be generated by activities at the site, and the low-impact development site design strategies that will be used to comply with the rules. The strategic plan shall also include a development schedule.
17. The Draft EIS should state that the development shall comply with the prevailing "Storm Drainage Standards" and will ensure the Project's compliance with the Rules Relating to Water Quality and Storm Drainage Standards. This compliance will be verified at the time that the grading/construction plans are submitted to the DPP for review.
18. The municipal wastewater system is available and adequate to accommodate the initial phase of the Project (Aloha Stadium replacement). Future development phases will need to be reevaluated for impacts to the wastewater system, which may require improvements to the wastewater system. Existing municipal sewer lines located on the project site will need to be relocated if structures are to be located over them. The Draft EIS should account for this phasing and identify funding sources to pay for the upgrades.
19. The Draft EIS should include a description on how the Project will comply with the City's Park Dedication requirements for the residential/lodging components.

Mr. Keola Cheng
November 8, 2019
Page 5

20. The Draft EIS should state the Project will need to comply with Subdivision Rules and Regulations for the realignment of Salt Lake Boulevard.
21. The Draft EIS should list all the permits involved in getting the Project approved and built.

Should you have any questions, please contact Franz Krintz, of our staff, at 768-8046.

Very truly yours,



Eugene H. Takahashi
Deputy Director

KKS:ah

cc: The Honorable David Y. Ige
Governor of the State of Hawaii
Chris Kinimaka, Department of Accounting and General Services, State of Hawaii



10422-01
December 23, 2020

Eugene H. Takahashi
Department of Planning and Permitting
650 South King St. 7th Floor
Honolulu, HI, 96813
(808) 768-8000

Subject: Environmental Impact Statement Preparation Notice:
New Aloha Stadium Entertainment District (NASED)
Tax Map Keys (TMK): [1] 9-9-003:061, [1] 9-9-003:055, 070, and 071.
Hālawā, Oahu, Hawai‘i

Dear Mr. Takahashi:

Thank you for participating in the scoping process for the subject Environmental Impact Statement (EIS) Preparation Notice. We acknowledge your comments and concerns outlined in your letter (2019/ELOG-1819-FK). They have been considered in the preparation of the Draft Programmatic EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1, Section 24.

We offer the following in response to your comments relating to the scope and content of the Draft Programmatic EIS:

1. The Proposed Action’s alignment with and relationship to the objectives and supporting policies of the Oahu General Plan and the Primary Urban Center are discussed and evaluated in the Draft Programmatic EIS – refer to section 5.2.1 *City and County of Honolulu General Plan* and Section 5.2.2 *Primary Urban Center Development Plan (2004)*.
2. The Proposed Action’s alignment with and relationship to the objectives and goals of the Draft Final Hālawā Area Transit-Oriented Development (TOD) Plan are discussed and evaluated in the Draft Programmatic EIS – refer to Section 5.2.3 *Hālawā Transit-Oriented Development Plan*.
3. The Proposed Action’s “Land Uses” are discussed and evaluated in Section 5.2.3 *Hālawā Transit-Oriented Development Plan* mentioned in the preceding response.
4. The NASED Programmatic Master Plan (PMP), appended to the Draft Programmatic EIS as *Appendix A-1: Programmatic Master Plan*, outlines the program and vision for the Proposed Action. Nonetheless, the reason for preparing a PMP and a Programmatic EIS is to accommodate future design changes and refinements by the yet-to-be selected District

Developer(s). Specifically, the final design, scale, and layout of both the New Aloha Stadium, as well as the ancillary development surrounding it will be determined by that District Developer(s), in partnership with the State.

5. The aforementioned NASED PMP discusses the urban design elements referenced in your letter.

6. Your suggestion has been shared with the project team for consideration in reviewing the conceptual designs and site layout for the Draft Programmatic EIS and the PMP. It will also be shared with the selected District Developer(s) who will prepare the final design and site layout. We concur that the proportionate mix of land uses will impact traffic and demand for water, wastewater and other infrastructure.

7. Overall, as discussed in Section 4.11.2 (Multi-Modal Facilities) of the Draft Programmatic EIS, the Proposed Action is anticipated to increase and improve multi-modal facilities (pedestrian, bicycle, and transit) and connectivity within the Project Site and the surrounding area

8. Connectivity with the Pearl Harbor Historic Trail and Arizona Memorial are evaluated and discussed in the aforementioned NASED PMP – refer to Section 2.3 *Sustainability and Resilience* under Subsection *Establishing a Green Circulation Network*.

9. Significant View-planes, as well as wind conditions are discussed and evaluated in both the subject PMP and Draft Programmatic EIS.

10. An overview of project phasing and implementation is included within the NASED PMP.

11. It is acknowledged that there is a need for additional affordable housing inventory and options across the state. Furthermore, recent events have shown that there is a shortage of affordable housing within proximity to Honolulu's urban core.

As envisioned, the Proposed Action will directly serve this need through offering a diverse range of residential options accounting for upwards of 1,800 new residences. Proposed Action master planning and design efforts are ongoing, as a parallel process coupled with the project's district procurement strategy. The subject district procurement process will select an ideal District Developer that will blend public funds with the resources and expertise of a private development and design team to leverage a better, higher-value outcome for all interested parties; public and private alike.

The selected District Developer's final master plan and design scheme will comply with applicable affordable housing requirements. The Proposed Action's residential offerings will provide needed housing inventory. The program and scope of these residential offerings are outlined and discussed in the subject Draft Programmatic EIS and Draft Programmatic Master Plan (which is appended to the Draft Programmatic EIS as an appendix).

The very nature of District Procurement will ensure a strong, inherent synergy between public and private interests that will reflect a unified response to the need for housing in Honolulu's urban core.

An analysis of the current and anticipated housing market conditions in relation to the Proposed Action is provided in Chapter 4, Section 13.2.1 *Population and Housing* of the Draft Programmatic EIS. Additionally, within the *Appendix A-1 Programmatic Master Plan* (PMP) by Crawford Architects, the PMP addresses a variety of housing options in Chapter 2.6 *Equity and Inclusion*, under subsection *Residential and Housing Diversity*.

12. As the impacts of climate change are increasingly brought to the forefront of mainstream science as new data and research are made available, the greater development community has acknowledged an inherent social responsibility to promote sustainable, environmentally friendly, low-impact design for new buildings and structures. Chapter 2.3 *Sustainability and Resilience* of the NASED PMP outlines the sustainability initiatives and strategy that has been set forth for the implementation of the Proposed Action.

13. As mentioned previously, Project Design is still on-going, and it is anticipated that adjustments will be made to the conceptual designs and site layout presented in this Draft Programmatic EIS and the PMP during the design phase by the eventual selected District Developer. Specifically, the final design, scale, and layout of both the New Aloha Stadium, as well as the ancillary development surrounding, including project landscaping will be determined by the selected District Developer in partnership with the State. Nonetheless, should the removal of the referenced monkeypod trees be required, the selected District Developer will comply with all permitting and regulatory requirements.

14. The NASED PMP does not outline major improvements to Hālawa Stream. But, as referenced previously, the final design, scale, and layout of both the New Aloha Stadium, as well as the ancillary development surrounding it, including the Hālawa Stream will be determined by the selected District Developer.

15. The Proposed Action will seek to improve accessibility, connectivity, and mobility within the Project Site and surrounding community by creating a network of pedestrian walkways, bike paths, developing safer routes for mass transit and ride sharing options, and improvements made to major arterials that service the area. The Proposed Action will create multi-modal streets and paths that enhance the sense of place and accessibility of the surrounding community.

Existing traffic conditions as well as anticipated project related traffic impacts are discussed in the Draft Programmatic EIS. Refer to Chapter 4, Section 11: *Traffic*, which summarizes the findings and analysis conducted under a formal traffic study, which is appended to the Draft Programmatic EIS as *Appendix H: Traffic Impact Assessment*.

16. DPP's request for a Post-Construction Stormwater Quality Strategic Plan, pursuant to Section 20-3-50 of the "Rules Relating to Water Quality" is acknowledged. The selected District Developer should fulfill this requirement pending the finalization of project design.

17. Your request is acknowledged, the Draft Programmatic EIS will reference that the proposed action will comply with the standards and requirements cited in your letter.

18. Thank you for confirming the adequacy of the municipal wastewater system to serve the initial phase (Phase 1A) of the Proposed Action. It is further acknowledged, and reflected in the Draft Programmatic EIS, that development beyond Phase 1A (Aloha Stadium Replacement) would potentially require improvements to the wastewater system.

19. The Draft Programmatic EIS outlines that the selected District Developer will comply with the City's Park Dedication requirements.

20. The Draft Programmatic EIS will reflect that the Proposed Action will comply with Subdivision Rules and Regulations for the realignment of Salt Lake Boulevard.

21. A list of anticipated required permits and regulatory approvals is included in the subject Draft EIS. Refer to Section 5.3 *Permits and Approvals* of the Draft Programmatic EIS.

Your email, along with this response, will be reproduced and included in the forthcoming Draft Programmatic EIS. The Draft Programmatic EIS, including the various technical studies associated with it, will be available for review on Office of Environmental and Quality Control website following its publication in *The Environmental Notice*.

We appreciate your interest and participation in this environmental review process.

Sincerely,

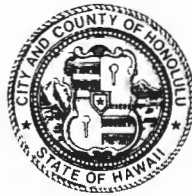
A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Chris Kinimaka, Department of Accounting and General Services
Stacey Jones, Crawford Architects

POLICE DEPARTMENT
CITY AND COUNTY OF HONOLULU

801 SOUTH BERETANIA STREET • HONOLULU, HAWAII 96813
TELEPHONE: (808) 529-3111 • INTERNET: www.honolulu.org



KIRK CALDWELL
MAYOR

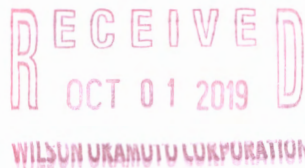
SUSAN BALLARD
CHIEF

JOHN D. MCCARTHY
JONATHAN GREMS
DEPUTY CHIEFS

OUR REFERENCE AF-DK

September 25, 2019

The Honorable David Ige
Governor of Hawaii
Executive Chambers, State Capitol
415 South Beretania Street
Honolulu, Hawaii 96813




Dear Governor Ige:

This is in response to a letter from the Wilson Okamoto Corporation requesting input on the Environmental Impact Statement Preparation Notice for the proposed creation of a New Aloha Stadium Entertainment District on the grounds of the existing Aloha Stadium site in Halawa.

Based on the information provided in the Office of Environmental Quality Control's *The Environmental Notice*, this project will have a significant impact on the services and operations of the Honolulu Police Department.

If there are any questions, Captain Aaron Farias of District 3 (Pearl City) may be contacted at 723-8803.

Sincerely,


for Allan T. Nagata
Assistant Chief
Support Services Bureau

cc: Mr. Chris Kinimaka, Department of
Accounting and General Services
✓ Mr. Keola Cheng, Wilson Okamoto
Corporation

Serving and Protecting With Aloha



10422-01
December 23, 2020

Allan T. Nagata
Support Services Bureau
City and County of Honolulu
Police Department
801 South Beretania Street
Honolulu, HI 96813

Subject: Environmental Impact Statement Preparation Notice:
New Aloha Stadium Entertainment District (NASED)
Tax Map Keys (TMK): [1] 9-9-003:061, [1] 9-9-003:055, 070, and 071.
Hālawā, Oahu, Hawai‘i

Dear Mr. Nagata

Thank you for participating in the scoping process for the subject Environmental Impact Statement (EIS) Preparation Notice. We acknowledge your comments and concerns outlined in your letter dated September 25, 2019 (ref: AF-DK). They have been considered in the preparation of the Draft Programmatic EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1, Section 24.

We concur that development of the Proposed Action is anticipated to have a significant impact on the services and operations of the Honolulu Police Department. The Draft Programmatic EIS provides an assessment of the existing conditions, anticipated impacts and mitigation measures associated with HPD’s operations within Chapter 4, Section 14 *Public Services and Facilities*, Subsection 1 *Police Fire, and Medical Services*.

Your letter, along with this response, will be reproduced and included in the forthcoming Draft Programmatic EIS. The Draft Programmatic EIS, including the various technical studies associated with it, will be available for review on the Office of Environmental and Quality Control website following its publication in *The Environmental Notice*.

We appreciate your interest and participation in this environmental review process.

Sincerely,

Keola Cheng
Director of Planning

cc: Chris Kinimaka, Department of Accounting and General Services
Stacey Jones, Crawford Architects

DAVID Y. IGE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

September 12, 2019

MEMORANDUM

SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT

RECEIVED
COMMISSION ON WATER
RESOURCE MANAGEMENT
2019 SEP 13 PM 1:44

LD 1681

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:

SUBJECT:

LOCATION:

APPLICANT:

R Russell Y. Tsuji, Land Administrator *VEN*
Environmental Impact Statement Preparation Notice for Proposed New Aloha Stadium Entertainment District
Halawa, Island of Oahu; TMK: (1) 9-9-003:061, and neighboring parcels 055, 070, & 071
Wilson Okamoto Corporation on behalf of Department of Accounting and General Services, State of Hawaii

Transmitted for your review and comment is information on the above-referenced project. The notice of availability of the EISPN has been published in OEQC's official publication, The Environmental Notice (TEN), on September 08, 2019. This issue of the TEN and a link to the Draft SEIS can be found at:

http://oeqc2.doh.hawaii.gov/The_Environmental_Notice/2019-09-08-TEN.pdf

Please submit comments by **October 04, 2019**. 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 Barbara Lee at 587-0453 or by email at barbara.j.lee@hawaii.gov. Thank you.

- () We have no objections.
- () We have no comments.
- (x) Comments are attached.

Signed: /s/ M. Kaleo Manuel

Attachments
Cc: Central Files

Print Name: Deputy Director
Date: September 24, 2019

RTD 5234.3/2187.3

DAVID Y. IGE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT
P.O. BOX 621
HONOLULU, HAWAII 96809

SUZANNE D. CASE
CHAIRPERSON

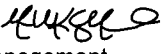
BRUCE S. ANDERSON, PH.D.
KAMANA BEAMER, PH.D.
MICHAEL G. BUCK
NEIL J. HANNAHS
WAYNE K. KATAYAMA
PAUL J. MEYER

M. KALEO MANUEL
DEPUTY DIRECTOR

September 24, 2019

REF: RFD.5234.3

TO: Mr. Russell Tsuji, Administrator
Land Division

FROM: M. Kaleo Manuel, Deputy Director 
Commission on Water Resource Management

SUBJECT: Environmental Impact Statement Preparation Notice for Proposed New Aloha Stadium
Entertainment District

FILE NO.: RFD.5234.3
TMK NO.: (1) 9-9-003:061 and neighboring parcels 055, 070, & 071

Thank you for the opportunity to review the subject document. The Commission on Water Resource Management (CWRM) is the agency responsible for administering the State Water Code (Code). Under the Code, all waters of the State are held in trust for the benefit of the citizens of the State, therefore all water use is subject to legally protected water rights. CWRM strongly promotes the efficient use of Hawaii's water resources through conservation measures and appropriate resource management. For more information, please refer to the State Water Code, Chapter 174C, Hawaii Revised Statutes, and Hawaii Administrative Rules, Chapters 13-167 to 13-171. These documents are available via the Internet at <http://dlnr.hawaii.gov/cwrn>.

Our comments related to water resources are checked off below.

- ☐ 1. We recommend coordination with the county to incorporate this project into the county's Water Use and Development Plan. Please contact the respective Planning Department and/or Department of Water Supply for further information.
- ☐ 2. We recommend coordination with the Engineering Division of the State Department of Land and Natural Resources to incorporate this project into the State Water Projects Plan.
- ☐ 3. We recommend coordination with the Hawaii Department of Agriculture (HDOA) to incorporate the reclassification of agricultural zoned land and the redistribution of agricultural resources into the State's Agricultural Water Use and Development Plan (AWUDP). Please contact the HDOA for more information.
- ☐ 4. We recommend that water efficient fixtures be installed and water efficient practices implemented throughout the development to reduce the increased demand on the area's freshwater resources. Reducing the water usage of a home or building may earn credit towards Leadership in Energy and Environmental Design (LEED) certification. More information on LEED certification is available at <http://www.usgbc.org/leed>. A listing of fixtures certified by the EPA as having high water efficiency can be found at <http://www.epa.gov/watersense>.
- ☐ 5. We recommend the use of best management practices (BMP) for stormwater management to minimize the impact of the project to the existing area's hydrology while maintaining on-site infiltration and preventing polluted runoff from storm events. Stormwater management BMPs may earn credit toward LEED certification. More information on stormwater BMPs can be found at <http://planning.hawaii.gov/czm/initiatives/low-impact-development/>
- ☐ 6. We recommend the use of alternative water sources, wherever practicable.
- ☐ 7. We recommend participating in the Hawaii Green Business Program, that assists and recognizes businesses that strive to operate in an environmentally and socially responsible manner. The program description can be found online at <http://energy.hawaii.gov/green-business-program>.
- ☐ 8. We recommend adopting landscape irrigation conservation best management practices endorsed by the Landscape Industry Council of Hawaii. These practices can be found online at

- http://www.hawaiiscape.com/wp-content/uploads/2013/04/LICH_Irrigation_Conservation_BMPs.pdf.
- ☐ 9. There may be the potential for ground or surface water degradation/contamination and recommend that approvals for this project be conditioned upon a review by the State Department of Health and the developer's acceptance of any resulting requirements related to water quality.
 - ☐ 10. The proposed water supply source for the project is located in a designated water management area, and a Water Use Permit is required prior to use of water. The Water Use Permit may be conditioned on the requirement to use dual line water supply systems for new industrial and commercial developments.
 - ☐ 11. A Well Construction Permit(s) is (are) are required before the commencement of any well construction work.
 - ☐ 12. A Pump Installation Permit(s) is (are) required before ground water is developed as a source of supply for the project.
 - ☐ 13. There is (are) well(s) located on or adjacent to this project. If wells are not planned to be used and will be affected by any new construction, they must be properly abandoned and sealed. A permit for well abandonment must be obtained.
 - ☐ 14. Ground-water withdrawals from this project may affect streamflows, which may require an instream flow standard amendment.
 - ☒ 15. A Stream Channel Alteration Permit(s) is (are) required before any alteration can be made to the bed and/or banks of a steam channel.
 - ☐ 16. A Stream Diversion Works Permit(s) is (are) required before any stream diversion works is constructed or altered.
 - ☐ 17. A Petition to Amend the Interim Instream Flow Standard is required for any new or expanded diversion(s) of surface water.
 - ☐ 18. The planned source of water for this project has not been identified in this report. Therefore, we cannot determine what permits or petitions are required from our office, or whether there are potential impacts to water resources.
- ☐ OTHER:

If you have any questions, please contact Dean Uyeno of the Commission staff at 587-0234.



10422-01
December 23, 2020

Kaleo Manuel
Deputy Director
DLNR- Commission on Water Resource Management
P.O Box 621
Honolulu, HI, 96809

Subject: Environmental Impact Statement Preparation Notice:
New Aloha Stadium Entertainment District (NASED)
Tax Map Keys (TMK): [1] 9-9-003:061, [1] 9-9-003:055, 070, and 071.
Hālawā, Oahu, Hawai‘i

Dear Mr. Manuel:

Thank you for participating in the scoping process for the subject Environmental Impact Statement (EIS) Preparation Notice. We acknowledge your comments and concerns as outlined by letter dated September 24, 2019 (REF: RFD.5234.3). They have been considered in the preparation of the Draft Programmatic EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1, Section 24.

We offer the following in response to your comment relating to the scope and content of the Draft Programmatic EIS:

Comment: “Stream Channel Alteration Permit(s) is (are) required before any alteration can be made to the bed and/or banks of a stream channel.”

Response: Your comment is acknowledged. At this time, no stream channel alterations are anticipated to be required in association with the development of the Proposed Action.

The subject EIS process is intended to evaluate and disclose the anticipated environmental impacts of the Proposed Action. The scope of the Proposed Action is outlined in the NASED Programmatic Master Plan (PMP) which is appended to the Draft Programmatic EIS as *Appendix A-1: Programmatic Master Plan*, outlines the program and vision for the Proposed Action. Nonetheless, it should be noted that Project Design is still on-going, and it is anticipated that adjustments will be made to the conceptual designs and site layout presented in this EIS and the PMP as design progresses at the direction of the State and District Developer(s). Should future design plans reflect work that would require modifications to any Project Site streams, Stream Channel Alteration Permit(s) would be obtained pursuant to consultation with your agency.

10422-01

Letter to Kaleo Manuel

Page 2

December 23, 2020

Your letter, along with this response, will be reproduced and included in the forthcoming Draft Programmatic EIS. The Draft Programmatic EIS, including the various technical studies associated with it, will be available for review on Office of Environmental and Quality Control website following its publication in *The Environmental Notice*.

We appreciate your interest and participation in this environmental review process.

Sincerely,

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Keola Cheng
Director of Planning

cc: Chris Kinimaka, Department of Accounting and General Services
Stacey Jones, Crawford Architects

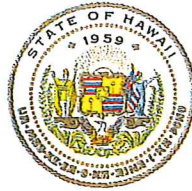
DAVID Y. IGE
GOVERNOR OF HAWAII



RECEIVED
LAND DIVISION

SEP 18 AM 10:38

DEPT. OF LAND &
NATURAL RESOURCES
STATE OF HAWAII



SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

September 12, 2019

LD 1681

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:

SUBJECT:

Russell Y. Tsuji, Land Administrator

Environmental Impact Statement Preparation Notice for Proposed New Aloha Stadium Entertainment District

LOCATION:

Halawa, Island of Oahu; TMK: (1) 9-9-003:061, and neighboring parcels 055, 070, & 071

APPLICANT:

Wilson Okamoto Corporation on behalf of Department of Accounting and General Services, State of Hawaii

Transmitted for your review and comment is information on the above-referenced project. The notice of availability of the EISPN has been published in OEQC's official publication, The Environmental Notice (TEN), on September 08, 2019. This issue of the TEN and a link to the Draft SEIS can be found at:

http://oeqc2.doh.hawaii.gov/The_Environmental_Notice/2019-09-08-TEN.pdf

Please submit comments by **October 04, 2019**. 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 Barbara Lee at 587-0453 or by email at barbara.j.lee@hawaii.gov. Thank you.

- () We have no objections.
- () We have no comments.
- (✓) Comments are attached.

Signed:

Carty S. Chang, Chief Engineer

Print Name:

Date:

9/16/19

Attachments

Cc: Central Files

19 SEP 13 PM 12:08 ENGINEERING

**DEPARTMENT OF LAND AND NATURAL RESOURCES
ENGINEERING DIVISION**

LD/Russell Y. Tsuji

**Ref: Environmental Impact Statement Preparation Notice for Proposed New
Aloha Stadium Entertainment District**

Location: Halawa, Island of Oahu

TMK(s): (1) 9-9-003:061

**Applicant: Wilson Okamoto Corporation on behalf of Department of
Accounting and General Services, State of Hawaii**

COMMENTS

The rules and regulations of the National Flood Insurance Program (NFIP), Title 44 of the Code of Federal Regulations (44CFR), are in effect when development falls within a Special Flood Hazard Area (high risk areas). State projects are required to comply with 44CFR regulations as stipulated in Section 60.12. Be advised that 44CFR reflects the minimum standards as set forth by the NFIP. Local community flood ordinances may stipulate higher standards that can be more restrictive and would take precedence over the minimum NFIP standards.

The owner of the project property and/or their representative is responsible to research the Flood Hazard Zone designation for the project. Flood Hazard Zones are designated on FEMA's Flood Insurance Rate Maps (FIRM), which can be viewed on our Flood Hazard Assessment Tool (FHAT) (<http://gis.hawaiiinfip.org/FHAT>).

If there are questions regarding the local flood ordinances, please contact the applicable County NFIP coordinating agency below:

- Oahu: City and County of Honolulu, Department of Planning and Permitting (808) 768-8098.
- Hawaii Island: County of Hawaii, Department of Public Works (808) 961-8327.
- Maui/Molokai/Lanai: County of Maui, Department of Planning (808) 270-7253.
- Kauai: County of Kauai, Department of Public Works (808) 241-4896.

The applicant should include water demands and infrastructure required to meet project needs. Please note that the projects within State lands requiring water service from their local Department/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 is required to provide water demands and calculations to the Engineering Division so it can be included in the State Water Projects Plan Update projections.

Signed: _____

CARTY S. CHANG, CHIEF ENGINEER

Date: _____

9/14/19



10422-01
December 23, 2020

Carty S. Chang P.E
Chief Engineer
DLNR- Engineering Division
P.O Box 621
Honolulu, HI 96809

Subject: Environmental Impact Statement Preparation Notice:
New Aloha Stadium Entertainment District (NASED)
Tax Map Keys (TMK): [1] 9-9-003:061, [1] 9-9-003:055, 070, and 071.
Hālawā, Oahu, Hawai‘i

Dear Mr. Chang:

Thank you for participating in the scoping process for the subject Environmental Impact Statement (EIS) Preparation Notice. We acknowledge your comments and concerns. They have been considered and incorporated in the Draft Programmatic EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1, Section 24.

The following is offered in response to your comments:

Comment #1: *“The rules and regulations of the National Flood Insurance Program (NFIP), Title 44 of the Code of Federal Regulations (44CFR), are in effect when development falls within a Special Flood Hazard Area (high risk areas). State projects are required to comply with 44CFR regulations as stipulated in Section 60.12. Be advised that 44CFR reflects the minimum standards as set forth by the NFIP. Local community flood ordinances may stipulate higher standards that can be more restrictive and would take precedence over the minimum NFIP standards.*

The owner of the project property and/or their representative is responsible to research the Flood Hazard Zone designation for the project. Flood Hazard Zones are designated on FEMA's Flood Insurance Rate Maps (FIRM), which can be viewed on our Flood Hazard Assessment Tool (FHAT) (<http://gis.hawaiiinfip.org/FHAT>).”

Response #1: The Draft Programmatic EIS outlines and discusses the Proposed Action’s relationship to Flood Hazard Zones – refer to Section 4.4.2 *Flood and Tsunami Hazard*.

Comment #2: *“The applicant should include water demands and infrastructure required to meet project needs. Please note that the projects within State lands requiring water service from their local Department/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 is required to provide water demands and calculations to the Engineering Division so it can be included in the State Water Projects Plan Update projections.”

Response #2: The EIS process is intended to evaluate and disclose the anticipated environmental impacts of the Proposed Action. Pursuant to this effort, the Board of Water Supply has been consulted to ascertain the availability of water service to cover the development of the Proposed Action. The scope of the Proposed Action is outlined in the NASED Programmatic Master Plan (PMP) which is appended to the Draft Programmatic EIS as *Appendix A-1: Programmatic Master Plan*, outlines the program and vision for the Proposed Action. Nonetheless, it should be noted that Project Design is still on-going, and it is anticipated that adjustments will be made to the conceptual designs and site layout presented in this Draft Programmatic EIS and the PMP as design moves forward under the direction of the State and District Developer(s). Specifically, the final design, scale, and layout of both the New Aloha Stadium, as well as the mixed-use development surrounding it will be directed by the State and District Developer(s). It is further acknowledged that projects within State lands requiring water service from the Board of Water Supply system will be required to pay a resource development charge, in addition to potential Water Facilities Charges.

Your letter, along with this response, will be reproduced and included in the forthcoming Draft Programmatic EIS. The Draft Programmatic EIS, including the various technical studies associated with it, will be available for review on Office of Environmental and Quality Control website following its publication in *The Environmental Notice*.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Chris Kinimaka, Department of Accounting and General Services
Stacey Jones, Crawford Architects

DAVID Y. IGE
GOVERNOR OF HAWAII



SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

October 08, 2019

LD 1681

Keola Cheng, Associate Director of Planning
Wilson Okamoto Corporation
1907 S. Beretania Street, Suite 400
Honolulu, HI 96826

Via email: KCheng@wilsonokamoto.com

Dear Mr. Cheng:

**SUBJECT: Environmental Impact Statement Preparation Notice for Proposed
New Aloha Stadium Entertainment District; Halawa, Island of Oahu;
TMK: (1) 9-9-003:061, and neighboring parcels 055, 070, & 071**

Thank you for the opportunity to review and comment on the above subject. The Land Division of the Department of Land and Natural Resources (DLNR) distributed copies of your request to DLNR's various Divisions for their review and comments.

Enclosed are responses from our a) Engineering Division, b) Commission on Water Resource Management, and c) Land Division – Oahu District on the subject matter. Should you have any questions, please feel free to contact Barbara Lee at (808) 587-0453 or barbara.j.lee@hawaii.gov. Thank you.

Sincerely,

A handwritten signature in dark ink, appearing to read "Russell Y. Tsuji", is written over a horizontal line.

Russell Y. Tsuji
Land Administrator

Enclosure
cc: Central Files

DAVID Y. IGE
GOVERNOR OF HAWAII



SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

September 12, 2019

LD 1681

MEMORANDUM

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

FROM: *R* Russell Y. Tsuji, Land Administrator *VEN*

SUBJECT: **Environmental Impact Statement Preparation Notice for Proposed New Aloha Stadium Entertainment District**

LOCATION: Halawa, Island of Oahu; TMK: (1) 9-9-003:061, and neighboring parcels 055, 070, & 071

APPLICANT: Wilson Okamoto Corporation on behalf of Department of Accounting and General Services, State of Hawaii

Transmitted for your review and comment is information on the above-referenced project. The notice of availability of the EISPN has been published in OEQC's official publication, The Environmental Notice (TEN), on September 08, 2019. This issue of the TEN and a link to the Draft SEIS can be found at:

http://oeqc2.doh.hawaii.gov/The_Environmental_Notice/2019-09-08-TEN.pdf

Please submit comments by **October 04, 2019**. 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 Barbara Lee at 587-0453 or by email at barbara.j.lee@hawaii.gov. Thank you.

- () We have no objections.
(x) We have no comments, at this time.
() Comments are attached.

Signed:

Attachments
Cc: Central Files

Print Name:
Date:

Patti E. Miyashiro
September 19, 2019



10422-01
December 23, 2020

Patti E. Miyashiro
DLNR Land Division
P.O Box 621
Honolulu, HI, 96809

Subject: Environmental Impact Statement Preparation Notice:
New Aloha Stadium Entertainment District (NASED)
Tax Map Keys (TMK): [1] 9-9-003:061, [1] 9-9-003:055, 070, and 071.
Hālawā, Oahu, Hawai‘i

Dear Ms. Miyashiro:

Thank you for participating in the scoping process for the subject Environmental Impact Statement (EIS) Preparation Notice. We acknowledge that the Department of Land and Natural Resources-Land Division-Oahu District has no comments to offer at this time as outlined in your letter dated October 8, 2019 (LD 1681).

Your letter, along with this response, will be reproduced and included in the forthcoming Draft Programmatic EIS. The Draft Programmatic EIS, including the various technical studies associated with it, will be available for review on Office of Environmental and Quality Control website following its publication in *The Environmental Notice*.

We appreciate your interest and participation in this environmental review process.

Sincerely,

Keola Cheng
Director of Planning

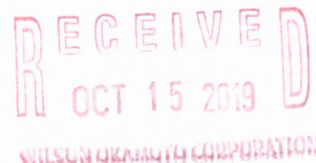
cc: Chris Kinimaka, Department of Accounting and General Services
Stacey Jones, Crawford Architects



STATE OF HAWAII
DEPARTMENT OF EDUCATION
P.O. BOX 2360
HONOLULU, HAWAII 96804

OFFICE OF FACILITIES AND OPERATIONS

October 7, 2019



Keola Cheng
Wilson Okamoto and Associates
1907 South Beretania Street
Honolulu, Hawaii 96826

Re: Environmental Impact Statement Preparation Notice for Planning for New Stadium
and Site Redevelopment, DAGS Job No. 12-10-0862

Dear Mr. Cheng:

The Hawaii State Department of Education (HIDOE) has the following comments for the New Aloha Stadium Entertainment District EISPN (Project). According to the EISPN, the proposed Project is to construct a new stadium and redevelop the existing stadium lands to create the New Aloha Stadium Entertainment District on approximately 98 acres of land located at Halawa, Island of Oahu, TMK: 9-9-003: 005,061, 070, and 071.

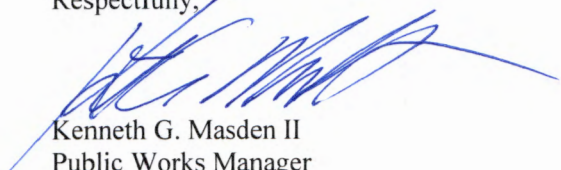
The HIDOE schools currently serving the Project area are Aiea Elementary, Aiea Intermediate, and Aiea High. The Draft Environmental Impact Statement (DEIS) needs to include the anticipated number of residential units to be developed. Also, there should be an explanation of the educational amenity.

The Project is located within the Leeward Oahu School Impact Fee District. Chapter 302A-1606, Hawaii Revised Statutes, require that residential developments with 50 or more units execute and agreement with the HIDOE. The developer is encouraged to meet with the HIDOE as early as possible to execute an Educational Contribution Agreement.

Further comments will be provided during the review of the Draft Environmental Impact Statement.

Thank you for the opportunity to comment. Should you have questions, please contact Robyn Loudermilk, School Lands and Facilities Specialist with the Facilities Development Branch, Planning Section, at 784-5093 or via email at robyn.loudermilk@k12.hi.us.

Respectfully,


Kenneth G. Masden II
Public Works Manager
Planning Section

KGM:rl

c: John Erickson, Complex Area Superintendent, Aiea/Moanalua/Radford
David DePonte, Department of Accounting and General Services



10422-01
December 23, 2020

Kenneth G. Masden II
Public Works Manager
Planning Section
State of Hawai‘i - Department of Education
P.O Box 2360,
Honolulu, Hawai‘i, 96804

Subject: Environmental Impact Statement Preparation Notice:
New Aloha Stadium Entertainment District (NASED)
Tax Map Keys (TMK): [1] 9-9-003:061, [1] 9-9-003:055, 070, and 071.
Hālawā, Oahu, Hawai‘i

Dear Mr. Masden II:

Thank you for your letter (DAGS Job No. 12-10-0862) dated October 7, 2019 regarding the subject Draft Environment Impact Statement (EIS) for the proposed NASED. The scope of your comments is acknowledged and will be incorporated into the EIS process moving forward. We acknowledge your comments and concerns, they have been considered in the preparation of the Draft EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1, Section 24.

The scope of your comment is acknowledged and has been incorporated into the EIS process.

The following is offered in response to your comment:

Comment: *“The HIDOE schools currently serving the Project area are Aiea Elementary, Aiea Intermediate, and Aiea High. The Draft Environmental Impact Statement (DEIS) needs to include the anticipated number of residential units to be developed. Also, there should be an explanation of the educational amenity.*

The Project is located within the Leeward Oahu School Impact Fee District. Chapter 302A-1606, Hawaii Revised Statutes, require that residential developments with 50 or more units execute and agreement with the HIDOE. The developer is encouraged to meet with the HIDOE as early as possible to execute an Educational Contribution Agreement.”

Response: We acknowledge that the Proposed Action will be served by the HIDOE’s ‘Aiea Elementary, ‘Aiea Intermediate, and ‘Aiea High Schools.

The Proposed Action will provide needed housing options for the growing population in the region. Upon completion and build out, the Proposed Action is anticipated to potentially encompass residential uses that may account for up to 1,800 new homes which will provide much

needed housing inventory for residents seeking to live closer to town as well as those in the market for competitively priced housing.

It is also recognized that the Project Site is located within HIDOE's Leeward O'ahu School Impact Fee District, and that Chapter 302A-1606 of the Hawai'i Revised Statutes (HRS) mandates that residential developments with 50 or more units must execute an agreement (Educational Contribution Agreement) with the HIDOE. This requirement will be woven into District Procurement. Pursuant to selection of District Developer(s), the NASED will comply with applicable Federal, State, and City permitting and regulatory requirements. Consequently, it is anticipated that the State and selected District Developer(s) will be consulting directly with HIDOE to verify and adhere to statutory educational contribution requirements.

Your email, along with this response, will be reproduced and included in the forthcoming Draft Programmatic EIS. It is anticipated the Draft Programmatic EIS, including the various technical studies associated with it, will be available for review on Office of Environmental and Quality Control website following its publication in *The Environmental Notice*.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Chris Kinimaka, Department of Accounting and General Services
Stacey Jones, Crawford Architects

DAVID Y. IGE
GOVERNOR



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

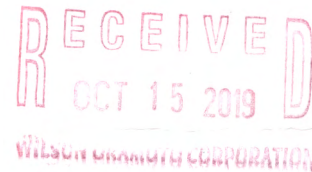
JADE T. BUTAY
DIRECTOR

Deputy Directors
LYNN A.S. ARAKI-REGAN
DEREK J. CHOW
ROSS M. HIGASHI
EDWIN H. SNIFFEN

IN REPLY REFER TO:
DIR 0934
STP 8.2756

October 4, 2019

Mr. Keola Cheng
Associate Director of Planning
Wilson Okamoto Corporation
1907 South Beretania Street
Honolulu, Hawaii 96826



Dear Mr. Cheng:

Subject: New Aloha Stadium Entertainment District
Environmental Impact Statement Preparation Notice (EISPN)
Halawa, Oahu, Hawaii
TMK: (1) 9-9-003:061, 055, 070, 071

The Department of Transportation (DOT) understands the Department of Accounting and General Services is proposing the development of a new stadium facility (to replace the existing stadium) and other related ancillary facilities to create an Aloha Stadium Entertainment District (Stadium District) on the approximately 98 acres of the existing stadium site and certain adjacent parcels. The project envisions a down-sized stadium, from 50,000 seats to approximately 35,000 seats. The new stadium complex would include facilities to accommodate related and new events.

Three options for development of the stadium district were provided in the EISPN. It was stated that the development of the stadium district would occur over time until eventually full buildout was reached.

DOT's comments on the subject project are as follows:

Airports Division (DOT-AIR)

1. The stadium district is 2.37 miles from the property boundary of the Daniel K. Inouye International Airport (HNL). All projects within five miles from Hawaii State airports must read the Technical Assistance Memorandum (TAM) for guidance with development and activities that may require further review and permits. The TAM is available at the following link:
http://files.hawaii.gov/dbedt/op/docs/TAM-FAA-DOT-Airports_08-01-2016.pdf.
2. The stadium district is 17,834 feet from the end of Runway 8L. The Federal Aviation Administration (FAA) regulation requires the submittal of FAA Form 7460-1 Notice of Proposed Construction or alteration pursuant to the Code of Federal Regulations, Title 14, Part 77.9 if the construction or alteration is within 20,000 feet of a public use or military airport which exceeds a

100:1 surface from any point on the runway of each airport with its longest runway more than 3,200 feet. Construction equipment and staging area heights, including heights of temporary construction cranes need to be included in the submittal. The form and criteria for submittal are available at the following website: <https://oeaaa.faa.gov/oeaaa/external/portal.jsp>.

3. Photovoltaic (PV) systems located in or near the approach path of aircrafts into HNL can create a hazardous condition for pilots because of possible glint and glare reflected from the PV array. If glint or glare from the PV array creates a hazardous condition for pilots, the owner of the PV system shall immediately mitigate the hazard upon notification by DOT-AIR and/or FAA.
4. PV systems have been known to emit radio frequency interference (RFI) to aviation-dedicated radio signals, disrupting the reliability of air-to-ground communications. Again, the owner of the PV system shall immediately mitigate the RFI hazard upon notification by DOT-AIR and/or FAA.

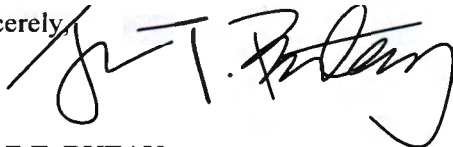
Highways Division (DOT-HWY)

A visual review of the conceptual options A, B, and C indicated that the stadium district will largely, but not always, retain the current accesses of the existing Aloha Stadium. Major differences between the options included different locations of the new stadium within the stadium district.

1. It is assumed that each option will have a traffic impact analysis regarding the pros and cons of each option to facilitate the selection process for a preferred option. The analysis is expected to be of a more general nature, suitable for assisting in the selection of a preferred option. DOT-HWY will provide comments on the options analysis as it feels appropriate.
2. DOT-HWY may require that a more detailed Traffic Impact Analysis Report be prepared once a preferred option selection is made, to more specifically analyze the option's effects to State highways and recommend improvements as may be applicable.

If there are any questions, please contact Mr. Blayne Nikaido of the DOT Statewide Transportation Planning Office at (808) 831-7979 or via email at blayne.h.nikaido@hawaii.gov.

Sincerely,



JADE T. BUTAY
Director of Transportation



10422-01
December 23, 2020

Director Jade T. Butay
State of Hawaii
Department of Transportation
869 Punchbowl St, Room 509
Honolulu, HI, 96813
(808) 587-2167

Subject: Environmental Impact Statement Preparation Notice:
New Aloha Stadium Entertainment District (NASED)
Tax Map Keys (TMK): [1] 9-9-003:061, [1] 9-9-003:055, 070, and 071.
Hālawā, Oahu, Hawai‘i

Dear Mr. Butay.

Thank you for participating in the scoping process for the subject Environmental Impact Statement (EIS). We acknowledge your comments and concerns as outlined in your letter dated October 4, 2019 (ref: DIR 0934, STP 8.2756), they have been considered in the preparation of the Draft Programmatic EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1, Section 24.

We offer the following in response to your comments relating to the scope and content of the Draft Programmatic EIS:

Airports Division (DOT-AIR)

Comment #1: *“The stadium district is 2.37 miles from the property boundary of the Daniel K. Inouye International Airport (HNL). All projects within five miles from Hawaii State airports must read the Technical Assistance Memorandum (TAM) for guidance with development and activities that may require further review and permits. The TAM is available at the following link: http://files.hawaii.gov/dbedt/op/docs/TAM-FAA-DOT-Airports_08-01-2016.pdf.”*

Response #1: We acknowledge that the location of the Proposed Action is subject to the cited Technical Assistance Memorandum (TAM). The NASED Programmatic Master Plan (PMP), appended to the Draft Programmatic EIS as *Appendix A-1: Programmatic Master Plan*, outlines the program and vision for the Proposed Action. Nonetheless, the reason for preparing a PMP and a Programmatic EIS is to accommodate future design changes and refinements by the yet-to-be selected District Developer. Specifically, the final design, scale, and layout of both the New Aloha Stadium, as well as the ancillary

development surrounding it will be determined by that District Developer. The District Developer will also be responsible for complying with all TAM requirements. The TAM requirement will be included in the list of potentially required permits and approvals. (refer to the section of the DPEIS where required permits and approvals will be listed).

Comment #2: *“The stadium district is 17,834 feet from the end of Runway 8L. The Federal Aviation Administration (FAA) regulation requires the submittal of FAA Form 7460-1 Notice of Proposed Construction or alteration pursuant to the Code of Federal Regulations, Title 14, Part 77.9 if the construction or alteration is within 20,000 feet of a public use or military airport which exceeds a 100: 1 surface from any point on the runway of each airport with its longest runway more than 3,200 feet. Construction equipment and staging area heights, including heights of temporary construction cranes need to be included in the submittal. The form and criteria for submittal are available at the following website: <https://oeaaa.faa.gov/oeaaa/external/portal.jsp>.”*

Response #2: As previously discussed, the final design, scale, and layout of both the New Aloha Stadium, as well as the ancillary development surrounding it will be determined by the selected District Developer. The selected District Developer will also be responsible for complying with all FAA requirements, including those applicable to construction equipment such as cranes. The FAA Form 7460-1 Notice of Proposed Construction or Alteration will be included in the list of potentially required permits and approvals. (refer to the section of the DPEIS where required permits and approvals will be listed).

Comment #3: *“Photovoltaic (PV) systems located in or near the approach path of aircrafts into HNL can create a hazardous condition for pilots because of possible glint and glare reflected from the PV array. If glint or glare from the PV array creates a hazardous condition for pilots, the owner of the PV system shall immediately mitigate the hazard upon notification by DOT-AIR and/or FAA.”*

“PV systems have been known to emit radio frequency interference (RFI) to aviation-dedicated radio signals, disrupting the reliability of air-to-ground communications. Again, the owner of the PV system shall immediately mitigate the RFI hazard upon notification by DOT-AIR and/or FAA.”

Response #3: It is not anticipated that PV Systems installed onsite would adversely impact Airport Operations. Glint and glare produced by the PV systems will be mitigated through adherence to design and best management practices (BMPs). Should any larger scale PV Systems be considered for installation, the preparation of a glint and glare study will be required prior to authorization of construction.

With regard, to the relationship between PV systems and radio frequency interference (RFI), no adverse impacts on airport operations are anticipated from the implementation of the Proposed Action. The scope and scale of onsite PV systems would not be anticipated to produce a significant level of electromagnetic interference.

As previously discussed, the final design, scale, and layout of both the New Aloha Stadium, as well as the ancillary development surrounding it will be determined by the selected District Developer. The selected District Developer will also be responsible for complying with all mandated regulations and permits in relation to the installation of PV systems.

Highways Division (DOT-HWY)

Comment #1: *“It is assumed that each option will have a traffic impact analysis regarding the pros and cons of each option to facilitate the selection process for a preferred option. The analysis is expected to be of a more general nature, suitable for assisting in the selection of a preferred option. DOT-HWY will provide comments on the options analysis as it feels appropriate.”*

Response #1: The purpose of the Draft Programmatic EIS process is to evaluate and disclose the anticipated environmental impacts of the Proposed Action. The NASED Programmatic Master Plan (PMP), appended to the Draft Programmatic EIS as *Appendix A-1: Programmatic Master Plan*, outlines the program and vision for the Proposed Action. The rationale for preparing a PMP and a Programmatic EIS is to accommodate future design changes and refinements by the yet-to-be selected Public-Private-Partnership (P3) developer. Specifically, the final design, scale, and layout of both the New Aloha Stadium, as well as the ancillary development surrounding it will be determined by that P3 developer.

Therefore, pursuant to the scope of the Draft Programmatic EIS process, both existing and anticipated future traffic conditions based on the NASED PMP have been evaluated. A summary of these findings, along with a full Traffic Impact Analysis Report (TIAR) are included within the Draft Programmatic EIS. Any significant deviation from the program evaluated may require subsequent re-evaluation as determined in consultation with agencies administering transportation facilities. If traffic or other environmental impacts are significantly more adverse than presented in the Final Programmatic EIS, a supplemental EIS may be required.

Comment #2: *“DOT-HWY may require that a more detailed Traffic Impact Analysis Report be prepared once a preferred option selection is made, to more specifically analyze the option’s effects to State highways and recommend improvements as may be applicable.”*

Response #2: Your comment is acknowledged. The Draft Programmatic EIS discloses that Programmatic analysis and documentation will likely be required pursuant to final design.

Your email, along with this response, will be reproduced and included in the forthcoming Draft Programmatic EIS. The Draft Programmatic EIS, including the various technical studies associated with

10422-01

Letter to Jade T. Butay

Page 4

December 23, 2020

it, will be available for review on Office of Environmental and Quality Control website following its publication in *The Environmental Notice*.

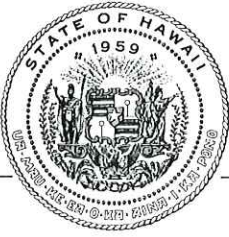
We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Chris Kinimaka, Department of Accounting and General Services
Stacey Jones, Crawford Architects



OFFICE OF PLANNING STATE OF HAWAII

235 South Beretania Street, 6th Floor, Honolulu, Hawaii 96813
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DAVID Y. IGE
GOVERNOR

MARY ALICE EVANS
DIRECTOR
OFFICE OF PLANNING

DTS201909161341ED

November 6, 2019

Mr. Keola Cheng
Associate Director of Planning
Wilson Okamoto Corporation
1907 South Beretania Street, Suite 400
Honolulu, Hawaii 96826

Dear Mr. Cheng:

Subject: Environmental Impact Statement Preparation Notice – Proposed New Aloha Stadium Entertainment District, Halawa, Ewa District, Oahu
Tax Map Keys: (1) 9-9-003: 061; 9-9-003: 055, 070, and 071

Thank you for the opportunity to provide comments on this Environmental Impact Statement Preparation Notice (EISP) for the planning of a new stadium and site redevelopment of the Aloha Stadium.

It is our understanding that the Department of Accounting and General Services (DAGS), in response to conclusions in the February 2017 Aloha Stadium Conceptual Redevelopment Report, proposes the construction of a new stadium facility and related ancillary development on the grounds of the existing Aloha Stadium site in Halawa. The project envisions the creation of a vibrant, mixed-use community anchored by a modern, multipurpose sports and entertainment venue, now branded as the New Aloha Stadium Entertainment District (NASED).

The Draft Environmental Impact Statement (DEIS) is being prepared in conjunction with a master plan being developed to lay the foundation for procurement of a private partner to construct and maintain the new stadium. The master plan for the entire site provides three options for possible location of the new Aloha Stadium, which will be downsized from its existing capacity of 50,000 seats, to a capacity of approximately 35,000 seats. Additional features for NASED will include hotels, retail space, and community recreational space. The EISP states that the Phase 1 will comprise the construction of the new stadium and additional mixed-use elements.

The Office of Planning (OP) has reviewed the EISP and has the following comments to offer.

Transit-Oriented Development

1. NASED is one of the priority TOD projects identified by the Hawaii Interagency Council for Transit-Oriented Development in its *State of Hawaii Strategic Plan for Transit Oriented Development, Revised August 2018*. The DEIS should consider the *TOD Strategic Plan* and other State TOD projects in the area when evaluating the proposed project and its impacts. The *TOD Strategic Plan* can be found at: https://planning.hawaii.gov/wp-content/uploads/State-TOD-Strategic-Plan_Dec-2017-Rev-Aug-2018.pdf.
2. It is important that the NASED project be evaluated and planned in terms of its physical and functional relationship to an adjacent priority TOD project identified in the *TOD Strategic Plan* -- the redevelopment of the Hawaii Public Housing Authority's (HPHA) Puuwai Momi project, situated on Tax Map Key (1) 9-9-003: 056. HPHA envisions increasing the project unit count to 1,500 units. As the HPHA is not currently listed as an agency under "Consultation" on page 8 of the EISPN, OP recommends consultation with HPHA to ensure that optimal TOD benefits are derived from the co-location of these projects in this area.
3. The NASED DEIS should analyze and discuss the cumulative impacts of the NASED development and additional housing units—those planned for Puuwai Momi and other nearby parcels—on roadway and infrastructure systems serving this area, as well as identify measures that are planned or proposed to mitigate or avoid short- and long-term impacts on these infrastructure facilities.
4. The DEIS should define the timing of Phase 1 and the approximate extent of the area to be developed under Phase 1 and identify the infrastructure improvements that will be required for the first phase and subsequent phasing. The DEIS should discuss where bundling of improvements needed for subsequent phases in Phase 1 delivery might be advantageous to avoid having to dig up streets or finished improvements in later phases.
5. The EISPN states that "the proposed project will not result in development at the Halawa/Aloha Stadium HART station," while the options being proposed under the master plan clearly show development on that parcel. TOD is most successful when access to stations or the stations themselves are physically integrated with adjoining buildings or facilities. This option should not be foreclosed on for the future, and any potential impacts of such integration should be noted. On a related note, the DEIS should examine the need for a multimodal mobility center in proximity to the rail station or within the NASED that would enhance the user experience in travelling to, from, and within the district.

6. The DEIS will need to discuss the regional wastewater system capacity and planned City and County of Honolulu (City) improvement projects as it impacts Phase 1 and subsequent phases of buildout. The DEIS should identify options being considered to meet the wastewater collection and treatment demand should City system capacity not be available when needed.
7. Traffic, parking, and noise impacts on adjoining neighborhoods have been raised as concerns. The DEIS should discuss what measures can or will be taken to manage traffic volume and flow, parking, and promote greater connectivity within the NASED that provides safe pedestrian and bicycle access to the rail station and within NASED. It would be useful for the DEIS to examine and discuss a range of noise attenuation strategies that could be considered in facility and site design, building materials, landscaping, and event management.
8. The DEIS should discuss the energy efficiency and renewable energy technologies that will be used in meeting the increased energy demand that would be generated by NASED development.
9. The DEIS should also identify whether there any environmental hazards on the property from contamination onsite or offsite that would need to be remediated or removed prior to development. If remediation or removal is required, the DEIS should identify the extent of the response required and who will be the responsible party/ies for the response action.
10. The DEIS should discuss the need for State TOD Development Plan Approval by the OP. Pursuant to § 225M-2(b)(10)(H), the OP shall “approve all state agencies’ development plans for parcels along the rail transit corridor.” For purposes of this requirement, “Development plans” mean conceptual land use plans that identify the location and planned uses within a defined area. OP’s review and endorsement of these development plans focuses on their consistency with county-adopted TOD or development plans that set forth TOD strategies, as well as the Smart Growth and TOD principles of compact, mixed-use, transit-linked, well-connected, and walkable communities. OP’s approval of development plans is undertaken in the course of its review of environmental assessments and EISs prepared pursuant to Chapter 343, HRS.
11. In addition, the State TOD Planning and Implementation Project, currently underway and managed by OP, has developed an anticipated land use scenario and identified regional and project-serving infrastructure needs for TOD buildout in the Halawa-Stadium TOD Priority Area. The purpose of the project is to provide information on infrastructure

project requirements, costs, and timing to help formulate an infrastructure investment strategy for the State that would support TOD on State lands. The land use scenario and the infrastructure needs assessment have been developed in consultation with State agencies, including DAGS and the Stadium Authority. A brief description of this project should be provided in the DEIS. If possible, it would be valuable to identify where the infrastructure assumptions, improvement requirements, costs, and timing developed for the NASED DEIS differ significantly from those compiled under the State TOD Implementation Project, so that adjustments may be made, or differences reconciled as needed in formulating recommendations for a broader State infrastructure investment strategy for the region.

12. Drainage/Stormwater Runoff Controls/Low Impact Development (LID)
Section 1.2, page 2 of the EISPN lists resource categories such as Geology, Topography, Soils, and Surface and Coastal Waters that will be evaluated in the DEIS. Based on the project area's size, and its proximity to Aiea Bay, this redevelopment project may be subject to the City and County of Honolulu, Department of Planning and Permitting (DPP) rules on drainage and onsite stormwater management. Please indicate any LID post-construction standards as they would apply to this project.

To assist in the development of onsite stormwater management plans, and the resource categories listed above, OP has developed guidance documents on this subject. We recommend consulting these evaluative tools when developing mitigation methods to offset polluted storm runoff. These documents offer useful techniques to keep land-based pollutants and sediment in place, while considering the management practices best suited for the topography of the area and the types of contaminants potentially affecting nearby water resources. These useful stormwater evaluative tools include:

- Stormwater Impact Assessments assist in identifying and evaluating information on hydrology, stressors, sensitivity of aquatic and riparian resources, and management measures to control runoff, as well as consider secondary and cumulative impacts to the area:
http://files.hawaii.gov/dbedt/op/czm/initiative/stomwater_impact/final_stormwater_impact_assessments_guidance.pdf; and
- Low Impact Development (LID), A Practitioners Guide covers a range of structural best management practices for stormwater control management and layout that minimize environmental impacts:
http://files.hawaii.gov/dbedt/op/czm/initiative/lid/lid_guide_2006.pdf.

13. Hawaii Coastal Zone Management (CZM) Program

The DEIS will need to evaluate the relationship of the proposed action with the objectives and supporting policies of the Hawaii CZM Program, listed in HRS § 205A-2, as amended. This analysis should include the project's compatibility with all ten of the components of HRS § 205A-2. If the project conflicts with any of the provisions of HRS § 205A-2, the DEIS should indicate what steps will be taken to align the project with these objectives and supporting policies. Compliance with HRS § 205A-2 is a vital component for satisfying the requirements of HRS Chapter 343.

14. Hawaii State Planning Act

The DEIS will also need to assess the relationship of the proposed action with the Hawaii State Planning Act, as found in HRS Chapter 226. This assessment should detail the proposed project's relevance with all parts of HRS Chapter 226, the Hawaii State Planning Act; which include Part I – the goals, objectives, and policies; Part II – planning coordination and implementation (State Functional Plans); and Part III – priority guidelines. The DEIS should discuss those policy elements that would be negatively impacted by the proposed project and the measures that will be taken to mitigate negative impacts.

If you have any questions regarding these comments, please contact Ruby Edwards, Land Use Division, (808) 587-2817, or Joshua Hekekoa, CZM Program, (808) 587-2845.

Mahalo,



Mary Alice Evans
Director

c: Christine L Kinimaka, Department of Accounting and General Services
Scott Chan, Stadium Authority
Aedward Los Banos, Hawaii Community Development Authority



10422-01
December 23, 2020

Mary Alice Evans
Director, Office of Planning
235 South Beretania St, 6th floor
Honolulu, HI, 96813

Subject: Environmental Impact Statement Preparation Notice:
New Aloha Stadium Entertainment District (NASED)
Tax Map Keys (TMK): [1] 9-9-003:061, [1] 9-9-003:055, 070, and 071.
Hālawā, Oahu, Hawai‘i

Dear Ms. Evans:

Thank you for participating in the scoping process for the subject Environmental Impact Statement (EIS). Preparation Notice with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1, Section 24.

We offer the following in response to your comments outlined in your letter dated November 6, 2019 (DTS201909161341ED) in relation to the scope and content of the Draft Programmatic EIS:

1. The Proposed Action, when considered in conjunction with past, present and reasonably foreseeable future actions to the environment, may result in cumulative impacts. Section 4.18.1 (Known Conceptual and Underway Development Projects) of this EIS provides a summary of known conceptual and underway development within proximity of the Project Site. A review of potential cumulative and secondary impacts of the Proposed Action and other development is also provided. These developments include the following:

- Live Work Play ‘Aiea;
- Aiea-Pearl City Neighborhood TOD Plan;
- Hālawā Area TOD Plan;
- O‘ahu Community Correctional Center (OCCC);
- Pu‘uwai Momi Development;
- Honouliuli / Waipahu / Pearl City Wastewater Conveyance Facilities; and
- Other Potential Developments

2. The scope of your comments is acknowledged, they will be incorporated into the forthcoming Draft Programmatic EIS.

3. Proposed Action residential products will provide prospective residents with a wide range of housing choices. Upon completion and build out, the Proposed Action is anticipated to include up to 1,800 new homes which will provide much needed housing inventory for residents seeking to live closer to town as well as those in the market for competitively priced housing.

An analysis of the current housing conditions and the proposed actions anticipated impacts is provided in Chapter 4, Section 13.2.1 *Population and Housing* of the Draft EIS. Additionally, within DEIS Appendix A-1, *Programmatic Master Plan* (PMP), a variety of housing options are addressed under Chapter 2.6 *Equity and Inclusion*, under subsection *Residential and Housing Diversity*.

4. An overview of project phasing and implementation is included within the NASED PMP.

5. The scope of your comments is acknowledged. Multimodal transportation strategies are further discussed within the Programmatic Mater Plan Chapter 3.6 *Public Transit*, included as Appendix A-1 of the Draft Programmatic EIS.

6. A Preliminary Engineering Report (PER) prepared by Wilson Okamoto Corporation serves as a basis for the EIS evaluation of the Project Site and regional infrastructure and utilities under the context of the Proposed Action. The Draft Programmatic EIS includes the PER as Appendix J *Preliminary Engineering Report*.

7. The Proposed Action will seek to improve accessibility, connectivity, and mobility within the Project Site and surrounding community by creating a network of pedestrian walkways, bike paths, developing safer routes for mass transit and ride sharing options, and improvement made to major arterials that service the area. The Proposed Action will create multi-modal streets and paths that enhance the sense of place and accessibility of the surrounding community.

Existing conditions and the anticipated impacts of the Proposed Action are addressed in the subject Draft EIS. Information relating to traffic is addressed in Chapter 4, Section 11 *Traffic*, which summarizes the findings and analysis conducted under a formal traffic study, which is appended to the Draft EIS as Appendix H *Traffic Impact Assessment*.

8. The scope of your comments is acknowledged, it is anticipated the implementation of energy efficient designs and renewable energy technologies will be pursued for incorporation to the project at the direction of the selected District Developer.

9. A hazardous materials remediation plan will be prepared and implemented by the selected P3 developer(s) prior to development of the District. Known hazardous materials will be contained or remediated to a level acceptable for the future planned uses. However, it is possible that additional future development at the proposed stadium site may require additional remediation measures. Such measures are difficult to quantify or estimate at this time, as they are tied specifically to the Proposed Action's design, demolition, and site preparation efforts which, at this early stage of project planning and programming, are unknown.

The Draft EIS provides an assessment of the existing conditions and anticipated impacts of the proposed action relating to Hazardous materials in Chapter 4, Section 10 *Hazardous Materials*. The EIS also included a detailed report prepared by ENPRO environmental dated March 4th, 2020 appended as Appendix G: Hazardous Materials Survey.

Coordination will be undertaken with the appropriate agencies during permitting and construction in order to ensure that the Proposed Action will not result in significant impacts with regard to surface and coastal waters. A National Pollutant Discharge Elimination System (NPDES) permit for storm water runoff from construction activities would be required as individual and/or cumulative soil disturbances in the Project Site exceed one acre of land area. Any discharges related to the proposed Action's construction or operation activities will comply with applicable State Water Quality Standards as specified in Hawai'i Administrative Rules, Chapter 11-54 and 11-55 Water Pollution Control, Department of Health. Excavation and grading activities will be regulated by applicable provisions of the County's grading ordinance.

The Draft EIS also provides an assessment of the existing conditions and anticipated impacts of the Proposed Action associated with surface waters in Chapter 4, Section 3.1 *Surface Water*. Subsequently AECOS has prepared a Natural Resource Assessment that includes an in depth study of the Hālawā Stream. AECOS Natural Resources Assessment has been appended to the Draft EIS as Appendix C: Natural Resources Assessment- NASED.

10. The Proposed Action will require permits and approvals for various agencies prior to the construction and operation of the proposed NASED. A list of required Permits and Approvals is further discussed in Section 5.3 *Permits and Approvals* of the Draft Programmatic EIS.

11. Your comment is acknowledged, "Land Uses" are discussed as an environmental resource criteria within the subject Draft Programmatic EIS.

12. The Proposed Action's relationship to the list of resources that include Geology, Topography, Soils, Surface Water and Coastal Waters and evaluated in the Draft Programmatic EIS – refer to Chapter 4 *Description of Existing Environment, Impacts and Mitigation Measures* of this Draft Programmatic EIS.

13. The Proposed Action's alignment with and relationship to the objectives and supporting policies of the Hawaii Coastal Zone Management is discussed and evaluated in the Draft Programmatic EIS – refer to Section 5.1.3 *Hawaii Coastal Zone Management Program*.

14. The Proposed Action's alignment with and relationship to the objectives and supporting policies of the State Functional Plan is discussed and evaluated in the Draft Programmatic EIS – refer to Section *State Functional Plans*.

Your letter, along with this response, will be reproduced and included in the forthcoming Draft Programmatic EIS. The Draft Programmatic EIS, including the various technical studies associated with it, will be available for review on Office of Environmental and Quality Control website following its publication in *The Environmental Notice*.

We appreciate your interest and participation in this environmental review process.

10422-01

Letter to Mary Alice Evans

Page 4

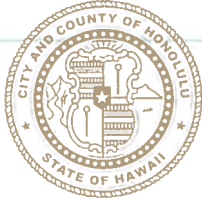
December 23, 2020

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Chris Kinimaka, Department of Accounting and General Services
Stacey Jones, Crawford Architects



CITY COUNCIL
CITY AND COUNTY OF HONOLULU
530 SOUTH KING STREET, ROOM 202
HONOLULU, HAWAII 96813-3065
TELEPHONE: (808) 768-5010 • FAX: (808) 768-5011

CAROL FUKUNAGA

HONOLULU CITY COUNCIL, DISTRICT 6
PHONE: 768-5006 FAX: 768-1199
EMAIL: cafukunaga@honolulu.gov

November 7, 2019

Mr. Keola Cheng
Wilson Okamoto Corporation
Honolulu, Hawai'i 96826

Via Email:
NASED.EIS@wilsonokamoto.com

Dear Mr. Cheng:

RE: Programmatic Environmental Impact Statement ("PEIS") for the Proposed New Aloha Stadium Entertainment District ("NASED")

Thank you for the opportunity to offer comments on the scope of key issues and potential environmental concerns to be included as part of the Programmatic Environmental Impact Statement ("PEIS") for the proposed New Aloha Stadium Entertainment District ("NASED").

This sports and entertainment district - which will be the first of its kind in Hawaii – provides a great opportunity to redevelop and energize this transportation hub and gathering place. I find it refreshing to hear the State's commitment to keep the current Aloha Stadium operating while the new Stadium and Entertainment District is being developed. The three proposed Stadium configurations also allow community stakeholders to help shape the configuration with the best aesthetic and capacity features, and to address long-standing neighborhood concerns of traffic congestion, on-street parking, noise, pollution, and related land use issues.

Please consider the following items to be incorporated in the EIS:

- **TRANSPORTATION PLAN AND TRAFFIC IMPACTS:**

This site is located amidst several major transportation thoroughfares (H-1, H-2, H-201 and H3 freeways and other major highways including Moanalua Road, Kamehameha Highway, Nimitz Highway), with many arterial streets leading into residential and business areas.

Current Aloha Stadium activities have negatively impacted residents in nearby neighborhoods, with traffic, parking, and congestion. Coupled with NASED development, the construction of a rail station, and other development activities, traffic, parking and congestion are expected to worsen even more. A comprehensive transportation/vehicular circulation plan, incorporating bus and rail systems, must ensure efficient ingress and egress for those who live in abutting neighborhoods, as well as a coordinated traffic management plan for NASED workers and visitors (including Aloha

Stadium attendees) to enter and depart from the Stadium as efficiently and expeditiously as possible.

- **SAFETY OF PEDESTRIANS/ PERSONAL TRANSPORTATION DEVICE USERS AND BICYCLISTS/MOBILE TRANSPORTATION DEVICE USERS:**

Please promote pedestrian walkability features and provide optimum safety of pedestrians and personal transportation device users, including those using walkers, wheelchairs and mobile scooters, to comfortably traverse the different areas of NASED.

With the nearby historic Pearl Harbor Trail serving as a new travel route for bicyclists and other mobile transportation device users, their safety needs and concerns should also be considered, without infringing on the safety of pedestrians and personal transportation device users.

- **NOISE:**

Residents commented on how existing Stadium activities create noise at a level that often permeates nearby residences. A careful consideration should be made of which Stadium configuration will generate the least amount of musical, or other entertainment programming, sound penetration into nearby residences.

NASED construction and other development activities will further impact the level and duration of noise in the area. Thoughtful noise abatement strategy should be utilized to protect the health and safety of neighboring residents and workers.

- **SOCIO-ECONOMIC IMPACT:**

Described as the state's biggest open-air flea market, the Aloha Stadium Swap Meet provides local vendors a place to sell their wares. Please consider the adverse impacts of displacement and utilize management strategies to assist current flea market vendors during construction and development phases.

There are a number of retail operations located in this vicinity, including the Pearlridge Shopping Center and the Aiea Shopping Center. Please evaluate the socio-economic impacts of NASED commercial redevelopment upon nearby businesses with NASED's proposed retail operations. Preparation of a business/economic development plan for the NASED's retail proposal with a small business focus, owned and/or operated by the residents, would promote win-win opportunities for neighborhood retailers and new entrants.

- **SOIL AND AIR QUALITY:**

Earlier studies have detected contaminants in the soil. Please ensure that the contaminants have been removed before construction begins.

Air quality concerns arising from construction debris and dust must be prepared with community feedback and participation, including a mitigation plan to protect the health and safety of neighboring residents and businesses.

- **SURFACE AND GROUNDWATER PROTECTION:**

Community concerns about the 2014 fuel leaks from the Navy-owned Red Hill Bulk Fuel Storage Facility require careful monitoring not only of the tanks, but the fuel pipes that are in

the area. Other possible contamination sources in the area should be identified to avoid any disturbances that could compromise our surface and ground waters.

- HISTORIC, ARCHAEOLOGICAL, AND CULTURAL SITES AND RESOURCES:

Nearby Pearl Harbor Memorial and the Historic Trails are widely-acknowledged historic sites in this area, but there may be lesser known, equally-valuable resources and sites. A careful investigation should be conducted to determine whether additional historic, archaeological and cultural sites and resources may be affected.

- AFFORDABLE HOUSING:

As the midpoint of the planned rail line, the Aloha Stadium rail station provides remarkable transient-oriented development (TOD) opportunities, including the development of urgently-needed affordable housing.

At the same time, sensitive attention must be paid to the existing residential neighborhood, and the quality and quantity of new affordable housing should be thoughtfully integrated with the already-built community.

An infrastructure analysis is needed to determine what additional resources are needed to meet the increased capacity needs of new housing units and other TOD developments in and around NASED.

- GREEN AND OPEN SPACES:

For optimum health, aesthetic value and well-being of residents and visitors, careful thought and planning should be given to making the best use of green and open space.

- CLIMATE CHANGE AND IMPACT

As part of the overall environmental review/evaluation, please address if and how NASED project may contribute to adverse climate change impacts, and provide alternatives to mitigate them.

In light of the close proximity of Aiea Bay, please address how sea/water level rise and other climate change impacts will be addressed in the planning and development of the NASED project.

In addition to these recommendations for evaluation in NASED environmental studies, I commend the planning team for soliciting a wide range of community perspectives during the Prep Notice process. I look forward to future comment opportunities during your review.

Sincerely,



Carol Fukunaga
Councilmember, District 6



10422-01
December 23, 2020

Councilmember Carol Fukunaga
Honolulu City Council
530 South King St.
Honolulu, HI, 96813-3065
cafukunaga@honolulu.gov

Subject: Environmental Impact Statement Preparation Notice:
New Aloha Stadium Entertainment District (NASED)
Tax Map Keys (TMK): [1] 9-9-003:061, [1] 9-9-003:055, 070, and 071.
Hālawā, Oahu, Hawai'i

Dear Councilmember Fukunaga:

Thank you for participating in the scoping process for the subject Environmental Impact Statement (EIS). We acknowledge your comments and concerns, they have been considered in the preparation of the Draft Programmatic EIS with regard to meeting content requirements prescribed in Hawai'i Administrative Rules, Title 11, Chapter 200.1, Section 24.

Your comments, along with this response, will be reproduced and included in the forthcoming Draft Programmatic EIS. The Draft Programmatic EIS, including the various technical studies associated with it, will be available for review on Office of Environmental and Quality Control website following its publication in *The Environmental Notice*.

We appreciate your interest and participation in this environmental review process.

Sincerely,

Keola Cheng
Director of Planning

cc: Chris Kinimaka, Department of Accounting and General Services
Stacey Jones, Crawford Architects

[Reply](#) [Reply All](#) [Forward](#)

Navy Comments for State of Hawaii/Aloha Stadium Entertainment District

Muraoka, John T CIV USN NAVFAC HAWAII PEARL (USA) [jo...]

To: Keola Cheng

Cc: oeqc@doh.hawaii.gov

Attachments: Copy of NASED EISPN comme~1.xlsx (12 KB) [Open as Web Page]

Monday, November 11, 2019 7:03 AM

This message has a digital signature. The digital signature couldn't be validated because the S/MIME control isn't available.

All,

Apologize for the delay in getting this response to you. Navy comments to the State of Hawaii/Aloha Stadium Entertainment District are attached. The Navy would like to remain engaged as this initiative progresses. We look forward to continuing to work together on this initiative. Please let me know if anyone has any questions.

John Muraoka
NAVFAC HI in Support of
NRH REC and Environmental Compliance
Code EV13
Bldg X-11, Ph: 471-4850
e-mail: john.muraoka@navy.mil

Document Title:		Version / Revision:	Document Receipt Date:
NASED EISPN			
Service Provider POC:		Phone:	Review Comments Due By:
Navy			7-Nov-19
Reviewer Name	Line, Section, Page, Figure or Table	Reviewer Comment	
COMMENTS			
		Navy requests ongoing engagement to ensure that Stadium and ancillary development is compatible with Navy's land use and mission.	
		Navy requests that proposed actions do not compromise national security or the physical security of the Installation.	
		Navy requests to be engaged in any discussions which entails transportation options; including bus routes.	
		Navy requests to be engaged in any discussions which entail Stadium parking discussions.	
		Navy requests to be engaged in any discussions that pertain to placement of signage (related to the Installation and historic visitor sites).that prior to any placement of signage (related to the Installation and historic visitor sites).	
		The Joint Base looks forward in working with the State of Hawaii in planning for the new Stadium and site redevelopment of the area.	
		The State should ensure traffic impact to the Joint Base installation is minimized. The potential development of additional housing as part of the New Aloha Stadium Entertainment District will result in additional traffic volume which may negatively impact the Navy's entry control facilities.	
		As the State continues its planning for the new Stadium Entertainment District, please be cognizant about potential impact to DOD mission such as view planes, impact to our communication devices, etc. Operational security is of utmost importance to the Joint Base and DOD.	
		There may be opportunites for the State of Hawaii/Aloha Stadium Entertainment District developer(s) to work with the Joint Base on facilities that can also benefit the Joint Base -- for example, parking, lodging, eating establishments, entertainment facilities, training centers, administrative facilities, etc.	

Reviewer Name	Line, Section, Page, Figure or Table	Reviewer Comment



10422-01
December 23, 2020

John Muraoka
Naval Facilities Engineering Command (NAVFAC)
U.S Navy-Department of Defense
John.muraoka@navy.mil
(808) 471- 4850

Subject: Environmental Impact Statement Preparation Notice:
New Aloha Stadium Entertainment District (NASED)
Tax Map Keys (TMK): [1] 9-9-003:061, [1] 9-9-003:055, 070, and 071.
Hālawā, Oahu, Hawai‘i

Dear Mr. Muraoka:

Thank you for participating in the scoping process for the subject Environmental Impact Statement (EIS). We acknowledge your comments and concerns, they have been considered in the preparation of the Draft Programmatic EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1, Section 24.

We offer the following in response to your comments relating to the scope and content of the Draft Programmatic EIS:

The adjacent Joint Base Pearl Harbor Hickman (JBPHH) military installation is one of the Navy’s busiest harbors and is considered a critical strategic component of the nation’s defense network and operations. Securing the line of sight and visibility of on-base operation is a chief concern. Pursuant to the initial early scoping effort associated with the subject EIS process, the Navy has expressed that it is imperative that the Proposed Action not compromise national security or the physical security of the adjacent JBPHH. The State and selected District Developer(s) will consult with the Navy, as appropriate to ensure that final design and implementation of the Proposed Action will not present a National Security risk, nor adversely impair the physical security of the JBPHH installation.

The Proposed Action will seek to improve accessibility, connectivity, and mobility within the Project Site and surrounding community by creating a network of pedestrian walkways, bike paths, developing safer routes for mass transit and ride sharing options, and improvement made to major arterials that service the area. The Proposed Action will create multi-modal streets and paths that enhance the sense of place and accessibility of the surrounding community.

Existing conditions and the anticipated impacts of the Proposed Action are addressed in the Draft Programmatic EIS. Information relating to traffic is addressed in Chapter 4, Section 11 *Traffic*, which summarizes the findings and analysis conducted under a formal traffic study, which is appended to the Draft Programmatic EIS as *Appendix H Traffic Impact Assessment*.

Your email, along with this response, will be reproduced and included in the forthcoming Draft Programmatic EIS. It is anticipated the Draft Programmatic EIS, including the various technical studies associated with it, will be available for review on Office of Environmental and Quality Control website following its publication in *The Environmental Notice*.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Chris Kinimaka, Department of Accounting and General Services
Stacey Jones, Crawford Architects

From: Patricia Cadiz <pbcs5@mac.com>
Sent: Sunday, September 8, 2019 8:59 AM
To: Keola Cheng
Cc: yukilei.sugimura@mauicounty.us
Subject: New Aloha Stadium

TWIMC

I request that the EIS include an economic evaluation of impacts to our state debt and a fair analysis of funding priorities statewide.

Maui has been waiting a long time for much needed infrastructure upgrades and even basic repairs for schools and infrastructure. I'd like to see an evaluation of the needs and benefits of a new stadium vs the needs and benefits of outer island infrastructure.

Thank you,

Patti Cadiz

2406 Waipua Street

Paia, HI 96779

Sent from my iPhone



10422-01
December 23, 2020

Patti Cadiz
2406 Waipua Street
Paia, HI, 96779

Subject: Environmental Impact Statement Preparation Notice:
New Aloha Stadium Entertainment District (NASED)
Tax Map Keys (TMK): [1] 9-9-003:061, [1] 9-9-003:055, 070, and 071.
Hālawā, Oahu, Hawai‘i

Dear Ms. Cadiz:

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We appreciate your interest and participation in this environmental review process.

Sincerely,

Keola Cheng
Director of Planning

cc: Chris Kinimaka, Department of Accounting and General Services
Stacey Jones, Crawford Architects



Eric Gill, Financial Secretary-Treasurer

Gemma Weinstein, President

Godfrey Maeshiro, Senior Vice-President

November 7, 2019

Agency

Chris Kinimaka
Department of Accounting and General Services
1151 Punchbowl St
Honolulu, HI 96813

Copy to Applicant

Keola Chang
Wilson Okamoto Corporation
1907 S. Beretania St.
Honolulu, HI 96826

RE: Response to the EISPN for the New Aloha Stadium Entertainment District (NASED)

Dear Ms. Kinimaka,

UNITE HERE Local 5 is the labor union that represents most hotel workers in Waikiki, as well as other hotel, food service and health care workers across the state. We believe that issues affecting the working class are not only related to our jobs, but span into our personal lives as well. It is in this capacity that we respectfully submit our testimony for the New Aloha Stadium Entertainment District EISPN.

Our primary concern is that local needs—particularly around affordable housing—are insufficiently represented in the potential development for this site. Multiple recent studies identify affordable housing as one of the foremost issues for kama’aina. In 2015, a national survey found that homelessness and housing ranked as the second and third most important issues to residents of Hawaii.ⁱ In 2016, that same poll found those issues rose to first and second, respectively.ⁱⁱ A 2017 statewide survey from the Hawaii Association of Realtors found that 85% of residents feel significant concern over the lack of affordable housing.ⁱⁱⁱ In the 2019 Hawaii Perspectives Poll, 45% of voters live in a household with someone considering moving away.^{iv} Just as Local 5 has a responsibility to its members, the City and County of Honolulu has a responsibility to its residents and their needs.

Local 5 was one of the few organizations represented at both the Community Scoping Meeting and the WT Partnership’s P3 Industry Day. At the Community Scoping Meeting, community members made clear that affordable housing, traffic, desire for more community usage, and

retaining the swap meet were among their top concerns for the Aloha Stadium redevelopment. Yet when developers, financiers, architects, general contractors, and engineers gathered to discuss the same redevelopment at the P3 Industry Day, there was little mention of any of the community's concerns from either the State or the private sector. We find this very concerning, especially given the opportunity that this large-scale public project affords to address these concerns.

Minimally, the Draft EIS should include analysis of the following:

1. Study of the feasibility of building a hotel as part of this redevelopment project. This should include comparative discussion about various levels of service at which such a hotel could operate, the ideal size of such a hotel, the amenities such a hotel would have, and how each of the foregoing would impact the number, type and quality of jobs at such a hotel.
2. Please explain all processes for the community and/or the Honolulu City Council to input or discretion over the Stadium project and its component pieces. Please explain the timeline for such input or discretion.
3. Please provide a timeline for the project that includes when demolition will take place, when construction of each component will take place, when each component will become operational or obtain a certificate of occupancy, and when each component of the project will be complete.
4. Several projects on our islands have completed Environmental Impact Statements or Environmental Assessments years before construction commences, and in some cases decades before the projects are complete. The environment, including each of the aspects that an Environmental Impact Statement is supposed to address, can change significantly during that time – traffic, socioeconomics, population, availability of utilities, endangered and native flora and fauna, etc. Please discuss how this project and any components of this project not completed in five years will address and mitigate the project's changing impacts as the surrounding environment changes.
5. Please include analysis of the impacts of all other known and/or proposed developments which are either in the area or large in scale which could affect or be affected by this project. Among other things, this would include the Aiea Live Work Play project, potential redevelopment of the Neal Blaisdell Center, Ho'opili, Koa Ridge, Hoakalei Resort at Ocean Pointe, and other large sports complexes and concert venues on Oahu.
6. Please include analysis of ways this project could incorporate large-scale affordable housing projects at different affordability levels, and the impact the project would have

on the statewide need for affordable housing under each alternative (including any alternatives which do not consider large-scale affordable housing components).

7. Please describe all forms of public subsidies, tax incentives, tax breaks, public financing, and other public monies that will be: a) available to developers of the various components of this project, and b) used for any part of this project at any stage.
8. Please provide a valuation of each of the the assets and contracts that will be awarded to private partners for this project.

Mahalo,

Abby Snyder
UNITE HERE! Local 5
1516 South King St.
Honolulu, HI 96826
808-941-2141 ext. 238
asnyder@5.unitehere.org

ⁱ <https://www.civilbeat.org/2015/03/what-are-the-top-five-issues-in-hawaii/>

ⁱⁱ <http://www.hawaiifreepress.com/ArticlesMain/tabid/56/ID/17421/CQ-Roll-Call-Top-5-Issues-in-Hawaii.aspx>

ⁱⁱⁱ <https://www.bizjournals.com/pacific/news/2017/02/15/survey-reveals-hawaii-residents-most-pressing.html>

^{iv} <https://www.staradvertiser.com/2019/03/14/hawaii-news/homelessness-cost-of-living-cited-as-major-concerns-in-hawaii/>



10422-01
December 23, 2020

Abby Snyder
Local 5
1516 South King St.
Honolulu, HI, 96826
asynder@5.unitehere.org

Subject: Environmental Impact Statement Preparation Notice:
New Aloha Stadium Entertainment District (NASED)
Tax Map Keys (TMK): [1] 9-9-003:061, [1] 9-9-003:055, 070, and 071.
Hālawā, Oahu, Hawai'i

Dear Ms. Snyder:

Thank you for participating in the scoping process for the subject Environmental Impact Statement (EIS). We acknowledge your comments and concerns, they have been considered in the preparation of the Draft Programmatic EIS with regard to meeting content requirements prescribed in Hawai'i Administrative Rules, Title 11, Chapter 200.1, Section 24.

Your comments, along with this response, will be reproduced and included in the forthcoming Draft Programmatic EIS. The Draft Programmatic EIS, including the various technical studies associated with it, will be available for review on Office of Environmental and Quality Control website following its publication in *The Environmental Notice*.

We appreciate your interest and participation in this environmental review process.

Sincerely,

Keola Cheng
Director of Planning

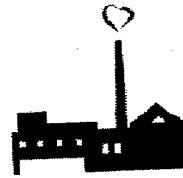
cc: Chris Kinimaka, Department of Accounting and General Services
Stacey Jones, Crawford Architects

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November 7, 2019

Mr. Keola Cheng, Planning Consultant
Wilson Okamoto Corporation
Honolulu, Hawai'i 96826

Ms. Christine L. Kinimaka, Public Works Administrator
Department of Accounting and General Services
State of Hawai'i 96818

Re: Aloha Stadium Entertainment District EIS

Thank you for this opportunity to give input on this exciting and sensitive new project. We hope our input can manifest itself into a meaningful redevelopment for our community. This redevelopment does not happen in isolation, it will impact our four vital transportation corridors of Salt Lake Boulevard, Kamehameha Highway, Moanalua Road and the H-1 freeway.

Currently the present Aloha Stadium is a standalone structure surrounded by parking spaces, that usually prove to be inadequate in number. Depending on the event, it is not unusual to have event goers parking spill over into the surrounding neighborhoods. You will hear over and over, the most critical concern from the surrounding community is the increase density with uses such as small businesses and "hotel" in the proposed plans. This increase in density will adversely impact parking spaces and emphasize the shortages in our neighborhood. As the circle around the redevelopment enlarges, traffic congestion issues on our above four (4) arteries will impact our community's ability to navigate home or to the Leeward plains. Currently the Aloha Stadium occupies a large area with a large parking mass. The stadium is used mostly on the weekends and the proposed redevelopment uses would mean a daily use of the property. Less parking spaces to accommodate those users and more traffic flow in and out of the neighborhood. Certainly, the rail station at Hālawā will provide some relief for commuters and end destination users but there is no parking attached to that rail station. Although, we have reservations to blocking our view planes to Pearl Harbor a palatable low rise parking structure must be considered. Supplemental mass transit integration is a necessity to reduce congestion and improve accessibility to any new development. Attention also must be given to exiting the area heading west without going through 'Aiea town or doubling back to Honolulu and then west.

"Building A Sense of Community"

Aloha Stadium Entertainment District EIS Comments

Page 2

We understand the emphasis will be on alternative modes of transportation in and out of the area such as the rail, bicycle and pedestrian. Effort must be made to make these alternative modes of transportation seamless and integrated with each other. For example, bicyclists must be able to use the Pearl Harbor Historic Trail bike path to connect to the rail station. Renewed efforts must be made between intergovernmental agencies to open the Admiral's Boathouse gate and proper maintenance of the Pearl Harbor Historic Trail must be detailed and continual. Parties involved must be identified and clear MOU must be established to ensure the Trail maintenance.

Traffic patterns, closing current roadways and converting them into pedestrian walkways should be looked at to alleviate some of the stress on the local traffic. The local community must have access to any of these new transit thoroughfares.

Open space designations should not just be "OPEN SPACE" or "Green Space". These designated areas should be opportunities for our community to recreate. Some ideas are dog runs/parks, tennis courts, mini soccer fields, sand beach volleyball areas, golf driving ranges, and family gathering/picnic areas (grass areas) where children can just play with their parents or other children. Efforts should also be made to open up Pearl Harbor's recreational areas to kayaking, sailing, rowing, outrigger canoeing or working on the Loko Pa'aiau Fishpond. The new activity in the area, with buy in from the community as users makes it less likely to have undesirable users in these new areas.

An interesting model of a public park/area hailed as a model for urban design in the age of climate crisis is New York City's Hunter Point South. It incorporates the water feature of the Hudson River and provides a multitude of community uses for the surrounding neighborhoods. Such care given to having the redevelopment address the needs of the surrounding neighborhoods will buy much good will as communities will see the redevelopment as mutually beneficial.

Some still question plans for a smaller stadium so there needs to be a commitment to pursue smaller sporting events so the stadium is well used. State revenue is an important factor when considering a smaller stadium. Consideration must be given to the positioning of the new stadium. The more of a buffer that can be provided to surrounding homes the better. The stadium should be positioned as far away from the residential areas and closer to the freeway interchanges. Even positioned nearer the Aiea Elementary school would be desirable as both uses are not at the same time. The pedestrian overpass in front of Aiea Elementary could still be used, maybe building the stadium to have an entry right from the pedestrian overpass. A buffer of trees and/or buildings should be planned between the residents and stadium. There is currently a dense grove of trees that line the H3 access from Aiea to the airport but maybe additions like sound walls can be built hidden by these dense trees to provide an additional sound barrier.

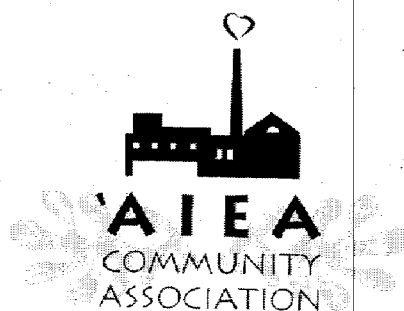
A museum and cultural amenity could be planned together. Mo'olelos or story boards that pay tribute and document the entire Pearl Harbor area, their livelihood and practices would be invaluable. Special features highlighting the Hālawā, Kalauao and 'Aiea ahupua'a as will also serve as great centers for learning. An educational hub where leeward area schools can come

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November 7, 2019

Mr. Keola Cheng, Planning Consultant
Wilson Okamoto Corporation
Honolulu, Hawai'i 96826

Ms. Christine L. Kinimaka, Public Works Administrator
Department of Accounting and General Services
State of Hawai'i 96818

Re: Aloha Stadium Entertainment District EIS

Thank you for this opportunity to give input on this exciting and sensitive new project. We hope our input can manifest itself into a meaningful redevelopment for our community. This redevelopment does not happen in isolation, it will impact our four vital transportation corridors of Salt Lake Boulevard, Kamehameha Highway, Moanalua Road and the H-1 freeway.

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"Building A Sense of Community"

P. O. Box 2785 • 'Aiea, Hawai'i • 96701

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Aloha Stadium Entertainment District EIS Comments
Page 3

and get some hand-on interactive experiences would be so beneficial for our keiki. Working together with University cultural practitioners to develop these "miniature" Bishop Museums would be welcomed by kamainas and malihinis.

Careful thought must be given to the hotel feature. It will add tremendous density. If the hotel's purpose is to service the venue of the Aloha Stadium Entertainment District, it can be smaller in height, limited car access, promote bus drop off and pickup and rail transit accessible.

At the public hearing, there were many who testified in favor of affordable housing, some even suggesting such dense housing as the Singapore's answer of seven towers of 50' heights. The 'Aiea Community Association recognizes the need for affordable housing but will strongly oppose have such dense housing or use of the Aloha Stadium redevelopment as an answer for O'ahu's housing shortage. We do not feel the community's best interests will be served using this prime, central and open space as housing. We do not want to be another plopped down Waikiki or a densely populated Kakaako area. Those of us, who are live long residents of 'Aiea, bought the suburbs and we would like to have some semblance of it preserved.

We look forward to continued community opportunities for input and review. Thank you very much for including us in this process. Our community is cautiously excited and optimistic about the Aloha Stadium Redevelopment and the opportunities it presents to us. We would like to see innovative and futuristic uses for this precious 'aina that will not compromise the values and negatively impact our quality of life.

Mahalo,

Claire Tamamoto
Aiea Community

"Building A Sense of Community"

P. O. Box 2785 • Aiea, Hawaii • 96701

Nov 07 19 11:28p

AHP

8084880404

p.5



10422-01
December 23, 2020

Claire Tamamoto
Aiea Community Association
P.O. Box 2785, 'Aiea, HI 96701
aieacommunity@gmail.com

Subject: Environmental Impact Statement Preparation Notice:
New Aloha Stadium Entertainment District (NASED)
Tax Map Keys (TMK): [1] 9-9-003:061, [1] 9-9-003:055, 070, and 071.
Hālawā, Oahu, Hawai'i

Dear Ms. Tamamoto:

Thank you for participating in the scoping process for the subject Environmental Impact Statement (EIS). We acknowledge your comments and concerns, they have been considered in the preparation of the Draft Programmatic EIS with regard to meeting content requirements prescribed in Hawai'i Administrative Rules, Title 11, Chapter 200.1, Section 24.

Your comments, along with this response, will be reproduced and included in the forthcoming Draft Programmatic EIS. The Draft Programmatic EIS, including the various technical studies associated with it, will be available for review on Office of Environmental and Quality Control website following its publication in *The Environmental Notice*.

We appreciate your interest and participation in this environmental review process.

Sincerely,

Keola Cheng
Director of Planning

cc: Chris Kinimaka, Department of Accounting and General Services
Stacey Jones, Crawford Architects

From: Amy Wake <pastoramywake@gmail.com>
Sent: Thursday, October 3, 2019 6:09 PM
To: Public Comment
Subject: Aloha Stadium

Aloha,

I strongly believe the New Aloha Stadium Entertainment District should include much more than 2,000 housing units. Since the redevelopment takes place on 98 acres of state-owned property, and has access to its own rail station, this is an ample opportunity for the state to develop a mass amount of affordable housing units (80% AMI or below) and to aid Oahu's critical housing crisis. Please consider revising this proposal to include 5,000 housing units to meet the needs of the area's growing population.

Peace,

Amy

Rev. Amy C. Wake, Senior Pastor
Trinity United Methodist Church
1716 Komo Mai Dr
Pearl City, HI 96782



10422-01
December 23, 2020

Rev. Amy C Wake, Senior Pastor
Trinity United Methodist Church
1716 Komo Mai Dr
Pearl City, HI 96782
pastoramywake@gmail.com

Subject: Environmental Impact Statement Preparation Notice:
New Aloha Stadium Entertainment District (NASED)
Tax Map Keys (TMK): [1] 9-9-003:061, [1] 9-9-003:055, 070, and 071.
Hālawā, Oahu, Hawai'i

Dear Rev. Amy Wake:

Thank you for participating in the scoping process for the subject Environmental Impact Statement (EIS). We acknowledge your comments and concerns, they have been considered in the preparation of the Draft Programmatic EIS with regard to meeting content requirements prescribed in Hawai'i Administrative Rules, Title 11, Chapter 200.1, Section 24.

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We appreciate your interest and participation in this environmental review process.

Sincerely,

Keola Cheng
Director of Planning

cc: Chris Kinimaka, Department of Accounting and General Services
Stacey Jones, Crawford Architects

From: Carla <cbm@hawaii.rr.com>
Sent: Wednesday, November 6, 2019 6:57 PM
To: Public Comment
Subject: New Aloha Stadium Entertainment District Housing Units

I feel very strongly that the New Aloha Stadium Entertainment District is an opportunity to create many more than the planned 2,000 housing units. With access to rail on 98 acres of state-owned property, this is a perfect opportunity for the state to aid Oahu's critical housing crisis by developing a mass amount of affordable housing units. The EIS should quantify the impact on the state's published housing demand.

Thank you,
Carla S. Allison
1062 Oilipuu Place
Honolulu, HI 96825

--

This email has been checked for viruses by Avast antivirus software.
<https://www.avast.com/antivirus>



10422-01
December 23, 2020

Carla S. Allison
1062 Oilipuu Pl
Honolulu, HI 96825
cbm@hawaii.rr.com

Subject: Environmental Impact Statement Preparation Notice:
New Aloha Stadium Entertainment District (NASED)
Tax Map Keys (TMK): [1] 9-9-003:061, [1] 9-9-003:055, 070, and 071.
Hālawā, Oahu, Hawai‘i

Dear Ms. Allison:

Thank you for participating in the scoping process for the subject Environmental Impact Statement (EIS). We acknowledge your comments and concerns, they have been considered in the preparation of the Draft Programmatic EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1, Section 24.

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We appreciate your interest and participation in this environmental review process.

Sincerely,

Keola Cheng
Director of Planning

cc: Chris Kinimaka, Department of Accounting and General Services
Stacey Jones, Crawford Architects

From: David Kimo Frankel <davidkimofrankel@hawaiiantel.net>
Sent: Friday, September 20, 2019 10:37 AM
To: Public Comment
Subject: EISPN

I would like to offer the following comments on the EISPN for the New Aloha Stadium Entertainment District.

The EISPN assumes that a stadium is needed. One of the primary reasons for a stadium is to host football games. Without the stadium, it would be much more difficult for the University of Hawai'i and high schools to play football. Therefore, a secondary impact that the EIS must consider is that football causes a significant number of players to suffer the effects of concussions. While I do not expect the EIS to include thorough medical review of the latest science on concussions, it must acknowledge that the project will facilitate concussions. Using commonly accepted statistical analysis, it can even calculate how many individuals are likely to suffer concussions annually at the stadium.

On the flip side, as the science matures and as lawsuits increase, there is a distinct likelihood that in the next few decades, football will not be played in the way it is now at the high school and collegiate level. There is a distinct possibility that high schools and even the University of Hawaii will shut down these programs as they grapple with the expense, personal tragedy and societal costs of concussions. If this happens, how often will this new stadium be used?

The EIS should include a graph that shows how attendance at Aloha Stadium has steadily decreased since it was built. While there are many armchair quarterbacks who can provide multiple explanations for the decline, the EIS should acknowledge that in general fewer people want to attend sporting events on O'ahu. That trend may well continue into the future, even with a new stadium.

Finally, the EIS should explore a fourth option. Instead of creating a structure that encourages residents to sit on their butts for hours, consider installing attractions that allow residents to be participants rather than spectators. Instead of a stadium, you could offer a running path, pickleball courts, volleyball courts, sports fields and a dogpark. And you could include more affordable housing.

David Kimo Frankel
1638-A Mikahala Way
Honolulu, HI 96816



10422-01
December 23, 2020

David Kimo Frankel
1638-A Mikahala Way
Honolulu, HI, 96816

Subject: Environmental Impact Statement Preparation Notice:
New Aloha Stadium Entertainment District (NASSED)
Tax Map Keys (TMK): [1] 9-9-003:061, [1] 9-9-003:055, 070, and 071.
Hālawā, Oahu, Hawai‘i

Dear Mr. Frankel:

Thank you for participating in the scoping process for the subject Environmental Impact Statement (EIS). We acknowledge your comments and concerns, they have been considered in the preparation of the Draft Programmatic EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1, Section 24.

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We appreciate your interest and participation in this environmental review process.

Sincerely,

Keola Cheng
Director of Planning

cc: Chris Kinimaka, Department of Accounting and General Services
Stacey Jones, Crawford Architects



WILSON OKAMOTO
CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

1907 South Beretania Street, Suite 400
Honolulu, Hawaii 96826
T (808) 946-2277 F (808) 946-2253
W <http://www.wilsonokamoto.com>
Attention: Mr. Keola Cheng

**SUBJECT: EISPN: PROPOSED NEW ALOHA STADIUM ENTERTAINMENT
DISTRICT (NASED) –
SCOPING MEETING, SEPTEMBER 25, 2019**

I would like to express my feelings on the future of Aloha Stadium. If possible, I would recommend I would like to see the "Option B" plan to become a reality & build the new Aloha Stadium west of the current location. The reason being is that Aloha Stadium would continue to be at or near its current location (although west) & also preserve the current landscape near Aloha Stadium for fear to come. Also, by moving Aloha Stadium west of its current location, the commute times to & from the new Aloha Stadium would remain the same give or take if an accident were to happen either on the H-2 Freeway or near the new Aloha Stadium. Finally, I believe that the new Aloha Stadium should be built with a seating capacity of 80,000 so that the State of Hawaii can finally host a NFL Super Bowl.

(include additional sheets as necessary)

PLEASE PRINT: Name: JOSYIA ARGILLON Phone: (808) 271-6544
Organization: NIA
Mailing Address: P.O. BOX 37335 HONOLULU, HI, 96837
Email: JOSYIAARGILLON000@gmail.com

Please submit comments by November 7, 2019, or email
NASED.EIS@wilsonokamoto.com

*Receipt of e-mailed comments will be confirmed via e-mail. If you do not receive a confirmation message, please contact our office (see contact information, above).



10422-01
December 23, 2020

Joshua Arallon
P.O Box 37335
Honolulu, HI, 96837

Subject: Environmental Impact Statement Preparation Notice:
New Aloha Stadium Entertainment District (NASED)
Tax Map Keys (TMK): [1] 9-9-003:061, [1] 9-9-003:055, 070, and 071.
Hālawā, Oahu, Hawai‘i

Dear Mr. Arallon:

Thank you for participating in the scoping process for the subject Environmental Impact Statement (EIS). We acknowledge your comments and concerns, they have been considered in the preparation of the Draft Programmatic EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1, Section 24.

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Sincerely,

Keola Cheng
Director of Planning

cc: Chris Kinimaka, Department of Accounting and General Services
Stacey Jones, Crawford Architects

From: Kevin Carney <kevin.carney@eahhousing.org>
Sent: Monday, October 14, 2019 12:44 PM
To: Public Comment
Cc: Kevin Carney
Subject: Aloha Stadium Redevelopment EIS

Follow Up Flag: Follow up
Flag Status: Flagged

Only 2,000 housing units on state land when we have a recognized housing crisis for at least the last 10 years? What a great opportunity to provide ridership for rail in a central part of Oahu! The largest demand for housing is for those making 80% of the Area Median Income and below. At that level of income we are talking about rental housing and renters are most likely to be your rail commuters. So help solve the housing crisis and provide ridership for rail by increasing the number of housing units to 10,000 with a majority of those at 80% AMI and below.

Thank you for the opportunity to comment.

Kevin



Kevin R. Carney, (PB), NAHP-E

Vice President, Hawaii

RB-16444

Office: (808) 523-8826 Fax: (808) 523-8827 | kevin.carney@eahhousing.org

www.eahhousing.org | [Twitter](#) | [Facebook](#) | [Youtube](#)

1001 Bishop St., Suite 2880, Honolulu, HI 96813

EAH Housing | HI Lic. RB-16985 | CalBRE Lic. 853495

“The mission of EAH Housing is to expand the range of opportunities for all by developing, managing and promoting quality affordable housing and diverse communities.”

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10422-01
December 23, 2020

Kevin R. Carney
EAH Housing
1001 Bishop St., Suite 2880, Honolulu, HI, 96813
kevin.carney@eahhousing.org
Work: (808) 523-8826

Subject: Environmental Impact Statement Preparation Notice:
New Aloha Stadium Entertainment District (NASED)
Tax Map Keys (TMK): [1] 9-9-003:061, [1] 9-9-003:055, 070, and 071.
Hālawā, Oahu, Hawai‘i

Dear Mr. Carney:

Thank you for participating in the scoping process for the subject Environmental Impact Statement (EIS). We acknowledge your comments and concerns, they have been considered in the preparation of the Draft Programmatic EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1, Section 24.

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We appreciate your interest and participation in this environmental review process.

Sincerely,

Keola Cheng
Director of Planning

cc: Chris Kinimaka, Department of Accounting and General Services
Stacey Jones, Crawford Architects

From: Velasco, Nicole A NOR <NVelasco@noresco.com>
Sent: Tuesday, September 24, 2019 6:26 PM
To: Public Comment
Subject: Central Utility Plant for Aloha Stadium

Aloha!

I am off-island and unable to attend the Sept. 25th meeting for the Aloha Stadium EIS. I was wondering what considerations will be made regarding a central utility plant for the entire entertainment district?

Mahalo,
Nicole

Nicole A. Velasco

Business Development

NORESCO

3375 Koapaka Street., Ste. F220-26, Honolulu, HI 96819

Cell 808.304.3716 | nvelasco@noresco.com

www.noresco.com

Confidentiality Note:

Dissemination, distribution or copying of this e-mail or the information herein by anyone other than the intended recipient, or an employee or agent of a system responsible for delivering the message to the intended recipient, is prohibited. If you are not the intended recipient, please inform the sender and delete all copies.



10422-01
December 23, 2020

Nicole A. Velasco
NORESO
Business Development
3375 Koapaka Street
Ste. F220-26, Honolulu, HI 96819
nvelasco@noresco.com

Subject: Environmental Impact Statement Preparation Notice:
New Aloha Stadium Entertainment District (NASED)
Tax Map Keys (TMK): [1] 9-9-003:061, [1] 9-9-003:055, 070, and 071.
Hālawā, Oahu, Hawai‘i

Dear Ms. Velasco:

Thank you for participating in the scoping process for the subject Environmental Impact Statement (EIS). We acknowledge your comments and concerns, they have been considered in the preparation of the Draft Programmatic EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1, Section 24.

Your comments, along with this response, will be reproduced and included in the forthcoming Draft Programmatic EIS. The Draft Programmatic EIS, including the various technical studies associated with it, will be available for review on Office of Environmental and Quality Control website following its publication in *The Environmental Notice*.

We appreciate your interest and participation in this environmental review process.

Sincerely,

Keola Cheng
Director of Planning

cc: Chris Kinimaka, Department of Accounting and General Services
Stacey Jones, Crawford Architects

From: Samuel L Domingo <revsamdom@gmail.com>
Sent: Wednesday, November 6, 2019 12:56 PM
To: Public Comment
Subject: Comments for EIS on NASED
Attachments: EIS Comment re Stadium.docx

Attaching my comments.

--

Rev. Samuel L Domingo
204 Kuuhoa Place
Kailua, Hawaii 96734
Cell Phone: 808-384-8701
Email: revsamdom@gmail.com

To the New Aloha Stadium Entertainment District Delivery Team:

I am a retired United Methodist pastor, who has been in ministry here for over 40 years, and one of the two remaining pastors who help create Faith Action for Community Equity in 1993. We are a grassroots, interfaith 501(c)3 non-profit organization driven by a deep spiritual commitment to improving the quality of life for our members and all the people of Hawaii.

Our state and especially the island of Oahu is experiencing a housing **crisis**. The members of Faith Action continue to be concerned with creating housing for our local residents especially those whose incomes are 80% and below the AMI. We are now interested in pursuing the creation of higher density housing on public lands and that the conversations around the plans for a new stadium ought to include building low cost housing.

I offer my comments on the Environmental Impact Statement.

- Regarding the Purpose and Need:
I would like the Purpose and Need statement to explicitly include low cost housing (which should be defined as households earning 80% of area median income spending no more than 30% of that income on housing costs) in addition to stadium renovation/replacement, mixed-use development, and transit-oriented development.
- Regarding socioeconomic characteristics:
The Department of Business, Economic Development and Tourism (DBEDT) issued a March 2015 report stating, "The forecast projects demand for an additional 64,700 to 66,000 housing units, during the 2015-2025 period... Wages and incomes have not been growing as fast as housing prices, making it harder to afford real estate in Hawaii, especially for younger and lower-income households." The state has clearly indicated the need for more housing units for local residents. Therefore, I believe this EIS should examine affordable housing as a socioeconomic impact of the proposed project. It should quantify the impact on the state's published housing demand.
- Regarding infrastructure, traffic, and utilities:
The EIS should quantify the site's maximum housing capacity (given as housing units, gross floor area, and building height). The EIS should also examine the impact of raising the maximum housing capacity of the site by constructing additional capacity or preserving space for utilities.
- Regarding public services and facilities:
Given the March 2015 DBEDT report quantifying the need for housing units, I believe the EIS should quantify the project's impact to public land as an opportunity cost by decreasing the developable state land area. The analysis should include a declaration of the highest and best use of the land proximate to the future rail station in the context of the Halawa Area Transit-Oriented Development Plan. This plan must "Preserve existing affordable housing and potential opportunities for new affordable housing, and as appropriate, with supportive services." If the plan does not include the physical maximum quantity of affordable housing units, the EIS should quantify the land area

that could be preserved as undeveloped parcels for the future implementation of low cost housing within the site. The State Legislature is considering a bill proposing development of high-density affordable housing on state-owned land, therefore the EIS should quantify the impact to available state land for high-density affordable housing, particularly on the rail corridor.

- Regarding air quality:

The EIS should examine the relationship between housing units and air quality. A sensitivity analysis should be included reducing and/or eliminating parking spaces for exclusive residential use. The most aggressive analysis should examine the effects of 100% low cost housing units for transit-dependent residents who would not keep motor vehicles on site. Another air quality sensitivity analysis should assume all Swap Meet vendors and Entertainment District employees have on-site housing units that are low cost (at 30% of their income) and dedicated for their living so they can live within walking distance of their places of business.

- Regarding infrastructure, traffic, and utilities:

The EIS should examine the relationship between increased housing units and motor vehicle traffic congestion. A sensitivity analysis should also be included to reducing and/or eliminating parking spaces for exclusive residential use. The most aggressive analysis should examine the effects of 100% low cost housing units for transit-dependent residents who would not keep personal vehicles on and near the site. Another traffic sensitivity analysis should assume all Swap Meet vendors and Entertainment District employees have on-site housing units that are low cost (at 30% of their income) and dedicated for their living so they can live within walking distance of their places of business.



10422-01
December 23, 2020

Rev. Samuel L. Domingo
204 Kuuhoa Pl
Kailua, HI, 96734
revsamdom@gmail.com

Subject: Environmental Impact Statement Preparation Notice:
New Aloha Stadium Entertainment District (NASED)
Tax Map Keys (TMK): [1] 9-9-003:061, [1] 9-9-003:055, 070, and 071.
Hālawā, Oahu, Hawai‘i

Dear Rev. Domingo:

Thank you for participating in the scoping process for the subject Environmental Impact Statement (EIS). We acknowledge your comments and concerns, they have been considered in the preparation of the Draft Programmatic EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1, Section 24.

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We appreciate your interest and participation in this environmental review process.

Sincerely,

Keola Cheng
Director of Planning

cc: Chris Kinimaka, Department of Accounting and General Services
Stacey Jones, Crawford Architects



**WILSON OKAMOTO
CORPORATION**
INNOVATORS • PLANNERS • ENGINEERS

1907 South Beretania Street, Suite 400
Honolulu, Hawaii 96826
T (808) 946-2277 F (808) 946-2253
W <http://www.wilsonokamoto.com>
Attention: Mr. Keola Cheng

**SUBJECT: EISPN: PROPOSED NEW ALOHA STADIUM ENTERTAINMENT
DISTRICT (NASED) –
SCOPING MEETING, SEPTEMBER 25, 2019**

Please address:

- 1) Noise + vibration containment. → Dome vs open air
- 2) car-centric → pedestrian, bike friendly
- 3) traffic control → accommodate neighborhood access local traffic
- 4) nature of the family-focused neighborhood → Affordable Housing
→ vs. importing "outside" mainland investors +
non-family type of occupants. Do not want another ^{New} Kakaako
- 5) enhancing the life for current residents → add value to the current residents
- 6) the venue is not just an "entertainment" development site for
→ incorporate the function into the existing neighborhood where people are raising their children, where people are retiring + want to enjoy retirement
- 7) please answer the public's emailed comments. I never received a reply.
- 8) Please go green + reduce carbon foot print. Please go green w/ grass + trees

(include additional sheets as necessary)

PLEASE PRINT: Name: Sandra Pak Phone: 224-5297
Organization: _____
Mailing Address: 295-B Manana'i Pl.
Honolulu, HI 96818
Email: Sandra.furuya@gmail.com

Please submit comments by November 7, 2019, or email
NASED.EIS@wilsonokamoto.com

*Receipt of e-mailed comments will be confirmed via e-mail. If you do not receive a confirmation message, please contact our office (see contact information, above).

(Fold on dotted lines and seal with tape or staple)

Postage
Required

NASED Comments
1907 South Beretania Street, Suite 400
Honolulu, Hawaii 96826
Attention: Mr. Keola Cheng

(Fold on dotted lines and seal with tape or staple)



10422-01
December 23, 2020

Sandra Pak
295-B Mananai Pl.
Honolulu, HI 96818
Sandra.furaya@gmail.com

Subject: Environmental Impact Statement Preparation Notice:
New Aloha Stadium Entertainment District (NASED)
Tax Map Keys (TMK): [1] 9-9-003:061, [1] 9-9-003:055, 070, and 071.
Hālawā, Oahu, Hawai'i

Dear Ms. Pak:

Thank you for participating in the scoping process for the subject Environmental Impact Statement (EIS). We acknowledge your comments and concerns, they have been considered in the preparation of the Draft Programmatic EIS with regard to meeting content requirements prescribed in Hawai'i Administrative Rules, Title 11, Chapter 200.1, Section 24.

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We appreciate your interest and participation in this environmental review process.

Sincerely,

Keola Cheng
Director of Planning

cc: Chris Kinimaka, Department of Accounting and General Services
Stacey Jones, Crawford Architects

(Fold on dotted lines and seal with tape or staple)

Postage
Required

NASED Comments
1907 South Beretania Street, Suite 400
Honolulu, Hawaii 96826
Attention: Mr. Keola Cheng

(Fold on dotted lines and seal with tape or staple)



**WILSON OKAMOTO
CORPORATION**
INNOVATORS • PLANNERS • ENGINEERS

1907 South Beretania Street, Suite 400
Honolulu, Hawaii 96826
T (808) 946-2277 F (808) 946-2253
W <http://www.wilsonokamoto.com>
Attention: Mr. Keola Cheng

**SUBJECT: EISP: PROPOSED NEW ALOHA STADIUM ENTERTAINMENT
DISTRICT (NASED) –
SCOPING MEETING, SEPTEMBER 25, 2019**

- 1) How will building the new complex affect the properties located across the stadium in the Halawa Valley Estates?
- 2) What methods of construction will be used? Will it affect the foundation of homes across the street in Halawa Valley Estates?
- 3) Will the current water, gas, electrical + roads be upgraded to handle the additional entertainment/stadium venues?
- 4) Will construction barriers be erected to protect homes in Halawa Valley Estates from dirt, fumes, etc?

(include additional sheets as necessary)

PLEASE PRINT: Name: Tina Tamara Phone: 285-0258
Organization: _____
Mailing Address: 99-290 Ohehena Ln
Aiea HI 96701
Email: tamarat014@hawaii.rr.com

Please submit comments by November 7, 2019, or email
NASED.EIS@wilsonokamoto.com

*Receipt of e-mailed comments will be confirmed via e-mail. If you do not receive a confirmation message, please contact our office (see contact information, above).



10422-01
December 23, 2020

Tina Tamaru
99-290 Ohenana Loop
Aiea, HI, 96701
tamarut014@hawaii.rr.com

Subject: Environmental Impact Statement Preparation Notice:
New Aloha Stadium Entertainment District (NASED)
Tax Map Keys (TMK): [1] 9-9-003:061, [1] 9-9-003:055, 070, and 071.
Hālawā, Oahu, Hawai‘i

Dear Ms. Tamaru:

Thank you for participating in the scoping process for the subject Environmental Impact Statement (EIS). We acknowledge your comments and concerns, they have been considered in the preparation of the Draft Programmatic EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1, Section 24.

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We appreciate your interest and participation in this environmental review process.

Sincerely,

Keola Cheng
Director of Planning

cc: Chris Kinimaka, Department of Accounting and General Services
Stacey Jones, Crawford Architects

From: anthonyk001@hawaii.rr.com
Sent: Wednesday, September 18, 2019 11:40 AM
To: Public Comment
Subject: Aloha Stadium Comments

35,000 seat is too small. This will be the only large capacity outdoor facility in Hawaii for the next 50 years. The old 50,000 seat stadium, while not sold out frequently, still fills the stands on occasion. Limiting the new facility to 35,000 seems very short sighted for a once in a generation project.



10422-01
December 23, 2020

Anthony K
anthonyk001@hawaii.rr.com

Subject: Environmental Impact Statement Preparation Notice:
New Aloha Stadium Entertainment District (NASED)
Tax Map Keys (TMK): [1] 9-9-003:061, [1] 9-9-003:055, 070, and 071.
Hālawā, Oahu, Hawai‘i

Dear Mr. Anthony K:

Thank you for participating in the scoping process for the subject Environmental Impact Statement (EIS). We acknowledge your comments and concerns, they have been considered in the preparation of the Draft Programmatic EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1, Section 24.

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We appreciate your interest and participation in this environmental review process.
Sincerely,

Keola Cheng
Director of Planning

cc: Chris Kinimaka, Department of Accounting and General Services
Stacey Jones, Crawford Architects

From: Brad Kaya <bkkaya1132@gmail.com>
Sent: Tuesday, September 24, 2019 10:40 AM
To: Public Comment
Subject: New Aloha Stadium project public comment

Dear Members of Crawford Architects,

Thank you for allowing me to offer comments about the new Aloha Stadium Entertainment District. I believe the next stadium, along with UH and Daniel Inouye International Airport, should be the man-made jewels of Oahu. I had the opportunity to travel to Seattle for the recent UH game and toured Century Link Stadium and attended the football game at Husky Stadium. I would like to see the experience at our next stadium to be similar to those in Seattle. It goes without saying that the stadium planners should visit 3-4 successful stadium venues on the mainland to get some ideas for a successful stadium district and to not have to so called, "reinvent the wheel."

These are my suggestions for the new stadium entertainment district that would enhance the experience for those attending events there, especially UH football (and fan experience needs to be enhanced there for revenue and therefore program vitality):

1. Reduce the environmental footprint of the stadium, for example, PV panels (which may mean ensuring the proper grid) and ensuring recycling opportunities.
2. Have enough parking lots to accommodate the attendees. We shouldn't have to wait in car line one hour before kickoff for only one stadium lot open and have to park in a small gated lot off lower Halawa lot for a game with only 20,000 attendees. What happens when there are 45,000 attendees? If space becomes an issue, consider a parking structure for those who will not be tailgating or walk up ticket buyers.
3. There should be multiple parking lots that allow for tailgating. All lots and parking structure should have multiple entrances and exits to access Moanalua Road, Kahuapaani Road, Kamehameha Hwy, and freeways. There should not be a line to get into lots before the game once the gates are open, unless the event is sold out.
4. There should be a shopping/dining district between the stadium and the train station and Pearl Harbor (Arizona Memorial). This could draw patrons from all three venues (see the University Village adjacent to UW athletic complex, for example).
5. There could be a park nearby the shopping district on the stadium property for patrons to enjoy. They could buy their food and picnic, walk, or play. A kids playground would be nice. This could be enjoyed by game day fans as a place for kids to play or throw the ball around as there is presently no place to do these in the current stadium lots.

Thank you for your consideration of these comments. I also look forward to offering suggestions on the stadium design.
Sincerely,
Brad Kaya



10422-01
December 23, 2020

Brad Kaya
Bkkaya1132@gmail.com

Subject: Environmental Impact Statement Preparation Notice:
New Aloha Stadium Entertainment District (NASED)
Tax Map Keys (TMK): [1] 9-9-003:061, [1] 9-9-003:055, 070, and 071.
Hālawā, Oahu, Hawai‘i

Dear Mr. Kaya:

Thank you for participating in the scoping process for the subject Environmental Impact Statement (EIS). We acknowledge your comments and concerns, they have been considered in the preparation of the Draft Programmatic EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1, Section 24.

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We appreciate your interest and participation in this environmental review process.

Sincerely,

Keola Cheng
Director of Planning

cc: Chris Kinimaka, Department of Accounting and General Services
Stacey Jones, Crawford Architects

From: Calvin Pham <cfpham@yahoo.com>
Sent: Tuesday, November 5, 2019 8:39 PM
To: Public Comment
Subject: NASED Comments

To the New Aloha Stadium Entertainment District Delivery Team:

Please accept my written comments to include narrative and analysis within the Environmental Impact Statement as follows:

- Regarding the Purpose and Need:

I would like the Purpose and Need statement to explicitly include affordable housing (which should be defined as households earning 80% of area median income spending no more than 30% of that income on housing costs) in addition to stadium renovation/replacement, mixed-use development, and transit-oriented development.

- Regarding socioeconomic characteristics:

The Department of Business, Economic Development and Tourism (DBEDT) issued a March 2015 report stating, "The forecast projects demand for an additional 64,700 to 66,000 housing units, during the 2015-2025 period... Wages and incomes have not been growing as fast as housing prices, making it harder to afford real estate in Hawaii, especially for younger and lower-income households." The state has clearly indicated the need for more housing units for local residents. Therefore, I believe this EIS should examine affordable housing as a socioeconomic impact of the proposed project. It should quantify the impact on the state's published housing demand.

- Regarding infrastructure, traffic, and utilities:

The EIS should quantify the site's maximum housing capacity (given as housing units, gross floor area, and building height). The EIS should also examine the impact of raising the maximum housing capacity of the site by constructing additional capacity or preserving space for utilities.

- Regarding public services and facilities:

Given the March 2015 DBEDT report quantifying the need for housing units, I believe the EIS should quantify the project's impact to public land as an opportunity cost by decreasing the developable state land area. The analysis should include a declaration of the highest and best use of the land proximate to the future rail station in the context of the Halawa Area Transit-Oriented Development Plan. This plan must "Preserve existing affordable housing and potential opportunities for new affordable housing, and as appropriate, with supportive services." If the plan does not include the physical maximum quantity of affordable housing units, the EIS should quantify the land area that could be preserved as undeveloped parcels for the future implementation of affordable housing within the site. The State Legislature is considering a bill proposing development of high-density affordable housing on state-owned land, therefore the EIS should quantify the impact to available state land for high-density affordable housing, particularly on the rail corridor.

- Regarding air quality:

The EIS should examine the relationship between housing units and air quality. A sensitivity analysis should be included reducing and/or eliminating parking spaces for exclusive residential use. The most aggressive analysis should examine the effects of 100% affordable housing units for transit-

dependent residents who would not keep motor vehicles on site. Another air quality sensitivity analysis should assume all Swap Meet vendors and Entertainment District employees have on-site housing units that are affordable (at 30% of their income) and dedicated for their living so they can live within walking distance of their places of business.

- Regarding infrastructure, traffic, and utilities:

The EIS should examine the relationship between increased housing units and motor vehicle traffic congestion. A sensitivity analysis should also be included reducing and/or eliminating parking spaces for exclusive residential use. The most aggressive analysis should examine the effects of 100% affordable housing units for transit-dependent residents who would not keep personal vehicles on and near the site. Another traffic sensitivity analysis should assume all Swap Meet vendors and Entertainment District employees have on-site housing units that are affordable (at 30% of their income) and dedicated for their living so they can live within walking distance of their places of business.

Calvin Foo Pham
Salt Lake Resident
96818



10422-01
December 23, 2020

Calvin Foo Pham
cfpham@yahoo.com

Subject: Environmental Impact Statement Preparation Notice:
New Aloha Stadium Entertainment District (NASED)
Tax Map Keys (TMK): [1] 9-9-003:061, [1] 9-9-003:055, 070, and 071.
Hālawā, Oahu, Hawai‘i

Dear Mr. Pham:

Thank you for participating in the scoping process for the subject Environmental Impact Statement (EIS). We acknowledge your comments and concerns, they have been considered in the preparation of the Draft Programmatic EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1, Section 24.

Your comments, along with this response, will be reproduced and included in the forthcoming Draft Programmatic EIS. The Draft Programmatic EIS, including the various technical studies associated with it, will be available for review on Office of Environmental and Quality Control website following its publication in *The Environmental Notice*.

We appreciate your interest and participation in this environmental review process.

Sincerely,

Keola Cheng
Director of Planning

cc: Chris Kinimaka, Department of Accounting and General Services
Stacey Jones, Crawford Architects

From: Chaz Mihara <chazkm@hawaii.edu>
Sent: Tuesday, October 29, 2019 12:03 AM
To: Public Comment
Subject: UHMTV Story Interview

To whom it may concern,

My name is Chaz Mihara. I'm a Journalism student at the University of Hawaii at Manoa. I am doing a story for UHMTV on the New stadium. I would like to schedule a video interview with someone to get some information. My email is chazkm@hawaii.edu

Thank You,

Chaz Mihara



10422-01
December 23, 2020

Chaz Mihara
chazkm@hawaii.edu

Subject: Environmental Impact Statement Preparation Notice:
New Aloha Stadium Entertainment District (NASED)
Tax Map Keys (TMK): [1] 9-9-003:061, [1] 9-9-003:055, 070, and 071.
Hālawā, Oahu, Hawai‘i

Dear Chaz Mihara:

Thank you for participating in the scoping process for the subject Environmental Impact Statement (EIS). We acknowledge your comments and concerns, they have been considered in the preparation of the Draft Programmatic EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1, Section 24.

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We appreciate your interest and participation in this environmental review process.

Sincerely,

Keola Cheng
Director of Planning

cc: Chris Kinimaka, Department of Accounting and General Services
Stacey Jones, Crawford Architects

From: Evy Hao <evyhao@gmail.com>
Sent: Monday, October 14, 2019 1:11 PM
To: Public Comment
Subject: New Aloha Stadium Entertainment District

Follow Up Flag: Follow up
Flag Status: Flagged

Greetings,

Please revise the proposal to add more affordable housing (80% or below AMI). The proposed 2,000 housing units need to be much higher (5,000? 7,000?) to begin to address the dire need on Oahu.

This redevelopment has the huge acreage of state land and the tremendous asset of its own train station. It would be a crying shame for us not to take this opportunity to meet a vital need of our our people. Meeting that need for a home will positively impact many areas of economic, social, and personal life.

I ask for your thoughtful consideration on this matter.

Aloha,
Evelyn Hao, retired teacher and principal of Hawaii pubic schools



10422-01
December 23, 2020

Evelyn Hao
evyhao@gmail.com

Subject: Environmental Impact Statement Preparation Notice:
New Aloha Stadium Entertainment District (NASED)
Tax Map Keys (TMK): [1] 9-9-003:061, [1] 9-9-003:055, 070, and 071.
Hālawā, Oahu, Hawai‘i

Dear Ms. Hao:

Thank you for participating in the scoping process for the subject Environmental Impact Statement (EIS). We acknowledge your comments and concerns, they have been considered in the preparation of the Draft Programmatic EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1, Section 24.

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We appreciate your interest and participation in this environmental review process.

Sincerely,

Keola Cheng
Director of Planning

cc: Chris Kinimaka, Department of Accounting and General Services
Stacey Jones, Crawford Architects

From: globor@aol.com
Sent: Saturday, September 28, 2019 2:54 PM
To: Public Comment
Subject: Museum near Aloha Stadium
Attachments: Museum.brochure.pdf

(Keola - my attachments bounced back, sending in 3 emails.)

Keola Cheng & Chace Shigemasa

I came up with the idea for a new "Hawai'i Heroes" museum in 2015 while serving on the Neighborhood Board for Foster Village, Aliamanu, SaltLake. The museum will feature federal leaders like President Obama, Senator Inouye, Congresswoman Patsy Mink, also entertainer Bruno Mars and Polynesian NFL football players. (see attached brochure).

The community backs this museum.

TOD Administrator Harrison Rue received numerous letters of support from the community in 2016.

Harrison Rue liked the museum concept for the Halawa Rail Station. Harrison Rue included the Museum in the City's final Plan, dated July 2017. (see attached). The 119-page Halawa Station Plan mentions the museum **6 times**. (see attached).

Two years ago, Harrison Rue told us to wait until the state took action on the fate of Aloha stadium. The state finally took action on July 8, 2019.

This museum needs to be included in your ENTERTAINMENT DISTRICT plans.

Mahalo nui loa,
Gloria Borland
Hawai'i Heroes Museum (temporary name)
(808) 781-4472

The museum is mentioned 6 times in City's Final Plan. (see attached)

page 33

Some thought has been given by the public on what types of venues could act as a complement to Aloha Stadium. Examples include an outdoor amphitheater, a relocated Ice Palace, a museum honoring prominent citizens and residents of Hawaii, entertainment venues that may cater to visiting military personnel and other attractions or museums that may play off of synergies between the Pearl Harbor Visitor Center and Aloha Stadium.

page 39

Retail uses that service the basic needs of tourists, commuters, and residents. Street retail uses might include grocery stores, bakeries, convenience stores, and personal services such as banks, dry cleaners, and hair salons. Day care as well as medical offices would serve commuters and residents alike. Restaurants with outdoor dining would further contribute to an active streetscape. Entertainment uses could include theaters, health clubs, a museum, or other uses that support game day and non-game day activity.

page 48

- Establish Cultural Facilities in addition to entertainment usage such as sports hall of fame to showcase notable athletes from Hawaii in professional and amateur national or international sports. In addition, as suggested by one community member, a hall of fame or museum showcasing political, cultural, and scientific leaders and innovators from Hawaii would be ideal in the Corridors plan.

page 52

The area immediately adjacent to the rail station is characterized as a high-density, high-intensity urban mix of uses. The mixed-use core is also intended to serve as the "front door" to the Halawa area. The mixed-use core should utilize the stadium-station connection as its central organizing element. Opportunities may include:

- Multi-modal transit linkages and accommodation of the rail station's park-and-ride function.
- Potential to incorporate an entertainment or cultural use, such as a tourist information center or museum.
- Usage of wayfinding elements to assist tourists and stadium goers.
- Ability to accommodate large amounts of parking via a below grade parking mezzanine or structured garage.
- Accommodation of a community retail anchor to serve residents and transit riders.

page 67

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- 9.



Mixed-use sports and entertainment districts adjacent to sports stadiums require a threshold level of development, or “critical mass”, in order to be successful. This phase represents the initial investment (aside from infrastructure preparation) a developer may make, allowing for a more intensive year-round usage of the stadium site. The uses that make up the investment rely upon the ability to create a vibrant, lively environment that a broad array of locals and visitors will be drawn to. Successful districts of this type must be large enough, and have the right mix of uses, to foster this environment. The following elements should be located adjacent to Aloha Stadium, preferably along the stadium-station connection:

- A large, programmable open space that can be used for events.
- A hotel.
- A cultural venue, such as a theater, **museum**, or cinema.
- Supporting retail and dining.
- Introduction of structured parking or underground parking magazines.
- Gateway signage at TOD district edges.

From: globor@aol.com
Sent: Saturday, September 28, 2019 2:55 PM
To: Public Comment
Subject: Museum near Aloha Stadium # 2
Attachments: Halawa_Area_TOD_Plan_Draft_Final_07-17_web (1).pdf

attachment 2

From: globor@aol.com
Sent: Saturday, September 28, 2019 2:55 PM
To: Public Comment
Subject: Museum near Aloha Stadium #3
Attachments: Museum.6pages.pdf

attachment 3



A clear strategy for community benefits should be explained.



Aloha Stadium should continue as a focus and community resource.



Pedestrian connectivity should be improved near the Stadium/Station.



An entertainment or cultural venue could play off of area attractions.



Development sites should be clearly identified in planning efforts.

COMMUNITY BENEFITS

Some participants at community workshops expressed concern on who will pay for public realm improvements, and how developers will be attracted to the Halawa area. The Plan should discuss how to leverage private investment and contributions towards completing and expanding necessary public infrastructure upgrades or improvements. Such community benefits may be exchanged for development bonuses.

ALOHA STADIUM

Participants in public outreach events are curious about how Aloha Stadium will be affected by TOD. State organizations, such as the Stadium Authority and the Department of Accounting and General Services (DAGS) have led the discussions during the planning process about the future of the stadium, and their leadership was helpful for public outreach and the development scenarios. The State will ultimately determine the future redevelopment of the stadium site.

ADDITIONAL PEDESTRIAN CONNECTIONS

To increase overall connectivity within the Halawa area, it has been suggested by stakeholders and by members of the public that additional pedestrian connections be considered through and around the Stadium/Station area. These include connections to central Aiea, permanently opening the pedestrian bridge over Interstate 201, access to Halawa Stream, and providing an alternate pedestrian connection from Aloha Stadium Station to the Pearl Harbor Visitor Center.

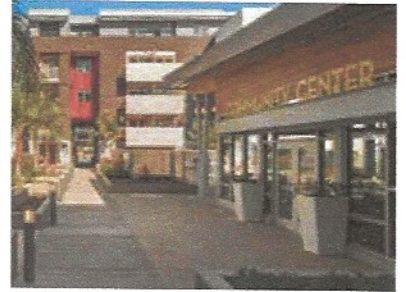
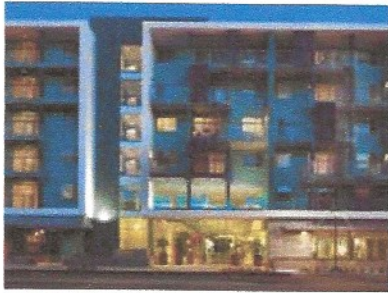
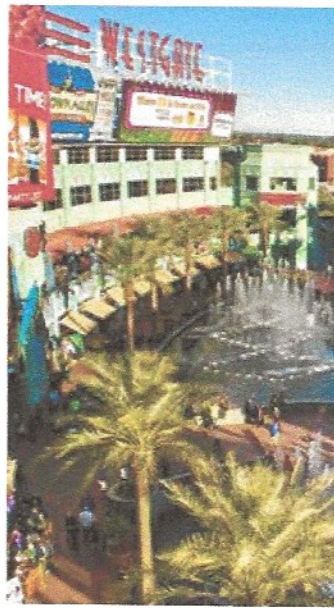
ENTERTAINMENT/CULTURAL VENUES

Some thought has been given by the public on what types of venues could act as a complement to Aloha Stadium. Examples include an outdoor amphitheater, a relocated Ice Palace, a museum honoring prominent citizens and residents of Hawaii, entertainment venues that may cater to visiting military personnel and other attractions or museums that may play off of synergies between the Pearl Harbor Visitor Center and Aloha Stadium.

DEVELOPMENT SITES

Members of the public are curious on the impact that TOD will have on the largely single-family communities that make up the Halawa area. It should be made clear in this document and in future planning efforts where development is likely to occur.

LAND USE



3. RETAIL AND ENTERTAINMENT

Retail uses that service the basic needs of tourists, commuters, and residents. Street retail uses might include grocery stores, bakeries, convenience stores, and personal services such as banks, dry cleaners, and hair salons. Day care as well as medical offices would serve commuters and residents alike. Restaurants with outdoor dining would further contribute to an active streetscape. Entertainment uses could include theaters, health clubs, a museum, or other uses that support game day and non-game day activity.



4. DIVERSE HOUSING

Provide a variety of housing types that appeal to a diversity of lifestyles, including transit-oriented young families, empty nesters, and singles. A mix of affordable, for-sale and rental housing should incorporate design features that promote street orientation and pedestrian scale. Site and building design should take advantage of mountain and coastal views and prevailing breezes, including courtyards and rooftop amenities.

3.1.2 THE PLAN'S KEY CHARACTERISTICS

The Halawa Area TOD Plan's key characteristics and specific advantages are depicted in Figure 3-6. They include:

LAND USE SUMMARY- PLAN COMPONENTS

- **Relocate Aloha Stadium** away from the current location as a new 30,000-40,000 seat stadium. This frees up developable land in the center of the stadium site. Phasing of the relocation so as to maintain use of the existing stadium while constructing the new one is an important criterion.
- **Create an Appealing Gateway** of mixed-use and entertainment uses from the transit station to stadium. Establishing a strong visual and aesthetic core and connection between station and the stadium.
- **Enhance and Balance the Energy of the District** by creating both daytime and nighttime activities. The maximum development of retail and office space (up to 2.6 million GSF) on the stadium site will provide a critical mass of activities to take advantage of transit, populate the site during non-game days, and improve safety and walkability of the area for residents.
- **Establish a Single 200-300 Room Hotel** for military, business, and sports travelers.
- **Establish an Office/Institutional Campus** appropriately located on the mauka side of stadium. An athletic theme would provide natural synergies with the stadium and the sports and entertainment district. For flexibility, "creative office" uses could substitute or add diversity to a sports and fitness institute.
- **Concentrate Most of the Ground Floor Retail Space** appropriately along the mixed-use corridor and around central open spaces.
- **Encourage High-Density Residential Mixed-Use** close to station area. Density projections of housing assumes 2,000 new residential units over the entire 100 acre Stadium Site. A density of 20 dwelling units per acre will be within the PUC transit-oriented preferred densities or between 13 to 140 dwelling units per acre. High density residential, not to exceed 250 feet to minimize blocking important views, will help with financial feasibility.
- **Line Salt Lake Boulevard with Street-level Retail** to serve the convenience needs of new residential units above and for the surrounding neighborhoods. This

mixed-use district would be no higher than 4 floors above street level, where an eclectic mix and variety of stores and shopping opportunities creates its own engaging street vibe and appeal.

- **Provide Office Uses**, such as uses with different operating hours from retail use. This presents opportunities for shared parking with a variety of parking structures quite dissimilar from the existing expanse of surface parking. A parking management program can allow Aloha Stadium to manage its parking needs.
- **Consider High-Density Mixed-Use Redevelopment** at Puuwai Momi, and medium-density, longer term development at Stadium Mall, Stadium Marketplace, and Aiea Elementary School sites.
- **Establish Cultural Facilities** in addition to entertainment usage such as sports hall of fame to showcase notable athletes from Hawaii in professional and amateur national or international sports. In addition, as suggested by one community member, a hall of fame or museum showcasing political, cultural, and scientific leaders and innovators from Hawaii would be ideal in the Corridors plan.

OPEN SPACE IMPROVEMENTS

- **Provide a Multi-functional Landscaped or Hardscaped Open Space** fronting of Aloha Stadium designed as an outdoor amphitheater for multi-functional events.
- **Extend Pedestrian and Bicycle Improvements** to adjoining development areas from the station-stadium area, including Stadium Marketplace, Stadium Mall, Aiea Elementary School, and Puuwai Momi Public Housing. Integrate Halawa Stream with pedestrian and bicycle networks to facilitate connections to adjacent development sites and complete the overall open space network.
- **Provide a Gathering Place** below H-1 at Stadium Mall.

TRANSPORTATION IMPROVEMENTS

- **Provide an Outer, "Ring" Road** along the perimeter of the stadium site, in order to improve vehicle flow and provide access to the office/institutional campus mauka of the stadium.
- **Provide an Intersection at Kamehameha Highway** mauka of Salt Lake Boulevard.

3.1.3 PLANNING AREA SUB-DISTRICTS

Each sub-district provides an idea of the preferred land use character of its specific locale in the Corridors scenario. The characteristics of each sub-district are described and explained as to how they compliment the vision, contribute to potential opportunities, and fulfill the goals of transit-oriented development. Figure 3-9 provides a depiction of sub-district boundaries.

MIXED-USE CORE

The area immediately adjacent to the rail station is characterized as a high-density, high-intensity urban mix of uses. The mixed-use core is also intended to serve as the "front door" to the Halawa area. The mixed-use core should utilize the stadium-station connection as its central organizing element. Opportunities may include:

- Multi-modal transit linkages and accommodation of the rail station's park-and-ride function.
- Potential to incorporate an entertainment or cultural use, such as a tourist information center or museum.
- Usage of wayfinding elements to assist tourists and stadium goers.
- Ability to accommodate large amounts of parking via a below grade parking mezzanine or structured garage.
- Accommodation of a community retail anchor to serve residents and transit riders.

ALOHA STADIUM

A rebuilt Aloha Stadium located closer to Pearl Harbor along Kamehameha Highway opens up land for other purposes. Other opportunities include:

- Incorporation of retail, dining, and other venues common in NFL stadiums.
- A hall of fame for all Hawaii sports.
- Configuration of the stadium to maximize views.
- Create an appropriate sense of arrival.

INSTITUTIONAL DISTRICT

An office or institutional campus (e.g., sports performance, exercise science, physical/occupational therapy) located adjacent to the stadium would provide natural synergies with the nearby stadium and mixed-use development district, and could incorporate athletic fields. A cluster of office buildings around centralized green space also offers an attractive opportunity for a large campus-style office development that is in close proximity to the district's amenities, while maintaining a critical mass that office users will desire. Opportunities include:

- Utilization of open spaces/athletic fields for public use.
- Designation of a surface pedestrian right-of-way to better connect Aloha Stadium to the Aiea Elementary School District.

THE GATHERING PLACE

The "Gathering Place", is an active, open space fronting Aloha Stadium. It acts as the hub of pedestrian connections and is surrounded by a reserve of Monkeypod Trees. The Gathering Place is intended to be a flexible multifunctional landscaped or hardscaped open space which could be the setting for community events such as the Great Aloha Fun Run, football rally nights, auto shows, farmers markets and the Swap Meet and Marketplace.



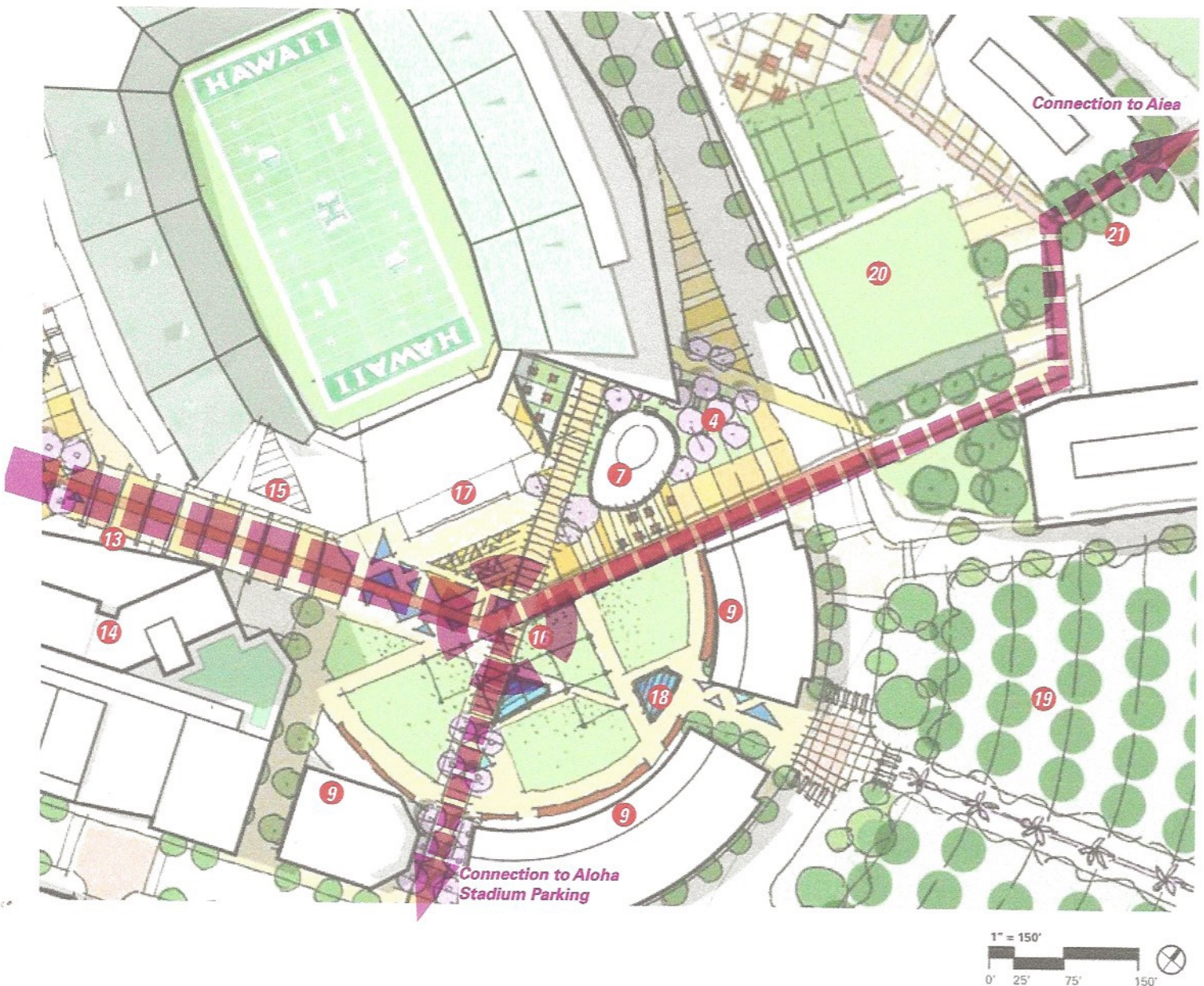
Mixed-Use Core



Open Central Space

KEY ELEMENTS:

- | | |
|------------------------------------|---|
| 1 Aloha Stadium Station | 11 Elevated Pedestrian Connection to Aloha Stadium Concourse (optional) |
| 2 Richardson Field | 12 Events Kiosk |
| 3 Station Park-and-Ride | 13 Paseo Connection |
| 4 Grove with Seating | 14 Hotel/Entertainment Venue |
| 5 Bus Transfer Station | 15 Aloha Stadium Entrance |
| 6 Wayfinding Kiosk/Bicycle Station | 16 Gathering Place |
| 7 Cafe with Outdoor Seating | 17 Scoreboard/Video Screen |
| 8 Museum/Information Center | 18 Water Feature |
| 9 Retail/Restaurant Frontage | 19 Surface Parking Lot (Tailgating/Swap Meet Venue) |
| 10 Pocket Park | 20 Athletic Field |
| | 21 Office Campus |



5.4.3 PHASE 2: ALOHA STADIUM

Replacement of the current Aloha Stadium with a contemporary, first-class stadium with a smaller capacity presents exciting opportunities for ancillary development around the stadium and the new rail station. However, most major sports stadiums take many years of pre-development planning even before construction can begin. No matter where Aloha Stadium is planned to be located on the stadium site, its location will be crucial in determining the character of mixed-use development and the sports and entertainment component of the Halawa area.

Aloha Stadium is proposed to be relocated slightly west of the current stadium location, allowing for the potential for a phased construction/demolition process in a compact area. This may minimize any potential disruptions to stadium events, such as UH home games, and maximize the remainder of the site for parking or additional development. The following additional improvements could be provided at this phase:

- Improved vehicular accessibility to the stadium site, such as a ramp from the H-1 freeway.
- Provide connectivity and introduce an internal street grid based on Complete Streets concepts and guidelines within the stadium site to delineate surface parking lots, structures, or future development sites.
- Potential reorganization or on-site relocation of the Swap Meet.
- Potential realignment of area streets, such as Salt Lake Boulevard, to optimize stadium traffic and/or future development.



Phase 2: Relocate and build a new Aloha Stadium

5.4.4 PHASE 3: GATHERING PLACE

Mixed-use sports and entertainment districts adjacent to sports stadiums require a threshold level of development, or “critical mass”, in order to be successful. This phase represents the initial investment (aside from infrastructure preparation) a developer may make, allowing for a more intensive year-round usage of the stadium site. The uses that make up the investment rely upon the ability to create a vibrant, lively environment that a broad array of locals and visitors will be drawn to. Successful districts of this type must be large enough, and have the right mix of uses, to foster this environment. The following elements should be located adjacent to Aloha Stadium, preferably along the stadium-station connection:

- A large, programmable open space that can be used for events.
- A hotel.
- A cultural venue, such as a theater, museum, or cinema.
- Supporting retail and dining.
- Introduction of structured parking or underground parking magazines.
- Gateway signage at TOD district edges.



Phase 3: Build gathering place and sports and entertainment district

Multi Media Democracy Museum

Showcasing Hawaii's contribution to the rest of the world

"To understand
Barack,
you need to understand
Hawaii"
- Michelle Obama

Hawaii-born,
they made
a difference
in America.



President Barack Obama born and raised in Honolulu. ▲



WE HAVE TO BUILD THINGS
THAT WE WANT TO SEE
ACCOMPLISHED, IN LIFE AND
IN OUR COUNTRY, BASED ON
OUR OWN PERSONAL
EXPERIENCES... **TO MAKE
SURE THAT OTHERS... DO
NOT HAVE TO SUFFER THE
SAME DISCRIMINATION.**

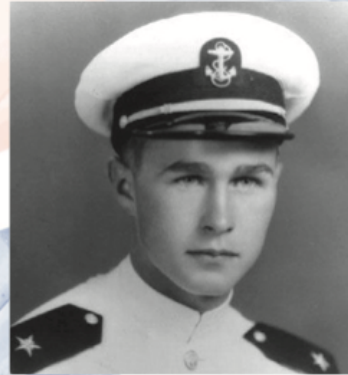
—Patsy Takemoto Mink

US Congresswoman Patsy Mink authored Title IX in 1972, giving Girls equal opportunity in sports and higher education. ▲



US Senator Dan Inouye wrote the Constitutional Amendment lowering the voting age to 18. This was the 26th Amendment passed in 1971. Senator Inouye also helped pass the Civil Rights Act of 1964 and the Voting Rights Act of 1965. He passed the Americans with Disabilities Act in 1990. ▲

Historical Research: Gloria Borland



*The youngest pilot in the Navy,
George H Bush. ▲*

Hawaii's 442 Regiment shipped off to Europe in 1943. The 442 was segregated, for Americans of Japanese ancestry. Hawaii's 442 rescued the "Lost Battalion" from Texas the 36th Division was surrounded by German soldiers in France in 1944. The 442 is the most highly decorated regiment in US Army history. ▲



After walking on the moon, Apollo astronauts greeted by President Richard Nixon at Pearl Harbor Hawaii 1969. ▲



President Lyndon Johnson 1966. ▲



Jimmy Carter



John F Kennedy

Before they were president, John F. Kennedy, George H. Bush and Jimmy Carter were young Naval officers stationed at Pearl Harbor. ◀

Born in Maui to a missionary family, Samuel Chapman Armstrong graduated from Punahou School in 1859. During the Civil War he fought at Gettysburg and then volunteered to lead a segregated colored-troop. After the war, Armstrong founded Hampton Institute in Virginia to educate former slaves. His protégé was Booker T. Washington who founded Tuskegee Institute in Alabama. ►



The City and County of Honolulu has allocated space in their draft plans to include a historical museum at the Halawa Rail station near Aloha Stadium. Residents and visitors alike will walk away knowing this untold story of Hawaii. We need community support to make this museum a reality. Please contact your City Council member to express your support. The Multi-Media Democracy Museum will honor American presidents and congressional leaders who were influenced by Hawaii and went on to improve the progress of Democracy.



BRUNO MARS

Born in Honolulu 1985. Graduated from Roosevelt High School in 2003.



BETTE MIDLER

Born in Honolulu 1945.
Graduated from Radford
High School in 1963.

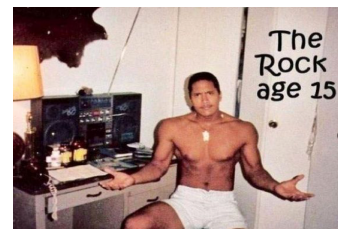
MUSEUM

HAWAII MODERN HEROES
The ENTERTAINERS



Dwayne Johnson

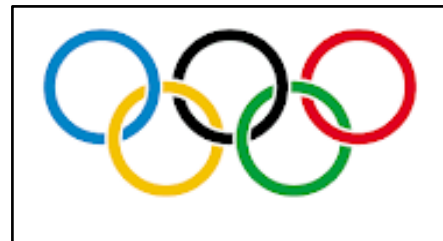
Grew up in Honolulu.
Attended McKinley High School.



Hawaii Sports Museum Olympians



Hawaii's **Duke Kahanamoku** won 3 Gold Medals in Swimming at the Stockholm Olympics 1912 and Antwerp Olympics 1920.

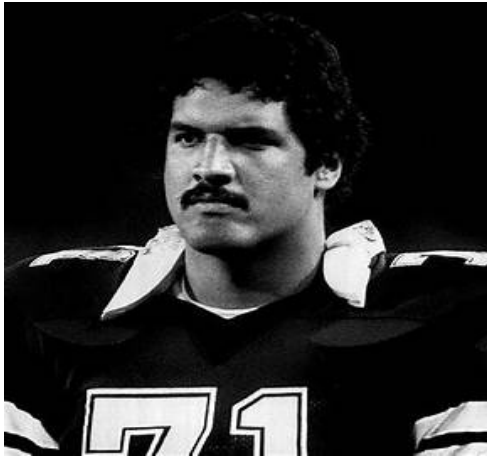


Hawaii's **Bryan Cave** won the Olympic Gold Medal in Decathlon at the Beijing Olympics in 2008.

Bryan Cave grew up on Oahu's north shore, he graduated from Castle High School.

Hawaii Sports Museum

Hawaii's NFL Players



Mark Tuinei - NFL
Dallas Cowboys
Graduated, Punahou School, 1978

Dallas Cowboys 1983-1997.
3 times Superbowl, 1992,1993, 1995.
2 times Pro Bowl 1994, 1995



Marcus Mariota – NFL
Tennessee Titans,
Graduated, St. Louis High School, 2011

Tennessee Titans 2015-present
Heisman Trophy 2014



TROY POLAMALU, PITTSBURGH STEELERS

NOTABLE NFL PLAYERS OF SAMOAN DESCENT

PLAYER	POSITION	PRIMARY TEAM
MIKE IUPATI	OL	SAN FRANCISCO 49ERS
MARCUS MARIOTTA	QB	TENNESSEE TITANS
TROY POLAMALU	DB	PITTSBURGH STEELERS
JESSE SAPOLU	OL	SAN FRANCISCO 49ERS
JUNIOR SEAU	LB	SAN DIEGO CHARGERS
MA'A TANUVASA	DE	DENVER BRONCOS
MOSI TATUPU	RB	NEW ENGLAND PATRIOTS
MANU TUIASOSOPO	DL	SEATTLE SEAHAWKS
MARK TUINEI	OL	DALLAS COWBOYS

Hawaii Sports Museum Women Sports & Title IX



University of Hawaii Rainbow Wahine Volleyball Team 1979
NCAA Champion 1979,, 1982, 1983, 1987



Clarissa Moore
World Champion Surfer

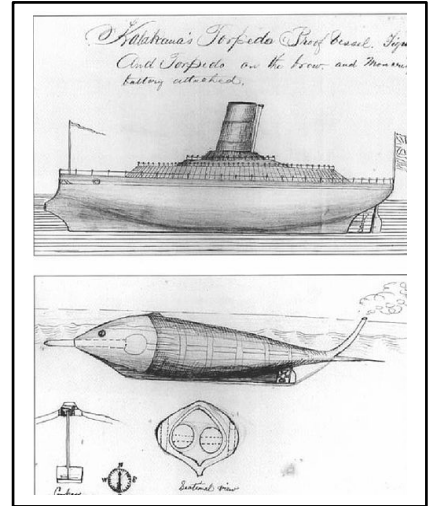
Hawaii Inventors

Hawaii Museum



King David Kalakaua received two U.S. patents for his inventions.

The roots of innovation can be traced to the 1870s and Hawaii's **King David Kalakaua**, a Renaissance man, scientist and inventor. The King was friends with Thomas Edison and in 1886 he installed electricity at Iolani Palace in Honolulu, four years before the White House had lights. King Kalakaua invented an improved double screw and an improved bottle stopper in 1872. He also invented a new fish ram and a torpedo-proof vessel in 1875.



Verifone was invented in Hawaii.



Bill Melton founded VERIFONE the first electronic point of sale terminal in 1981 to help merchants with verifying check and credit card payments in Hawaii. A University of Hawaii engineer **Jimmy Thomson** developed Verifone's technology.

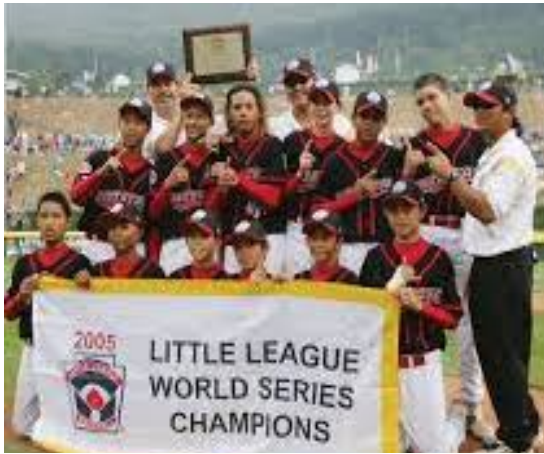
One of the young interns working under engineer Jimmy Thompson was **Steve Case**, who later became CEO of AOL.

After hitting \$30 million in sales, Verifone moved to California in 1985 and was bought by Hewlett Packard in 1997. Today Verifone is in 150 countries, has 50% of the world's non-cash transactions, and process \$7.6 Billion transactions a year.

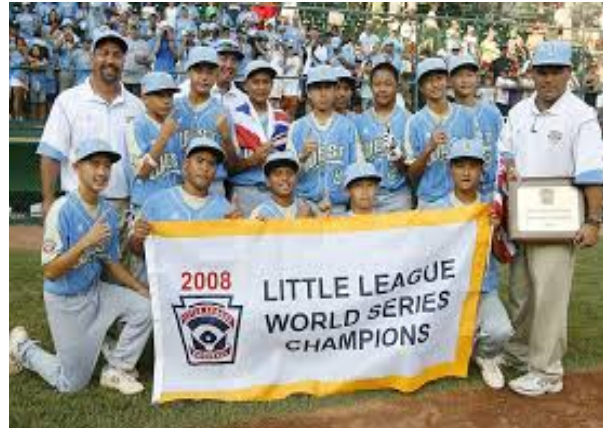
Verifone is the only global billion-dollar company produced from Hawaii.

Little League World Champions

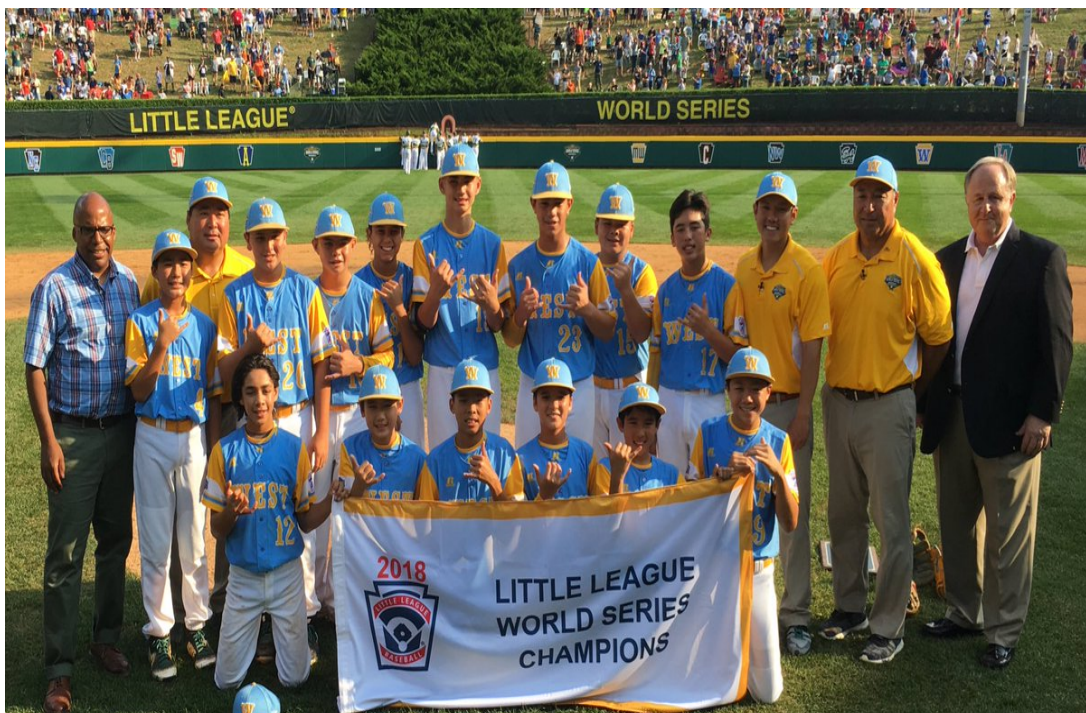
Hawaii Heroes Museum



2005 World Champions Ewa Beach



2008 World Champions Waipio



2018 World Champions Waipio, Hawaii



10422-01
December 23, 2020

Gloria Borland
globor@aol.com

Subject: Environmental Impact Statement Preparation Notice:
New Aloha Stadium Entertainment District (NASED)
Tax Map Keys (TMK): [1] 9-9-003:061, [1] 9-9-003:055, 070, and 071.
Hālawā, Oahu, Hawai‘i

Dear Ms. Borland:

Thank you for participating in the scoping process for the subject Environmental Impact Statement (EIS). We acknowledge your comments and concerns, they have been considered in the preparation of the Draft Programmatic EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1, Section 24.

Your comments, along with this response, will be reproduced and included in the forthcoming Draft Programmatic EIS. The Draft Programmatic EIS, including the various technical studies associated with it, will be available for review on Office of Environmental and Quality Control website following its publication in *The Environmental Notice*.

We appreciate your interest and participation in this environmental review process.

Sincerely,

Keola Cheng
Director of Planning

cc: Chris Kinimaka, Department of Accounting and General Services
Stacey Jones, Crawford Architects

From: hrlld@hushmail.com
Sent: Thursday, November 7, 2019 10:50 PM
To: Public Comment
Subject: EISPN Comments

I appreciate the opportunity to provide input on the new stadium.

I support construction of a new stadium, and I accept its reduced capacity. However, I suggest a stadium that can be temporarily expanded to 40,000 for major events. I hope that all parties - architects, engineers, and vendors can meet this request.

I support option A, building the stadium on its present footprint. Option A would not require razing the parking area, cutting that cost.

Why are athletic facilities not meant to host events part of Option A? Public park space should not be in the purview of Aloha Stadium. A better idea would be to build mini Aloha Stadium, a 3,000 seat stadium with everything the main stadium has, locker rooms, scoreboard, etc. It would be an affordable option for smaller organizations, or the stadium could host simultaneous high school football games.

For option B, why was building an arena not considered? I wonder if a 15,000 to 18,000 seat arena could fit on the current stadium site?

What are educational and cultural amenities? Who may use these spaces, and will there be rental fees for these spaces? Again, park space shouldn't be in the purview of a stadium authority.

I am opposed to the entertainment district in all proposals. Aloha Stadium is close to Pearlridge Center and Pearl Highlands Center. Additionally, Aiea Bowl bowling alley and the Ice Palace ice skating rink are next to the stadium - an entertainment district seems unnecessary. Also, retail space doesn't make sense. Aiea Shopping Center, Stadium Mall, and Stadium Marketplace are right near the Stadium's boundaries. The only retailer that should be allowed is the University of Hawaii's official store. Other retailer development should not take place.

There is a benefit to building a hotel on stadium property. medical tourism. Pali Momi hospital is right next to Pearlridge Shopping Center, and Kaiser Permanente hospital is in Moanalua. Patients undergoing outpatient surgery will have another hotel option.

Why wasn't closing down the stadium an option? Would there be cost savings in shutting down and building without keeping the stadium open? It should be noted that more Oahu high schools now have artificial surface fields. Also, Maui War Memorial Stadium has the ability to host University of Hawaii football games.

I feel that the three options overestimate rail's impact on traffic. After all, though the driving can be slow, it's door to door service, so to speak. Also, less parking means less tailgating, and some ill will at being price gouged at the concessions.

I look forward to a new Aloha Stadium. I appreciate a field that can handle football, rugby and soccer. Though rare, being able to join a rugby world cup, or soccer world cup bid would be nice. The reduced cost of maintaining a new stadium will be very appreciated.

May this project meet budget and be finished on time. Thank you for the opportunity to comment.



10422-01
December 23, 2020

Harold Uchibori
hhu@lava.net

Subject: Environmental Impact Statement Preparation Notice:
New Aloha Stadium Entertainment District (NASED)
Tax Map Keys (TMK): [1] 9-9-003:061, [1] 9-9-003:055, 070, and 071.
Hālawā, Oahu, Hawai‘i

Dear Mr. Uchibori:

Thank you for participating in the scoping process for the subject Environmental Impact Statement (EIS). We acknowledge your comments and concerns, they have been considered in the preparation of the Draft Programmatic EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1, Section 24.

Your comments, along with this response, will be reproduced and included in the forthcoming Draft Programmatic EIS. The Draft Programmatic EIS, including the various technical studies associated with it, will be available for review on Office of Environmental and Quality Control website following its publication in *The Environmental Notice*.

We appreciate your interest and participation in this environmental review process.
Sincerely,

Keola Cheng
Director of Planning

cc: Chris Kinimaka, Department of Accounting and General Services
Stacey Jones, Crawford Architects

From: Jan Ishiki <jansff2k@live.com>
Sent: Saturday, October 5, 2019 3:53 AM
To: Public Comment
Subject: Aloha Stadium Redevelopment

Hello Wilson

I have a couple of questions regarding the Aloha Stadium Redevelopment. I read that the number of seat will be reduced from 50,000 to 35,000. Since the plan is to add retail space and hotel and residential units and office space, is that the reason for reducing the amount of seats in the stadium? Will that not affect the decision of artists and sports organizations to rethink about coming to Hawaii to hold their events? Unless the music artists performs in more than one show, wouldn't the music artist gain more in one show with 50,000 seats versus having less seating?

Plus, wouldn't the sports organization gain more in a stadium seated for 50,000 people versus having less seats unless they are having more than one game? What if these artists and organizations decide not to come to Hawaii because the amount of tickets sold may not be worthless to cover the overhead costs and have less profit.

Also, I hope that the plan includes easier access for the senior citizens and the disabled. I also hope the restrooms will be height friendly, especially in the women's restrooms. For example, making sure that the toilet seat cover and toilet paper and handbag hook is low and closer to the toilet for small people will be able to reach.

I would appreciate a prompt response.

Thank you

Janis



10422-01
December 23, 2020

Janis Ishiki
Jansff2k@live.com

Subject: Environmental Impact Statement Preparation Notice:
New Aloha Stadium Entertainment District (NASED)
Tax Map Keys (TMK): [1] 9-9-003:061, [1] 9-9-003:055, 070, and 071.
Hālawā, Oahu, Hawai‘i

Dear Janis Ishiki:

Thank you for participating in the scoping process for the subject Environmental Impact Statement (EIS). We acknowledge your comments and concerns, they have been considered in the preparation of the Draft Programmatic EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1, Section 24.

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We appreciate your interest and participation in this environmental review process.

Sincerely,

Keola Cheng
Director of Planning

cc: Chris Kinimaka, Department of Accounting and General Services
Stacey Jones, Crawford Architects

From: Jason Sumner <sumner.lasvegas@gmail.com>
Sent: Friday, September 27, 2019 2:06 PM
To: Public Comment
Subject: NASED Comment/Question

Regarding "**Option B**"

Is there any potential safety concern with the Stadium being located too close to Kam Highway?

For Example: Federal Buildings are required to have a significant setback from roadways to help to prevent a potential "terrorist attack."



10422-01
December 23, 2020

Jason Sumner
Sumner.lavegas@gmail.com

Subject: Environmental Impact Statement Preparation Notice:
New Aloha Stadium Entertainment District (NASED)
Tax Map Keys (TMK): [1] 9-9-003:061, [1] 9-9-003:055, 070, and 071.
Hālawā, Oahu, Hawai‘i

Dear Mr. Sumner:

Thank you for participating in the scoping process for the subject Environmental Impact Statement (EIS). We acknowledge your comments and concerns, they have been considered in the preparation of the Draft Programmatic EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1, Section 24.

Your email, along with this response, will be reproduced and included in the forthcoming Draft Programmatic EIS. The Draft Programmatic EIS, including the various technical studies associated with it, will be available for review on Office of Environmental and Quality Control website following its publication in *The Environmental Notice*.

We appreciate your interest and participation in this environmental review process.

Sincerely,

Keola Cheng
Director of Planning

cc: Chris Kinimaka, Department of Accounting and General Services
Stacey Jones, Crawford Architects

From: Linda Green <lqueueg@yahoo.com>
Sent: Wednesday, November 6, 2019 6:47 PM
To: Public Comment
Subject: More housing at the Aloha Stadium!

I believe that the Aloha Stadium redevelopment should include MORE THAN 2,00 units! Please, more affordable housing!

Since the redevelopment takes place on 98 acres of state-owned property, and has access to its own rail station, this is an ample opportunity for the state to develop a **mass amount** of affordable housing units (80% AMI or below) and to aid Oahu's **critical housing crisis**. The EIS should quantify the impact on the state's published housing demand.

Mahalo.

Linda Green



10422-01
December 23, 2020

Linda Green
lqueue@yahoo.com

Subject: Environmental Impact Statement Preparation Notice:
New Aloha Stadium Entertainment District (NASED)
Tax Map Keys (TMK): [1] 9-9-003:061, [1] 9-9-003:055, 070, and 071.
Hālawā, Oahu, Hawai‘i

Dear Ms. Green:

Thank you for participating in the scoping process for the subject Environmental Impact Statement (EIS). We acknowledge your comments and concerns, they have been considered in the preparation of the Draft Programmatic EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1, Section 24.

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We appreciate your interest and participation in this environmental review process.

Sincerely,

Keola Cheng
Director of Planning

cc: Chris Kinimaka, Department of Accounting and General Services
Stacey Jones, Crawford Architects

From: Liz Nelson <hawaiilizzie@gmail.com>
Sent: Saturday, October 5, 2019 10:45 AM
To: Public Comment
Subject: Aloha Stadium Entertainment District project

Aloha,

I strongly believe the New Aloha Stadium entertainment District should include much more than 2,000 housing units. Since the redevelopment takes place on 98 acres of state-owned land and has access to its own rail station, this is a great opportunity to develop a mass amount of affordable housing units (80% AMI or below) to aid Oahu's critical housing crisis.

Please consider revising this proposal to include a larger mass of housing units to meet the needs of the area's population.

Thank you very much.

Liz Nelson
Faith Action for Community Equity



10422-01
December 23, 2020

Liz Nelson
Faith Action for Community Equity
hawaiilizzie@gmail.com

Subject: Environmental Impact Statement Preparation Notice:
New Aloha Stadium Entertainment District (NASED)
Tax Map Keys (TMK): [1] 9-9-003:061, [1] 9-9-003:055, 070, and 071.
Hālawā, Oahu, Hawai‘i

Dear Ms. Nelson:

Thank you for participating in the scoping process for the subject Environmental Impact Statement (EIS). We acknowledge your comments and concerns, they have been considered in the preparation of the Draft Programmatic EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1, Section 24.

Your comments, along with this response, will be reproduced and included in the forthcoming Draft Programmatic EIS. The Draft Programmatic EIS, including the various technical studies associated with it, will be available for review on Office of Environmental and Quality Control website following its publication in *The Environmental Notice*.

We appreciate your interest and participation in this environmental review process.

Sincerely,

Keola Cheng
Director of Planning

cc: Chris Kinimaka, Department of Accounting and General Services
Stacey Jones, Crawford Architects

From: Marian Heidel <mheidel808@icloud.com>
Sent: Wednesday, September 25, 2019 12:44 PM
To: Public Comment
Subject: New Aloha Stadium and Housing

Dear EIS folks,

Aloha and thank you for taking public input on your study decision-making.

I strongly believe the New Aloha Stadium Entertainment District should include much more than 2,000 housing units. Since the redevelopment takes place on 98 acres of state-owned property, and has access to its own rail station, this is an ample opportunity for the state to develop a mass amount of affordable housing units (80% AMI or below) and to aid Oahu's critical housing crisis. Please consider revising this proposal to include a larger mass of housing units to meet the needs of the area's growing population.

Mahalo,

**Marian Heidel
Kailua, HI 96734**



10422-01
December 23, 2020

Marian Heidel
Mheidel808@cloud.com

Subject: Environmental Impact Statement Preparation Notice:
New Aloha Stadium Entertainment District (NASED)
Tax Map Keys (TMK): [1] 9-9-003:061, [1] 9-9-003:055, 070, and 071.
Hālawā, Oahu, Hawai‘i

Dear Ms. Heidel

Thank you for participating in the scoping process for the subject Environmental Impact Statement (EIS). We acknowledge your comments and concerns, they have been considered in the preparation of the Draft Programmatic EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1, Section 24.

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We appreciate your interest and participation in this environmental review process.

Sincerely,

Keola Cheng
Director of Planning

cc: Chris Kinimaka, Department of Accounting and General Services
Stacey Jones, Crawford Architects

From: M Carolyn Kuahulu <dukiecarol@aol.com>
Sent: Monday, October 14, 2019 3:36 PM
To: Public Comment
Subject: Aloha Stadium Entertainment District

Follow Up Flag: Follow up
Flag Status: Flagged

Aloha,

I strongly believe the New Aloha Stadium Entertainment District should include much more than 2,000 housing units. Since the redevelopment takes place on 98 acres of state-owned property, and has access to its own rail station, this is an ample opportunity for the state to develop a mass amount of affordable housing units (80% AMI or below) and to aid Oahu's critical housing crisis. Because it is near the rail station, it will also help with traffic. Please consider revising this proposal to include a larger mass of housing units to meet the needs of the area's growing population. I could certainly benefit from some more affordable housing but will probably have to leave the islands before there are enough units available.

Mahalo,

Mary Carolyn Kuahulu



10422-01
December 23, 2020

Mary Carolyn Kuahulu
dukiecarol@aol.com

Subject: Environmental Impact Statement Preparation Notice:
New Aloha Stadium Entertainment District (NASED)
Tax Map Keys (TMK): [1] 9-9-003:061, [1] 9-9-003:055, 070, and 071.
Hālawā, Oahu, Hawai‘i

Dear Ms. Kuahulu:

Thank you for participating in the scoping process for the subject Environmental Impact Statement (EIS). We acknowledge your comments and concerns, they have been considered in the preparation of the Draft Programmatic EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1, Section 24.

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We appreciate your interest and participation in this environmental review process.

Sincerely,

Keola Cheng
Director of Planning

cc: Chris Kinimaka, Department of Accounting and General Services
Stacey Jones, Crawford Architects

From: Nanea Lo <naneaclo@gmail.com>
Sent: Wednesday, September 25, 2019 12:04 AM
To: Public Comment
Subject: More Housing NOW.

Hello,

I strongly believe the New Aloha Stadium Entertainment District should include much more than 2,000 housing units. Since the redevelopment takes place on 98 acres of state-owned property, and has access to its own rail station, this is an ample opportunity for the state to develop a mass amount of affordable housing units (80% AMI or below) and to aid Oahu's critical housing crisis. Please consider revising this proposal to include a larger mass of housing units to meet the needs of the area's growing population.

Me ke aloha 'āina,

Nanea Lo
Phone: [\(808\)454-3504](tel:(808)454-3504)
Email: naneaclo@gmail.com
<https://www.linkedin.com/in/naneaclo>

Some people say that Hawai'i will be a better place when Hawaiians no longer stand in the way of progress. But even these people must know that at this point, this will no longer be Hawai'i. - *Jonathan Kay Kamakawiwo'ole Osorio. The Value of Hawai'i*

From: Nanea Lo <naneaclo@gmail.com>
Sent: Monday, October 14, 2019 2:50 PM
To: Public Comment
Subject: Aloha Stadium EIS (Environmental Impact Study)

Follow Up Flag: Follow up
Flag Status: Flagged

Hello,

I strongly believe the New Aloha Stadium Entertainment District should include much more than 2,000 housing units. Since the redevelopment takes place on 98 acres of state-owned property, and has access to its own rail station, this is an ample opportunity for the state to develop a mass amount of affordable housing units (80% AMI or below) and to aid Oahu's critical housing crisis. Please consider revising this proposal to include a larger mass of housing units to meet the needs of the area's growing population.

Me ke aloha 'āina,

Nanea Lo
Phone: [\(808\)454-3504](tel:8084543504)
Email: naneaclo@gmail.com
<https://www.linkedin.com/in/naneaclo>

Some people say that Hawai'i will be a better place when Hawaiians no longer stand in the way of progress. But even these people must know that at this point, this will no longer be Hawai'i. - Jonathan Kay Kamakawiwo'ole Osorio. *The Value of Hawai'i*

From: Nanea Lo <naneaclo@gmail.com>
Sent: Wednesday, November 6, 2019 5:14 PM
To: Public Comment
Subject: Testimony: More Housing for New Aloha Stadium Entertainment District

Hello,

My name is Nanea Lo. I come from Papakōlea, O‘ahu, but I currently reside in Kaimukī. I am a kanaka maoli (native Hawaiian) master’s student at UH Mānoa in the Department of Urban and Regional Planning. I am writing it to say that I STRONGLY BELIEVE the New Aloha Stadium Entertainment District should include much more than 2,000 housing unit. Since the redevelopment takes place on 98 acres of de facto state-owned property, and has access to its own rail station, this is an ample opportunity for the state to develop a mass amount of affordable housing units (80% AMI or below) and to aid O‘ahu’s critical housing crisis. The EIS should quantify the impact on the de facto state’s published housing demand.

Me ke aloha ‘āina,

--

Nanea Lo
Phone: (808)454-3504
[Email: naneaclo@gmail.com](mailto:naneaclo@gmail.com)

Independent Contractor,
Native Stories
Search “Native Stories” for our podcast
Download our mobile app
<https://nativestories.org/>
<https://www.facebook.com/ournativestories/>



Some people say that Hawai‘i will be a better place when Hawaiians no longer stand in the way of progress. But even these people must know that at this point, this will no longer be Hawai‘i.- Jonathan Kay Kamakawiwo‘ole Osorio. The Value of Hawai‘i



10422-01
December 23, 2020

Nanea Lo
naneaclo@gmail.com

Subject: Environmental Impact Statement Preparation Notice:
New Aloha Stadium Entertainment District (NASED)
Tax Map Keys (TMK): [1] 9-9-003:061, [1] 9-9-003:055, 070, and 071.
Hālawā, Oahu, Hawai‘i

Dear Nanea Lo:

Thank you for participating in the scoping process for the subject Environmental Impact Statement (EIS). We acknowledge your comments and concerns, they have been considered in the preparation of the Draft Programmatic EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1, Section 24.

Your comments, along with this response, will be reproduced and included in the forthcoming Draft Programmatic EIS. The Draft Programmatic EIS, including the various technical studies associated with it, will be available for review on Office of Environmental and Quality Control website following its publication in *The Environmental Notice*.

We appreciate your interest and participation in this environmental review process.

Sincerely,

Keola Cheng
Director of Planning

cc: Chris Kinimaka, Department of Accounting and General Services
Stacey Jones, Crawford Architects

From: Nicole Woo <woonicole@yahoo.com>
Sent: Wednesday, November 6, 2019 5:44 PM
To: Public Comment
Subject: Aloha Stadium EIS

Dear Sir or Madam,

Mahalo for this chance to comment on the Aloha Stadium Entertainment District environmental impact study.

I was disappointed to read that it is currently planned to include only 2,000 housing units. Considering the affordable housing crisis on Oahu, as well as the huge size of the development on state land, our community will have missed a tremendous opportunity to build many additional units, and at affordable levels, meaning at or below 80 percent of area median income.

We can't afford to let this chance to make a real dent in our affordable housing crisis pass us by. Please include an analysis of the district's impact on housing demand in the EIS.

Thank you,

Nicole Woo
Honolulu resident



10422-01
December 23, 2020

Nicole Woo
Woonicole@yahoo.com

Subject: Environmental Impact Statement Preparation Notice:
New Aloha Stadium Entertainment District (NASED)
Tax Map Keys (TMK): [1] 9-9-003:061, [1] 9-9-003:055, 070, and 071.
Hālawā, Oahu, Hawai‘i

Dear Ms. Woo:

Thank you for participating in the scoping process for the subject Environmental Impact Statement (EIS). We acknowledge your comments and concerns, they have been considered in the preparation of the Draft Programmatic EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1, Section 24.

Your comments, along with this response, will be reproduced and included in the forthcoming Draft Programmatic EIS. The Draft Programmatic EIS, including the various technical studies associated with it, will be available for review on Office of Environmental and Quality Control website following its publication in *The Environmental Notice*.

We appreciate your interest and participation in this environmental review process.

Sincerely,

Keola Cheng
Director of Planning

cc: Chris Kinimaka, Department of Accounting and General Services
Stacey Jones, Crawford Architects

From: Wilson Okamoto Corporation
Sent: Monday, December 30, 2019 8:27 AM
To: Keola Cheng; Dalton Beauprez
Subject: FW: Contact Form on Wilson Okamoto Website

Jeanine S.H.Y. Morioka
Senior Project Administrator

1907 South Beretania Street, Suite 400
Honolulu, Hawaii 96826
T (808) 946-2277 F (808) 946-2253
W <http://www.wilsonokamoto.com>

This message contains information that might be confidential and privileged. Unless you are the addressee or are authorized by the sender, you may not use, copy or disclose the information contained in this message. If you have received this message in error, please delete it and advise the sender.

-----Original Message-----

From: Wilson Okamoto Website [mailto:web@wilsonokamoto.com]
Sent: Sunday, December 29, 2019 2:55 PM
To: wocwebform@gmail.com
Subject: Contact Form on Wilson Okamoto Website

Name: Owen Tamamoto
Company: Imua Pickleball Hui
Email: ntamaok@gmail.com
Phone: 808-233-8698

Comment: This message is intended for Mr. Keola Cheng.

On behalf of Imua Pickleball Hui, I am inquiring about the possibility of adding pickle ball courts to New Aloha Stadium Entertainment District plans. We are hoping that multi-use recreational areas include pickle ball courts.

--

This e-mail was sent from a contact form on Wilson Okamoto
(<https://linkprotect.cudasvc.com/url?a=http%3a%2f%2fwww.wilsonokamoto.com&c=E,1,6Ulc6bnA7S488a3sWcQSooh8W4VNmYBh4lwjhzN5KZ05i53uY6GMlgeEr2JhEI00bwlm3j7VCGMCq7N-pxFIVyzjp46hYhPughPVI9SVwq6N66E,&typo=1>)



10422-01
December 23, 2020

Owen Tamamoto
Imua Pickleball Hui
ntamaok@gmail.com

Subject: Environmental Impact Statement Preparation Notice:
New Aloha Stadium Entertainment District (NASED)
Tax Map Keys (TMK): [1] 9-9-003:061, [1] 9-9-003:055, 070, and 071.
Hālawā, Oahu, Hawai‘i

Dear Mr. Tamamoto:

Thank you for participating in the scoping process for the subject Environmental Impact Statement (EIS). We acknowledge your comments and concerns, they have been considered in the preparation of the Draft Programmatic EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1, Section 24.

Your comments, along with this response, will be reproduced and included in the forthcoming Draft Programmatic EIS. The Draft Programmatic EIS, including the various technical studies associated with it, will be available for review on Office of Environmental and Quality Control website following its publication in *The Environmental Notice*.

We appreciate your interest and participation in this environmental review process.

Sincerely,

Keola Cheng
Director of Planning

cc: Chris Kinimaka, Department of Accounting and General Services
Stacey Jones, Crawford Architects

From: Randy Ching <makikirandy@yahoo.com>
Sent: Monday, October 14, 2019 12:44 PM
To: Public Comment
Subject: Aloha Stadium EIS

Follow Up Flag: Follow up
Flag Status: Flagged

Aloha. I am offering comments to the EIS for the proposed re-development of Aloha Stadium which sits on a 98-acre parcel of public land.

There are 3 things which would make rental housing units (badly needed here on Oahu) more available on the 98 acres.

1) Tear down the current stadium and build a new one on UH Manoa's lower campus (aka "The Quarry"). Make the new stadium's seating capacity 25,000. That way, it could fit in where the 2 large grass practice fields are now. Yes, the softball stadium and some tennis courts would have to be re-located. But many more students would attend UH sporting events with an on-campus stadium. And the lower campus already has a sizable parking lot.

2) Do not include any parking for the new rental housing units that will be built on the 98 acres. There could be 20,000 to 25,000 rental units built on the site if you don't build any parking lots. The reason is two-fold. One, there will be a rail station at the stadium site. Two, TOD around that rail station means that everything you need on a daily basis will be within 10 minutes by foot. You won't need a car!

3) Oahu will need 60,000 rental units in the next decade. The stadium site could provide 1/3 to 5/12 of the projected need. That is huge. We need rental housing more than we need a new stadium. If you insist on the new stadium being on the current site, use only 20 acres for it. The other 78 acres should be rental housing -- if there has to be mixed use, then put the retail on the first floor and everything above that should be rentals. This way, you could provide 15,000+ units for rent (about a quarter of Oahu's needs).

Please consider revising this proposal to include a larger mass of housing units to meet the needs of the area's growing population. Mahalo.

Randy Ching
Kalihi
makikirandy@yahoo.com
942-0145

From: Randy Ching <makikirandy@yahoo.com>
Sent: Thursday, November 7, 2019 7:31 AM
To: Public Comment
Subject: Aloha Stadium redevelopment EIS comments

Comments for EIS:

Aloha Wilson Okamoto,

I believe the New Aloha Stadium Entertainment District should include 20,000 housing units, specifically rental units in the price range of \$500 to \$1000 a month. There should be no parking requirements for the rental units because 1) the rail station will be within a half mile of the site and 2) the TOD around the station will provide everyday needs within walking distance. Ideally, there will be no parking at all -- every square inch of the site will be used for rental housing and mixed-use development. The Stadium Authority should tear down Aloha Stadium and put the new stadium (25,000 seats) in the UH-M lower campus.

Every person who rents a unit should be given a transit pass every month for rail and bus use. This will incentivize tenants to NOT own a car. There should be a BIKI station with at least 100 bicycles for rent. For the folks who drive to the retail shops, at least 25% of the stalls should be EV charging stations (type 2) with options to pay for fast charging. Finally, there should be EV Handi-Vans to transport those unable to walk, bike, bus.

To support local farmers, there should be a farmer's market at least once a week (preferably twice a week) within the 98-acre site. The farmer's market could even be held in conjunction with the swap meet. There should be 1 acre set aside for community gardens. Every tenant who wants a 10' x 10' plot should be able to have one. The one acre garden should have water and mulch available for all gardeners. The water could be partially supplied by catchment systems, cisterns, water tanks, rain barrels, and re-used water from aquaculture (tilapia/lettuce) setups.

To the maximum extent possible, gray water should be used to flush toilets and irrigate landscaping plants. The gray water can (should) be treated biologically, not chemically. All housing units should have "purple pipes" which are connected to a water treatment plant. The water from the treatment plants can be for any non-potable uses. The treatment plant should be on-site to minimize the cost of piping (both for sewage and "purple pipe").

Electricity should be 100% renewable -- preferably solar + battery storage. There will be lots of roof space for PV panels. The power plant should be located on-site (a micro grid for the 20,000 units). This will be part of a distributed generation system -- Oahu should

be moving quickly to DG. Also, hot water should come from solar panels. The water pumps will be powered by the micro grid. Oahu needs to prepare for a fossil-fuel-free world ASAP.

Mahalo.

Randy Ching
Honolulu
makikirandy@yahoo.com



10422-01
December 23, 2020

Randy Ching
makikirandy@yahoo.com

Subject: Environmental Impact Statement Preparation Notice:
New Aloha Stadium Entertainment District (NASED)
Tax Map Keys (TMK): [1] 9-9-003:061, [1] 9-9-003:055, 070, and 071.
Hālawā, Oahu, Hawai‘i

Dear Mr. Ching:

Thank you for participating in the scoping process for the subject Environmental Impact Statement (EIS). We acknowledge your comments and concerns, they have been considered in the preparation of the Draft Programmatic EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1, Section 24.

Your comments, along with this response, will be reproduced and included in the forthcoming Draft Programmatic EIS. The Draft Programmatic EIS, including the various technical studies associated with it, will be available for review on Office of Environmental and Quality Control website following its publication in *The Environmental Notice*.

We appreciate your interest and participation in this environmental review process.

Sincerely,

Keola Cheng
Director of Planning

cc: Chris Kinimaka, Department of Accounting and General Services
Stacey Jones, Crawford Architects

From: Randy Gonce <rgonce@my.hpu.edu>
Sent: Thursday, November 7, 2019 3:12 PM
To: Public Comment
Subject: Aloha Stadium

Aloha,

I strongly believe the New Aloha Stadium Entertainment District should have a main focus on affordable housing. The proposed 2,000 housing units is not enough and we should start with building all the affordable units as phase 1 of the redevelopment. The stadium redevelopment should not start until we get affordable units built and operational. The Stadium should be seen as an incentive after addressing our housing crisis.

We have a chance to show our people what our priorities are: sports/entertainment or serving those who are suffering immensely. We assisted in creating this affordable housing crisis it's our kuleana to be the main driver in its solution.

Since the redevelopment takes place on 98 acres of state-owned property, and has access to its own rail station, this is an ample opportunity for the state to develop a mass amount of affordable housing units (80% AMI or below) and to aid Oahu's critical housing crisis. The EIS should quantify the impact on the state's published housing demand.

Mahalo.

*Comments and testimony represents my own personal views and not that of professional or employment positions I may have.

--

Randy Gonce

Administrative Assistant on Homelessness - Hawai'i State Executive Branch
Executive Committee Member - Young Progressives Demanding Action
State Central Committee Representative - Veterans Caucus of Democratic Party
Board Member - Drug Policy Forum of Hawai'i
Board of Directors - Ka 'Ulu Lā'au - Specializing in Native Hawaiian Plants and Lei
Communications Chair - Board Member - Partners in Care (Hawaii's Homelessness Continuum of Care)

"Love and compassion are necessities, not luxuries. Without them humanity cannot survive."
-Tenzin Gyatso, the 14th Dalai Lama



10422-01
December 23, 2020

Randy Gonce
rgonce@m.hpu.edu

Subject: Environmental Impact Statement Preparation Notice:
New Aloha Stadium Entertainment District (NASED)
Tax Map Keys (TMK): [1] 9-9-003:061, [1] 9-9-003:055, 070, and 071.
Hālawā, Oahu, Hawai'i

Dear Mr. Gonce:

Thank you for participating in the scoping process for the subject Environmental Impact Statement (EIS). We acknowledge your comments and concerns, they have been considered in the preparation of the Draft Programmatic EIS with regard to meeting content requirements prescribed in Hawai'i Administrative Rules, Title 11, Chapter 200.1, Section 24.

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We appreciate your interest and participation in this environmental review process.

Sincerely,

Keola Cheng
Director of Planning

cc: Chris Kinimaka, Department of Accounting and General Services
Stacey Jones, Crawford Architects

From: Robert and Doris <LEE8749@twc.com>
Sent: Thursday, November 7, 2019 9:46 AM
To: Public Comment
Subject: Aloha Stadium Plans for affordable Housing

I support having more affordable housing in Hawaii. At present, we are pricing our future generations out of the housing market. We need to stop building expensive housing and think of the children who go to the mainland to live, because of all the money they save by living there. Why should we be spending more than half of our paycheck for housing? It is not feasible. Families are affected by the fact that it costs a lot of money to live in Paradise.

Please increase the affordable housing quota to double the chances for our children to live in Hawaii. Mahalo and God Bless.

Doris Lee, FACE member at Wahiawa United Methodist Church



10422-01
December 23, 2020

Robert and Doris Lee
LEE8749@twc.com

Subject: Environmental Impact Statement Preparation Notice:
New Aloha Stadium Entertainment District (NASED)
Tax Map Keys (TMK): [1] 9-9-003:061, [1] 9-9-003:055, 070, and 071.
Hālawā, Oahu, Hawai‘i

Dear Robert and Doris Lee

Thank you for participating in the scoping process for the subject Environmental Impact Statement (EIS). We acknowledge your comments and concerns, they have been considered in the preparation of the Draft Programmatic EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1, Section 24.

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We appreciate your interest and participation in this environmental review process.

Sincerely,

Keola Cheng
Director of Planning

cc: Chris Kinimaka, Department of Accounting and General Services
Stacey Jones, Crawford Architects

From: Soo San Schake <office@faithactionhawaii.org>
Sent: Monday, September 30, 2019 9:13 PM
To: Public Comment
Subject: comment on EIS Aloha Stadium

Aloha,

I strongly believe the New Aloha Stadium Entertainment District should include much more than 2,000 housing units. Since the redevelopment takes place on 98 acres of state-owned property, and has access to its own rail station, this is an ample opportunity for the state to develop a mass amount of affordable housing units (80% AMI or below) and to aid Oahu's critical housing crisis. Please consider revising this proposal to include a larger mass of housing units to meet the needs of the area's growing population and critical housing needs.

Mahalo,

--

Soo Schake
Organizing Assistant
Faith Action for Community Equity
(808) 989-9398
www.faithactionhawaii.org

"Until the great mass of the people shall be filled with the sense of responsibility for each other's welfare, social justice can never be attained." - Helen Keller



10422-01
December 23, 2020

Soo San Schake
FACE
office@faithactionhawaii.org

Subject: Environmental Impact Statement Preparation Notice:
New Aloha Stadium Entertainment District (NASED)
Tax Map Keys (TMK): [1] 9-9-003:061, [1] 9-9-003:055, 070, and 071.
Hālawā, Oahu, Hawai'i

Dear Soo Schake:

Thank you for participating in the scoping process for the subject Environmental Impact Statement (EIS). We acknowledge your comments and concerns, they have been considered in the preparation of the Draft Programmatic EIS with regard to meeting content requirements prescribed in Hawai'i Administrative Rules, Title 11, Chapter 200.1, Section 24.

Your comments, along with this response, will be reproduced and included in the forthcoming Draft Programmatic EIS. The Draft Programmatic EIS, including the various technical studies associated with it, will be available for review on Office of Environmental and Quality Control website following its publication in *The Environmental Notice*.

We appreciate your interest and participation in this environmental review process.

Sincerely,

Keola Cheng
Director of Planning

cc: Chris Kinimaka, Department of Accounting and General Services
Stacey Jones, Crawford Architects

From: Steven Costa <thnxkeakua@gmail.com>
Sent: Thursday, November 7, 2019 8:21 AM
To: Public Comment
Subject: Aloha Stadium Re-Development

Aloha! I had the opportunity to attend the first meeting a few weeks ago, for the first meeting on planing to redevelop Aloha Stadium. I was saddened to hear, that so few low cost housing units were part of the initial plans.

Regarding the Purpose and Need:

I would like the Purpose and Need statement to explicitly include affordable housing (which should be defined as households earning 80% of area median income spending no more than 30% of that income on housing costs) in addition to stadium renovation/replacement, mixed-use development, and transit-oriented development.

- Regarding socioeconomic characteristics:

The Department of Business, Economic Development and Tourism (DBEDT) issued a March 2015 report stating, "The forecast projects demand for an additional 64,700 to 66,000 housing units, during the 2015-2025 period... Wages and incomes have not been growing as fast as housing prices, making it harder to afford real estate in Hawaii, especially for younger and lower-income households." The state has clearly indicated the need for more housing units for local residents. Therefore, I believe this EIS should examine affordable housing as a socioeconomic impact of the proposed project. It should quantify the impact on the state's published housing demand.

- Regarding infrastructure, traffic, and utilities:

The EIS should quantify the site's maximum housing capacity (given as housing units, gross floor area, and building height). The EIS should also examine the impact of raising the maximum housing capacity of the site by constructing additional capacity or preserving space for utilities.

- Regarding public services and facilities:

Given the March 2015 DBEDT report quantifying the need for housing units, I believe the EIS should quantify the project's impact to public land as an opportunity cost by decreasing the developable state land area. The analysis should include a declaration of the highest and best use of the land proximate to the future rail station in the context of the Halawa Area Transit-Oriented Development Plan. This plan must "Preserve existing affordable housing and potential opportunities for new affordable housing, and as appropriate, with supportive services." If the plan does not include the physical maximum quantity of affordable housing units, the EIS should quantify the land area that could be preserved as undeveloped parcels for the future implementation of affordable housing within the site. The State Legislature is considering a bill proposing development of high-density affordable housing on state-owned land, therefore the EIS should quantify the impact to available state land for high-density affordable housing, particularly on the rail corridor.

- Regarding air quality:

The EIS should examine the relationship between housing units and air quality. A sensitivity analysis should be included reducing and/or eliminating parking spaces for exclusive residential use. The most aggressive analysis should examine the effects of 100% affordable housing units for transit-dependent residents who would not keep motor vehicles on site. Another air quality sensitivity analysis should assume all Swap Meet vendors and Entertainment District employees have on-site

housing units that are affordable (at 30% of their income) and dedicated for their living so they can live within walking distance of their places of business.

- Regarding infrastructure, traffic, and utilities:

The EIS should examine the relationship between increased housing units and motor vehicle traffic congestion. A sensitivity analysis should also be included reducing and/or eliminating parking spaces for exclusive residential use. The most aggressive analysis should examine the effects of 100% affordable housing units for transit-dependent residents who would not keep personal vehicles on and near the site. Another traffic sensitivity analysis should assume all Swap Meet vendors and Entertainment District employees have on-site housing units that are affordable (at 30% of their income) and dedicated for their living so they can live within walking distance of their places of business.

Attachments area



Here you go.

Thank you!

Thanks!



10422-01
December 23, 2020

Steven Costa
thnxkeakua@gmail.com

Subject: Environmental Impact Statement Preparation Notice:
New Aloha Stadium Entertainment District (NASED)
Tax Map Keys (TMK): [1] 9-9-003:061, [1] 9-9-003:055, 070, and 071.
Hālawā, Oahu, Hawai‘i

Dear Mr. Costa:

Thank you for participating in the scoping process for the subject Environmental Impact Statement (EIS). We acknowledge your comments and concerns, they have been considered in the preparation of the Draft Programmatic EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1, Section 24.

Your comments, along with this response, will be reproduced and included in the forthcoming Draft Programmatic EIS. The Draft Programmatic EIS, including the various technical studies associated with it, will be available for review on Office of Environmental and Quality Control website following its publication in *The Environmental Notice*.

We appreciate your interest and participation in this environmental review process.

Sincerely,

Keola Cheng
Director of Planning

cc: Chris Kinimaka, Department of Accounting and General Services
Stacey Jones, Crawford Architects

From: Wayne Mukai <waynemukai@gmail.com>
Sent: Wednesday, September 25, 2019 9:26 AM
To: Public Comment
Subject: New Stadium Design

Aloha Wilson!

In looking at the artist rendition of the proposed new stadium , it seems to be a low roof U - Shape design. Is there any chance you could provide MORE seats on the sidelines and go HIGHER?? Sideline seats are much more desirable for Football viewing vs. the end zone and you can sell the seats for much more \$\$\$

??



10422-01
December 23, 2020

Wayne Mukai
waynemukai@gmail.com

Subject: Environmental Impact Statement Preparation Notice:
New Aloha Stadium Entertainment District (NASED)
Tax Map Keys (TMK): [1] 9-9-003:061, [1] 9-9-003:055, 070, and 071.
Hālawā, Oahu, Hawai‘i

Dear Mr. Mukai:

Thank you for participating in the scoping process for the subject Environmental Impact Statement (EIS). We acknowledge your comments and concerns, they have been considered in the preparation of the Draft Programmatic EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1, Section 24.

Your comments, along with this response, will be reproduced and included in the forthcoming Draft Programmatic EIS. The Draft Programmatic EIS, including the various technical studies associated with it, will be available for review on Office of Environmental and Quality Control website following its publication in *The Environmental Notice*.

We appreciate your interest and participation in this environmental review process.

Sincerely,

Keola Cheng
Director of Planning

cc: Chris Kinimaka, Department of Accounting and General Services
Stacey Jones, Crawford Architects

From: Robert H Stiver <bobfromoahu@gmail.com>
Sent: Wednesday, November 6, 2019 7:42 PM
To: Public Comment
Subject: Aloha Stadium-area Development

Aloha,

I strongly believe the New Aloha Stadium Entertainment District should include many more than 2,000 affordable housing units (I believe that there is a recognized 17,000-unit or even closer- to-25,000-unit shortfall in affordable housing on Oahu spanning the next several years).

Since the redevelopment takes place on 98 acres of state-owned property and will have discrete rail-station access, this is a unique, can't-miss opportunity for the state to make available a paradigm-changing number of affordable housing units (80% AMI or below), thus mitigating Oahu's critical housing shortfall.

Wilson-Okamoto folks, you seem to be the state's agent here, and I recognize your company name as a long-term powerhouse in Hawaii's business economy. Earn your contract monies by listening to the voices of the people by, for example, quantifying the probable impact of Aloha Stadium on the state's published housing demand...also not incidentally, use your professionalism to convince state authorities, via the EIS, that this development, if done properly, will have a direct and observable effect on our loss of young, productive citizens, men and women, and their families to other climes and working opportunities.

I, Bob Stiver, don't need "affordable housing": as a now-retired federal bureaucrat, I "got mine" -- a fine home in Pearl City, larger than I need. I'm interested, and I want you, and the state, to be viscerally interested, in the younger generation!

Mahalo and best wishes for success,

Robert H. Stiver
Pearl City
455-9823



10422-01
December 23, 2020

Robert H. Stiver
bobfromoahu@gmail.com

Subject: Environmental Impact Statement Preparation Notice:
New Aloha Stadium Entertainment District (NASD)
Tax Map Keys (TMK): [1] 9-9-003:061, [1] 9-9-003:055, 070, and 071.
Hālawā, Oahu, Hawai'i

Dear Mr. Stiver:

Thank you for participating in the scoping process for the subject Environmental Impact Statement (EIS). We acknowledge your comments and concerns, they have been considered in the preparation of the Draft Programmatic EIS with regard to meeting content requirements prescribed in Hawai'i Administrative Rules, Title 11, Chapter 200.1, Section 24.

Your comments, along with this response, will be reproduced and included in the forthcoming Draft Programmatic EIS. The Draft Programmatic EIS, including the various technical studies associated with it, will be available for review on Office of Environmental and Quality Control website following its publication in *The Environmental Notice*.

We appreciate your interest and participation in this environmental review process.

Sincerely,

Keola Cheng
Director of Planning

cc: Chris Kinimaka, Department of Accounting and General Services
Stacey Jones, Crawford Architects

NASED Comments
Wilson Okamoto Corporation
1907 South Beretania Street
Suite 400
Honolulu, HI 96826

NASED.EIS@wilsonokamoto.com

On behalf of the vendors of the Aloha Stadium Swap Meet & Marketplace, we respectfully submit the following comments in regard to the “New Aloha Stadium Entertainment District (NASED)”

Given that the development of the NASED will greatly affect us, we see this matter as critical to our lives and our livelihoods.

We strongly support “Option A” of the redevelopment plan for the following reasons:

- The Swap Meet at Aloha Stadium has a proud history over the last 40 years of serving the Hawaii community, visitors to our state, and supporting the lives of the vendors.
- The tropical weather, combined with the outdoor shopping environment, has created a unique shopping experience. We have identified that this unique experience is enjoyed by many of our visitors, especially those visiting from across the globe. We believe this has played a large part in maintaining an economically sustainable operation.

We also have the following concerns:






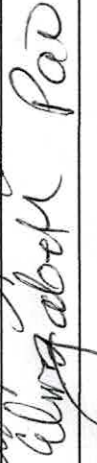











- Parking lot sizes should be the same as it is currently. This will allow our vehicles to be safely parked within the stalls while serving our customers.
- The current opening days and hours are suitable and preferred for the Swap Meet.



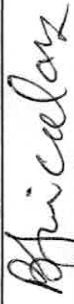




We appreciate the time and effort all members of the Aloha Stadium Authority, and Governor Ige have put into the Aloha Stadium’s continuous maintenance and improvements. We want the NASED to be a successful project that benefits all the stakeholders.



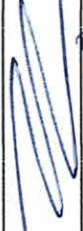












We strongly believe that the people of Hawaii and our visitors should continue to have a pleasant and unique outdoor shopping experience. Shopping at the Aloha Stadium Swap Meet has always been an Aloha way of life and part of the Hawaiian Lifestyle – as it has been and will be.















Respectfully,












The undersigned vendors of The Aloha Stadium Swap Meet




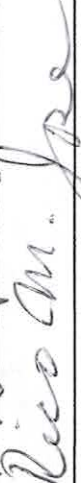












Vendor #	Name	Signature	Date	Email or ph no.
204	James Kim		10/20/19	Suyoon03@gmail.com
2267-01	Gwen KANESHIRO		10/20/19	
3238	Shaunara Bitanga		10/20/19	Jmax45ka@gmail.com
88	Rodolfo Palisay		10/20/19	(808) 308-1770
421-1	Gilbert S. Tabora		10/20/19	(808) 344-3777
2732	ELIZABETH PAO		10/20/19	808-798-3815
2838	DALLAS LOWRANCE		10/20/19	dallas10hawaiiattcl.net
430	BEN'S CRAFT		10/20/19	(808) 389-1997
1050	NHAN NGUYEN		10/20/19	808 218-3420
2327	ARLENE WRIGHT		10/20/19	808-2265799
#68	Francis Chen		10/20/19	382-9910
1647	Pat Sun Song		10/20/19	223-1663
375	Winnie Chan		10/20/19	389-2883
1059	KHAN KON KUNAW		10/20/19	328 2893
103			10/20/19	944-8757
414	YOUNG TAIK SONG		10/20/19	393-3989

















Vendor #	Name	Signature	Date	Email
347	Sang Yang Pae		10-20-19	808-721-7127
2725	Shroff Carens		10-20-19	ederlinmae808@yahoo.com
2842	BOB NICOLAS		10-23-19	808 258 4152
2725-4	ARIEL Asuncion		10-23-19	808-388-0572
2779	Marnel Siglesta		10-23-19	808-5721-0491
2772	ALFREDO Siglesta		10-23-19	808 6799964
2798	Hyun Kim		10-23-19	(808)779-9765







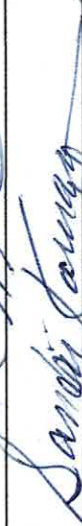









Vendor #	Name	Signature	Date	Email
315	Jamie Nguyen		10/20/19	
781	Thanh Nguyen		10/20/19	
2133	Danny Chung			
1074	Diem Ha Nguyen		10/20/19	
2544	Liam Siu		10/20/19	
2389	Bong Kim		10/20/19	
12	Kyung Ho Cho		10/20/19	
348	Peter Pai		10/20/19	
546	PORNTIP RUAMSUP		10/20/19	
1079	Quoc Linh Hoang		10/20/19	
323	Thi Nguyen		10/20/19	
302	Ngie Mehsein		10/20/19	
508	PHUNG ZHEN STK		10-20-19	
1487	Guillermo Gomez		10/20/19	
24	Myung J. PARK		10/20/19	

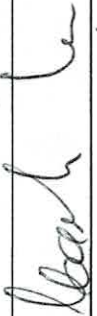















Vendor #	Name	Signature	Date	Email
227	Teannae Lam		10/23/19	
330	Phia Nguyen		10/23/19	
258	Tim Lind		10/23/19	
574	Margie Lee		10/23/19	
307	Chen Ng		10/23/19	alokameltingpot@hawaii.com
4016	Johnson Way		10/23/19	
1907	Lucie Mak		10/23/19	
177	Long Jung		10/23/19	
	Phy Tranh Nguyen		10/23/19	
1496	DAF HONG		10/23/2019	
1349	Phong Hong		10/22/2019	
	Phong Hong		10/23/2019	
272	Phi Tan		10/23/19	
358	Phan Young Cho		10/23/19	




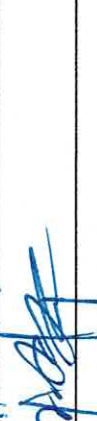











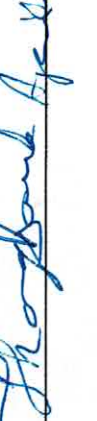
Vendor #	Name	Signature	Date	Email
2960	Kenny's Logistics & Barge Trans. Hwang		10/20	Podong 09@yahoo.com
35	Vilma S. Bongolan		10/20	VilmaBongolan@yahoo.com
427	Jeanie Tang		10/20	808-389-5185
426	Jackie Tang		10/20	808-277-7388 islandfantasy808@hotmail.com
262	Kenneth Lou		10/20	808-561-0008
2397	Robert McInnis		10/20	10mshawingm
77	Harvey Chen		10/20	2869990
2926	Lena delo Sales		10/25	Lena delo Sales @ Pacific Pearl Co
254	Jorge Benes		10/25	636-0667
1888	Forney Leon		10/25	
2003	Jerrin		10/25	

















Vendor #	Name	Signature	Date	Email
1851	RANDALL GOUNDS		10/20/19	randallgounds@yahoo.com
2774-01	Kenny Gao		10/20/19	sleepcity@gmail.com
3230	Kaler Rens		10/20/19	KalerRens1326@gmail.com
1887	RICO M. JASE		10/20/19	9397hives@yahoo.com
565	Allen Yoshika		10/20/19	RealCity1711@yahoo.com
1665	Debrah Soares		10/10/19	soares.ppl@hawaii.gov
22	DEAN BABA		10/20/19	deanbaba1950@gmail.com
3043	Danny ROSA		10/20/19	gifts@igmail.com
3163	JOE HIRATO		10/20/19	JoeHirato@aol.com
525	PAT YUM		10/20/19	COOKIES/COOKIES
2	BARBU D. CRUM		10-20-19	10 SAND ISLAND PRWY
2951	Emilio Domingo		10-20-19	emilio'smassage@yahoo.com
	DA Heather Cadron		10/20/19	(808) 386-4075
	Heather J. Cadron		10/20/19	
	Jerry Gaschwend		10/20/19	gusgusheaven@gmail.com
	Dorothy H. Omori		10/20/19	

















Vendor #	Name	Signature	Date	Email
152	RAYMOND HOW		OCT 20/19	Raymondhow001@gmail.com
2257	Souda Thonesavanh		Oct 20-19	Sacred Treasures@yahoo.com
2109	Fraillan Banavai		10-20-19	
56	Alan Chan		10-20-19	alanm1808@gmail.com
1754	Vicky Mo		10-20-19	808 200-8434
86	AMY CHAN		10/20/19	808 382 9910
1253	Cao, XianJing		10/20/19	808 384-7245
3256	Xingzhen Zhu		10/20/19	(808)-728-6888
1038	HAO NGUYEN		10/20/19	(808) 3085271
3257	Yu-Chen Lee		10/20/19	(808) 5181618
2710	Hui Ying Liang		10/20/19	(808) 1-772-0818
61	SIMO CHAN		10/20/19	808 382-1789
	LEONARD DALL		10/20/19	907 383 4200
1001	Liu, Yanling		10/20/19	(808) 282-7822
1051	Nguyen Huong		10/20/19	(808) 206-2590
592	Robert Cheng		10-20-19	808 282 3965

















Vendor #	Name	Signature	Date	Email
2880	Mee Choo, Ng		10/20/19	May1912999@gmail.com
1037	DAI BUI		10/20/19	ketuanga@yahoo.com
67	DART CHEUNG		10/20/19	
855	Allen San Eixelin		10/20/2019	lithalia@bald@yahoo.com
47	William BULMER		10/20/19	bbulmer@juno.com
2635	ANOUZA, THAMOUNTHA		10/20/19	TANOUXO@GMAIL.COM
2359	Sandii Kamaunu		10/20/19	TFTC@Hawaii.BR.COM
2564	Sung I Yokosko		10/20/19	
1386	Tina Araiza		10/20/19	Timothy@618.com
1687	E-K FASHION		10/20/19	
1634	Shane Wentz		10/20/19	
1307	Dallas Carter		10/20/19	
112	Norminda Fian		10/20/19	Sonnymorminde@yahoo.com
504	Petelo		10-20-19	
2144	Kot hen beutel		10/20/19	
1979	LUISABONTO MARIQUE		10/20/11	Piromon@GMAIL.COM

Vendor #	Name	Signature	Date	Email
222	MARTIN LAI		10-20-19	martinlai61@gmail.com
184	MAN K KAN		10/20/19	
250	Ryan Lee		10/20/19	thehonorablenfabric88@outmail.com
541	WIN SON LEE		10-20-19	
66	Mi chri chenth		10/20	
3055	TRAN NHAN		10/20	
482	NGUYEN VO		10/20	
679	Quoc Linh HOANG		10/20/19	JHOANG75@GMAIL.COM
23	Linda NS		10/20/19	chiping22@gmail.com
329	Nguyen Tim		10/22/19	tim_nguyen007@gmail.com
450	Loan Tran		10/20/19	john210an@yahoo.com
1317	ROBERT PICERNO		10/20/19	ROBERT PICERNO@AOL.COM
11	Sheneer chh		10/20/19	
328	THUY NGUYEN		10/20/19	AMERICANPIPERL
993	Vien le		10/26/19	Thanh (a) 1937
223	Michael Lai		10/26/19	thanhthao_0211@yahoo.com

Vendor #	Name	Signature	Date	Email
259	Jim Lin		10/20/19	linsmarket@aol.com
1047	Khong Au		10/20/19	
1964	And Lai		10/20/19	ALOHAPARADISEGIFT@aol.com
2215	Judy Lan		10/20/19	JUDYWD77@GMAIL.COM
2912	Juan Kuecar		10/20/19	VACINCOX@HOTMAIL.COM
3145	ESSE Kuranigui		10/20/19	abnafaabrice@hotmail.com
2834	Baydan Etrellon		10/20/19	
312	hien thunguyen			808-741-2805
551	Quang Dig		10/20/19	
349	Pak Taebo		10/23/19	808 741-3780
1372	Precious Isolat		10/23/19	(808) 922-1258
796	HenRy, Le		10-23-19	longsinh2801@yahoo.com
1278	Anthony Truong		10-23-19	vogctony@gmail.com
3132	Nadalmu Stabeninn		10-23-19	(425) 346-5617
2827	GABRILO ABUYUAN		10-23-19	698-0161
2753	THONGSOVKAPA KOUN		10/23/19	(808) 226-9124

Vendor #	Name	Signature	Date	Email
2899	David Levi		10/20/19	
2418	GIL Hakimi		10/20/19	
37	Jaime Leon		10/20/19	383-4050
1226	Lakalaka Manako		10/20/19	808 779 6549
302402	THI VIET AN LE		10/20/19	808 - 741 0900
1391	chad J Kim		10/22/19	387-5356
476	NANDY VEPANO		10/23/19	382 5856
3192	Nelani Uyeden		10/23/19	295 1749
1881	Brynn Iruud		10/23/19	808 354 2020
400	Hyeon Du SHIN		10/23/19	808 256 3636
153		Sharif HUA	10/24/19	387-8884
2003	Sharif Lawler		10/23/19	808 398 5948 William Lawler Dwyer.com
2812	Kenneth Konishi		10/23/19	
3178	Kyong S. Batacan		10/13/19	224 0153
719	Karen Choi		10/23/19	392-3782
97	Wilson DIFP		10/23/19	386-5630

Vendor #	Name	Signature	Date	Email
459	VINH DUC TRAW		10/20/19	nguyenthan17@yahoo.com
69	Jack Hsu		10/20/19	Tina Enterprises
310	Can Nguyen		10/20/19	Linda - Nguyen 25 @mha.com
1184	Thong Ming Guo		10/20/19	3870398
521	Massoud Goussefi		10/23/19	
852	Jessie Taree		10/23/19	
413	SEUNG HYUP SONG		10/23/19	
5142	MY LE THIELE		10/23/19	
1036	Horim Phelao		10/23/19	
1037	Dat Bui		10/23/19	Ketuong@yahoo.com
1889	Brady Thomas		10/23/19	bradythomas@gmail.com
506	YAO, CITENG HSZ		10/23/19	Yaocheng Hsiao@yahoo.com
2652	MATTHEW BASSUENER		10/23/19	MATTHEW.BASSUENER@gmail.com
732	Gai Quan Ren		10/23/19	gonggerainbow987@gmail.com
2043	Chad Baker		10/23/19	chadbaker@gmail.com
2693	Jeffery Cyles		10/23/19	veggieassassins@gmail.com

Vendor #	Name	Signature	Date	Email
#442	KI TON SONG		10/20/19	
#318	Khank Nguyen		10/20/19	Tompromhonorolulu@gmail.com
511	Tom Yin		10/20/2019	
313	Huy Nguyen		10/20/19	
103	Lox Do		10-20-19	
45	CA. NGEE Amy		10.20.19	
111	Sophia Ferreira		10/20/19	
229	Suying Lam		10/20/19	
64	Khung Hoi CHENG		10/20/19	
616	HOANG TRAN		10/20/19	TRANTEEES@
235	Lienthi LUONG		10/20/19	gmail.com
2551	Koun DO		10/20/19	Keunhangui@gmail.com
47	Dr. C. Capilina		10/20/19	marlou808@yahoo.com
1564	Eddie Gossing		10/20/2019	
1056	Park Sooy Ho		10/20/2019	
226	Cindy Ly		10/20/19	TEXT 808 724 2019

Vendor #	Name	Signature	Date	Email
	Lyden Keith Van Gundy	SPKVB	10-20-19	bug21vx@gmail.com
2422	Judy Cheng	Judy Cheng	10-20-19	jcheng041393@yahoo.com
219	Hoi Ming Kwok	Hoi Ming Kwok	10/20/19	395-9515
448	Lawrence Tran	Lawrence Tran	10/20/19	778-3388
519	Kevin Yoneda	Kevin Yoneda	10/20/19	7794598
3171-02	Huak Vanh	Huak Vanh	10/20/19	808 291-2212
1827	NGUYEN H. LAI	Nguyen H. Lai	10/20/19	nguyenhaila@gmail.com
270	COLIN LNU	Colin LNU	10/20/19	HRJHAWATI@gmail.com
23	Chipmang	Chipmang	10/20/19	chiping222@gmail.com
	Mac Robin	Mac Robin	10/20/19	freereviving78@gmail.com
2462	Serge Bulayer	Serge Bulayer	10/20/19	AlshASerge@gmail.com
552	Kevin Diep	Kevin Diep	10-20-19	286-6431
22-4	William Lai	William Lai	10-20-19	728-1038
311	DANNY NGUYEN	DANNY NGUYEN	10/20/19	741-2970
225	Lillian Lai	Lillian Lai	10/20/19	leho1973@gmail.com

Vendor #	Name	Signature	Date	Email
385	Barbara Ryder	Barbara Ryder	10/20/19	—
	Robert Johnston	Robert Johnston	10/20/19	
	Cindy Fang	Cindy Fang	10/20/19	—
1054	BAO TRAN HOANG, NOUVEAU	Bao Tran Hoang	10/23/19	(808) 232-9882
1771	John Wang	John Wang	10/25/19	—
3194	Blue, Annette	Annette Blue	10/26/19	annblue9104@yahoo.com
	CORRINE HOLLINGSWORTH	Corrine Hollingsworth	10/26/19	530-510-3007
2657	GIL CONSTANTINO	Gil Constantino	10/26/19	(808) 722-6948
2596	Ron Oshiro	Ron Oshiro	10/26/19	ronoshiro99@gmail.com
2093	Quylene Puahi	Quylene Puahi (STAN 13)	10/27/19	vpuahich@hotmail
2093	Keahi Paise	Keahi Paise (STAN 13)	10/27/19	Kaliaub@gmail.com
2093	Kali Puahi	Kali Puahi	10/27/19	vpuahich@hotmail.com
	GERALD NAKAHO	Gerald NakaHo	10/27/19	808 321 3951
	John Zheng	John Zheng	10/27/19	808/395/2036
	John Kierkiewicz	John Kierkiewicz	10/27/19	808/422/9424
	ARNE SAMOE A	Arne Samoe A	10-27-19	808 294-6060

Vendor #	Name	Signature	Date	Email
431	PURA Z. TEACSON	Pura Z. Teacson	10/23/19	purateacson@yahoo.com
324	NGUYEN Q THU	Anthony	10/23/19	
2415	Kusuma Yimphong	Jim Grit	10/23/19	
1588	Monika Sake	[Signature]	10/23/19	m.velikite@yahoo.com
415	KAREN KAA'INOA	Michael Harrison	10/23/19	KKaa11@aol.com
309	Billy Nguyen	[Signature]	11/23/19	
3001	J.A. JAMES	J. James	10/23/19	
2319	LAM, LANG	[Signature]	10/26/19	ASJF8023@Yahoo.com
369	QUACH - HA	[Signature]	10/26/19	389 5666
2754	Ricky Young	Ricky Young	10/26/2019	330-9070
2754	Ricky Young	Ricky Young	10/26/2019	330-9070
272761	SOH NANNING	Don Nanning	10/26/19	
daily	Jerry Domingo	Jerry Domingo	10-26-19	orchids@hawaii.rr.com
2001	Casandra Tsujihara	Casandra Tsujihara	10-26-19	(808) 622-3931
1833	Lorraine Lanj	Lorraine Lanj	10-27-19	-
114	Chane Mana Victoria	Chane Mana Victoria	10-27-19	808 Chanell@gmail.com

Vendor #	Name	Signature	Date	Email
2491	ALBERT HINO	Albert M. Hino	Oct. 20, 2019	
2619	PAUL ISING	Paul Ising	Oct. 20, 19	paul.ising@icloud.com
2709	Kapiolani Kelly	Kapiolani Kelly	Oct 20/19	
1446	ESUABO A JUAN	Esuabo A. Juan	20 Oct 19	esjuans2@yahoo
333	Wesley Noda	Wesley Noda	10/20/19	
2789	Tseng Gynkwan	Tseng Gynkwan	10/20/19	
3285	Josh Doran	Josh Doran	10/20/19	
157	Gary Hawkins	Gary Hawkins	10/27/19	
	Susan White	Susan White	10/27/19	
	William Doran	William Doran	10/27/19	
26	Guy Batongbat	Guy Batongbat	10-27-19	
	John Robertson	JOHN ROBERTSON		



10422-01
December 23, 2020

Aloha Stadium Swap Meet Vendors

Subject: Environmental Impact Statement Preparation Notice:
New Aloha Stadium Entertainment District (NASED)
Tax Map Keys (TMK): [1] 9-9-003:061, [1] 9-9-003:055, 070, and 071.
Hālawā, Oahu, Hawai‘i

To Aloha Stadium Swap Meet Vendors:

Thank you for participating in the scoping process for the subject Environmental Impact Statement (EIS). We acknowledge your comments and concerns, they have been considered in the preparation of the Draft Programmatic EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1, Section 24.

Your comments, along with this response, will be reproduced and included in the forthcoming Draft Programmatic EIS. The Draft Programmatic EIS, including the various technical studies associated with it, will be available for review on Office of Environmental and Quality Control website following its publication in *The Environmental Notice*.

We appreciate your interest and participation in this environmental review process.

Sincerely,

Keola Cheng
Director of Planning

cc: Chris Kinimaka, Department of Accounting and General Services
Stacey Jones, Crawford Architects



WILSON OKAMOTO
CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

1907 South Beretania Street, Suite 400
Honolulu, Hawaii 96826
T (808) 946-2277 F (808) 946-2253
W <http://www.wilsonokamoto.com>
Attention: Mr. Keola Cheng

**SUBJECT: EISP: PROPOSED NEW ALOHA STADIUM ENTERTAINMENT
DISTRICT (NASED) –
SCOPING MEETING, SEPTEMBER 25, 2019**

Residents of Crosspointe (Mananai Pl) have to sit in
the same lane of traffic as those entering the stadium
and it always gets congested

Coming from town and taking the Halawa cutoff,
there is a giant pothole on Kahuapaani St.
that continues to grow and no one has addressed
it despite reporting to the pothole hotline

Parking in neighboring residential areas is becoming
a growing problem.

(include additional sheets as necessary)

PLEASE PRINT: Name: _____ Phone: _____

Organization: _____

Mailing Address: _____

Email: _____

Please submit comments by November 7, 2019, or email
NASED.EIS@wilsonokamoto.com

*Receipt of e-mailed comments will be confirmed via e-mail. If you do not receive a confirmation message, please contact our office
(see contact information, above).



10422-01
December 23, 2020

Unidentified Commenter #1

Subject: Environmental Impact Statement Preparation Notice:
New Aloha Stadium Entertainment District (NASED)
Tax Map Keys (TMK): [1] 9-9-003:061, [1] 9-9-003:055, 070, and 071.
Hālawā, Oahu, Hawai‘i

To Whom It May Concern:

Thank you for participating in the scoping process for the subject Environmental Impact Statement (EIS). We acknowledge your comments and concerns, they have been considered in the preparation of the Draft Programmatic EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1, Section 24.

Your comments, along with this response, will be reproduced and included in the forthcoming Draft Programmatic EIS. The Draft Programmatic EIS, including the various technical studies associated with it, will be available for review on Office of Environmental and Quality Control website following its publication in *The Environmental Notice*.

We appreciate your interest and participation in this environmental review process.

Sincerely,

Keola Cheng
Director of Planning

cc: Chris Kinimaka, Department of Accounting and General Services
Stacey Jones, Crawford Architects



WILSON OKAMOTO
CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

1907 South Beretania Street, Suite 400
Honolulu, Hawaii 96826
T (808) 946-2277 F (808) 946-2253
W <http://www.wilsonokamoto.com>
Attention: Mr. Keola Cheng

**SUBJECT: EISPN: PROPOSED NEW ALOHA STADIUM ENTERTAINMENT
DISTRICT (NASED) –
SCOPING MEETING, SEPTEMBER 25, 2019**

What are you going to do about the 50th state fair?

I think you should at least leave room for
the fair to still be there. I think it would
be good.

What are you going to do about the Swap Meet?

I think you should also keep the Swap Meet.
For some people selling at the Swap Meet is
their 2nd job cause ~~they~~ have to pay ~~for~~ their
bills and put food on the table. Tourist look
forward to going to the Swap Meet.

(include additional sheets as necessary)

PLEASE PRINT: Name: _____ Phone: _____

Organization: _____

Mailing Address: _____

Email: _____

Please submit comments by November 7, 2019, or email
NASED.EIS@wilsonokamoto.com

*Receipt of e-mailed comments will be confirmed via e-mail. If you do not receive a confirmation message, please contact our office
(see contact information, above).



10422-01
December 23, 2020

Unidentified Commenter #2

Subject: Environmental Impact Statement Preparation Notice:
New Aloha Stadium Entertainment District (NASED)
Tax Map Keys (TMK): [1] 9-9-003:061, [1] 9-9-003:055, 070, and 071.
Hālawā, Oahu, Hawai‘i

To Whom It May Concern:

Thank you for participating in the scoping process for the subject Environmental Impact Statement (EIS). We acknowledge your comments and concerns, they have been considered in the preparation of the Draft Programmatic EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1, Section 24.

Your comments, along with this response, will be reproduced and included in the forthcoming Draft Programmatic EIS. The Draft Programmatic EIS, including the various technical studies associated with it, will be available for review on Office of Environmental and Quality Control website following its publication in *The Environmental Notice*.

We appreciate your interest and participation in this environmental review process.

Sincerely,

Keola Cheng
Director of Planning

cc: Chris Kinimaka, Department of Accounting and General Services
Stacey Jones, Crawford Architects

Appendix M:

DEIS Consultation Response Letters

From: [Public Comment](#)
To: [Andrew Blasko](#)
Subject: Fw: Draft Programmatic Environmental Impact Statement, New Aloha Stadium Entertainment District, Halawa
Date: Tuesday, February 9, 2021 1:50:30 PM
Attachments: [LD1340_DEIS-NewAlohaStadiumEntertnmtDistrict.Halawa_DLNRReplyLetter.pdf](#)

From: Lee, Barbara J <barbara.j.lee@hawaii.gov>
Sent: Friday, February 5, 2021 7:32 PM
To: Public Comment <publiccomment@wilsonokamoto.com>
Cc: DePonte, David C <david.c.deponte@hawaii.gov>
Subject: Draft Programmatic Environmental Impact Statement, New Aloha Stadium Entertainment District, Halawa

Aloha,
Attached please find comments from the Department of Land and Natural Resources on the subject project.
Thank you for the opportunity to comment.
Barbara

Barbara J Lee
Special Projects & Development Specialist
Land Division
Department of Land and Natural Resources
PO Box 621
Honolulu, HI 96809-0621

DAVID Y. IGE
GOVERNOR OF HAWAII



SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT

**STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION**

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

February 05, 2021

LD 1340

Wilson Okamoto Corporation
Attn: NASED EIS
1907 S. Beretania Street, Suite 400
Honolulu, HI 96826

Via email: NASED.EIS@wilsonokamoto.com

Dear Sirs:

**SUBJECT: Draft Programmatic Environmental Impact Statement for the
Proposed New Aloha Stadium Entertainment District, Honolulu,
Island of Oahu, Hawaii
TMK: (1) 9-9-003:061, 9-9-003:055, 070, and 071**

Thank you for the opportunity to review and comment on the subject project. The Land Division of the Department of Land and Natural Resources (DLNR) distributed copies of your request to DLNR's various divisions for their review and comment.

Enclosed are responses received from our (a) Division of Forestry and Wildlife, and (b) Land Division, Oahu District. Should you have any questions about the attached responses, please feel free to contact Barbara Lee via email at barbara.j.lee@hawaii.gov. Thank you.

Sincerely,

Russell Tsuji

Russell Y. Tsuji
Land Administrator

Enclosures

cc: Central Files

D. Deponge, DAGS Public Works Division, Planning Branch *Via email: david.c.deponte@hawaii.gov*



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

January 25, 2021

LD 1340

MEMORANDUM

TO: **DLNR Agencies:**
___ Div. of Aquatic Resources
___ Div. of Boating & Ocean Recreation
X Engineering Division (via email: DLNR.Engr@hawaii.gov)
X Div. of Forestry & Wildlife (via email: Rubyrosa.T.Terrago@hawaii.gov)
___ Div. of State Parks
X Commission on Water Resource Management (via email: DLNR.CWRM@hawaii.gov)
___ Office of Conservation & Coastal Lands
X Land Division – Oahu District (via email: DLNR.Land@hawaii.gov)

FROM: Russell Y. Tsuji, Land Administrator **Russell Tsuji**

SUBJECT: **Draft Programmatic Environmental Impact Statement
New Aloha Stadium Entertainment District**

LOCATION: Halawa, Island of Oahu, Hawaii; TMK: (1) 9-9-003:061, 055, 070, & 071

APPLICANT: **Wilson Okamoto Corporation on behalf of State Hawaii Department of
Accounting & General Services, Public Works Division, Planning Branch**

Transmitted for your review and comment is information on the above-referenced subject. The DEA was published on December 23, 2020 in the Office of Environmental Quality Control's periodic bulletin, The Environmental Notice, at the following link:

http://oeqc2.doh.hawaii.gov/The_Environmental_Notice/2020-12-23-TEN.pdf

Please submit any comments by **February 05, 2021** to DLNR.Land@hawaii.gov, and copied to barbara.j.lee@hawaii.gov. If no response is received by this date, we will assume your agency has no comments. If you have any questions, please contact Barbara Lee directly via email at barbara.j.lee@hawaii.gov. Thank you.

- () We have no objections.
() We have no comments.
() We have no additional comments.
☒ Comments are attached.

Signed: _____

Print Name: _____

Division: _____

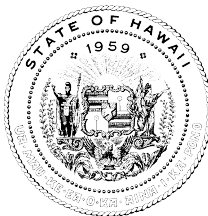
Date: _____

DAVID G. SMITH
Administrator
Division of Forestry and Wildlife
Feb 4, 2021

Attachments

Cc: Central Files

DAVID Y. IGE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
DIVISION OF FORESTRY AND WILDLIFE
1151 PUNCHBOWL STREET, ROOM 325
HONOLULU, HAWAII 96813

SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

ROBERT K. MASUDA
FIRST DEPUTY

M. KALEO MANUEL
DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
BUREAU OF CONVEYANCES
COMMISSION ON WATER RESOURCE MANAGEMENT
CONSERVATION AND COASTAL LANDS
CONSERVATION AND RESOURCES ENFORCEMENT
ENGINEERING
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

February 4, 2021

MEMORANDUM

Log no. 3001

TO: RUSSELL Y. TSUJI, Administrator
Land Division

FROM: DAVID G. SMITH, Administrator
Division of Forestry and Wildlife

SUBJECT: Division of Forestry and Wildlife Comments for the Draft Environmental Impact Statement for the New Aloha Stadium Entertainment District

The Department of Land and Natural Resources, Division of Forestry and Wildlife (DOFAW) has received your inquiry regarding the Draft Environmental Impact Statement for the new Aloha Stadium Entertainment District in Halawa on O‘ahu, Hawai‘i, TMKs: (1) 9-9-003:061, 055, 070 and 071. The proposed project consists of constructing a new stadium facility comprised of 27,500 to 35,000 seats; mixed-use development comprised of residential, retail, entertainment, office space, hotel development and ancillary facilities; supporting infrastructure; public amenities; and requisite utility improvements.

The State listed Hawaiian Hoary Bat or ‘Ōpe‘ape‘a (*Lasiurus cinereus semotus*) has the potential to occur in the vicinity of your project area and may roost in nearby trees. If any trees must be removed for the project during the bat breeding season there is a risk of injury or mortality to juvenile bats. If any site clearing is required this should be timed to avoid disturbance during the bat birthing and pup rearing season (June 1 through September 15). If this cannot be avoided, woody plants greater than 15 feet (4.6 meters) tall should not be disturbed, removed, or trimmed without consulting DOFAW. Barbed wire should be avoided for any construction because bat mortalities have been documented as a result of becoming ensnared by barbed wire during flight.

State listed waterbirds such as the Hawaiian Stilt (*Himantopus mexicanus knudseni*), Hawaiian Coot (*Fulica alai*), and Hawaiian Common Gallinule (*Gallinula chloropus sandvicensis*) have the potential to occur in the vicinity of the proposed project site. It is against State law to harm or harass these species. If any of these species are present during construction activities, then all activities within 100 feet (30 meters) should cease, and the bird should not be approached. Work may continue after the bird leaves the area of its own accord. If a nest is discovered at any point, please contact the O‘ahu DOFAW Office at (808) 973-9778.

DOFAW is concerned about attracting vulnerable birds to areas that may host nonnative predators such as cats, rodents, and mongoose. Additionally, improvements to the area is likely to increase human activity and may generate more trash and other predator attractants. We recommend taking action to minimize predator presence; remove cats, place bait stations for rodents and mongoose, and provide covered trash receptacles.

We recommend minimizing the movement of plant or soil material between worksites, such as in fill. Soil and plant material may contain invasive fungal pathogens, vertebrate and invertebrate pests (e.g. Little Fire Ants, Coconut Rhinoceros Beetles), or invasive plant parts that could harm our native species and ecosystems. We recommend consulting the O'ahu Invasive Species Committee at (808) 266-7994 in planning, design, construction and operation of the project to learn of any high-risk invasive species in the area and ways to mitigate spread. All equipment, materials, and personnel and visitors should be cleaned of excess soil and debris to minimize the risk of spreading invasive species.

DOFAW recommends using native plant species for landscaping that are appropriate for the area (i.e. climate conditions are suitable for the plants to thrive, historically occurred there, etc.). Please do not plant invasive species. DOFAW recommends consulting the Hawai'i-Pacific Weed Risk Assessment website to determine the potential invasiveness of plants proposed for use in the project (<https://sites.google.com/site/weedriskassessment/home>). We recommend that you refer to www.plantpono.org for guidance on selection and evaluation for landscaping plants.

We note that artificial lighting can adversely impact seabirds that may pass through the area at night by causing disorientation. This disorientation can result in collision with manmade artifacts or grounding of birds. For nighttime lighting that might be required, DOFAW recommends that all lights be fully shielded to minimize impacts. Nighttime work that requires outdoor lighting should be avoided during the seabird fledging season from September 15 through December 15. DOFAW recommends conducting an analysis of the lighting arrangement on the proposed stadium and surrounding structures. We suggest consulting with our main admin office at (808) 587-0166 to determine best management practices and minimization measures to reduce risks to seabirds.

We appreciate your efforts to work with our office for the conservation of our native species. Should the scope of the project change significantly, or should it become apparent that threatened or endangered species may be impacted, please contact our staff as soon as possible. If you have any questions, please contact Koa Matsuoka, Protected Species Habitat Conservation Planning Associate at (808) 587-4149 or koa.matsuoka@hawaii.gov

Sincerely,



DAVID G. SMITH
Administrator



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

January 25, 2021

LD 1340

MEMORANDUM

TO: **DLNR Agencies:**
___ Div. of Aquatic Resources
___ Div. of Boating & Ocean Recreation
X Engineering Division (via email: DLNR.Engr@hawaii.gov)
X Div. of Forestry & Wildlife (via email: Rubyrosa.T.Terrago@hawaii.gov)
___ Div. of State Parks
X Commission on Water Resource Management (via email: DLNR.CWRM@hawaii.gov)
___ Office of Conservation & Coastal Lands
X Land Division – Oahu District (via email: DLNR.Land@hawaii.gov)

FROM: Russell Y. Tsuji, Land Administrator *Russell Tsuji*

SUBJECT: **Draft Programmatic Environmental Impact Statement
New Aloha Stadium Entertainment District**

LOCATION: Halawa, Island of Oahu, Hawaii; TMK: (1) 9-9-003:061, 055, 070, & 071

APPLICANT: **Wilson Okamoto Corporation on behalf of State Hawaii Department of
Accounting & General Services, Public Works Division, Planning Branch**

Transmitted for your review and comment is information on the above-referenced subject. The DEA was published on December 23, 2020 in the Office of Environmental Quality Control's periodic bulletin, The Environmental Notice, at the following link:

http://oeqc2.doh.hawaii.gov/The_Environmental_Notice/2020-12-23-TEN.pdf

Please submit any comments by **February 05, 2021** to DLNR.Land@hawaii.gov, and copied to barbara.j.lee@hawaii.gov. If no response is received by this date, we will assume your agency has no comments. If you have any questions, please contact Barbara Lee directly via email at barbara.j.lee@hawaii.gov. Thank you.

- () We have no objections.
(☒) We have no comments.
() We have no additional comments.
() Comments are attached.

Signed: *Patti Miyashiro* *BC*
Print Name: Patti Miyashiro
Division: DLNR-LAND-ODLO
Date: Jan 26, 2021

Attachments
Cc: Central Files



WILSON OKAMOTO
CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

LD 1340
RECEIVED
LAND DIVISION

2020 DEC 23 AM 10:26

DEPT. OF LAND &
NATURAL RESOURCES
STATE OF HAWAII

10422-01
December 23, 2020

Mr. Russell Tsuji
State of Hawaii
DLNR-Land Division
1151 Punchbowl Street
Honolulu, HI, 96813

Subject: Notice of Availability
Draft Programmatic Environmental Impact Statement
New Aloha Stadium Entertainment District
D.A.G.S. Job No. 12-10-0862
Hālawā, Island of Oahu, Hawaii
TMK: [1] 9-9-003:061, [1] 9-9-003:055, 070, and 071



Dear Mr. Tsuji:

Notice of the availability of Draft Programmatic Environmental Impact Statement (DEIS) for the Proposed New Aloha Stadium Entertainment District will be published in the December 23, 2020 issue of the Office of Environmental Quality Control's *The Environmental Notice*. Written comments received in response to this DEIS will be considered in the preparation of the Final Environmental Impact Statement (FEIS). The deadline for comments is February 6, 2021, all comments must be post-marked or received via e-mail by this date. Please address comments to the following:

Wilson Okamoto Corporation
Attn: NASED EIS
1907 S. Beretania St., Suite 400
Honolulu, HI 96826

cc: David DePonte
Department of Accounting and General Services
Public Works Division, Planning Branch
P.O. Box 119, Honolulu,
Hawaii 96810-0119

You may also email comments to: NASED.EIS@wilsonokamoto.com and david.c.deponte@hawaii.gov

The DEIS is available for review on the OEQC Website at the QR Code above, or at the following URL address: <http://oeqc2.doh.hawaii.gov/>

We appreciate your interest in this environmental review process.

Sincerely

Keola Cheng
Director - Planning Department

cc: Chris Kinimaka, DAGS
Stacey Jones, Crawford Architects



WILSON OKAMOTO
C O R P O R A T I O N
INNOVATORS • PLANNERS • ENGINEERS

10422-01

Mr. Russell Y. Tsuji
Land Administrator
State of Hawai'i
Department of Land and Natural Resources
P.O. Box 621
Honolulu, HI 96809

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASD)
Hālawā, O'ahu, Hawai'i

Dear Mr. Tsuji:

Thank you for your letter dated February 5, 2021 (File No. LD 1340) containing comments from the State Department of Land and Natural Resources (DLNR) Division of Forestry and Wildlife (DOFAW) dated February 4, 2021 (Log No. 3001) and the DLNR Land Division, O'ahu District dated January 26, 2021 regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai'i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Division of Forestry and Wildlife (DLNR-DOFAW)

Comment 1: *The Department of Land and Natural Resources, Division of Forestry and Wildlife (DOFAW) has received your inquiry regarding the Draft Environmental Impact Statement for the new Aloha Stadium Entertainment District in Halawa on O'ahu, Hawai'i, TMKs: (1) 9-9-003:061, 055, 070 and 071. The proposed project consists of constructing a new stadium facility comprised of 27,500 to 35,000 seats; mixed-use development comprised of residential, retail, entertainment, office space, hotel development and ancillary facilities; supporting infrastructure; public amenities; and requisite utility improvements.*

*The State listed Hawaiian Hoary Bat or 'Ōpe'ape'a (*Lasiurus cinereus semotus*) has the potential to occur in the vicinity of your project area and may roost in nearby trees. If any trees must be removed for the project during the bat breeding season there is a risk of injury or mortality to juvenile bats. If any site clearing is required this should be timed to avoid*

disturbance during the bat birthing and pup rearing season (June 1 through September 15). If this cannot be avoided, woody plants greater than 15 feet (4.6 meters) tall should not be disturbed, removed, or trimmed without consulting DOFAW. Barbed wire should be avoided for any construction because bat mortalities have been documented as a result of becoming ensnared by barbed wire during flight.

Response 1: Your comments are acknowledged. Regarding your comment about the Hawaiian Hoary Bat, please note that Section 4.5.1 of the Programmatic Draft EIS acknowledges, “it is possible for the Hawaiian Hoary Bat overfly and or utilize the Project Site on a seasonal basis.” Moreover, Section 4.5.1 of the Programmatic Draft EIS within the impacts and mitigation measures discussion stated:

Regarding mammalian species, it is anticipated that the Proposed Action will not result in any significant adverse impacts. As noted above, it is possible that Hawaiian hoary bat may overfly the Project Site on a seasonal basis. The principal potential impact of the Proposed Action to bats involves the clearing and grubbing during the removal of vegetation. Removal of trees within the Project Site may temporarily displace individual bats using a tree as a roosting location. However, this species of bat uses multiple roosting locations within its home territory, so the disturbance associated with removal of vegetation would be minimal. An exception might be during pupping season because females carrying pups may be less able to rapidly vacate a roost as a tree is removed. Further, adult female bats sometimes leave their pups in the roost tree when they forage. Very small pups may be unable to flee a tree that is being felled. To mitigate potential impacts to roosting bats it is recommended that no woody vegetation taller than 4.6 m (15 ft.), be removed between June 1 and September 15, the period in which roosting bats are potentially at risk from vegetation clearing.

Please note that Section 4.5.1 of the Programmatic Final EIS has been updated to incorporate additional information provided in this comment letter. This letter, including the recommended mitigation measures presented in the Programmatic Final EIS, will be given to the selected Stadium Developer and Real Estate Developer(s) who will be responsible for incorporating appropriate measures into the final design of the Project Site to avoid or minimize impacts.

Comment 2: *State listed waterbirds such as the Hawaiian Stilt (*Himantopus mexicanus knudseni*), Hawaiian Coot (*Fulica alai*), and Hawaiian Common Gallinule (*Gallinula chloropus sandvicensis*) have the potential to occur in the vicinity of the proposed project site. It is against State law to harm or harass these species. If any of these species are present during construction activities, then all activities within 100 feet (30 meters) should cease, and the bird should not be approached. Work may continue after the bird leaves the area of its own accord. If a nest is discovered at any point, please contact the O’ahu DOFAW Office) at (808) 973-9778.*

Response 2: Your comments are acknowledged. Regarding the Hawaiian Stilt, or the ae‘o, is identified as a waterbird that may occur within the vicinity of the Project Site within Section 4.5.1 of the Programmatic Draft EIS. Please note that both the Hawaiian Coot, and the Hawaiian Common Gallinule have been incorporated into Section 4.5.1 of the Programmatic Final EIS. In addition, Section 4.5.1 of the Programmatic Final EIS has incorporated the following recommended mitigation measures:

- a. If any State listed waterbird species are present during construction activities, then all activities within 100 feet (30 meters) should cease, and the bird should not be approached. Work may continue after the bird leaves the area of its own accord.
- b. If a State listed waterbird nest is discovered at any point, please contact the O‘ahu DOFAW Office) at (808) 973-9778.

This letter, including the recommended mitigation measures presented in the Programmatic Final EIS, will be given to the selected Stadium Developer and Real Estate Developer(s) who will be responsible for incorporating appropriate measures into the final design of the Project Site to avoid or minimize impacts.

Comment 3: *DOFAW is concerned about attracting vulnerable birds to areas that may host nonnative predators such as cats, rodents, and mongoose. Additionally, improvements to the area is likely to increase human activity and may generate more trash and other predator attractants. We recommend taking action to minimize predator presence; remove cats, place bait stations for rodents and mongoose, and provide covered trash receptacles.*

Response 3: We acknowledge your comment regarding the potential to attract vulnerable birds to areas that may host nonnative predators such as cats, rodents, and mongoose. Impacts related to an increase in human activity and the potential to generate more trash and other predator attractants have been added to the discussions in Section 4.5.1 of the Programmatic Final EIS.

Comment 4: *We recommend minimizing the movement of plant or soil material between worksites, such as in fill. Soil and plant material may contain invasive fungal pathogens, vertebrate and invertebrate pests (e.g. Little Fire Ants, Coconut Rhinoceros Beetles), or invasive plant parts that could harm our native species and ecosystems. We recommend consulting the O‘ahu Invasive Species Committee at (808) 266-7994 in planning, design, construction and operation of the project to learn of any high-risk invasive species in the area and ways to mitigate spread. All equipment, materials, and personnel and visitors should be cleaned of excess soil and debris to minimize the risk of spreading invasive species.*

Response 4: We appreciate the information provided on soil and plant material that may contain invasive fungal pathogens, vertebrate and invertebrate pests (e.g. Little Fire Ants, Coconut Rhinoceros Beetles), or invasive plant parts that could harm our native species and

ecosystems. This information along with the following recommended mitigation measures will be incorporated into Section 4.5.1 of the Programmatic Final EIS:

- a. Minimize the movement of plant or soil material between worksites, such as in fill.
- b. Consult the O‘ahu Invasive Species Committee at (808) 266-7994 in planning, design, construction and operation of the project to learn of any high-risk invasive species in the area and ways to mitigate spread.
- c. All equipment, materials, and personnel and visitors should be cleaned of excess soil and debris to minimize the risk of spreading invasive species.

This letter, including the recommended mitigation measures presented in the Programmatic Final EIS, will be given to the selected Stadium Developer and Real Estate Developer(s) who will be responsible for incorporating appropriate measures into the final design of the Project Site to avoid or minimize impacts.

Comment 5: *DOFAW recommends using native plant species for landscaping that are appropriate for the area (i.e. climate conditions are suitable for the plants to thrive, historically occurred there, etc.). Please do not plant invasive species. DOFAW recommends consulting the Hawai‘i-Pacific Weed Risk Assessment website to determine the potential invasiveness of plants proposed for use in the project (<https://sites.google.com/site/weedriskassessment/home>). We recommend that you refer to www.plantpono.org for guidance on selection and evaluation for landscaping plants.*

Response 5: We appreciate the information provided on the various resources available for guidance on the selection and evaluation for landscaping plants. These resources will be consulted during the design of the Proposed Action. We acknowledge your comments and recommendation to use native plant species for landscaping that are appropriate for the area, and to avoid planting invasive species. The development of the Proposed Action will have a landscape plan that will incorporate the use of native plant species into the project design.

Comment 6: *We note that artificial lighting can adversely impact seabirds that may pass through the area at night by causing disorientation. This disorientation can result in collision with manmade artifacts or grounding of birds. For nighttime lighting that might be required, DOFAW recommends that all lights be fully shielded to minimize impacts. Nighttime work that requires outdoor lighting should be avoided during the seabird fledging season from September 15 through December 15. DOFAW recommends conducting an analysis of the lighting arrangement on the proposed stadium and surrounding structures. We suggest consulting with our main admin office at (808) 587-0166 to determine best management practices and minimization measures to reduce risks to seabirds.*

Response 6: Your comments are acknowledged as it relates to artificial lighting. Please note that Section 4.5.1 of the Programmatic Draft EIS discussed impacts related to seabirds from artificial lighting that may occur from construction and or operation of the Proposed Action. Specifically, Section 4.5.1 of the Programmatic Draft EIS states:

It should be noted that nocturnally flying seabirds, especially fledglings on their way to sea in the summer and fall, can become disoriented by exterior lighting. Thus, these seabirds flying over the Project Site could be temporarily impacted by construction lighting if used during nighttime construction. It is anticipated that the construction of the Proposed Action would primarily occur during typical daytime construction hours, approximately from 7 a.m. to 6 p.m., Monday through Friday, and 9 a.m. to 6 p.m., Saturdays. Hence, overhead construction lighting would not be a concern or threat to seabirds potentially flying over the Project Site at night. Therefore, construction of the Proposed Action would have minor adverse short-term impacts to these seabird species. It is recommended to protect seabirds that may overfly the Project Site, that all overhead lights installed be shielded downward to prevent casting light beams directly into the sky to mitigate long-term impacts that may result due to operation of the Proposed Action.

In addition, Section 4.5.1 of the Programmatic Final EIS will incorporate the recommended mitigation measures:

- a. Nighttime work that requires outdoor lighting should be avoided during the seabird fledging season from September 15 through December 15.
- b. An analysis of the lighting arrangement on the proposed stadium and surrounding structures should be conducted.
- c. DOFAW's main admin office should be consulted to determine best management practices and minimization measures to reduce risks to seabirds.

This letter, including the recommended mitigation measures, will be given to the selected Stadium Developer and Real Estate Developer(s) who will be responsible for incorporating appropriate measures into the project design to avoid or minimize impacts for each phase of development.

Comment 7: *We appreciate your efforts to work with our office for the conservation of our native species. Should the scope of the project change significantly, or should it become apparent that threatened or endangered species may be impacted, please contact our staff as soon as possible.*

Response 8: As indicated in the Responses above, this letter, including the recommended mitigation measures presented in the Programmatic Final EIS, will be given to the selected Stadium Developer and Real Estate Developer(s) who will be responsible for incorporating

appropriate measures into the final design of the Project Site to avoid or minimize impacts, as well as future coordination with DOFAW.

Land Division - O‘ahu District

We acknowledge that the DLNR Land Division, O‘ahu District has no comments to offer at this time.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Seto, Joanna L](#)
To: [Public Comment](#); [DePonte, David C](#)
Cc: [DOH.SDWB](#)
Subject: Availability of Draft Programmatic EIS For New Aloha Stadium Entertainment District
Date: Tuesday, December 29, 2020 12:33:09 PM

Aloha Mr. Cheng,

Mahalo for the December 23, 2020 letter regarding the Draft Programmatic EIS for the New Aloha Stadium Entertainment District in Halawa, Oahu. The Department of Health, Safe Drinking Water Branch (SDWB) has updated our standard comments and will no longer be responding directly to requests for comments on the following documents (Pre-consultation, Early Consultation, Preparation Notice, Draft, Final, Addendums, and/or Supplements):

- Environmental Impact Statements (EIS)
- Environmental Assessments (EA)
- Conservation District Use Applications (CDUA)
- Drinking Water Operator Certification
- Source Water Assessment and Protection
- Underground Injection Control (UIC) Wells

Please download the [SDWBStdCmts2020.docx – signed.pdf](#) for our standard comments regarding your project's responsibilities to maintain drinking water quality and any necessary permitting. The SDWB will not provide direct responses to these requests. Agencies and/or project coordinators may download and use this memo as the SDWB's official comments.

Mahalo,
Joanna

Joanna L. Seto, P.E.
Engineering Program Manager
Safe Drinking Water Branch | State of Hawaii, Department of Health
Uluakupu Building 4 | 2385 Waimano Home Road, Suite 110 | Pearl City, HI 96782-1400
Phone: (808) 586-4259
Cell: (808) 292-8408

Please consider financing your drinking water projects with [low cost](#) loans. Contact Ms. Joan Corrigan or Ms. Stefanie Weaver at (808) 586-4258 for more information on the benefits of using Drinking Water State Revolving Fund (DWSRF) Loans. Like us on [Facebook](#) and follow us on [Twitter](#).

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

DAVID Y. IGE
GOVERNOR OF HAWAII



ELIZABETH A. CHAR, M.D.
DIRECTOR OF HEALTH

STATE OF HAWAII
DEPARTMENT OF HEALTH
SAFE DRINKING WATER BRANCH
ULUAKUPU BLDG. 4
2385 WAIMANO HOME ROAD, SUITE 110
PEARL CITY, HI 96782

In reply, please refer to:
File: SDWB
SDWBSldCmb2020.docx

November 27, 2020

MEMORANDUM

TO: AGENCIES AND PROJECT OWNERS

FROM: JOANNA L. SETO, P.E., CHIEF 
Safe Drinking Water Branch

SUBJECT: SAFE DRINKING WATER BRANCH STANDARD PROJECT COMMENTS

This memo is provided for your information and sharing. You are encouraged to share this memo with your project partners, team members, and appropriate personnel.

The Department of Health (DOH), Safe Drinking Water Branch (SDWB) will no longer be responding directly to requests for comments on the following documents (Pre-consultation, Early Consultation, Preparation Notice, Draft, Final, Addendums, and/or Supplements):

- Environmental Impact Statements (EIS)
- ▲ Environmental Assessments (EA)
- ▲ Conservation District Use Applications (CDUA)
- Drinking Water Operator Certification
- Source Water Assessment and Protection
- Underground Injection Control (UIC) Wells

For agencies or project owners requiring DOH-SDWB comments for one or more of these documents, please utilize the DOH-SDWB Standard Comments below regarding your project's responsibilities to maintain drinking water quality and any necessary permitting. DOH-SDWB Standard Comments are also available on the DOH-SDWB website located at:
<https://health.hawaii.gov/sdwb/>.

DOH-SDWB Standard Comments

The following information is for agencies and/or project owners who are seeking comments regarding environmental compliance for their projects in the areas of: 1) Public Water Systems; 2) Underground Injection Control; 3) Groundwater Protection, and 4) Drinking Water State Revolving Fund with the Hawaii Administrative Rules (HAR), Chapters [11-19](#), [11-20](#), [11-21](#), [11-23](#), [11-23A](#), [11-25](#), and [11-65](#). You may be responsible for fulfilling additional requirements related to our program.

1. Public Water System Supervision

- a. Federal and state regulations define a public water system as a system that regularly serves an average of 25 or more individuals at least 60 days per year or has at least 15 service connections providing water for human consumption. All public water system owners and operators are required to comply with [Hawaii Administrative Rules \(HAR\), Title 11, Chapter 20, "Rules Relating to Public Water Systems."](#)
- b. All new public water systems are required to demonstrate and meet minimum capacity requirements prior to their establishment. This requirement involves demonstration that the system will have satisfactory technical, managerial, and financial capacity to enable the system to comply with safe drinking water standards and requirements.
- c. Projects that propose development of new sources of drinking water serving or proposed to serve a public water system must comply with the terms of HAR 11-20-29, entitled "Use of new sources of raw water for public water systems." This section requires that all new public water system sources be approved by the Director of Health (Director) prior to its use. Such approval is based primarily upon the submission of a satisfactory engineering report, which addresses the requirements set in HAR Section 11-20-29.
- d. The engineering report must identify all potential sources of contamination and evaluate alternative control measures, which could be implemented to reduce or eliminate the potential for contamination, including treatment of the water source. In addition, water quality analyses for all regulated contaminants, performed by a laboratory certified by the DOH State Laboratories Division (<https://health.hawaii.gov/sdwb/approvedlablist/>), must be submitted as part of the report to demonstrate compliance with all drinking water standards. Additional parameters may be required by the Director for this submittal or additional tests required upon his or her review of the information submitted.
- e. All sources of public water systems must undergo a source water assessment, which will delineate a source water protection area. This process is preliminary to the creation of a source water protection plan for that source and activities which will take place to protect the drinking water source.
- f. Projects proposing to develop new public water systems or proposing substantial modifications to existing public water systems must receive approval by the Director prior to construction of the proposed system or modification. These projects include treatment, storage, and distribution systems of public water systems. The approval authority for projects owned and operated by a County Board or Department of Water or Water Supply has been delegated to them.

- g. All public water systems must be operated by certified distribution system and water treatment plant operators as defined by [HAR Chapter 11-25, entitled "Rules Relating to Certification of Public Water System Operators."](#)
- h. All projects which propose the use of dual water systems or the use of a non-potable water system in proximity to an existing drinking water system to meet irrigation or other needs must be carefully designed and operated these systems to prevent the cross-connection of these systems and prevent the possibility of backflow of water from the non-potable system to the drinking water system. The two (2) systems must be clearly labeled and physically separated by air gaps or reduced pressure principle backflow prevention devices to avoid contaminating the drinking water supply. In addition, backflow devices must be tested annually to assure their proper operation. Further, all non-potable spigots and irrigated areas should be clearly labeled with warning signs to prevent the inadvertent consumption on non-potable water. Compliance with [HAR Chapter 11-21, entitled "Cross-Connection and Backflow Control"](#) is also required.
- i. All projects which propose the establishment of a potentially contaminating activity (as identified in the Hawai'i Source Water Assessment Plan) within the source water protection area of an existing source of water for a public water supply should address this potential and activities that will be implemented to prevent or reduce the potential for contamination of the drinking water source.

For further information concerning the application of capacity, new source approval, operator certification, source water assessment, backflow/cross-connection prevention or other regulated public water system programs, please contact the Safe Drinking Water Branch Engineering Section at (808) 586-4258 or email sdwb@doh.hawaii.gov.

2. Underground Injection Control (UIC) Program

- a. Injection wells used for the subsurface disposal of wastewater, sewage effluent, or surface runoff are subject to environmental regulation and permitting under [HAR Chapter 11-23 entitled "Underground Injection Control."](#) The DOH's approval must be first obtained before any injection well construction commences. A UIC permit must be issued before any injection well operation occurs.
- b. Authorization to use an injection well is granted when a UIC permit is issued to the injection well facility. The UIC permit contains discharge and operation limitations, monitoring and reporting requirements, and other facility management and operational conditions. A complete UIC permit application form found at <https://eha-cloud.doh.hawaii.gov/epermit/Home/9034789e-2918-4f30-82a2-9a5940e467f2> is needed to apply for a UIC permit.
- c. A UIC permit can have a valid duration of up to five (5) years. Permit renewal is needed to keep an expiring permit valid for another term.
- d. The UIC line delineates the extent of our underground sources of drinking water and is used to define areas where certain types of injection wells are prohibited. The UIC line is plotted on official UIC maps available for review at SDWB or by contacting the UIC program. Online interpretations of the UIC line maps exists and should be used with

caution as they are not the official maps. One website hosting an interpretation of the UIC line map is at the following:

https://geoportal.hawaii.gov/datasets/4597dde2703a4e539f51588531e48101_20

- e. If your project involves the construction of an injection well, you must first obtain the DOH's written approval to construct the injection well before any construction commences. The primary purpose of HAR, Chapter 11-23 is to protect underground sources of drinking water from injection well contamination. Written approval is obtained by filing an application for a UIC permit. You may submit your permit application via electronic filing (preferred method) through the DOH website at <http://eha.cloud.hawaii.gov/epermit> or submit a hard copy permit application to:

Safe Drinking Water Branch
Uluakupu Bldg. 4
2385 Waimano Home Road, Suite 110
Pearl City, Hawaii 96782-1400

- f. Areas mauka of the UIC line are considered to overlie underground sources of drinking water. Therefore, no new subclass A injection wells, such as sewage injection wells that receive greater than 1,000 gallons per day, will be allowed to be constructed.
- g. New sewage injection wells have been further prohibited effective July 5, 2018. Hawaii Revised Statutes 340E-2(e) states *"The director shall promulgate regulations establishing an underground injection control program. Such program shall prohibit any underground injection which is not authorized by a permit issued by the director; provided that the director shall not issue permits for the construction of sewage wastewater injection wells unless alternative wastewater disposal options are not available, feasible, or practical;"*
- h. New storm water drainage injection well construction must be sited beyond one-quarter mile of a drinking water well. If you intend to construct a drinking water well, be careful to site all drainage injection wells at least one-quarter mile away from the drinking water source well.

For further information about the UIC permit and the UIC Program, please contact UIC staff at (808) 586-4258 or email at sdwb@doh.hawaii.gov.

3. Drinking Water State Revolving Fund Program

The Drinking Water State Revolving Fund (DWSRF) is a federally-capitalized loan program that provides low interest loans to regulated community water systems in the State of Hawaii for their drinking water infrastructure projects. If you would like more information regarding DWSRF eligibility, financing options, etc., you may visit the DWSRF website at <https://health.hawaii.gov/sdwb/drinking-water-state-revolving-fund/> or contact Ms. Joan Corrigan at joan.corrigan@doh.hawaii.gov.

4. Private Water Wells

- a. **WARNING!** As the owner of a privately-owned well, you should **NOT** assume that water from your well is safe for consumption. It is your responsibility to make sure that your well water is safe to drink. The only way to do this is to have your well regularly tested for bacteriological and chemical contaminants.
- b. There are no regulations controlling water quality in private wells serving individual residences as there are for public water systems (public or privately-owned utilities supplying water to 25 or more people or 15 service connections). In other words, there are no enforceable limits for contaminants and no requirements for regular testing. Private wells are often found in rural areas, where many activities such as onsite wastewater disposal can contaminate the ground water.
- c. U.S. Environmental Protection Agency (EPA) Recommendations: The EPA recommends that private well owners test their well water each year for such contaminants as Total Coliform bacteria, Nitrates, as well as any other contaminants that may be of concern in your area. More frequent testing may be appropriate if you suspect a problem. EPA also suggests that you consider testing for pesticides, organic chemicals, and heavy metals before using it for the first time. Please refer to the EPA website on Private Drinking Water Wells at <http://www.epa.gov/privatewells>.
- d. Other Contaminants: Water testing can be very expensive. It is important that you spend time to identify what other potential contaminants may be of concern. Please refer to the EPA website on Private Drinking Water Wells for more information. Be aware of what and how you use and dispose of household and garden chemicals. Also determine the location of nearby septic tanks or cesspools, and agricultural or industrial activities in the area. General information on known chemical contamination of ground water in Hawaii can be found at the DOH website <http://health.hawaii.gov/sdwb/groundwater-contamination-viewer>.
- e. Laboratories: Whenever possible, utilize a laboratory that is certified or approved for the specific drinking water tests and carefully follow their instructions for collecting, storing, and transporting the samples. Be sure to ask the lab to use EPA approved methods for drinking water analysis. A list of Drinking Water Laboratories Certified or Approved by the Hawaii Department of Health, State Laboratories Division can be found at <https://health.hawaii.gov/sdwb/approvedlablist/>. As lab certification status changes constantly, confirm their status when you contact the lab. Please note that the list is limited to currently regulated contaminants in public water systems.
- f. Results: Once the lab provides you with the test results, you will be in a better position to determine if your well water is safe to drink or what contaminant you need to treat for. Generally, you should compare the results with Federal (<https://www.epa.gov/ground-water-and-drinking-water/national-primary-drinking-water-regulations>) and State (<http://health.hawaii.gov/sdwb/files/2014/07/MCL-Fct-2014-07-10.pdf>) Maximum Contaminant Level (MCL) drinking water standards. Where your test results are greater than the Federal or State maximum contaminant levels, your well water should be considered as unsafe for consumption.



WILSON OKAMOTO
C O R P O R A T I O N
INNOVATORS • PLANNERS • ENGINEERS

10422-01

Ms. Joanna L. Seto, P.E.
Engineering Program Manager
Safe Drinking Water Branch
State of Hawai'i, Department of Health
Uluakupu Building 4
2385 Waimano Home Road, Suite 110
Pearl City, HI 96782-1400

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O'ahu, Hawai'i

Dear Ms. Seto:

Thank you for your comments dated December 29, 2020 regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We understand the Department of Health, Safe Drinking Water Branch (SDWB) has updated their standard comments and will no longer be responding directly to requests for comments on certain environmental review and permit documents. SDWB's standard comments dated November 27, 2020 were provided as official comments from SDWB on the Proposed Action. Pursuant to this, we acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai'i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We note that because the standard comments cover a broad range of issues and concerns related to maintaining drinking water quality and necessary permitting, not all of the standards comments are applicable to the Proposed Action. Therefore, the following standard comments have been identified as relevant to the subject project, and we offer the following in response to your comments relating to the Draft EIS:

Comment 1: *f. Projects proposing to develop new public water systems or proposing substantial modifications to existing public water systems must receive approval by the Director prior to construction of the proposed system or modification. These projects include treatment, storage, and distribution systems of public water systems. The approval authority for projects owned and operated by a County Board or Department of Water or Water Supply has been delegated to them.*

Response 1: The Preliminary Engineering Report (PER) prepared by Wilson Okamoto Corporation dated June 2020, included as Appendix J of the Programmatic Draft EIS, states:

On-site water system improvements will consist of new water meter(s) to provide domestic and fire protection water service for the proposed project site. Water connection(s) to the existing BWS system is anticipated to be from the existing 36-inch water main and will be confirmed when construction plans for the proposed project are submitted to BWS for review and approval. Based on the proposed layout a section of the existing 36-inch BWS water main will need to be relocated to avoid conflict with the new stadium location. New backflow preventers, valves, and underground piping will also be required. New fire hydrants and fire access roads will be provided as required to ensure adequate fire protection for the proposed buildings.

Trenching and backfilling of proposed water lines will follow BWS standards and the Soils Engineers recommendations. During the design phase, the calculated water demands from the proposed project will determine the appropriate required meter and lateral size.

Section 4.15.1 of the Programmatic Final EIS has been updated to state:

Any proposed modifications to the existing BWS water systems will be coordinated with BWS. Proposed water mains will be located within paved roadways to ensure accessibility and will be made accessible for repairs and maintenance. Water connections and proposed structures will be designed and built to BWS Water System Standards, such that adequate setback from water main easements are maintained for the safety of the public and to prevent any damage to structures due to unforeseen breaks, repair, and maintenance vents. Furthermore, the Project Site is situated near BWS Kalauao Spring Brackish Water System. Specially, there is a non-potable water meter and 8-inch water line north of the Aloha Stadium parcel. As a means to conserve potable water, BWS will require the projects under the Proposed Action to connect to this system as a non-potable water source for irrigation and other application where applicable. The final design of the water systems will be designed and provided by the selected District Developer(s) and will comply with DOH and BWS cross-connection control and backflow prevention retirements, as well as HAR Chapter 11-21 entitled "Cross-Connection and Backflow Control" due the Project Site proximity to the potable water sources. Construction drawings will be submitted to BWS for review and approval prior to construction.

Comment 2: *h. All projects which propose the use of dual water systems or the use of a non-potable water system in proximity to an existing drinking water system to meet irrigation or other needs must be carefully designed and operated these systems to prevent the cross-connection of these systems and prevent the possibility of backflow of water from the non-potable system to the drinking water system. The two (2) systems must be clearly labeled and physically separated by air gaps or reduced pressure principle backflow*

prevention devices to avoid contaminating the drinking water supply. In addition, backflow devices must be tested annually to assure their proper operation. Further non-potable spigots and irrigated areas should be clearly labeled with warning signs to prevent the inadvertent consumption of non-potable water. Compliance with HAR Chapter 11-21, entitled "Cross-Connection and Backflow Control" is also required.

Response 2: We acknowledge your comments. We acknowledge that the design and operation of a non-potable water system in proximity to an existing drinking water system will need to comply with DOH and BWS cross-connection control and backflow prevention requirements, as well as HAR Chapter 11-21, entitled "Cross-Connection and Backflow Control." Furthermore, we acknowledge that the selected Stadium Developer and Real Estate Developer(s) will be required to submit construction drawings for BWS review and approval in conjunction with each stage of development. Section 4.15.1 of the Programmatic Final EIS and Section 4.3.3 of Appendix J has been updated to include the foregoing information.

Comment 3: *i. All projects which propose the establishment of a potentially contaminating activity (as identified in the Hawai'i Source Water Assessment Plan) within the source water protection area of an existing source of water for a public water supply should address this potential and activities that will be implemented to prevent or reduce the potential for contamination of the drinking water source.*

Response 3: The Project Site is located above the UIC line, indicating the underlying aquifer is considered a drinking water source. Construction activities associated with the implementation of the Proposed Action improvements may involve the use of materials and processes that involve chemical agents or materials typical to construction that could be considered hazardous. Additionally, a Hazardous Material Survey dated March 4, 2020 identified hazardous materials existing at the Project Site.

As noted in Section 4.10 of the Programmatic Draft EIS, a hazardous materials remediation plan will be prepared and implemented by the selected Stadium Developer and Real Estate Developer(s) prior to development of the relevant area of the Project Site. Known hazardous materials will be contained or remediated to a level acceptable for the future planned uses. Future development at the Project Site may require additional remediation measures and will be evaluated during design of the future phases of development.

Comment 4: *d. The UIC line delineates the extent of our underground sources of drinking water and is used to define areas where certain types of injection wells are prohibited. The UIC line is plotted on official UIC maps available for review at SDWB or by contacting the UIC program. Online interpretations of the UIC line maps exists and should be used with caution as they are not the official maps. One website hosting an interpretation of the UIC line map is at the following:
https://geoportal.hawaii.gov/datasets/4597dde2703a4e539f51588531e48101_20*

Response 4: We acknowledge your comments and appreciate the information provided on available UIC map resources. Section 4.3.3 of the Programmatic Draft EIS states “[t]he Project Site is located above the UIC line, indicating that the underlying aquifer is considered a drinking water source and limited types of injection wells are allowed and would be subject to permit requirements.” Section 4.3.3 of the Programmatic Draft EIS goes on further to state:

In terms of CCH regulation, the Project Site is generally outside of the CCH Board of Water Supply’s (BWS) established “No Pass” line. In areas makai of the “No Pass” line, all types of disposal systems (which meet suitable treatment standards) are acceptable to the BWS. Disposal above the “No-Pass” line is subject to careful review to ensure that no threat to groundwater supplies occurs. Only a small portion on the southwest end near the future HART station is within the “No-Pass” line. To further clarify, the installation of waste disposal facilities, which may contaminate groundwater resources used or expected to be used for domestic water supplies, are prohibited in the “No Pass” line area.

No new injection wells are being proposed under the Proposed Action in conformance with State and City & County of Honolulu (CCH) regulations.

Comment 5: *f. Areas mauka of the UIC line are considered to overlie underground sources of drinking water. Therefore, no new subclass A injection wells, such as sewage injection wells that receive greater than 1,000 gallons per day, will be allowed to be constructed.*

Response 5: Section 4.3.3 of the Programmatic Draft EIS states “[t]he Project Site is located above the UIC line, indicating that the underlying aquifer is considered a drinking water source and limited types of injection wells are allowed and would be subject to permit requirements.” This section has been updated to clarify that no new injection wells are being proposed under the Proposed Action in conformance with State and City & County of Honolulu (CCH) regulations.

Comment 6: *g. New sewage injection wells have been further prohibited effective July 5, 2018. Hawaii Revised Statutes 340E-2(e) states “The director shall promulgate regulations establishing an underground injection control program. Such program shall prohibit any underground injection which is not authorized by a permit issued by the director; provided that the director shall not issue permits for the construction of sewage wastewater injection wells unless alternative wastewater disposal options are not available, feasible, or practical.”*

Response 6: Section 4.3.3 of the Programmatic Draft EIS has been updated to clarify that no new injection wells are being proposed under the Proposed Action in conformance with State and City & County of Honolulu (CCH) regulations.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

DAVID Y. IGE
GOVERNOR



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

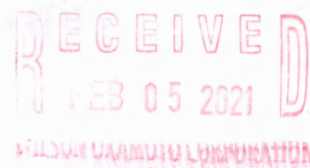
JADE T. BUTAY
DIRECTOR

Deputy Directors
LYNN A.S. ARAKI-REGAN
DEREK J. CHOW
ROSS M. HIGASHI
EDWIN H. SNIFFEN

IN REPLY REFER TO:
DIR 1127
STP 8.3110

January 29, 2021

Mr. Keola Cheng
Director – Planning Department
Wilson Okamoto Corporation
1907 S. Beretania Street, Suite 400
Honolulu, Hawaii 96826



Attention: NASED EIS

Dear Mr. Cheng:

Subject: Draft Programmatic Environmental Impact Statement (EIS)
New Aloha Stadium Entertainment District (NASED)
Halawa, Oahu, Hawaii
Tax Map Key: (1) 9-9-003: 061; 9-9-003: 055, 070, and 071

The State of Hawaii, Department of Transportation (HDOT) has reviewed the subject Draft EIS, and understands the State of Hawaii, Department of Accounting and General Services (DAGS) is proposing to construct a new stadium facility that will be supported by other mixed-use developments on the approximately 98-acre project site in Halawa, Oahu. The new, modern stadium facility is proposed to have a lower capacity of 27,500 to 35,000 seats, down from the existing 50,000 seat capacity of the current Aloha Stadium. Access to the project site is provided by Kamehameha Highway (State Route 99), Salt Lake Boulevard (County), and Kahuapaani Street (County).

HDOT has the following comments:

Airports Division (HDOT-A)

HDOT-A acknowledges the response from the developer regarding HDOT-A's previous comments provided on the Environmental Impact Statement Preparation Notice and has no further comments to provide at this time.

Highways Division (HDOT-HWY)

HDOT-HWY has reviewed the Draft Programmatic EIS and an included Traffic Impact Assessment Report (TIAR) dated May 2020, and has the following comments:

1. The TIAR identified and assessed the traffic impacts resulting from Phase 1 of the project. Separate traffic assessments will be prepared for the remaining phases when

more information is available. The study area included 9 intersections with field investigations conducted in September 2019. The TIAR analyzed the existing conditions and projected traffic conditions Without Project and With Project in the anticipated fully constructed and occupied first phase in the year 2026. The With Project level of service (LOS) findings for intersections within State jurisdiction with a LOS D or lower condition are as follows:

- a. Kamehameha Highway, Honomanu Street, and McGrew Loop intersection have eastbound AM LOS E, northbound PM LOS D, southbound AM LOS F, and southbound PM LOS E.
 - b. Kamehameha Highway and Salt Lake Boulevard (north) has a westbound PM LOS D.
 - c. Kamehameha Highway, Ford Island Bridge, and Salt Lake Boulevard (south) has an eastbound PM LOS D.
 - d. Salt Lake Boulevard and Kahuapaani Street intersection have eastbound/westbound/northbound AM LOS D, and northbound/southbound PM LOS D.
2. The TIAR should have a table with LOS and delay for each movement, and overall LOS if applicable for each scenario and study intersection.
 3. Comments on the TIAR are as follows:
 - a. Page 3, paragraph 1, should be revised that “Both parcels are expected to remain undeveloped with Phase 1 of the proposed project.”
 - b. Page 4, last paragraph, provide additional information on the location of the proposed additional access off Kamehameha Highway.
 - c. Figure 3 should identify the Exit to H-3 and Exit to H-1 as being existing. Also, provide justification for the Potential Exit to H-1.
 - d. Page 7, Area Roadway System, should identify jurisdiction and ownership for all roads and be consistent with the terms “southbound” and “south leg.” The southbound approach on Honomanu Street exclusive right-turn lane is very short and may be better described as a channelized right-turn.
 - e. Figure 4B shows an Exit to Kahuapaani Street, provide additional information on the exit.
 - f. Page 14, Capacity Analysis Methodology, the capacity analysis performed in the TIAR was based on the “Highway Capacity Manual” (HCM). Please verify the use of HCM. If Kamehameha Highway is restrained during the PM peak the HCM results would show better LOS than actual conditions.

- g. Page 17, paragraph 1, define “absolute” as used in “absolute commuter peak hour.”
- h. Page 17, paragraph 2, and for all intersections, what is the purpose of adding volumes on opposite approaches to the intersection and comparing AM to PM?
- i. Page 18, paragraph 1, states that the long cycle lengths are contributing to delays. Could a shorter cycle length be a mitigative measure? Suggest specifying high volume of southbound left-turn vehicles instead of just southbound vehicles.
- j. Page 25, paragraph 1, please describe in more detail how vehicles accessing the freeway ramps are influencing the intersection.
- k. Page 27, paragraph 2, states “the stadium facility in area 1.4 is not expected to generate external trips during the AM and PM commuter peak periods since special events associated with the stadium are generally expected to be held during evenings, weekends, and other off-peak periods.” Verify that area 1.4 will not include meeting rooms, offices, regular maintenance activities, etc. that would generate peak hour trips. Verify that weekday special events will not be held as existing stadium usage has weekday events that have created heavy traffic in the PM peak period. The TIAR should provide an analysis of the traffic impacts of a special event with the proposed project during the PM peak period unless the events are prohibited.
- l. Pages 27 to 31, Table 2: Peak Hour Trip Generation for NASED Phase 1 should be revised to correct discrepancies with Table 1: New Aloha Stadium Entertainment District-Phase 1 such as Area 1.2 Multifamily Housing Dwelling Units. Table 2 should be revised to correct AM Peak and PM Peak Totals for all Areas. Please provide equations or factors used to calculate Projected Trip Ends.
- m. Page 32, Table 3: Adjusted Peak Hour Trip Generation shows Total Projected Trip Ends reduced by 30% for AM Peak and 40% for PM Peak. Please provide more detail and justification for the reduction in trips. The TIAR describes the fixed guideway transit system as being fully operational by 2025 from Kapolei to Ala Moana Center. Reductions in trips due to rail transit needs to be re-evaluated based on a partially operational rail transit since recent estimates for completion to Ala Moana Center are anywhere from 2027 to 2033 due to financing and construction delays.
- n. Figure 7, clarify where accesses to the site are located.
- o. Page 41, paragraph 2, clarify what is an “improved sidewalk” and explain the existing gaps and obstacles that impact connectivity for pedestrians. Provide additional information on the pedestrian and bicycle connectivity within the project site and crossing Kamehameha Highway to the Pearl Harbor Bike Trail. Please provide a figure showing pedestrian facilities and the described concerns.

- p. Page 44, last paragraph, lists bike lanes along Kamehameha Highway between Halawa Drive and Waihona Street as improvements to improve connectivity; however, it is not feasible to do these improvements.
 - q. Figure 11 shows Kamehameha Highway as Level of Traffic Stress (LTS) 3, it should be LTS 4 as a multi-lane roadway with speeds greater than 25 mph.
 - r. Figure 12 should show proposed bicycle parking within the project site.
 - s. Page 51, Item number 6, where is this loading area off Kamehameha Highway? Why cannot passenger loading be done on site?
 - t. Page 52, Item number 12, the project will increase pedestrian activity to and from the Pearlridge Shopping Center and Aiea Shopping Center areas. Were facilities evaluated for the increases in pedestrian traffic?
- 4. The TIAR should provide recommended mitigation measures for direct impacts to State facilities due to the project to maintain LOS and delay level conditions at the “without project condition” for all horizon years. This should include a commitment to complete the mitigation measures and a proposed implementation schedule. Mitigation for special events should also be included.
 - 5. The applicant shall submit an updated TIAR that addresses comments made by HDOT, and additional TIARs for each phase of development to HDOT for review and acceptance.
 - 6. HDOT-HWY encourages the use of Travel Demand Management (TDM) strategies to reduce the number of trips generated by the project. Any project TDM strategies should be included in the TIAR.
 - 7. A Permit to Perform Work Upon State Highways shall be required for any work within the HDOT-HWY right-of-way (ROW). Construction plans prepared by a Hawaii licensed engineer shall be submitted for review and approval prior to applying for a permit to perform work.
 - 8. No additional stormwater runoff will be permitted in the HDOT-HWY ROW, including culverts. All additional stormwater runoff from the project site shall be managed and mitigated onsite.
 - 9. A permit is required from HDOT-HWY to transport oversized equipment and/or overweight loads within our State highway facilities

If there are any questions, please contact Mr. Blayne Nikaido of the HDOT Statewide Transportation Planning Office at (808) 831-7979 or via email at blayne.h.nikaido@hawaii.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Jade T. Butay". The signature is fluid and cursive, with a large initial "J" and a stylized "B".

JADE T. BUTAY
Director of Transportation

c: David DePonte, DAGS – Public Works Division, Planning Branch



WILSON OKAMOTO
C O R P O R A T I O N
INNOVATORS • PLANNERS • ENGINEERS

10422-01

Mr. Jade T. Butay
Director
State of Hawai'i
Department of Transportation
869 Punchbowl Street
Honolulu, HI 96813-5097

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASD)
Hālawā, O'ahu, Hawai'i

Dear Mr. Butay:

Thank you for your comments dated January 29, 2021 (File No. DIR 1127; STP 8.3110) regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai'i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix K.

We offer the following in response to your comments relating to the Draft EIS:

Airports Division (HDOT-A)

We acknowledge HDOT-A has no further comments to provide at this time.

Highways Division (HDOT-HWY)

Comment 1: *The TIAR identified and assessed the traffic impacts resulting from Phase I of the project. Separate traffic assessments will be prepared for the remaining phases when more information is available. The study area included 9 intersections with field investigations conducted in September 2019. The TIAR analyzed the existing conditions and projected traffic conditions Without Project and With Project in the anticipated fully constructed and occupied first phase in the year 2026. The With Project level of service (LOS) findings for intersections within State jurisdiction with a LOS D or lower condition are as follows:*

a. *Kamehameha Highway, Honomanu Street, and McGrew Loop intersection have eastbound AM LOS E, northbound PM LOS D, southbound AM LOS F, and southbound PM LOS E.*

- b. *Kamehameha Highway and Salt Lake Boulevard (north) has a westbound PM LOS D.*
- c. *Kamehameha Highway, Ford Island Bridge, and Salt Lake Boulevard (south) has an eastbound PM LOS D.*
- d. *Salt Lake Boulevard and Kahuapaani Street intersection have eastbound/westbound/northbound AM LOS D, and northbound/southbound PM LOS D.*

Response 1: As suggested in your comment, the Traffic Impact Report (TIR), which is summarized in Section 4.11 and appended to the Programmatic EIS as Appendix H, identified and assessed the impacts resulting from the Stadium Development and Initial Real Estate Development components of the Proposed Action to the extent feasible. At this time it is assumed that there will be further traffic assessment when more information is available about the design of the Project Site and land use allocations that will be determined by the Stadium Authority and the selected Stadium and Real Estate Developer(s). You are correct that the TIR conducted field investigation at nine intersections in September 2019, prior to the COVID-19 pandemic, during morning and afternoon peak hours, and projected traffic impacts with and without the Proposed Action under the assumption that the Stadium Development and Initial Real Estate Development would be constructed and operational by the year 2026. Moreover, you correctly cite the above intersections that fall within State jurisdiction that are anticipated to have a level of service (LOS) D or lower.

Comment 2: *The TIAR should have a table with LOS and delay for each movement, and overall LOS if applicable for each scenario and study intersection.*

Response 2: We acknowledge your comments. However, please note that for the purpose of intersection assessments, the overall LOS per approach is standard practice for reporting LOS. Although it is important to look at individual movements, the reporting of LOS per approach ensures that it does not place undue emphasis on an individual movement and instead on traffic operations at the intersection. Hence, a table with LOS and delay for each movement,

Comment 3: *Comments on the TIAR are as follows:*

- a. *Page 3, paragraph 1, should be revised that “Both parcels are expected to remain undeveloped with Phase 1 of the proposed project.”*

Response 3: The above statement from the TIR has been revised to state “Both parcels are expected to remain undeveloped with Phase 1 of the proposed project.” A copy of the updated TIR is appended to the Programmatic Final EIS as Appendix H.

Comment 4: *b. Page 4, last paragraph, provide additional information on the location of the proposed additional access off Kamehameha Highway.*

Response 4: We assumed that you are referring to the following statement that starts on page 4 and ends on page 7 of the TIR which states, “*An additional access off Kamehameha Highway will be provided to facilitate egress with modifications to the daily use circulation to be implemented during special events (see Figure 4A and 4B).*” Please note that this statement has been updated in the TIR and Section 4.11.1 of the Programmatic Final EIS to state, “*An additional access off Kamehameha Highway will be provided near the south end of the Halawa Rail Station to facilitate egress with modifications to the daily use circulation to be implemented during special events.*”

Comment 5: *c. Figure 3 should identify the Exit to H-3 and Exit to H-1 as being existing. Also, provide justification for the Potential Exit to H-1.*

Response 5: We acknowledge your comments. Please note that Figure 3 of the TIR has been updated to only show the existing exits to H-1 and H-3. With regards to the potential exit to H-1 as shown on Figure 3 of the TIR in the Programmatic Draft EIS, please note that this potential exit has been removed and is no longer shown in the updated TIR of the Programmatic Final EIS. However, as noted above in Response #1, the design of the Project Site will be determined by the Stadium Authority and the selected Stadium and Real Estate Developer(s). It is anticipated that the Stadium Authority and selected Stadium and Real Estate Developer(s) will coordinate with all the appropriate agencies when design of the Project Site is being finalized, especially as it relates to ingress and egress from the Project Site.

Comment 6: *d. Page 7, Area Roadway System, should identify jurisdiction and ownership for all roads and be consistent with the terms "southbound" and "south leg." The southbound approach on Honomanu Street exclusive right-turn lane is very short and may be better described as a channelized right-turn.*

Response 6: We acknowledge your comments. Please note that Section III.A. of the TIR has been updated to identify jurisdiction and ownership of all roads discussed in the Area Roadway System. The TIR has also been revised to maintain consistent referencing amongst terms used in the report. Moreover, Section 4.11.1 of the Programmatic Final has been updated accordingly to reflect the clarifications made in the updated TIR which is appended to the Programmatic Final EIS as Appendix H.

Comment 7: *e. Figure 4B shows an Exit to Kahuapaani Street, provide additional information on the exit.*

Response 7: We acknowledge your comments. Similarly, as noted in Response #5, all figures and designs are purely conceptual at this point and time. However, the potential exit to Kahuapaani was provided to show how the Project Site could conceptually be operated

as it relates to egress from the Project Site. As noted above in Response #1, the design of the Project Site will be determined by the Stadium Authority and the selected District Developer(s). It is anticipated that the Stadium Authority and selected District Developer(s) will coordinate with all the appropriate agencies when design of the Project Site is being finalized, especially as it relates to ingress and egress from the Project Site.

Comment 8: *f. Page 14, Capacity Analysis Methodology, the capacity analysis performed in the TIAR was based on the "Highway Capacity Manual" (HCM). Please verify the use of HCM. If Kamehameha Highway is restrained during the PM peak the HCM results would show better LOS than actual conditions.*

Response 8: Please note that the Highway Capacity Manual (HCM) methodology is an industry-accepted standard for capacity analysis. In addition to the LOS provided based on the HCM methodology, the TIR also includes queueing observations to provide a more comprehensive description of the traffic operations.

Comment 9: *g. Page 17, paragraph 1, define "absolute" as used in "absolute commuter peak hour."*

Response 9: We acknowledge your comments. Please note that “absolute” as used in “absolute commuter peak period” is defined as the period of time in which usage or traffic of the roadways is at its highest recorded volumes. Please note that Section 4.11.1 of the Programmatic Final EIS has been updated to define the term.

Comment 10: *h. Page 17, paragraph 2, and for all intersections, what is the purpose of adding volumes on opposite approaches to the intersection and comparing AM to PM?*

Response 10: Please note that the subject paragraph you are referring to is intended to provide a qualitative discussion of traffic operations and is not intended to be anything other than descriptive. In some cases where there is a disparity in the LOS during the AM and PM peak periods, the qualitative discussion may be used in later portions of the report to highlight those discrepancies and identify the major contributing factors to traffic operations.

Comment 11: *i. Page 18, paragraph 1, states that the long cycle lengths are contributing to delays. Could a shorter cycle length be a mitigative measure? Suggest specifying high volume of southbound left-turn vehicles instead of just southbound vehicles.*

Response 11: Please note that traffic operations along Kamehameha Highway are heavily influenced by the high volume of through traffic along the corridor. Traffic signal timing seems to be intended to facilitate throughput on the highway to support regional traffic flows. A consequence of this is that the side streets are allocated less green time and therefore operate at lower levels of service. Any changes to the cycle length or traffic signal

timing should be made based on regional analysis of the corridor rather than on operations at any individual intersection.

Please note that Section III.B.2.b. of the TIR has been updated to clarify the influence of the high volumes of (southbound) left-turning vehicles.

Comment 12: *j. Page 25, paragraph 1, please describe in more detail how vehicles accessing the freeway ramps are influencing the intersection.*

Response 12: Please note that Section III.B.2.i. of the TIR in the Programmatic Final EIS has been updated to explain that there is a high volume of vehicles from the southbound approach on Honomanu Street since it provides a connection to the Moanalua Freeway ramps.

Comment 13: *k. Page 27, paragraph 2, states "the stadium facility in area 1.4 is not expected to generate external trips during the AM and PM commuter peak periods since special events associated with the stadium are generally expected to be held during evenings, weekends, and other off-peak periods." Verify that area 1.4 will not include meeting rooms, offices, regular maintenance activities, etc. that would generate peak hour trips. Verify that weekday special events will not be held as existing stadium usage has weekday events that have created heavy traffic in the PM peak period. The TIAR should provide an analysis of the traffic impacts of a special event with the proposed project during the PM peak period unless the events are prohibited.*

Response 13: Please note that as discussed in Response #1 above, the design of the Project Site, which includes the New Aloha Stadium and the various spaces/uses that it will provide, will be determined by the Stadium Authority and the selected Stadium and Real Estate Developer(s). Moreover, the future operations of the New Aloha Stadium and what types of special events and when those special events are held are unknown at this time. However, it is assumed, for the purposes of analysis, that the New Aloha Stadium will not provide the types of uses listed above in Comment #13. Moreover, it is also assumed that any and all special events will be held during non-peak periods. However, it is recommended that the preparation of a Transportation Management Plan which includes traffic circulation, parking, loading, and traffic demand management strategies, as well as a clear public information plan to relay changes to the traffic circulation in the vicinity of the Project Site is recommended to minimize the impact of the special events and other off-peak activities associated with the Proposed Action on the surrounding roadways.

Comment 14: *l. Pages 27 to 31, Table 2: Peak Hour Trip Generation for NASED Phase I should be revised to correct discrepancies with Table 1: New Aloha Stadium Entertainment District-Phase 1 such as Area 1.2 Multifamily Housing Dwelling Units. Table 2 should be revised to correct AM Peak and PM Peak Totals for all Areas. Please provide equations or factors used to calculate Projected Trip Ends.*

Response 14: Please note that discrepancies between Table 1 and Table 2 of the TIR have been reconciled. As it relates to your comment about equations and factors used to calculate “Projected Trip Ends,” please note that trip generation calculations and NCHRP 562 Worksheet for Internal Capture have been included in Appendix D of the TIR, which is included in the Programmatic Final EIS as Appendix H.

Comment 15: *m. Page 32, Table 3: Adjusted Peak Hour Trip Generation shows Total Projected Trip Ends reduced by 30% for AM Peak and 40% for PM Peak. Please provide more detail and justification for the reduction in trips. The TIAR describes the fixed guideway transit system as being fully operational by 2025 from Kapolei to Ala Moana Center. Reductions in trips due to rail transit needs to be re-evaluated based on a partially operational rail transit since recent estimates for completion to Ala Moana Center are anywhere from 2027 to 2033 due to financing and construction delays.*

Response 15: Please note that the reductions are based upon industry-standard techniques included in the ITE Guidebook and the NCHRP 562 worksheet for calculating the internal capture of trips for complementary uses. Trip generation calculations and NCHRP 562 Worksheet for Internal Capture have been included in the Appendix D of the TIR, which is included in the Programmatic Final EIS as Appendix H.

The mode shares incorporated into the analysis were based on a study conducted by the State Department of Business, Economic Development and Tourism on commuting patterns in the vicinity of the Project Site which indicated that approximately 5%-8% of commuters travel via public transportation. For the purpose of analysis, this percentage was adjusted to 10% to account for the anticipated completion of the rail project. Although there may be some fluctuation in mode share for transit due to recent delays in the full completion of the overall rail transit, the difference in the mode share reduction incorporated into the analysis is expected to be minimal. In addition, as noted, a portion of the rail line including the Hālawā / Aloha Stadium HART Transit Station adjacent to the Project Site is expected to be operational prior to the completion of the downtown segment.

Comment 16: *n. Figure 7, clarify where accesses to the site are located.*

Response 16: Please note that access points for the Project Site are provided in Figure 3 and Figure 4A of the TIR included in the Programmatic Draft EIS. Moreover a description of the access points under the Proposed Action are included in Section II.B of the TIR. Specifically, Section II.B of the TIR in the Programmatic Draft EIS states:

Access to the project site is expected to be provided via driveways off Kamehameha Highway, Salt Lake Boulevard, and Kahuapaani Street with parking for the mixed-use developments to be provided via designated parking structures within their respective areas. A loading/service area will be provided near the northwest corner of the project site for deliveries and passenger loading with access provided via a driveway off Kamehameha Highway. In addition, an area has been designated for

ride share drop-off/pick-up within the project site east of the new stadium arena. Figure 3 depicts the expected daily vehicular circulation.

During special events, VIP parking will be provided within the parking garage of the future Halawa Rail Station while general parking will be provided via surface parking areas located east of the new stadium. Access to these parking areas will be provided via designated ingress/egress points with the exception of the Halawa Rail Station parking garage. An additional access off Kamehameha Highway will be provided to facilitate egress with modifications to the daily use circulation to be implemented during special events (see Figure 4A and 4B).

However, please note that Figure 3 and Figure 4A have been updated in the TIR of the Programmatic Final EIS.

Comment 17: *o. Page 41, paragraph 2, clarify what is an "improved sidewalk" and explain the existing gaps and obstacles that impact connectivity for pedestrians. Provide additional information on the pedestrian and bicycle connectivity within the project site and crossing Kamehameha Highway to the Pearl Harbor Bike Trail. Please provide a figure showing pedestrian facilities and the described concerns.*

Response 17: Please note that an "improved sidewalk" is considered to be a sidewalk that is paved and with curbs. This has been clarified in the TIR and Section 4.11.2 of the Programmatic Final EIS.

As it relates to your comment about existing gaps and obstacles, please note that under the Proposed Action, existing facilities for pedestrians and bicycles on the Project Site are expected to be completely redeveloped. Hence, the existing gaps and obstacles within the Project Site will be addressed under the design of the Project Site.

Regarding your comment about providing additional information on the pedestrian and bicycle connectivity within the Project Site and crossing Kamehameha Highway to the Pearl Harbor Bike Trail, please note that as noted in Response #1 above, the design of the Project Site, which includes pedestrian and bicycle connectivity within the Project Site and to the surrounding Project Region, will be determined by the Stadium Authority and the selected Real Estate Developer(s).

As it relates to your comment about providing a figure showing pedestrian facilities, please note that Figure 10 of the TIR and Figure 4-24 of the Programmatic Draft EIS depicts existing and proposed pedestrian facilities within the Project Site. However, please note that Figure 10 of the TIR and Figure 4-24 of the Programmatic Final EIS has been updated to show connectivity to the Pearl Harbor Bike Trail, as well as bicycle parking facilities.

Comment 18: *p. Page 44, last paragraph, lists bike lanes along Kamehameha Highway between Halawa Drive and Waihona Street as improvements to improve connectivity; however, it is not feasible to do these improvements.*

Response 18: Your comments are acknowledged. Please note that the bicycle improvements, discussed within Section VI.B.3 of the TIR included in the Programmatic Draft EIS, such as the bike lanes along Kamehameha Highway between Halawa Drive and Waihona Street are based upon the most recent public information available on the O‘ahu Bike Plan website. It should be noted that the discussion in Section VI.B.3 of the TIR acknowledges that exact details regarding these improvements are not known this time.

Comment 19: *q. Figure 11 shows Kamehameha Highway as Level of Traffic Stress (LTS) 3, it should be LTS 4 as a multi-lane roadway with speeds greater than 25 mph.*

Response 19: Your comments are acknowledged. Please note that the Level of Traffic Stress (LTS) for Kamehameha Highway depicted in Figure 11 of the TIR has been updated to LTS 4 as a multi-lane roadway with speeds greater than 25 miles per hour. A copy of the updated TIR has been appended to the Programmatic Final EIS as Appendix H.

Comment 20: *r. Figure 12 should show proposed bicycle parking within the project site.*

Response 20: Your comments are acknowledged. Please note that Figure 12 has been updated to include bicycle parking facilities. Moreover, it should be noted that Figure 10 of the TIR and Figure 2-6 of the Programmatic Draft EIS depicted bicycle rental facilities (e.g., Biki Bikes) which have also been added to Figure 12 in the TIR. Please note that Figures 2-6 and Figure 4-22 of the Programmatic Final EIS have been updated accordingly. However, as noted in Response #1 above, the design of the Project Site, which includes bicycle parking facilities within the Project Site and to the surrounding Project Region, will be determined by the Stadium Authority and the selected Real Estate Developer(s).

Comment 21: *s. Page 51, Item number 6, where is this loading area off Kamehameha Highway? Why cannot passenger loading be done on site?*

Response 21: Please note that passenger loading is anticipated to be on-site with the passenger loading to be accessed via a driveway off Kamehameha Highway as depicted in Figure 3 and Figure 4A of the TIR included in the Programmatic Draft EIS. Please note that Figure 3 and Figure 4A of the TIR have been updated in the Programmatic Final EIS.

Comment 22: *Page 52, Item number 12, the project will increase pedestrian activity to and from the Pearlridge Shopping Center and Aiea Shopping Center areas. Were facilities evaluated for the increases in pedestrian traffic?*

Response 22: Please note that the majority of walking studies indicate that in general, most people are only willing to walk a quarter-mile (equates to approximately a five-minute

walk) for commuting, shopping, or reaching transportation. It is possible that some attraction may result between the Proposed Action and the Pearlridge Shopping Center and the 'Aiea Shopping Center, however, given that these uses are approximately 0.5 mile to 1-mile away from the Project Site, pedestrian activity between these destinations is expected to remain similar to existing conditions. In addition, as discussed in the TIR, the ramps to the freeway and gaps in the existing pedestrian facilities outside the Project Site limit connectivity to the uses north and west of the Project Site.

Comment 23: *The TIAR should provide recommended mitigation measures for direct impacts to State facilities due to the project to maintain LOS and delay level conditions at the "without project condition" for all horizon years. This should include a commitment to complete the mitigation measures and a proposed implementation schedule. Mitigation for special events should also be included.*

Response 23: Your comments are acknowledged. However, the requirement to maintain delay under "without project conditions" may restrict the ability of any additional development in the Project Site because any addition of project-generated vehicles to the surrounding roadway network would result in a change in delay. It may be more appropriate to take a more macro view of operations to assess the impacts of any new development along this corridor. This approach would allow for more emphasis on multi-modal improvements rather than vehicular capacity improvements to maintain existing delay levels. However, it is recommended and assumed that mitigation strategies for special events would be incorporated during the development of a Transportation Management Plan.

Comment 24: *The applicant shall submit an updated TIAR that addresses comments made by HDOT, and additional TIARs for each phase of development to HDOT for review and acceptance.*

Response 24: Your comments are acknowledged. Please note that the TIR has been updated to address the comments made by the HDOT-HWY herein to the extent feasible based on information known at this time and is appended to the Programmatic Final EIS. It is understood that future TIRs will need to be prepared as design of the Project Site is finalized by the Stadium Authority and the selected Real Estate Developer(s). Section 4.11 and Chapter 9 of the Programmatic Final EIS have been updated to reflect this requirement.

Comment 25: *HDOT-HWY encourages the use of Travel Demand Management (TDM) strategies to reduce the number of trips generated by the project. Any project TDM strategies should be included in the TIAR.*

Response 25: Your comments are acknowledged. Please note that the TIR and Section 4.11 of the Programmatic Final EIS has been updated to include the above recommendation that Travel Demand Management strategies be included in future TMP.

Comment 26: *A Permit to Perform Work Upon State Highways shall be required for any work within the HDOT-HWY right-of-way (ROW). Construction plans prepared by a Hawaii licensed engineer shall be submitted for review and approval prior to applying for a permit to perform work.*

Response 26: Your comments are acknowledged. Please note that Section 5.3 of the Programmatic Final EIS has been updated to include the Permit to Perform Work Upon State Highways.

Comment 27: *No additional stormwater runoff will be permitted in the HDOT-HWY ROW, including culverts. All additional stormwater runoff from the project site shall be managed and mitigated onsite.*

Response 27: We acknowledge your comments. Please note that a Preliminary Engineering Report (PER) was prepared by Wilson Okamoto Corporation May 2020 in conjunction with the Programmatic Draft EIS effort, and discusses existing storm drainage facilities. As noted in Section 4.1.1 of the PER, existing storm runoff from rainfall on or within the Project Site is captured by four drainage systems, three of which discharge into Hālawa Stream and one that connects into the City drainage system along Salt Lake Boulevard. Runoff from rainfall on or within the site north of Hālawa Stream is captured by three main drainage systems. Two of the three systems are aligned to capture the runoff from rainfall on or within the parking lot surrounding the Aloha Stadium. Both drainage systems will additionally capture runoff from rainfall on or within the parking lot just south of Aloha Stadium before discharging into Halawa Stream. Anticipated drainage patterns associated with the Proposed Action are forecasted to match existing drainage conditions and are not anticipated to impact the DOT - Highway right of ways. Moreover, Section 4.15.3 of the Programmatic Draft EIS states:

The total drainage area for the Project Site was determined to be 97.08 acres and is comprised of eleven (11) drainage areas. The total anticipated storm runoff flow rate associated with the Proposed Action is forecast at approximately 397.40 cfs. The total storm water runoff from the site under the existing drainage conditions for the Project Site is 413.56 cfs. Under proposed drainage conditions, the runoff rate was calculated to be 397.40 cfs. In comparing the peak discharge of the existing and proposed drainage conditions for the Project Site, there is a decrease of 16.16 cfs in total runoff. The decrease in runoff can be primarily attributed to the relocated Stadium and the outdoor amphitheater, which replace a significant amount of impervious area with pervious surface. It should also be noted that there will be no increase in runoff to any of the individual drainage systems.

However, Section 4.1.1 of the PER and Section 4.15.3 have been updated in the Programmatic Final EIS to indicate that additional stormwater runoff is not permitted in DOT - Highway right of ways, including culverts.

Comment 28: *A permit is required from HDOT-HWY to transport oversized equipment and/or overweight loads within our State highway facilities.*

Response 28: Your comments are acknowledged. Please note that Section 5.3 of the Programmatic Final EIS has been updated to include that a permit from DOT - Highways is required to transport oversized equipment and/or overweight loads within State highway facilities.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Public Comment](#)
To: [Andrew Blasko](#)
Subject: Fw: 10422-01/WOA NASED Programmatic DEIS, OP comment letter
Date: Thursday, February 11, 2021 10:55:30 PM
Attachments: [DTS202101262334HE_NASED-ProgDEIS_OP-cmt-ltr_20210211.pdf](#)

From: Edwards, Ruby M <ruby.m.edwards@hawaii.gov>
Sent: Thursday, February 11, 2021 2:30 PM
To: Public Comment <publiccomment@wilsonokamoto.com>; DePonte, David C <david.c.deponte@hawaii.gov>
Cc: Funakoshi, Rodney Y <rodney.y.funakoshi@hawaii.gov>; Nakayama, Megumi <megumi.nakayama@hawaii.gov>; Miura, Carl Y <carl.y.miura@hawaii.gov>
Subject: 10422-01/WOA NASED Programmatic DEIS, OP comment letter

Aloha Keola and David,

Attached is the Office of Planning's comments on the New Aloha Stadium Entertainment District draft Programmatic Environmental Impact Statement. We apologize for the delay in getting these comments to you.

A hard copy of the comment letter will follow.

I also have a markup of Volume I noting spelling and other errors for your convenience—it is not comprehensive, but may help in catching some of those spelling errors, etc. I'll drop the doc off at DAGS Public Works unless instructed otherwise.

Mahalo and stay well!

Ruby

.....
... **Ruby Mariko Edwards, AICP**
... **Planner, Land Use Division**
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MARY ALICE EVANS
DIRECTOR
OFFICE OF PLANNING

DTS202101262334HE

February 11, 2021

Mr. Keola Cheng
Director, Planning Department
Wilson Okamoto Corporation
1907 South Beretania Street, Suite 400
Honolulu, Hawaii 96826

Dear Mr. Cheng:

Subject: Programmatic Draft Environmental Impact Statement – New Aloha Stadium
Entertainment District, Hālawā, O‘ahu, DAGS Job No. 12-10-0862

Thank you for the opportunity to review and provide comments on the Programmatic Draft Environmental Impact Statement (DEIS) for the proposed New Aloha Stadium Entertainment District (NASED).

The Proposed Action, the New Aloha Stadium Entertainment District, incorporates the construction of a new, modern stadium facility that will be supported by complementary mixed-use development. The project is anticipated to be undertaken through several development phases and is intended to create a community-centric sports and entertainment district that will offer a range of resident and visitor amenities, and stimulate economic development and job creation through the construction and operation of the new entertainment district. The NASED project is one of the priority, catalytic State transit-oriented development (TOD) projects in the *State Strategic Plan for Transit-Oriented Development* issued by the Hawai‘i Interagency Council for Transit-Oriented Development, of which the Office of Planning (OP) serves as co-chair.

OP understands that while the Proposed Action is the redevelopment of the entire Aloha Stadium property of approximately 98 acres, the Programmatic DEIS focuses primarily on the “Initial Development” Phase of the construction of a new, replacement stadium and ancillary mixed-use development immediately adjacent to the stadium and the Honolulu Authority for Rapid Transportation (HART) Hālawā Rail Station. OP acknowledges that additional studies are likely to be required at the project-level to supplement the information contained in the Programmatic EIS.

OP focused its review on Volume I of the Programmatic DEIS, and offers the following comments for the Programmatic Final Environmental Impact Statement (FEIS).

1. Overall, the DEIS generally addresses issues of concern and points of interest to OP programs as identified in OP's comments in response to the EIS Preparation Notice issued in November 2019.

With respect to Coastal Zone Management Act (CZMA) matters, the DEIS adequately discusses the Proposed Action in relation to CZM objectives and policies in Hawai'i Revised Statutes (HRS) Chapter 205A-2 related to drainage, erosion control, and sediment loss. In addition, the Aloha Stadium project area is outside of the Special Management Area (SMA), well beyond the shoreline setback area, and does not require permits that would trigger a CZMA federal consistency determination.

Sections of Volume I of the DEIS related to drainage contains little discussion of the role of low impact development or green infrastructure practices in mitigating stormwater runoff quantity or quality. The drainage discussion refers to how existing drain lines will be used to drain runoff into Hālawā Stream. On page 4-140, the text states that no streams are in proximity to the project site. OP recommends that Volume I of the FEIS include a summary discussion of how alternative stormwater management and treatment strategies for the site might be used and integrated into the urban form for the entire property.

2. Other Comments. Please note that the specific comments that follow are intended to ensure that Volume I contains a full and accurate summary of conditions, impacts, and mitigation measures, regardless of whether this information can be found in other volumes or appendices.
 - a. Permits and approvals. The list of permits and approvals on pages ES-20 and 5-104 includes a stockpiling permit under State/Office of Planning. OP does not issue such permits. This is likely a reference to the City Department of Planning and Permitting permit, and the FEIS should be corrected accordingly. The Lane Use/Occupancy permit is a State Department of Transportation permit.
 - b. Summary of long-term impacts in Impacts section. We note that long-term impacts are not consistently incorporated in each Impact section (Air Quality and Visual Resources are such instances), and that "may" is often used when stating whether or not the Proposed Action will result in cumulative impacts in the area. A project of this scale will have cumulative impacts. OP recommends that the Impact sections be reviewed to ensure that both short-term, construction-related impacts and longer-term impacts associated with

project buildout are acknowledged in the text. The impacts need not be quantified at this time, but they do need to be noted.

- c. Edits to reflect updated items. Text in the FEIS should be updated throughout the document, as needed, to reflect: (a) the adoption of the City Hālawā Area TOD Plan in October 2020; (b) the enactment of SB 2386, related to landfills; (c) publication of the Final EIS for the City's Honouliuli/Waipahu/Pearl City Wastewater Conveyance Facilities; and (d) the current timeframe for commencement of rail service to Hālawā Station.
- d. Other developments. The list of other developments in the vicinity should include Hālawā View Apartments, which while not adjacent to the project site, will contribute to resource and facility use in the area and trips generated between amenities in NASED and the residential project.
- e. LEED rating for buildings. We note that page 4-5 states that it is anticipated the District Developer(s) will obtain LEED Gold certification for individual buildings. In other sections, the statement reads LEED Silver. OP would encourage Gold certification. Regardless, the rating should be consistent throughout the FEIS.
- f. Soils section, page 4-9. Figure 4-2 displays all the soil types underlying the Project area. The narrative on page 4-9 does not include a description of KIA soils, which can readily be included to provide a complete description of soils for the entire site.
- g. Sea Level Rise (SLR). This section does not identify whether groundwater upwelling due to SLR might occur in this area. OP recommends that the 6-foot sea level rise exposure area also be displayed in Figure 4-7, as recent data shows global warming may be accelerating.
- h. Hazardous Materials. This section mentions closed underground storage tanks, as well as petroleum pipelines transecting the property. It would help the reader to identify whether any further action or mitigation will be needed as the project progresses and by whom.
- i. Education. The FEIS should provide general information on existing and projected enrollment capacity at nearby public schools and indicate the potential additional classroom capacity that may be needed to serve the growth in school-age population associated with project buildout.

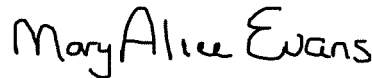
- j. Traffic. This section discusses “volume-to-capacity” ratio as another measure of impact of demand on road capacity. It would be useful if Table 4-8 or another table provided the volume-to-capacity ratio for the various road segments studied. The FEIS should summarize the potential impact of modal shifts due to improvements in pedestrian and bike facilities and access to transit in the project area.
- k. Section 4.15. The text references inclusion of the Preliminary Engineering Report as “Appendix K: Electrical Infrastructure Report”.
- l. Wastewater System. The timeframe for completion of the City East Interceptor wastewater collection system is 2037-2040, depending on the construction option to be selected by the City. It would be more accurate to use this timeframe in the NASED FEIS. OP notes the DEIS discusses how an onsite wastewater treatment system under consideration would produce R-1 recycled water. OP recommends the FEIS discuss how the goal in HRS § 174C-31(g)(6) of utilization of reclaimed water for uses other than drinking and potable water needs in State facilities by 2045 might be met if an onsite wastewater treatment system is not pursued.
- m. Table 5-5, page 5-49. The text states that “BLNR” is the accepting authority, which should be corrected in the FEIS.
- n. Table 5-6, page 5-57. The text refers to “State Department of Fish and Wildlife” protocol, which should be replaced with the correct agency title.
- o. Table 5-6, Objective A(1), page 5-64. The project is supportive of this policy as the project area is considered in the primary urban center.
- p. Table 5-8, Aiea Elementary District, page 5-95. This district, as defined in the City’s *Hālawā Area TOD Plan*, is comprised of the Aiea Elementary School campus and adjoining parcels across the freeway from the project site. Thus, these policies are not applicable to the project.
- q. List of Acronyms and miscellaneous corrections. The List of Acronyms contains incorrect agency names and often conflicting acronyms. Similarly, there are numerous misspellings and missing words in Volume I. OP recommends these be reviewed and revised accordingly in the FEIS.

Mr. Keola Cheng
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OP Review of TOD Conceptual Development Plans. Hawai'i Revised Statutes (HRS) § 225M-2(b)(10) designates OP as the lead agency for coordinating and advancing State smart growth and TOD planning statewide. Under HRS § 225M(b)(10)(H), OP is responsible for approving State agency development plans (conceptual land use plans) for parcels along the rail transit corridor. As noted earlier, the NASED project is a priority catalytic project for the State, with the potential to create a vibrant TOD community anchored by the new stadium and entertainment hub—a community that can provide needed affordable housing and economic opportunities and a range of amenities within walking distance of rail. By this letter, the Office of Planning **approves** the Stadium Authority/Department of Accounting and General Services' NASED Programmatic Master Plan for the New Aloha Stadium Entertainment District as incorporated and described in the Programmatic DEIS.

Thank you again for the opportunity to review and provide comments on the DEIS and the proposed project. If you have any questions, please contact Ruby Edwards of our Land Use Division at (808) 587-2817 or Joshua Hekeia of our Coastal Zone Management Program at (808) 587-2845.

Mahalo,

A handwritten signature in black ink that reads "Mary Alice Evans". The signature is written in a cursive, flowing style.

Mary Alice Evans
Director

c: David DePonte, Department of Accounting and General Services



WILSON OKAMOTO
C O R P O R A T I O N
INNOVATORS • PLANNERS • ENGINEERS

10422-01

Ms. Mary Alice Evans
Director
State of Hawai'i
Office of Planning and Sustainable Development
P.O. Box 2359
Honolulu, HI 96804

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O'ahu, Hawai'i

Dear Ms. Evans:

Thank you for your comments dated February 11, 2021 (File No. DTS202101262334HE) regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai'i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *Attached is the Office of Planning's comments on the New Aloha Stadium Entertainment District draft Programmatic Environmental Impact Statement. We apologize for the delay in getting these comments to you. A hard copy of the comment letter will follow. I also have a markup of Volume I noting spelling and other errors for your convenience—it is not comprehensive, but may help in catching some of those spelling errors, etc. I'll drop the doc off at DAGS Public Works unless instructed otherwise*

Response 1: We received the hardcopy with markups of Volume I noting spelling and other errors caught. Please note that we have made the necessary text revisions to correct these errors. We appreciate your thorough review of the Programmatic Draft EIS.

Comment 2: *The Proposed Action, the New Aloha Stadium Entertainment District, incorporates the construction of a new, modern stadium facility that will be supported by complementary mixed-use development. The project is anticipated to be undertaken through several development phases and is intended to create a community-centric sports and entertainment district that will offer a range of resident and visitor amenities, and stimulate economic development and job creation through the construction and operation of the new*

entertainment district. The NASED project is one of the priority, catalytic State transit-oriented development (TOD) projects in the State Strategic Plan for Transit-Oriented Development issued by the Hawai'i issued by the Hawai'i Interagency Council for Transit-Oriented Development, of which the Office of Planning (OP) serves as co-chair.

Response 2: Your comments are acknowledged and it is understood the the Proposed Action is identified as one of the priority, catalytic State TOD projects in the State Strategic Plan for Transit-Oriented Development issued by the Hawai'i issued by the Hawai'i Interagency Council for Transit-Oriented Development, of which the Office of Planning (OP) serves as co-chair. This has been incorporated into Section 5.2.3 of the Programmatic Final EIS.

Comment 3: *OP understands that while the Proposed Action is the redevelopment of the entire Aloha Stadium property of the approximately 98 acres, the Programmatic DEIS focuses primarily on the "Initial Development" Phase of the construction of a new, replacement stadium and ancillary mixed-use development immediately adjacent to the stadium and the Honolulu Authority for Rapid Transit (HART) Hālawā Rail Station. OP acknowledges that additional studies are likely to be required at the project-level to supplement the information contained in the Programmatic EIS.*

Response 3: Your understanding of how the Programmatic EIS evaluates the Proposed Action is generally correct. Please note that terminology relating the Proposed Action and its implementation have been updated in the Programmatic Final EIS to reflect updates to the Request-For-Proposal (RFP) process that is ongoing concurrently with this Programmatic EIS process. Hence, the term "Initial Development" phase, encompasses the "Stadium Development" and the "Initial Real Estate Development" subcomponent of the overall "Real Estate Development" component in the Programmatic Final EIS. This is discussed in detail in Section 1.1 of the Programmatic Final EIS.

Specifically, as discussed in Section 1.2 of the Programmatic Draft EIS, this approach is known as "tiering," and is intended to expedite resolution of big-picture issues so that any subsequent documentation can focus on any project-level impacts and issues, as necessary. Those big-picture issues and analyses do not have to be repeated in the subsequent environmental reviews, but rather can be referenced from the programmatic document. Tiering allows any necessary project-level environmental review documents to be conducted closer in time to the actual construction of the Proposed Action. As it relates to this Programmatic Final EIS, it directly assesses the Stadium Development and the Initial Real Estate Development components of the Proposed Action, while assessing the Subsequent Real Estate Development component to the extent feasible based on certain assumptions and details known at the time of this writing. As noted throughout this Programmatic EIS, the Proposed Action is anticipated to be built out over several years and is contingent upon the final design of the Project Site by selected Stadium Developer and Real Estate Developer(s) in partnership with the Proposing Agency.

Comment 4: *Overall, the DEIS generally addresses issues of concern and points of interest to OP programs as identified in OP's comments in response to the EIS Preparation Notice issued in November 2019.*

With respect to Coastal Zone Management Act (CZMA) matters, the DEIS adequately discusses the Proposed Action in relation to CZM objectives and policies in Hawai'i Revised Statutes (HRS) Chapter 205A-2 related to drainage, erosion control, and sediment loss. In addition, the Aloha Stadium project area is outside of the Special Management Area (SMA), well beyond the shoreline setback area, and does not require permits that would trigger a CZMA federal consistency determination.

Response 4: We acknowledge your confirmation that the Programmatic Draft EIS generally addresses issues of concern and points of interest to State Office of Planning and Sustainable Development's (OPSD) programs as identified in OPSD's comments in response to the Environmental Impact Statement (EIS) Preparation Notice issued in November 2019; and furthermore, that the Programmatic Draft EIS adequately discusses the Proposed Action in relation to the Coastal Zone Management (CZM) objectives and policies in Hawai'i Revised Statutes (HRS) Chapter 205A-2 related to drainage, erosion control, and sediment loss. Please note that Table 5-4 of the Programmatic Final EIS which discusses the CZM Act has been updated to reflect Act 16 of 2020, which was not reflected in the publication of the Programmatic Draft EIS.

Comment 5: *Sections of Volume I of the DEIS related to drainage contains little discussion of the role of low impact development or green infrastructure practices in mitigating stormwater runoff quantity or quality. The drainage discussion refers to how existing drain lines will be used to drain runoff into Hālawā Stream. On page 4-140, the text states that no streams are in proximity to the project site. OP recommends that Volume I of the FEIS include a summary discussion of how alternative stormwater management and treatment strategies for the site might be used and integrated into the urban form for the entire property.*

Response 5: With regard to your comment that sections of Volume I of the Programmatic Draft EIS related to drainage contains little discussion of the role of low impact development or green infrastructure practices in mitigating stormwater runoff quantity or quality, as stated in Section 2.3 of the Programmatic Draft EIS:

The program described within the PMP presents an overall constant basis for the development potential of the Project Site, for the purposes of Programmatic Draft EIS evaluation and disclosure as well as to inform the NASED RFP effort. It is anticipated that certain adjustments may be made to the designs and site layout presented in this Programmatic Draft EIS and the PMP during the design phase by the eventual selected District Developer(s) after preferred options have been identified. Specifically, the final design, scale, and layout of both the New Aloha

Stadium, as well as the mixed-use development surrounding it will be determined by the selected District Developer(s).

Post construction stormwater quality strategic plans are site specific and dependent upon land use activity and the amount of proposed impervious surfaces. These plans would typically be developed during the design phase as the actual development program and site layout would be determined by the selected Stadium and Real Estate Developer(s). The Stadium and Real Estate Developer(s) will be encouraged to seek to underscore sustainability and resilience in the Proposed Action's design efforts. This is anticipated to be demonstrated through the adoption of sustainable strategies that manage how the Proposed Action is designed and managed in terms of energy use, water consumption and waste generation. Furthermore, the Stadium and Real Estate Developer(s) will be required to adhere to the City's Rules Relating to Storm Water Quality amended September 2018. The Preliminary Engineering Report (PER) prepared by Wilson Okamoto Corporation dated June 2020, and included as Appendix J of the Programmatic Draft EIS, states:

Under the rules, projects that disturb more than one (1) acre of land are classified as Priority A projects.

Priority A projects are required (unless determined to be infeasible) to:

- *Incorporate appropriate Low Impact Development (LID) site design strategies to the "maximum extent practicable" (MEP).*
- *Incorporate appropriate Source Control BMPs to the MEP.*
- *Retain on-site by infiltration, evapotranspiration, or harvest/reuse as much of the water quality volume (WQV) as feasible with appropriate LID Retention Post-Construction Treatment Control BMPs.*
- *Biofilter any portion of the WQV that is not retained on-site with appropriate LID Biofiltration Post-Construction Treatment Control BMPs.*

If it is determined to be infeasible to retain and/or biofilter the Water Quality Volume, the City rules require the project to:

- *Treat (by detention, filtration, settling, or vortex separation) and discharge with appropriate Alternative Compliance Post-Construction Treatment Control BMPs, any portion of the WQV that is not retained on-site or biofiltered.*
- *Retain or biofilter at an offsite location, the volume of runoff from a non-tributary drainage area equivalent to the difference between the project's WQV and the amount retained on-site or biofiltered.*

Appropriate BMP measures include, but are not limited to: infiltration basins and trenches, subsurface infiltration systems, dry wells, bioretention basins, permeable pavement, green roofs, vegetated bio-filters, enhanced swales, detention basins, sand filters, vegetated swales and buffer strips.

This information has been included in Section 4.15.3 of the Programmatic Final EIS to serve as a discussion of how alternative stormwater management and treatment strategies for the Project Site might be used and integrated into the urban form for the entire property.

With regard to the quantity of stormwater runoff, the relocation of the New Aloha Stadium and the proposed outdoor amphitheater is anticipated to result in a decrease of stormwater runoff as a significant amount of impervious area will be replaced with pervious surface. Section 4.15.3 of the Programmatic Draft EIS states:

The total drainage area for the Project Site was determined to be 97.08 acres and is comprised of eleven (11) drainage areas. The total anticipated storm runoff flow rate associated with the Proposed Action is forecast at approximately 397.40 cfs. The total storm water runoff from the site under the existing drainage conditions for the Project Site is 413.56 cfs. Under proposed drainage conditions, the runoff rate was calculated to be 397.40 cfs. In comparing the peak discharge of the existing and proposed drainage conditions for the Project Site, there is a decrease of 16.16 cfs in total runoff. The decrease in runoff can be primarily attributed to the relocated Stadium and the outdoor amphitheater, which replace a significant amount of impervious area with pervious surface. It should also be noted that there will be no increase in runoff to any of the individual drainage systems.

With regard to the text on page 4-140 of the Programmatic Draft EIS that states no streams are in proximity to the Project Site, we note that this statement has been corrected and replaced in the Programmatic Final EIS with the following statement: “*Hālawā Stream crosses the southeastern part of the Project Site where it continues downstream and eventually turns westward before discharging into an estuary that opens into the East Loch of Pearl Harbor.*”

Comment 6: *Other Comments.* Please note that the specific comments that follow are intended to ensure that Volume I contains a full and accurate summary of conditions, impacts, and mitigation measures, regardless of whether this information can be found in other volumes or appendices.

a. *Permits and approvals.* The list of permits and approvals on pages ES-20 and 5-104 includes a stockpiling permit under State/Office of Planning. OP does not issue such permits. This is likely a reference to the City Department of Planning and Permitting permit, and the FEIS should be corrected accordingly. The Lane Use/Occupancy permit is a State Department of Transportation permit.

Response 6: Your comments are acknowledged. Please note that the Executive Summary and Section 5.3 of the Programmatic Final EIS has been revised to show the Stockpiling Permit as being approved by the City Department of Planning and Permitting and that the Lane Use/Occupancy permit is a State Department of Transportation permit.

Comment 7: *b. Summary of long-term impacts in Impacts section. We note that long-term impacts are not consistently incorporated in each impact section (Air Quality and Visual Resources are such instances), and that “may” is often used when stating whether or not the Proposed Action will result in cumulative impacts in the area. A project of this scale will have cumulative impacts. OP recommends that the Impact sections be reviewed to ensure that both short-term, construction-related impacts and longer-term impacts associated with project buildout are acknowledged in the text. The impacts need not be quantified at this time, but they do need to be noted.*

Response 7: We acknowledge your comment that the Proposed Action will result in cumulative impacts in the area due to the scale of the Proposed Action. The impacts and mitigation measure discussions throughout Chapter 4 of the Programmatic Final EIS have been reviewed and revised to include discussions on both short-term, construction related impacts and longer-term impacts associated with the buildout of the Proposed Action. However, as noted in Response #3 above, this Programmatic Final EIS, it directly assesses the Stadium Development and the Initial Real Estate Development components of the Proposed Action, while assessing the Subsequent Real Estate Development component to the extent feasible based on certain assumptions and details known at the time of this writing. As noted throughout this Programmatic EIS, the Proposed Action is anticipated to be built out over several years and is contingent upon the final design of the Project Site by selected Stadium Developer and Real Estate Developer(s) in partnership with the Proposing Agency. Hence, some impacts are substantiated with the word “may” as it is uncertain whether or not certain elements of the Proposed Action will be constructed, especially those related to the Subsequent Real Estate Development component. Nonetheless, where impacts are identified as, whether they may occur or not, appropriate mitigative measures are recommended.

Comment 8: *c. Edits to reflect updated items. Text in the FEIS should be updated throughout the document, as needed, to reflect: (a) the adoption of the City Hālawā Area TOD Plan in October 2020; (b) the enactment of SB 2386, related to landfills; (c) publication of the Final EIS for the City’s Honouliuli/Waipahu/Pearl City Wastewater Conveyance Facilities; and (d) the current timeframe for commencement of rail service to Hālawā Station.*

Response 8: We appreciate the updated information and note that the status of each item identified in Comment #8 has been revised in the Programmatic Final EIS where appropriate.

Comment 9: *d. Other developments. The list of other developments in the vicinity should include Hālawā View Apartments, which while not adjacent to the project site, will contribute to resource and facility use in the area and trips generated between amenities in NASED and the residential project.*

Response 9: The list of other developments in the vicinity provided in Section 4.19.1 of the Programmatic Final EIS has been updated to include the Hālawā View Apartments. We understand that while not adjacent to the Project Site, this development is anticipated to contribute to resource and facility use in the area and trips generated between amenities in Project and the Hālawā View Apartments project.

Comment 10: *e. LEED rating for buildings. We note that page 4-5 states that it is anticipated the District Developer(s) will obtain LEED Gold certification for individual buildings. In other sections, the statement reads LEED Silver. OP would encourage Gold certification. Regardless, the rating should be consistent throughout the FEIS.*

Response 10: The Programmatic Final EIS has been revised to consistently reference that at a minimum, the Stadium Authority and selected Stadium and Real Estate Developer(s) will obtain LEED Silver certification for each building. We acknowledge OPSD's recommendation is to obtain Gold certification. This letter and the recommendations will be provided to the Stadium and Real Estate Developer(s) who will make the final evaluation as to the LEED certification.

Comment 11: *f. Soils section, page 4-9. Figure 4-2 displays all the soil types underlying the Project area. The narrative on page 4-9 does not include a description of KIA soils, which can readily be included to provide a complete description of soils for the entire site.*

Response 11: Please note that Section 4.2.2 of the Programmatic Final EIS has been revised to include a description of the soils on the entire Project Site, which includes KIA soils.

Comment 12: *g. Sea Level Rise (SLR). This section does not identify whether groundwater upwelling due to SLR might occur in this area. OP recommends that the 6-foot sea level rise exposure area also be displayed in Figure 4-7, as recent data shows global warming may be accelerating.*

Response 12: Please note that Section 4.4.1 of the Programmatic Final EIS has been revised to include an expanded discussion of sea level rise impacts as it relates to 6-foot sea level rise exposure. Moreover, groundwater upwelling has been added to expand the discussions related to climate change and sea level rise. Figure 4-7 of the Programmatic Final EIS has been revised to show a 6-foot sea level rise exposure area. We note that a portion of TMK 9-9-003:061 is within the 6-foot sea level rise inundation area. However, the exposure area seems minimal. The selected Real Estate Developer(s) will be responsible for creating and implementing design and mitigation strategies that provide the capabilities to adapt to sea level rise impacts.

Comment 13: *h. Hazardous Materials. This section mentions closed underground storage tanks, as well as petroleum pipelines transecting the property. It would help the reader to identify whether any further action or mitigation will be needed as the project progresses and by whom.*

Response 13: With respect to pre-existing ground conditions such as underground storage tanks and the Navy petroleum pipelines that transect the Project Site, the selected Stadium Developer and Real Estate Developer(s) will be required to work closely with the Navy as well as any other agencies to ensure best management practices are implemented and any potential impacts of the Proposed Action with respect to such pre-existing ground conditions are appropriately mitigated. Moreover, as stated in Section 4.10 of the Programmatic Draft EIS, a hazardous materials remediation plan is anticipated to be prepared and implemented by the Stadium Developer and Real Estate Developer(s) prior to development of the relevant area of the Project Site. Known hazardous materials will be contained or remediated to a level acceptable for the future planned uses.

Comment 14: *i. Education. The FEIS should provide general information on existing and projected enrollment capacity at nearby public schools and indicate the potential additional classroom capacity that may be needed to serve the growth in school-age population associated with project buildout.*

Response 14: Section 4.14.2 of the Programmatic Final EIS has been revised to include general information on existing and projected enrollment capacity at nearby public schools, as indicated by the State Department of Education (DOE). With regard to your comment to “*indicate the potential additional classroom capacity that may be needed to serve the growth in school-age population associated with project buildout[,]*” this information is difficult to quantify at this time, as it is tied specifically to the Proposed Action’s design, which is unknown at this early stage of project planning and programming. However, we note that the Stadium Authority and the selected Real Estate Developer(s) will coordinate with the DOE throughout the design process and will need to comply with all requirements as outlined by the DOE. A summary of this discussion has been included in Section 9.1 of the Programmatic Final EIS related to issues to be resolved pursuant to selection of the Real Estate Developer(s).

Comment 15: *j. Traffic. This section discusses “volume-to-capacity” ratio as another measure of impact of demand on road capacity. It would be useful if Table 4-8 or another table provided the volume-to-capacity ratio for the various road segments studied. The FEIS should summarize the potential impact of modal shifts due to improvements in pedestrian and bike facilities and access to transit in the project area.*

Response 15: The traffic analysis for the Proposed Action was based primarily on intersection level of service (LOS) with the discussion on volume-to-capacity provided for

information purposes only. The discussion on volume-to-capacity has been removed from the Programmatic Final EIS to minimize confusion. Section 4.11 of the Programmatic Final EIS has been revised to include an expanded discussion of the potential impact of modal shifts due to improvements in pedestrian and bike facilities and access to transit in the Project Region.

Comment 16: *k. Section 4.15. The text references inclusion of the Preliminary Engineering Report as “Appendix K: Electrical Infrastructure Report”.*

Response 16: Please note that Section 4.15 of the Programmatic Final EIS has been revised to show the correct appendix designation for the Preliminary Engineering Report, which is Appendix J, not Appendix K.

Comment 17: *l. Wastewater System. The timeframe for completion of the City East Interceptor wastewater collection system is 2037-2040, depending on the construction option to be selected by the City. It would be more accurate to use this timeframe in the NASED FEIS. OP notes the DEIS discusses how an onsite wastewater treatment system under consideration would produce R-1 recycled water. OP recommends the FEIS discuss how the goal in HRS § 174C-31(g)(6) of utilization of reclaimed water for uses other than drinking and potable water needs in State facilities by 2045 might be met if an onsite wastewater treatment system is not pursued.*

Response 17: Section 4.15.2 of the Programmatic Final EIS has been updated to indicate that the timeframe for completion of the City East Interceptor wastewater collection system is 2037-2040, depending on the construction option to be selected by the City. This section has also been updated to discuss how the goal to utilize reclaimed water for uses other than drinking and potable water needs in State facilities by 2045 pursuant to HRS § 174C-31(g)(6) might be met if an on-site wastewater treatment system is not pursued.

Comment 18: *m. Table 5-5, page 5-49. The text states that “BLNR” is the accepting authority, which should be corrected in the FEIS.*

Response 18: Please note that the Programmatic Final EIS has been revised to show the Governor as the accepting authority.

Comment 19: *n. Table 5-6, page 5-57. The text refers to “State Department of Fish and Wildlife” protocol, which should be replaced with the correct agency title.*

Response 19: Please note that Table 5-6 of the Programmatic Final EIS has been revised to show the U.S. Fish and Wildlife Service as the referenced agency.

Comment 20: *o. Table 5-6, Objective A(1), page 5-64. The project is supportive of this policy as the project area is considered in the primary urban center.*

Response 20: We acknowledge that the Project Site is located in the Primary Urban Center and that Objective A(1) as shown on page 5-64 of the Programmatic Draft EIS is applicable to the Proposed Action. Table 5-6 and the associated discussion under Physical Development and Urban Design has been updated in the Programmatic Final EIS to reflect the applicability of Objective A(1).

Comment 21: *p. Table 5-8, Aiea Elementary District, page 5-95. This district, as defined in the City's Hālawā Area TOD Plan, is comprised of the Aiea Elementary School campus and adjoining parcels across the freeway from the project site. Thus, these policies are not applicable to the project.*

Response 21: We acknowledge that the 'Aiea Elementary District, as defined in the City's Hālawā Area TOD Plan, is located across the freeway from the Project Site and that policies concerning this district are not applicable to the Proposed Action. The discussion on the 'Aiea Elementary School District has been removed from Table 5-8 of the Programmatic Final EIS.

Comment 22: *q. List of Acronyms and miscellaneous corrections. The List of Acronyms contains incorrect agency names and often conflicting acronyms. Similarly, there are numerous misspellings and missing words in Volume I. Op recommends these be reviewed and revised accordingly in the FEIS.*

Response 22: The List of Acronyms has been revised in the Programmatic Final EIS. In addition, the Programmatic Final EIS has been reviewed and revised to address misspellings and missing words.

Comment 23: *r. OP Review of TOD Conceptual Development Plans. Hawai'i Revised Statutes (HRS) § 225M-2(b)(10) designates OP as the lead agency for coordinating and advancing State smart growth and TOD planning statewide. Under HRS § 225M(b)(10)(H), OP is responsible for approving State agency development plans (conceptual land use plans) for parcels along the rail transit corridor. As noted earlier, the NASED project is a priority catalytic project for the State, with the potential to create a vibrant TOD community anchored by the new stadium and entertainment hub—a community that can provide needed affordable housing and economic opportunities and a range of amenities within walking distance of rail. By this letter, the Office of Planning **approves** the Stadium Authority/Department of Accounting and General Services' NASED Programmatic Master Plan for the New Aloha Stadium Entertainment District as incorporated and described in the Programmatic DEIS.*

Response 23: We acknowledge your comment that the OPSD approves the Programmatic Master Plan for the Proposed Action as incorporated and described in the Programmatic Draft EIS.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in cursive script that reads "Keola Cheng". The ink is dark and the signature is fluid.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Department of Design and Construction](#)
To: [Public Comment](#)
Cc: ["david.c.deponte@hawaii.gov"](mailto:david.c.deponte@hawaii.gov)
Subject: Draft Programmatic Environmental Impact Statement New Aloha Stadium Entertainment District
Date: Friday, January 22, 2021 8:37:58 AM
Attachments: [836394 signed.PDF](#)

Aloha,

Please see the attached response to your inquiry dated December 23, 2020 regarding the Notice of Availability for the above subject matter.

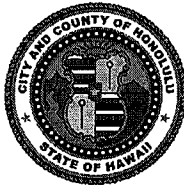
Thank you,

[City & County of Honolulu](#)
[Department of Design and Construction](#)
[650 South King Street](#)
[Honolulu, HI 96814](#)
ddc@honolulu.gov

DEPARTMENT OF DESIGN AND CONSTRUCTION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 11TH FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8480 • Fax: (808) 768-4567
Web site: www.honolulu.gov

RICK BLANGIARDI
MAYOR



ALEX KOZLOV, P.E.
DIRECTOR DESIGNATE

HAKU MILLES, P.E.
DEPUTY DIRECTOR

January 19, 2021

Wilson Okamoto Corporation
1907 S. Beretania Street, Suite 400
Honolulu, Hawaii 96826

Attn: NASED EIS

Dear Mr. Chang,

Subject: Notice of Availability
Draft Programmatic Environmental Impact Statement
New Aloha Stadium Entertainment District
D.A.G.S. Job No. 12-10-0862
Halawa, Island of Oahu, Hawaii
TMK: [1] 9-9-003:061, [1] 9-9-003:055, 070, and 071

Thank you for the opportunity to review and comment. The Department of Design and Construction has no comments to offer at this time.

Should you have any further questions, please contact me at 768-8480.

Sincerely,

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

AK Alex Kozlov, P.E.
Director Designate

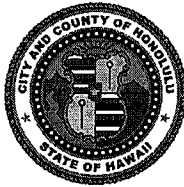
AK:cf (836394)

cc: Department of Accounting and General Services – David DePonte

DEPARTMENT OF DESIGN AND CONSTRUCTION
CITY AND COUNTY OF HONOLULU

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RICK BLANGIARDI
MAYOR



ALEX KOZLOV, P.E.
DIRECTOR DESIGNATE

HAKU MILLES, P.E.
DEPUTY DIRECTOR

January 19, 2021

Wilson Okamoto Corporation
1907 S. Beretania Street, Suite 400
Honolulu, Hawaii 96826

Attn: NASED EIS

Dear Mr. Chang,

Subject: Notice of Availability
Draft Programmatic Environmental Impact Statement
New Aloha Stadium Entertainment District
D.A.G.S. Job No. 12-10-0862
Halawa, Island of Oahu, Hawaii
TMK: [1] 9-9-003:061, [1] 9-9-003:055, 070, and 071

Thank you for the opportunity to review and comment. The Department of Design and Construction has no comments to offer at this time.

Should you have any further questions, please contact me at 768-8480.

Sincerely,

A handwritten signature in black ink, appearing to read "Alex Kozlov", is written over a horizontal line.

AK Alex Kozlov, P.E.
Director Designate

AK:cf (836394)

cc: Department of Accounting and General Services – David DePonte



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10422-01

Mr. Alex Kozlov, P.E.
Director Designate
Department of Design and Construction
650 South King Street, 11th Floor
Honolulu, HI 96813

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, Oʻahu, Hawaiʻi

Dear Mr. Kozlov:

Thank you for your comments dated January 19, 2021 regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawaiʻi Administrative Rules, Title 11, Chapter 200.1. We acknowledge that at this time the City and County of Honolulu Department of Design and Construction (DDC) does not have any comments to offer at this time. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

DEPARTMENT OF PLANNING AND PERMITTING
CITY AND COUNTY OF HONOLULU

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RICK BLANGIARDI
MAYOR



DEAN UCHIDA
DIRECTOR DESIGNATE

DAWN TAKEUCHI APUNA
DEPUTY DIRECTOR

EUGENE H. TAKAHASHI
DEPUTY DIRECTOR

RECEIVED
FEB 08 2021
WILSON OKAMOTO CORPORATION

February 5, 2021

2020/ELOG-2523(BS)

Mr. Keola Cheng
Director of Planning
Wilson Okamoto Corporation
1907 South Beretania, Suite 400
Honolulu, Hawaii 96826

Dear Mr. Cheng:

SUBJECT: Draft Programmatic Environmental Impact Statement (DEIS)
New Aloha Stadium Entertainment District
D.A.G.S. Job No. 12-10-0862
Halawa, Island of Oahu, Hawaii
Tax Map Key(s) (TMK) 9-9-003: 061, 9-9-003: 055,
070, and 071

Thank you for your letter dated December 23, 2020, and notice of the availability of the DEIS for the proposed New Aloha Stadium Entertainment District (Proposed Action). Following our review of the DEIS, the Department of Planning and Permitting (DPP) offers the following comments:

1. The Proposed Action should align as much as possible with the Halawa Area Transit-Oriented Development (TOD) Plan, which was created in partnership with City and State agencies and community stakeholders. The Final Environmental Impact Statement (FEIS) should address the final TOD Plan, adopted by the Honolulu City Council (Resolution 20-224, CD1) on December 9, 2020. The site planning, block structure, and relationships between buildings and streets should focus on placemaking and creation of a neighborhood that supports residents, visitors, and event-day gatherings.
2. The DEIS lists developments in its review of potential cumulative and secondary impacts of the Proposed Action and other developments (Sec. 4.19.1). The Aiea-Pearl City Neighborhood and the Halawa Area

TOD Plans are listed, but not the Airport Area TOD Plan. This plan has not been adopted, but includes the Pearl Harbor station area, including new communities envisioned in the Little Makalapa and the Naval Facilities Engineering Command sites.

3. In Section 5.2.4, the DEIS acknowledges how the Proposed Action is not in conformance with existing zoning regulations. However, the Halawa Area TOD Plan recommends new zoning and the extension of the TOD Special District boundary to include the site of the Proposed Action. To clarify the discussion, the FEIS should acknowledge the intended rezoning of the area and commit to future compliance with the TOD Special District regulations and other land use regulations specified in the Land Use Ordinance.
4. To promote a green, cool, and walkable neighborhood, a street tree plan for the Proposed Action should be carefully planned and prioritized so that no underground utilities or other obstacles will hinder the implementation of street trees along pedestrian sidewalks. The upcoming Honolulu TOD Street Tree Master Plan will provide guidance on tree types for existing streets in the Halawa TOD area and should be consulted. We encourage consistency with this plan along new streets in the site of the Proposed Action.
5. The Programmatic Master Plan Circulation Map (Figure 2-6) appropriately responds to our prior recommendations to show offsite connectivity to surrounding neighborhoods, the Pearl Harbor National Memorial Visitors Center, and the Pearl Harbor Historic Trail. However, the Navy has objected to the route shown on Figure 2-6 (connecting down the road leading diagonally from Richardson Field to the Visitor Center access road, then connecting to the trail past the Admiral's Boathouse). The DPP looked at other potential connections with federal and state agencies in a recent Federal Lands Access Program study, which identified a less-preferred, but possible route along the edge of Kamehameha Highway (in both directions, to the Visitors Center as well as the Historic Trail). We suggest showing both possible routes, pending further negotiations with the Navy.
6. Pedestrian connectivity from Salt Lake Boulevard into the site should be further explored and improved. The proposed Phase 3 full build-out (Figure 2-8) is predominantly focused on the Proposed Action's internal street network. Although there are single-family homes on the other side

of Salt Lake Boulevard, consideration should be given to having structures wrapped with ground-level retail or other active uses fronting this roadway. This frontage will better define the street blocks along Salt Lake Boulevard, which is a direct connection that nearby residents will utilize to access the Halawa rail transit station. Most importantly, buildings along Salt Lake Boulevard at the intersections of Kalaloe and Kahuapaani Streets can serve as gateways to the site of the Proposed Action, and should receive special design consideration.

7. The Visual Resources section (Section 4.12) of the DEIS and the subsequent View Shed Analysis in the Programmatic Master Plan, or Volume 2 of the DEIS, does not adequately identify and analyze potential impacts towards existing view sheds from surrounding public spaces, highways, adjacent streets, or from within the site of the Proposed Action. The FEIS should expand the View Shed Analysis to include the views and mitigation options for the "important views and vistas" listed in Section 3.2.3 of the Halawa Area TOD Plan. The Koolau and Waianae Mountain ranges should be listed as visual landmarks and significant vistas in the FEIS.
8. The DEIS assesses the Proposed Action against the 3.2-foot, Sea Level Rise (SLR) Exposure Area, however, as a critical facility and a resource that is considered vital to the community, it should be assessed against the projected six-foot SLR inundation area as depicted by the National Oceanic and Atmospheric Administration SLR Viewer pursuant to the Mayor's 2018 Climate Change Directive (Directive 18-2). A portion of TMK 9-9-003: 061 is within the six-foot SLR inundation area, therefore, should be included in the FEIS.
9. The FEIS should include a sector-specific vulnerability assessment which identifies impacts from SLR, assesses the possible consequences, and evaluates potential adaptation strategies that will mitigate chronic and acute impacts of SLR on the Proposed Action during its anticipated lifetime.
10. Assessments of the Proposed Action should review and address the City and County of Honolulu's (City's) Climate Change Commission's SLR Guidance (June 5, 2018) and Climate Change Brief (June 5, 2018) in the FEIS. These resources are screening and reference tools and do not replace more detailed modeling and analysis at the site level.

11. The discussions in the DEIS about consistency with the Hawaii State Plan, Hawaii State Functional Plans, Oahu General Plan, and the Primary Urban Center Development Plan in regards to housing are identical and do not address specific objectives or policies of each plan as they should. The discussions in the FEIS should mention that 700 of the 1,813 total residential units are proposed to be built in the initial development which is the subject of the DEIS. The FEIS should also mention how the Proposed Action will comply with the City's Affordable Housing Rules, both overall and for initial development, and more details on the proposed housing and affordable housing should be included in the FEIS overall.
12. The FEIS should state that the Proposed Action shall comply with all required submittals and standards by the City for a construction management plan, a traffic management plan (TMP), updates, and/or validation to the findings of the initial Traffic Impact Assessment Report once details of the proposed phasing is known. A TMP shall include traffic demand management strategies to minimize the amount of vehicular trips for daily activities by residents and employees. Early consultation with the Traffic Review Branch of the DPP, as well as the City's Department of Transportation Services is advised.
13. The FEIS should state that the Proposed Action shall comply with the City's prevailing drainage standards, stormwater quality rules and public works construction standards, details, and specifications. Compliance with these standards and rules will be verified at the time that the grading/construction plans are submitted to DPP for review.
14. The FEIS should include a narrative describing the project's post-construction stormwater quality strategic plan to comply with the "Rules Relating to Water Quality." The narrative should also include a written description of the proposed development, expected activities and pollutants that will be generated by activities at the site, and low impact development site design strategies that will be used to comply with the Rules and include a development schedule.
15. The FEIS should show the existing sewer lines serving the Honolulu Authority for Rapid Transportation at the Halawa-Aloha Stadium rail transit station in Figures 4-30 and 4-31.
16. The FEIS should state under Permits and Approvals (page 5-105 and ES-20), that the Sewer Connection Applications are reviewed and

Mr. Keola Cheng
February 5, 2021
Page 5

approved by the DPP. In addition, the FEIS should reflect that Stockpiling Permits are issued by the DPP, not the State Office of Planning.

17. Regarding the DPP's November 8, 2019 letter, providing comments on the Environmental Impact Statement Preparation Notice, comment No. 3 requested "Land Uses" be added to the categories for consideration in the DEIS. Although the impacts of different land use types are detailed throughout the DEIS, "Land Uses" was not included on Page 1-14 and there is no "Land Uses" section in Chapter 4.
18. In the discussion regarding conformance with the Hawaii State Plan about population, prior to submittal of the FEIS, please verify with the State Department of Business, Economic Development, and Tourism that the population projection data is for the City. Those numbers initially seem to be statewide rather than for the City.

Should you have any questions, please contact Franz Kraintz, of our staff, at 768-8046, or fkraintz@honolulu.gov.

Very truly yours,



Dean Uchida
Director Designate

DU:ah

cc: David DePonte



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INNOVATORS • PLANNERS • ENGINEERS

10422-01

Mr. Dean Uchida
Director
Department of Planning and Permitting
650 South King Street, 7th Floor
Honolulu, HI 96813

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, Oʻahu, Hawaiʻi

Dear Mr. Uchida:

Thank you for your comments dated February 5, 2021 (File No. 2020/ELOG-2523[BS]) regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawaiʻi Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Programmatic Draft EIS:

Comment 1: *The Proposed Action should align as much as possible with the Halawa Area Transit-Oriented Development (TOD) Plan, which was created in partnership with City and State agencies and community stakeholders. The Final Environmental Impact Statement (FEIS) should address the final TOD Plan, adopted by the Honolulu City Council (Resolution 20-224, CDI) on December 9, 2020. The site planning, block structure, and relationships between buildings and streets should focus on placemaking and creation of a neighborhood that supports residents, visitors, and event-day gatherings.*

Response 1: We acknowledge that the Proposed Action should align with the Hālawā Area Transit-Oriented Development (TOD) Plan, which was created in partnership with City and State agencies and community stakeholders, to the extent feasible. Please note that the function and intent of this Programmatic EIS process is to evaluate and disclose the anticipated environmental impacts of the Proposed Action. The scope of the Proposed Action is outlined in the Programmatic Master Plan (PMP) which is appended to the EIS as *Appendix A-1: Programmatic Master Plan*. The design of the Proposed Action is still ongoing, and it is anticipated that adjustments will be made to the conceptual designs and site layout presented in this EIS and the PMP during the design phase by the eventual selected

Stadium Developer and Real Estate Developer(s). Specifically, the final design, scale, and layout of both the New Aloha Stadium, as well as the Real Estate Development surrounding it will be determined by the Stadium Authority and the selected Stadium Developer and Real Estate Developer(s). However, it is expected that the State of Hawai‘i, in partnership with the selected Stadium Developer and Real Estate Developer(s), will coordinate and work closely with the CCH to implement the Proposed Action, while meeting the goals and objectives of both the Proposed Action and the Hālawā Area TOD Plan, and to minimize any potential impacts on land uses at the Project Site and the Project Region.

We also acknowledge that the Programmatic Final EIS should address the final TOD Plan that was adopted by the Honolulu City Council on December 9, 2020. Please note that Section 5.2.3 of the Programmatic Final EIS has been updated to address the adopted TOD Plan.

Regarding your comment that the “*site planning, block structure, and relationships between buildings and streets should focus on placemaking and creation of a neighborhood that supports residents, visitors, and event-day gatherings*” please note that as stated above, the design of the Proposed Action is still on-going and will eventually be finalized by the selected Stadium Developer and Real Estate Developer(s). However, the Stadium Developer and Real Estate Developer(s) will be made aware of the recommendation to focus on placemaking and creation of a neighborhood that supports residents, visitors, and event-day gatherings for further consideration in the final design.

Comment 2: *The DEIS lists developments in its review of potential cumulative and secondary impacts of the Proposed Action and other developments (Sec. 4.19.1). The Aiea-Pearl City Neighborhood and the Halawa Area TOD Plans are listed, but not the Airport Area TOD Plan. This plan has not been adopted, but includes the Pearl Harbor station area, including new communities envisioned in the Little Makalapa and the Naval Facilities Engineering Command sites.*

Response 2: We acknowledge that Section 4.19.1 of the Programmatic Draft EIS does not address or discuss the Airport Area TOD Plan. Please note that Section 4.19.1 of the Programmatic Final EIS has been updated to acknowledge the Airport Area TOD Plan.

Comment 3: *In Section 5.2.4, the DEIS acknowledges how the Proposed Action is not in conformance with existing zoning regulations. However, the Halawa Area TOD Plan recommends new zoning and the extension of the TOD Special District boundary to include the site of the Proposed Action. To clarify the discussion, the FEIS should acknowledge the intended rezoning of the area and commit to future compliance with the TOD Special District regulations and other land use regulations specified in the Land Use Ordinance.*

Response 3: We acknowledge that the Final Hālawā TOD Plan recommends new zoning and the extension of the TOD Special District to include the Project Site of the Proposed Action. Please note the discussion in Section 5.2.4 regarding the Proposed Action’s

conformance with City and County zoning has been updated to acknowledge the intended rezoning of the area and the intent to commit to future compliance with the TOD Special District regulations and other land use regulations specified in the Land Use Ordinance. However, it should be noted that the State of Hawai‘i is the landowner of the Project Site, and in partnership with the selected Stadium Developer and Real Estate Developer(s), may pursue different land-use configurations and strategies to maximize the value of the Proposed Action and address a number of Statewide needs. The State of Hawai‘i, as the land owner, have the ultimate say in how they use their lands to fit their needs. However, it is expected that the State of Hawai‘i, in partnership with the selected Stadium Developer and Real Estate Developer(s), will coordinate and work closely with the CCH to implement the Proposed Action, while meeting the goals and objectives of both the Proposed Action and the Hālawā Area TOD Plan, and to minimize any potential impacts on land uses at the Project Site and the Project Region.

Comment 4: *To promote a green, cool, and walkable neighborhood, a street tree plan for the Proposed Action should be carefully planned and prioritized so that no underground utilities or other obstacles will hinder the implementation of street trees along pedestrian sidewalks. The upcoming Honolulu TOD Street Tree Master Plan will provide guidance on tree types for existing streets in the Halawa TOD area and should be consulted. We encourage consistency with this plan along new streets in the site of the Proposed Action.*

Response 4: Regarding your comment, “to promote a green, cool, and walkable neighborhood, a street tree plan for the Proposed Action should be carefully planned and prioritized...” please note as discussed in Response #1 above, the design of the Proposed Action is still on-going and will eventually be finalized by the selected Stadium Developer and Real Estate Developer(s). This letter and its recommendations will be given to the selected Stadium Developer and Real Estate Developer(s) for consideration during the design process.

We acknowledge that the upcoming Honolulu TOD Street Master Plan will provide guidance on tree types for existing streets in the Hālawā TOD area. Please note that the eventual selected Stadium Developer and Real Estate Developer(s) will be responsible for ensuring consistency between the Proposed Action and the forthcoming Honolulu TOD Street Master Plan through the design process to the extent feasible. This recommendation has been added to Section 4.11.2 as it relates to pedestrian facilities for the Proposed Action.

Comment 5: *The Programmatic Master Plan Circulation Map (Figure 2-6) appropriately responds to our prior recommendations to show offsite connectivity to surrounding neighborhoods, the Pearl Harbor National Memorial Visitors Center, and the Pearl Harbor Historic Trail. However, the Navy has objected to the route shown on Figure 2-6 (connecting down the road leading diagonally from Richardson Field to the Visitor Center access road, then connecting to the trail past the Admiral's Boathouse). The DPP looked at other potential connections with federal and state agencies in a recent Federal Lands Access Program study, which identified a less preferred, but possible route along the edge*

of Kamehameha Highway (in both directions, to the Visitors Center as well as the Historic Trail). We suggest showing both possible routes, pending further negotiations with the Navy.

Response 5: We acknowledge your comment that the PMP Circulation Map appropriately responds to the Department of Planning and Permitting's prior comments and recommendations to show offsite connectivity to surrounding neighborhoods. However, it is understood that the Navy has objected to the route shown on Figure 2-6 that connects down the road leading diagonally from Richardson Field to the Visitor Center access road, then connecting to the trail past the Admiral's Boathouse. Please note that as discussed in Response #1, the designs presented in the PMP and the Programmatic EIS are conceptual in nature and are still on-going. The design will be finalized when the eventual Stadium Developer and Real Estate Developer(s) are selected.

Regarding your comment that other potential connections presented in a recent Federal Lands Access Program study should be depicted, please note that Figure 2-6 of the Programmatic Final EIS has been revised to show both possible routes.

Comment 6: *Pedestrian connectivity from Salt Lake Boulevard into the site should be further explored and improved. The proposed Phase 3 full build-out (Figure 2-8) is predominantly focused on the Proposed Action's internal street network. Although there are single-family homes on the other side of Salt Lake Boulevard, consideration should be given to having structures wrapped with ground-level retail or other active uses fronting this roadway. This frontage will better define the street blocks along Salt Lake Boulevard, which is a direct connection that nearby residents will utilize to access the Halawa rail transit station. Most importantly, buildings along Salt Lake Boulevard at the intersections of Kalaloe and Kahuapaani Streets can serve as gateways to the site of the Proposed Action, and should receive special design consideration.*

Response 6: Regarding your comment that pedestrian connectivity from Salt Lake Boulevard into the Project Site should be further explored and improved, please note that as discussed in Response #1 above, the design presented in the PMP and Programmatic EIS are conceptual in nature. The eventual selected Stadium Developer and Real Estate Developer(s) will finalize and implement the design of the Proposed Action. As mentioned in Response #4 above, this letter and its recommendations will be given to the selected Stadium Developer and Real Estate Developer(s) for consideration during the design process. Thus, it is assumed that the selected Stadium Developer and Real Estate Developer(s) will explore pedestrian connectivity when the design of the Proposed Action is being finalized.

Regarding your comments that consideration should be given to having structures wrapped with ground-level retail or other active uses fronting Salt Lake Boulevard and that the intersections of Kalaloe and Kahuapaani Streets should receive special design considerations, please note that this letter and its recommendations, which have been

incorporated into Section 4.11.2 of the Programmatic Final EIS, will be given to the selected Stadium Developer and Real Estate Developer(s) for consideration during the design process.

Comment 7: *The Visual Resources section (Section 4.12) of the DEIS and the subsequent View Shed Analysis in the Programmatic Master Plan, of Volume 2 of the DEIS, does not adequately identify and analyze potential impacts towards existing view sheds from surrounding public spaces, highways, adjacent streets, or from within the site of the Proposed Action. The FEIS should expand the View Shed Analysis to include the views and mitigation options for the "important views and vistas" listed in Section 3.2.3 of the Halawa Area TOD Plan. The Koolau and Waianae Mountain ranges should be listed as visual landmarks and significant vistas in the FEIS.*

Response 7: Regarding your comment that Section 4.12 of the Programmatic Draft EIS and the Viewshed Analysis within the PMP are inadequate, please note that the Viewshed Analysis has been updated in PMP and accordingly within Section 4.12 of the Final EIS to show the impact the development will have on areas referenced in the Hālawa Area TOD Plan, which includes views from H201/Red Hill, the Pearl Harbor Visitor Center, and views toward Honolulu and Diamond Head.

Regarding your comment that the Ko‘olau and Wai‘anae Mountain ranges should be listed as visual landmarks and significant vistas, please note that Section 4.12 of the Programmatic Final EIS has been updated to include this statement:

Visual landmarks and significant vistas associated with the Proposed Action include views of Pearl Harbor ~~and Ford Island~~ to the west, Daniel K. Inouye International Airport to the south, Hickam Air Force Base to the southwest, ~~and Ford Island to the west.~~ and far vistas of the Wai‘anae Mountain Range to the west and the Ko‘olau Mountain Range to the north. The Project Region also includes a mix of residential and industrial view planes that are not generally known for their scenic value. However, many residents and visitors consider the existing Aloha Stadium itself a valuable visual resource.

With the expanded analysis, it should be noted that the design presented in the PMP and Programmatic EIS are conceptual and the Proposed Action is programmatic in nature. However, as noted in the PMP, the goal of the design of the Project Site is to preserve the value of the overall existing viewsheds from the surrounding areas. It is expected that the selected Stadium and Real Estate Developer(s) will work closely with the City to preserve existing viewsheds as design of the Project Site is being finalized.

Comment 8: *The DEIS assesses the Proposed Action against the 3.2-foot, Sea Level Rise (SLR) Exposure Area, however, as a critical facility and a resource that is considered vital to the community, it should be assessed against the projected six-foot SLR inundation area as depicted by the National Oceanic and Atmospheric Administration SLR Viewer pursuant*

to the Mayor's 2018 Climate Change Directive (Directive 18-2). A portion of TMK 9-9-003:061 is within the six-foot SLR inundation area, therefore, should be included in the FEIS.

Response 8: Regarding your comment that the Proposed Action should be assessed against the projected six-foot sea level rise (SLR), please note that a discussion and Figure 4-7 of the Programmatic Final EIS has been updated in Section 4.4.1. It is acknowledged that a portion of Tax Map Key 9-9-003:061, along Hālawā Stream canal, is within the six-foot sea level rise exposure area. However, the exposure area seems minimal. The selected Stadium Developer and Real Estate Developer(s) will be responsible for creating and implementing design and mitigation strategies that provide the capabilities to adapt to sea level rise impacts.

Comment 9: *The FEIS should include a sector-specific vulnerability assessment which identifies impacts from SLR, assesses the possible consequences, and evaluates potential adaptation strategies that will mitigate chronic and acute impacts of SLR on the Proposed Action during its anticipated lifetime.*

Response 9: We acknowledge your comment and recommendation that the Programmatic Final EIS should include a sector-specific vulnerability assessment which identifies impacts from SLR, assesses the possible consequences, and evaluates potential adaptation strategies that will mitigate chronic and acute impacts of SLR on the Proposed Action during its anticipated lifetime. In accordance with HRS § 226-109 pertaining to Hawai'i's climate change adaptation priority guidelines, priority guidelines to prepare the State to address the impacts of climate change should:

(7) Promote sector resilience in areas such as water, roads, airports, and public health, by encouraging the identification of climate change threats, assessment of potential consequences, and evaluation of adaptation options;

Based on these guidelines, Sections 4.1.2 and 4.4.1 of the Programmatic Final EIS have been updated to address resiliency in each pertinent sector as it relates to SLR and the Proposed Action, and how the Proposed Action may adapt in the long-term. Moreover, a report entitled, “*NASED Climate Change – Sector Resilience Assessment*” has been appended to the Programmatic Final EIS as Appendix N.

Comment 10: *Assessments of the Proposed Action should review and address the City and County of Honolulu's (City's) Climate Change Commission's SLR Guidance (June 5, 2018) and Climate Change Brief (June 5, 2018) in the FEIS. These resources are screening and reference tools and do not replace more detailed modeling and analysis at the site level.*

Response 10: Regarding your comment that assessments of the Proposed Action should review and address the City and County of Honolulu's Climate Change Commission's SLR Guidance and Climate Change Brief (June 5, 2018) in the Programmatic Final EIS, please

note that Section 4.1 and Section 4.4.1 of the Programmatic Final EIS have been updated to include discussions related to the June 5, 2018 SLR guidance and Climate Change Brief.

We understand the resources provided are screening and reference tools and do not replace more detailed modeling and analysis at the site level, which is intended to occur during the design process.

Comment 11: *The discussions in the DEIS about consistency with the Hawaii State Plan, Hawaii State Functional Plans, Oahu General Plan, and the Primary Urban Center Development Plan in regards to housing are identical and do not address specific objectives or policies of each plan as they should. The discussions in the FEIS should mention that 700 of the 1,813 total residential units are proposed to be built in the initial development which is the subject of the DEIS. The FEIS should also mention how the Proposed Action will comply with the City's Affordable Housing Rules, both overall and for initial development, and more details on the proposed housing and affordable housing should be included in the FEIS overall.*

Response 11: Regarding your comment that discussions related to housing to each of the respective plans mentioned in Comment #11 are identical, please note the Proposed Action is programmatic in nature and it is not known at this time how the housing component of the Proposed Action will specifically meet each policy respective to housing within the aforementioned plans above. However, it is understood the Proposed Action may provide up to 1,800 new homes which will provide much needed housing inventory for residents seeking to live closer to town as well as those in the market for competitively priced housing as discussed throughout the Programmatic EIS.

Regarding your comment that the Programmatic Final EIS should mention that approximately 700 of the 1,800 new homes may be built in the Initial Real Estate Development , please note that this is discussed throughout the Programmatic Draft EIS. Specifically, page ES-3 of the Executive Summary states:

In summary, the PMP sets forth the vision for development of the Proposed Action that consists of two elements, as described previously in Chapter 1 Section 1: Background, the construction of a new 27,500 - 35,000 seat stadium referred to herein as the Stadium Development; and supporting Initial Real Estate Development consisting of approximately 730,000 Gross Square Feet (GSF) of residential space, 263,000 GSF of retail and entertainment space, 83,500 GSF of office space and 160,000 GSF of hotel space, along with supporting infrastructure, public amenities, and a portion of the requisite utility improvements to serve what is referred to herein as the Real Estate Development This Initial Real Estate Development component of the "Real Estate Development" is intended to serve as a catalyst to support the New Aloha Stadium and set the stage for Subsequent Real Estate Development of the Proposed Action to be sequentially developed in over time, in response to market conditions as outlined in Section 2.4.2 (Subsequent

NASED Real Estate Development Construction) of this Programmatic Final EIS. The comprehensive total build out is projected to encompass approximately 1,889,000 GSF of residential space, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 414,00 GSF of hotel space . Crawford Architects has developed this program based on detailed market analysis of the Project Site and Project Region conducted by Victus / RCLCO in 2019.

However, the Programmatic Final EIS has clarified in appropriate discussions to state that approximately 700 of the 1,800 residential units may be developed within the Initial Real Estate development where appropriate.

Regarding your comment that the Programmatic Final EIS “*should also mention how the Proposed Action will comply with the City's Affordable Housing Rules, both overall and for initial development*” please note that the selected Stadium Developer and Real Estate Developer(s) final master plan and design scheme will comply with any and all applicable affordable housing requirements. This has been clarified within the Programmatic Final EIS wherever housing, and specifically affordable housing is discussed.

As it relates to your comment that more details should be included about affordable housing, please note that as mentioned above, the Proposed Action is programmatic in nature and it is not known at this time how the housing component of Proposed Action will specifically be implemented. As discussed throughout the Programmatic EIS, the Proposed Action is envisioned to offer a diverse range of residential options which may account for up to approximately 1,800 new residences.

Comment 12: *The FEIS should state that the Proposed Action shall comply with all required submittals and standards by the City for a construction management plan, a traffic management plan (TMP), updates, and/or validation to the findings of the initial Traffic Impact Assessment Report once details of the proposed phasing is known. A TMP shall include traffic demand management strategies to minimize the amount of vehicular trips for daily activities by residents and employees. Early consultation with the Traffic Review Branch of the DPP, as well as the City's Department of Transportation Services is advised.*

Response 12: We acknowledge that the Proposed Action shall comply with all required submittals and standards by the City and County of Honolulu regarding a construction management plan, a traffic management plan (TMP), updates, and / or validation of the findings of the initial Traffic Impact Report once design has been finalized by the selected Stadium Developer and Real Estate Developer(s) and implementation of the Proposed Action has been determined. We acknowledge that a TMP shall include traffic demand strategies to minimize the amount of vehicular trips for daily activities by residents and employees. We also acknowledge that DPP advises early consultation with the Traffic Review Branch of the DPP and the City and County of Honolulu Department of Transportation Services. As discussed in Response #4 above, this letter and its recommendations, which are included in the TIR and Section 4.11 of the Programmatic EIS,

will be given to the selected Stadium Developer and Real Estate Developer(s) for consideration.

Comment 13: *The FEIS should state that the Proposed Action shall comply with the City's prevailing drainage standards, stormwater quality rules and public works construction standards, details, and specifications. Compliance with these standards and rules will be verified at the time that the grading/construction plans are submitted to DPP for review.*

Response 13: We acknowledge your comment and the Programmatic Final EIS has been revised to reflect that the Proposed Action will comply with the City and County of Honolulu's drainage standards, stormwater quality rules and public works construction standards, details, and specifications where appropriate. It is understood that when design is finalized by the eventual selected Stadium developer and Real Estate Developer(s), compliance with these standards and rules will be verified at the time the grading/construction plans are submitted to the DPP for review. Moreover, please note that Section 4.1.2 of Appendix J stated that discussed drainage runoff rates and improvements are determined based on the City and County of Honolulu's storm drainage standards.

Comment 14: *The FEIS should include a narrative describing the project's postconstruction stormwater quality strategic plan to comply with the "Rules Relating to Water Quality." The narrative should also include a written description of the proposed development, expected activities and pollutants that will be generated by activities at the site, and low impact development site design strategies that will be used to comply with the Rules and include a development schedule.*

Response 14: Regarding your comment that the FEIS should include a narrative describing the Proposed Action's post construction stormwater strategic plan to comply with the "Rules Relating to Water Quality," please note that the Section 4.1.2 of the Preliminary Engineering Report included as Appendix J to the Programmatic Draft EIS discusses the potential requirements of the Proposed Action that is subject to compliance with the City and County of Honolulu Rules Relating to Water Quality. Specifically, Section 4.1.2 of Appendix J states:

Drainage runoff rates and improvements for the proposed improvements are determined herein based on the CCH DPP, Storm Drainage Standards, dated August 2017. Any increase in runoff due to the proposed improvements will need to be retained on-site to ensure that the project will not have any adverse effects on downstream properties.

In addition, it is anticipated that drainage improvements will also be required to comply with the City's Rules Relating to Water Quality amended September 2018. Under these rules, projects that disturb more than one (1) acre of land are classified as Priority A projects.

Priority A projects are required (unless determined to be infeasible) to:

- *Incorporate appropriate Low Impact Development (LID) site design strategies to the “maximum extent practicable” (MEP).*
- *Incorporate appropriate Source Control BMPs to the MEP.*
- *Retain on-site by infiltration, evapotranspiration, or harvest/reuse as much of the water quality volume (WQV) as feasible with appropriate LID Retention Post-Construction Treatment Control BMPs.*
- *Biofilter any portion of the WQV that is not retained on-site with appropriate LID Biofiltration Post-Construction Treatment Control BMPs*

If it is determined to be infeasible to retain and/or biofilter the Water Quality Volume, the City rules require the project to:

- *Treat (by detention, filtration, settling, or vortex separation) and discharge with appropriate Alternative Compliance Post-Construction Treatment Control BMPs, any portion of the WQV that is not retained on-site or biofiltered.*
- *Retain or biofilter at an offsite location, the volume of runoff from a non-tributary drainage area equivalent to the difference between the project’s WQV and the amount retained on-site or biofiltered.*

Appropriate BMP measures include, but are not limited to: infiltration basins and trenches, subsurface infiltration systems, dry wells, bioretention basins, permeable pavement, green roofs, vegetated bio-filters, enhanced swales, detention basins, sand filters, vegetated swales and buffer strips.

Please note that Section 4.15.3 of the Programmatic Final EIS has been updated to discuss the above.

Please also note that as discussed in Response #1 above, the design presented in the PMP and Programmatic EIS are conceptual and the Proposed Action is programmatic in nature. The eventual selected Stadium Developer and Real Estate Developer(s) will finalize and implement the design of the Proposed Action, at which time compliance with the Rules Relating to Water Quality will be addressed.

Comment 15: *The FEIS should show the existing sewer lines serving the Honolulu Authority for Rapid Transportation at the Halawa-Aloha Stadium rail transit station in Figures 4-30 and 4-31.*

Response 15: Please note that at the time of publication of the Programmatic Draft EIS that this information was unavailable. However, as requested in Comment #15, existing sewer lines serving the Hālawā / Aloha Stadium HART Transit Station have been added to revised Figure 4-30 and Figure 4-31.

Comment 16: *The FEIS should state under Permits and Approvals (page 5-105 and ES-20), that the Sewer Connection Applications are reviewed and approved by the DPP. In addition, the FEIS should reflect that Stockpiling Permits are issued by the DPP, not the State Office of Planning.*

Response 16: We acknowledge your comments above. Please note that Section 5.3 and the summarized discussion within the Executive Summary have been revised to state that Sewer Connection Applications are approved by the DPP, as well as Stockpiling Permits being issued by the DPP.

Comment 17: *Regarding the DPP's November 8, 2019 letter, providing comments on the Environmental Impact Statement Preparation Notice, comment No. 3 requested "Land Uses" be added to the categories for consideration in the DEIS. Although the impacts of different land use types are detailed throughout the DEIS, "Land Uses" was not included on Page 1-14 and there is no "Land Uses" section in Chapter 4.*

Response 17: We acknowledge your comment above regarding "Land Uses" being a resource category to assess the Proposed Action against. Please note that Section 4.20 has been added to the Programmatic Final EIS which provides a discussion on existing land uses within the immediate surrounding area and how the Proposed Action may impact these land uses.

Comment 18: *In the discussion regarding conformance with the Hawaii State Plan about population, prior to submittal of the FEIS, please verify with the State Department of Business, Economic Development, and Tourism that the population projection data is for the City. Those numbers initially seem to be statewide rather than for the City.*

Response 18: Please note that your Comment #18 above is unclear with regards to what policy within the Hawai'i State Plan you are referring to. We assume that you are referring to policy 226-5 "Objectives and policies for population." Please note that this discussion is related to population projection data for the State, not the City and County of Honolulu. Specifically, the discussion related to this policy states:

The Proposed Action is in alignment with the pattern of population distribution as sought and envisioned under the Hawai'i State Plan. Population projections from DBEDT indicate that the State's population, which includes active-duty military personnel and their dependents as well as general civilian population, is projected to increase from 1.43 million as recorded in 2016, to 1.65 million in 2045. This is

indicative of an anticipated growth rate of approximately 0.5 percent per year over the projection period (DBEDT, 2018).

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Public Comment](#)
To: [Andrew Blasko](#)
Subject: Fw: Draft Programmatic EIS New Aloha Stadium Entertainment District
Date: Tuesday, February 9, 2021 1:52:53 PM
Attachments: [DRAFT Response Letter - DEIS New Aloha Stadium Entertainment District \(836748\) FINAL 1.docx](#)

From: Tsugawa, Greg <gtsugawa@honolulu.gov>
Sent: Monday, February 8, 2021 8:38 AM
To: Public Comment <publiccomment@wilsonokamoto.com>; 'david.c.deponte@hawaii.gov' <david.c.deponte@hawaii.gov>
Cc: Motoki, Michael S <michael.motoki@honolulu.gov>; Brady, Scott <scott.brady@honolulu.gov>; Youngling, Paula <pyoungling@honolulu.gov>; add.comment.hx1tw4.u-4275191.464833cc-558f-4453-8570-c1aa65117262@tasks.clickup.com <add.comment.hx1tw4.u-4275191.464833cc-558f-4453-8570-c1aa65117262@tasks.clickup.com>; Suliven, Christine <csuliven@honolulu.gov>; Ropati, Kelsey <kelsey.ropati@honolulu.gov>
Subject: Draft Programmatic EIS New Aloha Stadium Entertainment District

Hello:

The City and County of Honolulu's Department of Transportation Services is still in the process of obtaining the final signed copy of our comments on the Draft Programmatic Environmental Impact Statement for the New Aloha Stadium Entertainment District. We sincerely apologize for the delay.

We have attached a copy of our draft comments to this email, which we expect to be substantively similar to the final signed version. We will get you the final signed copy as soon as possible.

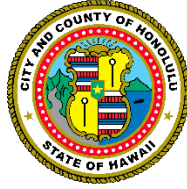
Thank you for your patience.

Sincerely,
Greg Tsugawa
City and County of Honolulu
Department of Transportation Services
Regional Planning Branch

DEPARTMENT OF TRANSPORTATION SERVICES
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
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RICK BLANGIARDI
MAYOR



J. ROGER MORTON
DIRECTOR DESIGNATE

JON Y. NOUCHI
DEPUTY DIRECTOR

TP12/20-836748

February 5, 2021

Wilson Okamoto Corporation
Attn: NASED EIS – Keola Cheng, Director, Planning Department
1907 South Beretania Street, Suite 400
Honolulu, Hawaii 96826

Dear Mr. Cheng:

SUBJECT: Draft Programmatic Environmental Impact Statement
New Aloha Stadium Entertainment District
D.A.G.S. Job No. 12-10-0862
Halawa, Island of Oahu, Hawaii
TMK: [1] 9-9-003:061, [1] 9-9-003:055, 070, and 071

Thank you for the opportunity to provide written comments regarding the subject project. We have the following comments.

1. **Transportation Impact Assessment (TIA).** The applicant should perform a TIA to examine the vehicle, pedestrian, bicycle, and public transit stress and comfort levels at the nearby intersections and driveways with corresponding improvements to mitigate these impacts by applying Complete Streets principles. The applicant shall discuss the future year growth rate, trip distribution, mode split, and route assignment assumptions used in the TIA. The TIA should analyze pedestrian demand, circulation patterns and infrastructure capacity surrounding the Halawa Rail Station.

The TIA should identify an appropriate speed limit for the streets adjacent to the project by analyzing conflict density and activity level, among other contextual factors, to determine the speed limit that will best minimize the risk of a person being killed or seriously injured. The National Association of City Transportation Officials (NACTO) Safe Speed Study methodology is recommended. A Safe Speed Study should be conducted for the longest relevant segment of a street corridor affected by the project.

The applicant shall submit all native files (e.g., Synchro, Excel, etc.) for the raw multi-modal counts and accompanying analyses to the Department of Transportation Services (DTS) Regional Planning Branch (RPB) at dtsplanningdiv@honolulu.gov. Please refer to the DTS TIA Guide for multimodal assessment tools and recommended analyses. The TIA Guide can be found at <http://www4.honolulu.gov/docushare/dsweb/View/Collection-7723>.

2. Complete Streets

- i. **Halawa Park and Ride.** Developer must coordinate park and ride improvements with DTS.
- ii. **Driveways.** Examine the feasibility of visual and audio warning beacons/signals at driveways with high pedestrian/bicycle conflict probabilities (e.g. driveways on Salt Lake Boulevard).
- iii. **Proposed Bicycle Improvements.** Developer must collaborate with DTS Traffic Engineering to coordinate the project with the proposed bicycle improvements in the project area.
- iv. **Pearl Harbor Bike Path Connection.** Developer must examine the feasibility of creating connection between the project site and the Pearl Harbor Bike Path. Any proposed improvement should be coordinated with DTS and the Department of the Navy.
- v. **Bicycle Storage.** Design of buildings must include short-term and long-term secured bicycle storage facilities.
- vi. **Bikeshare Stalls/Parking.** Bikeshare stalls should be located on private property, operated and maintained by the management entity, and included as part of the Developer's community benefits package. Bikeshare stalls shall not be counted in the provision of required bicycle parking based on retail square footage.
- vii. **Wayfinding.** Incorporate transit and bicycle wayfinding into overall wayfinding plan, with wayfinding signage indicating locations of the nearest transit options and the Pearl Harbor Bike Path.

- viii. **TheHandi-Van Loading.** The project should be designed to accommodate TheHandi-Van para-transit vehicles on-site, which require a minimum 31-foot turning radius, a 10-foot, 6-inch height clearance, and the ability to exit the site without reversing onto public roadways.

3. **Transit Oriented Development (TOD).** We suggest the following multi-modal mitigation measures be completed with the project:

- i. Make a contribution for complete streets improvements as recommended by subsequent TIA.
- ii. In conjunction with the proposed Phase 1 of the NASED project, examine the feasibility of implementing the following recommended roadway improvements from the State Transit-Oriented Development (TOD) Planning and Implementation project for the Island of Oahu, July 2020 report:
 - 1. Pg. 57, 3.3.5 Roadways and Circulation, Stadium Site Roadway Improvements: All recommended improvements located on City roadways within the project area.
 - 2. Pg. 63, Table 3-2 Halawa Stadium TOD Priority Area ROM Infrastructure Costs, Regional Roadway Improvements: 1) Bus only and/or bicycle lanes on Salt Lake Boulevard between Kamehameha Highway and Puuloa Road; 2) Off-street shared use paths on the mauka side of Salt Lake Boulevard between Kamehameha Highway and Kahuapaani Street, and Diamond Head side of Kamehameha Highway between Halawa Stream bridge and Halawa Rail Station.
- iii. Describe how the project will promote, encourage, and monitor transit use (rail, bus, paratransit) by its future staff, residents, and visitors. The description must also identify all existing transit facilities/stops and routes in the project area, and verify locations and routing with the DTS – Transportation Mobility Division (DTS-TMD). Contact DTS-TMD at TheBusStop@honolulu.gov.
- iv. Identify all nearby bus stops that are likely to be used by the project, and examine the feasibility of installing or improving amenities/facilities for both existing and future bus stops (shelters, benches, sidewalks, pavement, etc.). The Developer, management entity or owners'

association will be responsible for adopting (i.e., be responsible for litter removal, cleaning and maintenance of the bus stop shelter, benches and floor area) anticipated future bus stops fronting the project site at no cost to the City.

- v. Coordinate the design of future transit facilities that serve the project. This process should include examining the feasibility of relocating bus shelters and benches outside of City-owned right-of-way (ROW), which can aid the Honolulu Police Department in enforcing the “No Lying Down at Bus Stops” ordinance.
 - vi. Inform future staff, residents, and visitors of the City's vanpool, car share, and bikeshare programs to promote alternate modes of transportation.
 - vii. Provide future staff and with subsidized transit passes if they are not eligible for discounted fares.
4. **Parking.** A discussion regarding off-street parking and site generated parking demand should be added to this report. The project should consider TOD core principals. The January 2017 report, Trip and Parking Generation at Transit-Oriented Developments Number NITC-RR-767, concludes that less parking is required than suggested in the Institute of Transportation Engineers (ITE) Parking Generation Manual for sites that are dense, mixed use, with low stress pedestrian environments, and adjacent to a high quality transit stop. We recommend the applicant provide the minimum TOD parking ratio, given that the project falls within a TOD Plan area and is in close proximity to the future rail station.

5. Environmental Impact Statement.

- i. Pg. 4-79; 4.11.1 Vehicular Traffic Conditions, Existing Area Roadway System: Include discussion on the jurisdiction of the discussed roadways/intersections.
- ii. Pg. 4-81; last paragraph: Define “absolute commuter peak hours.”
- iii. Pg. 4-98; Bicycle Facilities; 1st paragraph: Text indicates on-site bicycle parking to be depicted in Figure 4-24, but the Figure only shows bicycle rental facilities.
- iv. Pg. 4-98; Bicycle Facilities: Figure 4-25 incorrectly duplicates Figure 4-22.

- v. Level of Service (LOS) for Moanalua Rd/Aiea Access Rd intersection, eastbound, AM peak with project (year 2026) in the tables in both EIS and TIR reports should be “D” according to Appendix E: Capacity Analysis Calculations of Appendix H: TIAR in the EIS Vol. III.

6. Traffic Impact Report (TIR)

- i. Pg. 28 and 31; Table 2: Peak Hour Trip Generation for NASED Phase 1 (cont'd): Some of the total numbers are incorrect.
 - 1. Area 1.2, Multifamily Housing, PM peak: 61 should be 93
 - 2. Area 1.3, Multifamily Housing, PM peak: 61 should be 60
 - 3. Area 1.7, Shopping Center, PM peak: 48 should be 51
 - 4. Area 1.7, General Office Building, PM peak: 14 should be 17
- ii. Pg. 37; Table 4: Existing and projected Year 2026 (without project) LOS Traffic Operating Conditions (cont'd): LOS for the AM peak, eastbound, Moanalua Rd/Aiea Access Rd intersection is not consistent with the LOS in Table 4-8 in the EIS (Pg. 4-88) and in Table 5 in the TIR (Pg. 40).
- iii. Pg. 44; 3. projected Conditions: The Oahu Bike Plan's proposed improvements are listed and are shown in Figure 12; however, bike lanes along Moanalua Road between Kaimakani Street and Kaahumanu Street are not shown in Figure 12.
- iv. Figure 12 in TIR: Under “Legend,” Proposed Protected Bikeway should be Proposed Protected Bike Lane.
- v. Pg. 53; VII. Recommendations; #23: Transportation Management Plan should also note that during construction, deliveries to the site should be scheduled during off-peak traffic hours to minimize any impacts to pedestrians and traffic at or near the proposed project driveways.
- vi. LOS for Moanalua Rd/Aiea Access Rd intersection, eastbound, AM peak with project (year 2026) in the tables in both EIS and TIR reports should be “D” according to Appendix E: Capacity Analysis Calculations of Appendix H: TIR in the EIS Vol. III.

- vii. Figure 4B in TIR is missing a legend.
- viii. Must include on-site parking requirements.
- 7. **Street Usage Permit.** A street usage permit from the DTS should be obtained for any construction-related work that may require the temporary closure of any traffic lane or pedestrian mall on a City street.
- 8. **Neighborhood Impacts.** The area representatives, neighborhood board, as well as the area residents, businesses, emergency personnel (fire, ambulance, and police), Oahu Transit Services, Inc. (TheBus and TheHandi-Van), etc., should be kept apprised of the details and status throughout the project and the impacts that the project may have on the adjoining local street area network.
- 9. **Disability and Communication Access Board (DCAB).** Project plans (vehicular and pedestrian circulation, sidewalks, parking and pedestrian pathways, vehicular ingress/egress, etc.) should be reviewed and approved by DCAB to ensure full compliance with Americans with Disabilities Act (ADA) requirements.

Thank you for the opportunity to review this matter. Should you have any questions, please contact Greg Tsugawa, of my staff, at 768-6683.

Very truly yours,

J. Roger Morton
Director Designate

cc: David DePonte
Department of Accounting and General Services



WILSON OKAMOTO
C O R P O R A T I O N
INNOVATORS • PLANNERS • ENGINEERS

10422-01

Mr. J. Roger Morton
Director Designate
Department of Transportation Services
650 South King Street, 3rd Floor
Honolulu, HI 96813

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear Mr. Morton:

Thank you for your comments dated February 5, 2021 (File No. TP12/20-836748) regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Programmatic Draft EIS:

Comment 1: Transportation Impact Assessment (TIA). *The applicant should perform a TIA to examine the vehicle, pedestrian, bicycle, and public transit stress and comfort levels at the nearby intersections and driveways with corresponding improvements to mitigate these impacts by applying Complete Streets principles. The applicant shall discuss the future year growth rate, trip distribution, mode split, and route assignment assumptions used in the TIA. The TIA should analyze pedestrian demand, circulation patterns and infrastructure capacity surrounding the Halawa Rail Station.*

Response 1: Your comments that a Transportation Impact Assessment (TIA) should be conducted to examine vehicle, pedestrian, bicycle, and public transit stress and comfort levels at the nearby intersections and driveways with corresponding improvements to mitigate these impacts by applying Complete Streets principles are acknowledged. However, please note that we feel that a TIA conducted at this time is inappropriate due to the fact that the design of the Proposed Action and its use/space allocations at this time are purely conceptual. It is our understanding that many inputs required to conduct a proper TIA would require elements related to the design and programming of the Proposed Action to be finalized. Moreover, in response to your comments about the TIA analyzing pedestrian demand, circulation patterns, and infrastructure capacity surrounding the Hālawā / Aloha

Stadium HART Transit Station, it should be noted that the HART Rail line is not operational, nor has the Hālawā / Aloha Stadium HART Transit Station completed construction. Hence, those elements of the TIA could not be properly assessed. Thus, it is assumed that the selected Real Estate Developer(s) will conduct a TIA at a later point in time when the design and programming of the Proposed Action are finalized. Please note that this letter and its recommendations have been passed along to the Stadium Authority and the selected Stadium Developer and Real Estate Developer(s).

Comment 2: *The TIA should identify an appropriate speed limit for the streets adjacent to the project by analyzing conflict density and activity level, among other contextual factors, to determine the speed limit that will best minimize the risk of a person being killed or seriously injured. The National Association of City Transportation Officials (NACTO) Safe Speed Study methodology is recommended. A Safe Speed Study should be conducted for the longest relevant segment of a street corridor affected by the project.*

Response 2: Your comments are acknowledged. As noted in Response #1 above, we feel that a TIA conducted at this time is inappropriate due to the fact that the design of the Proposed Action and its use/space allocations at this time are purely conceptual. It is our understanding that many inputs required to conduct a proper TIA would require elements related to the design and programming of the Proposed Action to be finalized. Thus, it is assumed that the selected Real Estate Developer(s) will conduct a TIA at a later point in time when the design and programming of the Proposed Action are finalized. Please note that this letter and its recommendations have been passed along to the Stadium Authority and the selected Stadium Developer and Real Estate Developer(s).

Comment 3: *The applicant shall submit all native files (e.g., Synchro, Excel, etc.) for the raw multi-modal counts and accompanying analyses to the Department of Transportation Services (DTS) Regional Planning Branch (RPB) at dtsplanningdiv@honolulu.gov. Please refer to the DTS TIA Guide for multimodal assessment tools and recommended analyses. The TIA Guide can be found at <http://www4.honolulu.gov/docushare/dsweb/View/Collection7723>.*

Response 3: Your comments are acknowledged. Please note that this letter and its recommendations have been passed along to the Stadium Authority and the selected Stadium Developer and Real Estate Developer(s). Hence, when the TIA is conducted, it is assumed that the applicant (the Real Estate District Developer(s)) will submit all native files for the raw multi-modal counts to the DTS.

Comment 4: Complete Streets

- i. ***Halawa Park and Ride.*** *Developer must coordinate park and ride improvements with DTS.*

Response 4: We acknowledge your comment that the selected Real Estate Developer(s) must coordinate park and ride improvements with DTS. This has been noted in Section 4.11.2 of the Programmatic Final EIS.

Comment 5: *ii. **Driveways.** Examine the feasibility of visual and audio warning beacons/signals at driveways with high pedestrian/bicycle conflict probabilities (e.g. driveways on Salt Lake Boulevard).*

Response 5: We acknowledge your comment to examine the feasibility of visual and audio warning beacons/signals at driveways with high pedestrian/bicycle conflict probabilities. It is anticipated that this feasibility analysis would occur during the design of the NASED. This recommendation has been added to Section 4.11.2 of the Programmatic Final EIS as it relates to pedestrian and bicycle facilities. Please note that the function and intent of this Programmatic EIS process is to evaluate and disclose the anticipated environmental impacts of the Proposed Action. The scope of the Proposed Action is outlined in the NASED Programmatic Master Plan (PMP) which is appended to the EIS as *Appendix A-1: Programmatic Master Plan*. The NASED design is still on-going, and it is anticipated that adjustments will be made to the conceptual designs and site layout presented in this EIS and the PMP during the design phase by the eventual selected Stadium Developer and Real Estate Developer(s). Specifically, the final design, scale, and layout of both the New Aloha Stadium, as well as the Real Estate Development surrounding it will be determined by the selected Stadium Developer and Real Estate Developer(s).

Comment 6: *iii. **Proposed Bicycle Improvements.** Developer must collaborate with DTS Traffic Engineering to coordinate the project with the proposed bicycle improvements in the project area.*

Response 6: We acknowledge your comment and have included this requirement as a recommendation in the TIR. The Real Estate Developer(s) will be responsible for collaborating with DTS Traffic Engineering to coordinate the project with the proposed bicycle improvements in the Project Site and Project Region.

Comment 7: *iv. **Pearl Harbor Bike Path Connection.** Developer must examine the feasibility of creating connection between the project site and the Pearl Harbor Bike Path. Any proposed improvement should be coordinated with DTS and the Department of the Navy.*

Response 7: Your comments are acknowledged. Please note, as discussed in the responses above, the design and programming of the Proposed Action is still on-going, and it is anticipated that adjustments will be made to the conceptual designs and site layout presented in this Programmatic EIS and the PMP during the design phase by the eventual selected Stadium Developer and Real Estate Developer(s). Specifically, the final design, scale, and layout of both the New Aloha Stadium, as well as the Real Estate Development surrounding it will be determined by the selected Stadium Developer and Real Estate Developer(s).

Hence, it is anticipated that feasibility of creating connections between the Project Site and the subject Pearl Harbor Bike Path will be explored by the eventual selected Real Estate Developer(s).

Comment 8: v. ***Bicycle Storage.** Design of buildings must include short-term and long-term secured bicycle storage facilities.*

Response 8: We acknowledge your comment that design of buildings must include short-term and long-term secured bicycle storage facilities. Please note as discussed in Response #5 above, the design of the Proposed Action is still on-going and will eventually be finalized by the selected Stadium Developer and Real Estate Developer(s). This letter, including the recommendations and requirements stated herein, will be given to the selected Stadium Developer and Real Estate Developer(s) for consideration during the design process.

Comment 9: vi. ***Bikeshare Stalls/Parking.** Bikeshare stalls should be located on private property, operated and maintained by the management entity, and included as part of the Developer's community benefits package. Bikeshare stalls shall not be counted in the provision of required bicycle parking based on retail square footage.*

Response 9: We acknowledge your comment that bikeshare stalls should be located on private property, operated and maintained by the management entity, and included as part of the Developer's community benefits package. We also understand that bikeshare stalls shall not be counted in the provision of required bicycle parking based on retail square footage. Please note as discussed in Response #5 above, the design of the Proposed Action is still on-going and will eventually be finalized by the selected Stadium Developer and Real Estate Developer(s). This letter, including the recommendations and requirements stated herein, will be given to the selected Stadium Developer and Real Estate Developer(s) for consideration during the design process.

Comment 10: vii. ***Wayfinding.** Incorporate transit and bicycle wayfinding into overall wayfinding plan, with wayfinding signage indicating locations of the nearest transit options and the Pearl Harbor Bike Path.*

Response 10: We acknowledge your comment and have included this requirement as a recommendation in the TIR, which has been incorporated into Section 4.11 of the Programmatic Final EIS. The Real Estate Developer(s) will be responsible for incorporating transit and bicycle wayfinding into an overall wayfinding plan, with wayfinding signage indicating locations of the nearest transit options and the Pearl Harbor Bike Path.

Comment 11: viii. ***TheHandi-Van Loading.** The project should be designed to accommodate TheHandi-Van para-transit vehicles on-site, which require a minimum 31-foot turning radius, a 10-foot, 6-inch height clearance, and the ability to exit the site without reversing onto public roadways.*

Response 11: We acknowledge your comment that the Proposed Action should be designed to accommodate TheHandi-Van para-transit vehicles on-site, which require a minimum 31-foot turning radius, a 10-foot, 6-inch height clearance, and the ability to exit the site without reversing onto public roadways. Please note as discussed in Response #5 above, the design of the Proposed Action is still on-going and will eventually be finalized by the selected Stadium Developer and Real Estate Developer(s). This letter, including the recommendations and requirements stated herein, will be given to the selected Stadium Developer and Real Estate Developer(s) for consideration during the design process.

Comment 12: **Transit Oriented Development (TOD).** *We suggest the following multimodal mitigation measures be completed with the project:*

i. *Make a contribution for complete streets improvements as recommended by subsequent TIA.*

Response 12: Your comments are acknowledged. As noted in Response #1 above, we feel that a TIA conducted at this time is inappropriate due to the fact that the design of the Proposed Action and its use/space allocations at this time are purely conceptual. It is our understanding that many inputs required to conduct a proper TIA would require elements related to the design and programming of the Proposed Action to be finalized. Thus, it is assumed that the selected Real Estate Developer(s) will conduct a TIA at a later point in time when the design and programming of the Proposed Action are finalized. Please note that this letter and its recommendations have been passed along to the Stadium Authority and the selected Stadium Developer and Real Estate Developer(s).

Comment 13: *ii. In conjunction with the proposed Phase 1 of the NASED project, examine the feasibility of implementing the following recommended roadway improvements from the State Transit-Oriented Development (TOD) Planning and Implementation project for the Island of Oahu, July 2020 report:*

1. *Pg. 57, 3.3.5 Roadways and Circulation, Stadium Site Roadway Improvements: All recommended improvements located on City roadways within the project area.*
2. *Pg. 63, Table 3-2 Halawa Stadium TOD Priority Area ROM Infrastructure Costs, Regional Roadway Improvements: 1) Bus only and/or bicycle lanes on Salt Lake Boulevard between Kamehameha Highway and Puuloa Road; 2) Off-street shared use paths on the mauka side of Salt Lake Boulevard between Kamehameha Highway and Kahuapaani Street, and Diamond Head side of Kamehameha Highway between Halawa Stream bridge and Halawa Rail Station.*

Response 13: Your comments are acknowledged. Please note as discussed in previous responses, the design of the Proposed Action is still on-going and will eventually be finalized by the selected Stadium Developer and Real Estate Developer(s). This letter,

including the recommendations and requirements stated herein, will be given to the selected Stadium Developer and Real Estate Developer(s) for consideration during the design process. Hence, it can be assumed that the eventual selected Real Estate Developer(s) will examine the feasibility of implementing the recommended roadway improvements listed in Comment #13 above.

Comment 14: *iii. Describe how the project will promote, encourage, and monitor transit use (rail, bus, paratransit) by its future staff, residents, and visitors. The description must also identify all existing transit facilities/stops and routes in the project area, and verify locations and routing with the DTS – Transportation Mobility Division (DTS-TMD). Contact DTS-TMD at TheBusStop@honolulu.gov.*

Response 14: Your comments are acknowledged. Similarly, as noted in the previous responses, the design of the Proposed Action is still on-going and will eventually be finalized by the selected Stadium Developer and Real Estate Developer(s). This letter, including the recommendations and requirements stated herein, will be given to the selected Stadium Developer and Real Estate Developer(s) for consideration during the design process. Hence, when the Stadium Developer and Real Estate Developer(s) are finalizing their design of the Project Site, it is assumed that their design and operation will promote, encourage, and monitor transit use (rail, bus, paratransit) by future users of the Project Site. Furthermore, when Stadium Developer and Real Estate Developer(s) are finalizing their design of the Project Site, it is anticipated that they will work with the DTS Transportation Mobility Division as it relates to verifying future transit locations and routing.

Comment 15: *iv. Identify all nearby bus stops that are likely to be used by the project, and examine the feasibility of installing or improving amenities/facilities for both existing and future bus stops (shelters, benches, sidewalks, pavement, etc.). The Developer, management entity or owners' association will be responsible for adopting (i.e., be responsible for litter removal, cleaning and maintenance of the bus stop shelter, benches and floor area) anticipated future bus stops fronting the project site at no cost to the City.*

Response 15: Your comments are acknowledged. As previously noted, the design of the Proposed Action is still on-going and will eventually be finalized by the selected Stadium Developer and Real Estate Developer(s). This letter, including the recommendations and requirements stated herein, will be given to the selected Stadium Developer and Real Estate Developer(s) for consideration during the design process. However, it should be noted that as discussed in Section 4.11.2 of the Programmatic Draft EIS, “Access to transit facilities in the project vicinity is expected to improve with the Proposed Action.” Hence, when design is being finalized, it is anticipated that the selected Real Estate Developer(s) will identify all bus stops in the Project Region that are expected to be improved under the Proposed Action while also exploring the feasibility of installing or improving amenities/facilities for both existing and future bus stops.

Comment 16: *v. Coordinate the design of future transit facilities that serve the project. This process should include examining the feasibility of relocating bus shelters and benches outside of City-owned right-of-way (ROW), which can aid the Honolulu Police Department in enforcing the “No Lying Down at Bus Stops” ordinance.*

Response 16: Similarly, as discussed in the prior responses related to future transit facilities, the design of the Proposed Action is still on-going and will eventually be finalized by the selected Stadium Developer and Real Estate Developer(s). This letter, including the recommendations and requirements stated herein, will be given to the selected Stadium Developer and Real Estate Developer(s) for consideration during the design process. However, it should be noted that as discussed in Section 4.11.2 of the Programmatic Draft EIS, “Access to transit facilities in the project vicinity is expected to improve with the Proposed Action.” As mentioned in Response #15 above, when design is being finalized, it is anticipated that the selected Real Estate Developer(s) coordinate design of existing and future transit facilities as it relates to the Proposed Action, and that the selected Real Estate Developer(s) will examine the feasibility of relocating bus shelters and benches outside of City-owned right-of-way (ROW).

Comment 17: *vi. Inform future staff, residents, and visitors of the City's vanpool, car share, and bikeshare programs to promote alternate modes of transportation.*

Response 17: Your comments are acknowledged. It is anticipated that when the design of the Proposed Action is finalized, that future users of the Project Site will be informed of the CCH’s vanpool, car share, and bikeshare programs available at the Project Site in order to promote alternate modes of transportation.

Comment 18: *vii. Provide future staff and with subsidized transit passes if they are not eligible for discounted fares.*

Response 18: Your comments are acknowledged. Please note that operation of the Proposed Action is not yet determined. However, this recommendation and the contents of this letter will be passed along to the Stadium Authority and the selected Stadium Developer and Real Estate Developer(s) for consideration.

Comment 19: Parking. *A discussion regarding off-street parking and site generated parking demand should be added to this report. The project should consider TOD core principals. The January 2017 report, Trip and Parking Generation at Transit-Oriented Developments Number NITC-RR-767, concludes that less parking is required than suggested in the Institute of Transportation Engineers (ITE) Parking Generation Manual for sites that are dense, mixed use, with low stress pedestrian environments, and adjacent to a high quality transit stop. We recommend the applicant provide the minimum TOD parking ratio, given that the project falls within a TOD Plan area and is in close proximity to the future rail station.*

Response 19: Your comments are acknowledged. Please note that it is anticipated that a parking study will be conducted by the eventual selected Stadium Developer and Real Estate Developer(s) as they finalize the design and programming of the Proposed Action. This parking study is anticipated to look at off-street parking and site generated parking demand, while considering TOD principals as mentioned in your Comment #19 above. It is understood that the January 2017 report entitled, *Trip and Parking Generation at Transit-Oriented Developments Number NITC-RR-767*, concludes that less parking is required than suggested in the Institute of Transportation Engineers (ITE) Parking Generation Manual for sites that are dense, mixed use, with low stress pedestrian environments, and adjacent to a high quality transit stop. It is acknowledged that the DTS recommends that the Proposed Action provide the minimum TOD parking ratio. Please note that Section 4.11 of the Programmatic EIS has been updated to include this information.

Comment 20: *Environmental Impact Statement.*

i. Pg. 4-79; 4.11.1 *Vehicular Traffic Conditions, Existing Area Roadway System:* Include discussion on the jurisdiction of the discussed roadways/intersections.

Response 20: We acknowledge your comments. Please note that Section III.A. of the TIR has been updated to identify jurisdiction and ownership of all roads discussed in the Area Roadway System. The TIR has also been revised to maintain consistent referencing amongst terms used in the report. Moreover, Section 4.11.1 of the Programmatic Final has been updated accordingly to reflect the clarifications made in the updated TIR which is appended to the Programmatic Final EIS as Appendix H.

Comment 21: Pg. 4-81; last paragraph: Define “absolute commuter peak hours.”

Response 21: We acknowledge your comments. Please note that “absolute” as used in “absolute commuter peak period” is defined as the period of time in which usage or traffic of the roadways is at its highest recorded volumes. Please note that Section III.B.2.a has been updated to define the term as well as Section 4.11.1 of the Programmatic Final EIS.

Comment 22: Pg. 4-98; *Bicycle Facilities; 1st paragraph:* Text indicates on-site bicycle parking to be depicted in Figure 4-24, but the Figure only shows bicycle rental facilities.

Response 22: Your comments are acknowledged. Please note that Figure 12 of the TIR and Figure 4-24 of the Programmatic Final EIS has been updated to include bicycle parking facilities. Moreover, it should be noted that Figure 2-6 of the Programmatic Draft EIS depicted bicycle rental facilities (e.g., Biki Bikes). Please note that Figures 2-6 and Figure 4-24 of the Programmatic Final EIS have been updated accordingly. However, as noted in Response #1 above, the design of the Project Site, which includes bicycle parking facilities within the Project Site and to the surrounding Project Region, will be determined by the Stadium Authority and the selected Stadium Developer and Real Estate Developer(s).

Comment 23: *Pg. 4-98; Bicycle Facilities: Figure 4-25 incorrectly duplicates Figure 4-22.*

Response 23: Your comments acknowledged. Please note that the correct Figure 4-25 has been revised in Programmatic Final EIS to display the appropriate figure.

Comment 24: *Level of Service (LOS) for Moanalua Rd/Aiea Access Rd intersection, eastbound, AM peak with project (year 2026) in the tables in both EIS and TIR reports should be “D” according to Appendix E: Capacity Analysis Calculations of Appendix H: TIAR in the EIS Vol. III.*

Response 24: Please note that tables in both the Programmatic Final EIS (Table 4-8) and TIR (Table 5) have been revised to show a “D” LOS for Moanalua Rd/Aiea Access Rd intersections, eastbound, AM peak with project (year 2026).

Comment 25: *Traffic Impact Report (TIR)*

i. *Pg. 28 and 31; Table 2: Peak Hour Trip Generation for NASED Phase 1 (cont’d): Some of the total numbers are incorrect.*

1. *Area 1.2, Multifamily Housing, PM peak: 61 should be 93*
2. *Area 1.3, Multifamily Housing, PM peak: 61 should be 60*
3. *Area 1.7, Shopping Center, PM peak: 48 should be 51*
4. *Area 1.7, General Office Building, PM peak: 14 should be 17*

Response 25: Your comments are acknowledged. Please note that Table 3 of the TIR in the Programmatic Final EIS has been corrected to reflect the appropriate numbers as shown in Comment #25 above.

Comment 26: *ii. Pg. 37; Table 4: Existing and projected Year 2026 (without project) LOS Traffic Operating Conditions (cont’d): LOS for the AM peak, eastbound, Moanalua Rd/Aiea Access Rd intersection is not consistent with the LOS in Table 4-8 in the EIS (Pg. 4-88) and in Table 5 in the TIR (Pg. 40).*

Response 26: Your comments are acknowledged. Please note that the difference between Table 5 and Table 6 of the TIR has been reconciled and Table 4-8 of the Programmatic Final EIS has been updated accordingly.

Comment 27: *iii. Pg. 44; 3. projected Conditions: The Oahu Bike Plan’s proposed improvements are listed and are shown in Figure 12; however, bike lanes along Moanalua Road between Kaimakani Street and Kaahumanu Street are not shown in Figure 12.*

Response 27: Your comments are acknowledged. Please note that Figure 12 of the TIR and Figure 4-24 of the Programmatic Final EIS have been revised to show the bike lanes

along Moanalua Road between Kaimakani Street and Kaahumanu Street, in addition to the requested changes discussed in Response #22 above.

Comment 28: *iv. Figure 12 in TIR: Under “Legend,” Proposed Protected Bikeway should be Proposed Protected Bike Lane.*

Response 28: Your comments are acknowledged. Please note that Figure 12 of the TIR and Figure 4-24 of the Programmatic Final EIS have been revised under the Legend to show a purple dotted line as a “Proposed Protected Bike Lane.”

Comment 29: *v. Pg. 53; VII. Recommendations; #23: Transportation Management Plan should also note that during construction, deliveries to the site should be scheduled during off-peak traffic hours to minimize any impacts to pedestrians and traffic at or near the proposed project driveways.*

Response 29: Your comments are acknowledged. Please note that Recommendation #20 in the TIR of the Programmatic Final EIS has been revised to include the note that during construction, deliveries to the site should be scheduled during off-peak traffic hours to minimize any impacts to pedestrians and traffic at or near the proposed project driveways. Moreover, please note that the recommendations of the TIR have been incorporated into Section 4.11 of the Programmatic Final EIS.

Comment 30: *vi. LOS for Moanalua Rd/Aiea Access Rd intersection, eastbound, AM peak with project (year 2026) in the tables in both EIS and TIR reports should be “D” according to Appendix E: Capacity Analysis Calculations of Appendix H: TIR in the EIS Vol. III.*

Response 30: Your comments are acknowledged. Please note that this comment is similar to Comment #24 above. As noted in Response #24 above, tables in both the Programmatic Final EIS (Table 4-8) and TIR (Table 6) have been revised to show a “D” LOS for Moanalua Rd/Aiea Access Rd intersections, eastbound, AM peak with project (year 2026).

Comment 31: *vii. Figure 4B in TIR is missing a legend.*

Response 31: Your comments are acknowledged. Please note that Figure 4B in the TIR and Figure 4-20 of the Programmatic Final EIS has been revised to include a legend.

Comment 32: *viii. Must include on-site parking requirements*

Response 32: Your comments are acknowledged. As discussed in Response #19 above, it is anticipated that a parking study will be conducted by the eventual selected Stadium Developer and Real Estate Developer(s) as they finalize the design and programming of the Proposed Action. This parking study is anticipated to look at off-street parking and site generated parking demand, while considering TOD principals as mentioned in your Comment #19 above, including on-site parking requirements. Regardless of the final design

of the Project Site, parking requirements will be met. It is further acknowledged that the January 2017 report entitled, *Trip and Parking Generation at Transit-Oriented Developments Number NITC-RR-767*, concludes that less parking is required than suggested in the Institute of Transportation Engineers (ITE) Parking Generation Manual for sites that are dense, mixed use, with low stress pedestrian environments, and adjacent to a high quality transit stop. It is acknowledged that the DTS recommends that the Proposed Action provide the minimum TOD parking ratio. Please note that Section 4.11 of the Programmatic EIS has been updated to include this information.

Comment 33: Street Usage Permit. *A street usage permit from the DTS should be obtained for any construction-related work that may require the temporary closure of any traffic lane or pedestrian mall on a City street.*

Response 33: We acknowledge your comment that a permit from the DTS is required for any construction-related work that may require the temporary closure of any traffic lane or pedestrian mall on a City street. The Street Usage Permit has been added to the list of permits and approvals that may be required for the in Section 5.3 of the Programmatic Final EIS.

Comment 34: Neighborhood Impacts. *The area representatives, neighborhood board, as well as the area residents, businesses, emergency personnel (fire, ambulance, and police), Oahu Transit Services, Inc. (TheBus and TheHandiVan), etc., should be kept apprised of the details and status throughout the project and the impacts that the project may have on the adjoining local street area network.*

Response 34: We acknowledge your comment and note that the Stadium Developer and Real Estate Developer(s) will be responsible for keeping area representatives, neighborhood board, as well as the area residents, businesses, emergency personnel (fire, ambulance, and police), Oahu Transit Services, Inc. (TheBus and TheHandiVan), etc. apprised of the details and status throughout the Proposed Action and the impacts that the Proposed Action may have on the adjoining local street area network.

Comment 35: Disability and Communication Access Board (DCAB). *Project plans (vehicular and pedestrian circulation, sidewalks, parking and pedestrian pathways, vehicular ingress/egress, etc.) should be reviewed and approved by DCAB to ensure full compliance with Americans with Disabilities Act (ADA) requirements.*

Response 35: We acknowledge your comment that Project plans will require review and approval by DCAB to ensure full compliance with ADA requirements. DCAB Review and Approval has been added to the list of permits and approvals that may be required for the subject project in Section 5.3 of the Programmatic Final EIS.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical

studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in cursive script that reads "Keola Cheng". The ink is dark and the signature is fluid.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

DEPARTMENT OF ENVIRONMENTAL SERVICES
CITY AND COUNTY OF HONOLULU

1000 ULUOHIA STREET, SUITE 308, KAPOLEI, HAWAII 96707
TELEPHONE: (808) 768-3486 • FAX: (808) 768-3487 • WEBSITE: <http://envhonolulu.org>



RICK BLANGIARDI
MAYOR

WESLEY T. YOKOYAMA, P.E.
DIRECTOR DESIGNATE

MICHAEL O'KEEFE
DEPUTY DIRECTOR

ROSS S. TANIMOTO, P.E.
DEPUTY DIRECTOR

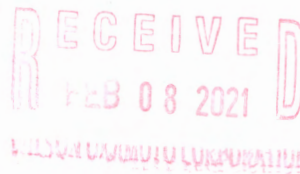
IN REPLY REFER TO:
PRO 21-006

February 1, 2021

Mr. Keola Cheng
Director, Planning Department
Wilson Okamoto Corporation
1907 South Beretania Street, Suite 400
Honolulu, Hawaii 96826

Attn: NASED EIS

Dear Mr. Cheng:



SUBJECT: Draft Programmatic Environmental Impact Statement (EIS)
New Aloha Stadium Entertainment District
D.A.G.S. Job No. 12-10-0862, Halawa, Oahu, Hawaii
TMKs 9-9-003:061, 055, 070, and 071

We have reviewed your letter dated December 23, 2020, regarding the subject Draft Programmatic EIS, and have the following comments:

1. As discussed in section 4.15.2 Wastewater System, Impacts and Mitigation Measures, at the bottom of page 4-134, we agree the City's existing Halawa force main will need to be relocated if the Proposed Action layout is followed. The new location of the force main should be either in the Salt Lake Blvd right-of-way, or otherwise in a location that is similarly paved and accessible to our maintenance crews. An easement will not be needed for the City right-of-way.
2. When planning the sewer connections for the project, appropriate consideration should be given to redirecting on-site sewer lines to connect to the 30-inch sewer downstream of the Halawa force main to the extent possible. The flows that cannot be redirected can be kept to the existing connection to the existing 21-inch sewer line. This redirection of flow will reduce the flow to the Halawa Wastewater Pump Station, potentially

Mr. Keola Cheng
February 1, 2021
Page 2

mitigating impacts to the pump station from this project, and therefore will be beneficial to both the project and to the City.

Should you have any questions, please call Jack Pobuk, Branch Head, CIP Program and Planning, at (808) 768-3464 or email jpobuk@honolulu.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Wesley T. Yokokama', with a long horizontal flourish extending to the right.

Wesley T. Yokokama, P.E.
Director Designate

cc: David DePonte
Department of Accounting and General Services
Public Works Division, Planning Branch
P.O. Box 119, Honolulu, HI 96810-0119
David.c.deponte@hawaii.gov



WILSON OKAMOTO
C O R P O R A T I O N
INNOVATORS • PLANNERS • ENGINEERS

10422-01

Mr. Wesley Yokokama, P.E.
Director Designate
Department of Environmental Services
1000 Uluohia Street, Suite 308
Kapolei, HI 96707

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, Oʻahu, Hawaiʻi

Dear Mr. Yokokama:

Thank you for your comments dated February 1, 2021 regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawaiʻi Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Programmatic Draft EIS:

Comment 1: *As discussed in section 4.15.2 Wastewater System, Impacts and Mitigation Measures, at the bottom of page 4-134, we agree the City's existing Hālawā force main will need to be relocated if the Proposed Action layout is followed. The new location of the force main should be either in the Salt Lake Blvd right-of-way, or otherwise in a location that is similarly paved and accessible to our maintenance crews. An easement will not be needed for the City right-of-way.*

Response 1: We acknowledge the City and County of Honolulu Department of Environmental Services (ENV) agrees that the existing Hālawā force main will need to be relocated depending upon the site layout of the New Aloha Stadium Entertainment District (NASED). We acknowledge that the new location of the Hālawā force main should either be located in the Salt Lake Blvd. right-of-way, or otherwise in a location that is similarly paved and accessible for maintenance crews. We also understand that an easement is not required for the CCH right-of-way. Please note that Section 4.15.2 of the Programmatic EIS has been updated to reflect this.

Comment 2: *When planning the sewer connections for the project, appropriate consideration should be given to redirecting on-site sewer lines to connect to the 30-inch*

sewer downstream of the Halawa force main to the extent possible. The flows that cannot be redirected can be kept to the existing connection to the existing 21-inch sewer line. This redirection of flow will reduce the flow to the Halawa Wastewater Pump Station, potentially mitigating impacts to the pump station from this project, and therefore will be beneficial to both the project and to the City.

Response 2: We acknowledge your comment that when planning sewer connections for the Proposed Action, appropriate consideration should be given to redirecting on-site sewer lines to connect to the 30-inch sewer downstream of the Hālawā force main to the extent feasible to reduce the amount of flow to the Hālawā Wastewater Pump Station. We acknowledge that any flows that cannot be redirected can be kept to the existing connection to the existing 21-inch sewer line. Please note that Section 4.2.3 of the Preliminary Engineering Report and Section 4.15.2 of the Programmatic EIS have been updated to reflect this.

Please note that the design of the Project Site is not finalized, and it is anticipated that adjustments will be made to the conceptual designs and site layout presented in this Programmatic EIS and the Master Plan. Specifically, the final design, scale, and layout of both the New Aloha Stadium, as well as the Real Estate Development surrounding it will be determined by the Stadium Authority, the selected Stadium Developer and Real Estate Developer(s).

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Public Comment](#)
To: [Andrew Blasko](#)
Subject: Fw: Providing Public Comment on NASED Draft PEIS
Date: Tuesday, February 9, 2021 1:49:55 PM
Attachments: [New Aloha Stadium Entertainment District NASED Draft PEIS Public Comment 020121.docx](#)

From: Joshua Frost <j.frost@capitol.hawaii.gov>
Sent: Tuesday, February 2, 2021 9:45 AM
To: Public Comment <publiccomment@wilsonokamoto.com>
Subject: Providing Public Comment on NASED Draft PEIS

Aloha,

Please see the attached comments from Representative Matt LoPresti.

Josh Frost
Office Manager
Representative Matt LoPresti, District 41
Hawai'i State House of Representatives

j.frost@capitol.hawaii.gov

New Aloha Stadium Entertainment District (NASED) Draft PEIS Public Comment

Honolulu Harbor is a vital artery for the distribution of food and goods necessary for the people of our state to survive. In the event of a catastrophic event that renders Honolulu Harbor unusable by disaster, natural or man-made, Joint Base Pearl Harbor-Hickam is designated as a back-up harbor in which shipping containers are able to be unloaded.

It is confirmed that Aloha Stadium is in the Distribution Management Plan (DMP) and Hawaii Emergency Management Agency (HI-EMA) is in the process of finalizing a Memorandum of Understanding (MOU) to secure its use. HI-EMA is also in the process of developing a more comprehensive logistics plan based on the catastrophic shutdown of the port. In addition to the Distribution Plan, there is a strategic document that incorporates the DMP with a Point of Distribution Plan and a Staging Plan in development.

Currently, there is no space at or near Joint Base Pearl Harbor-Hickam that can allow for the temporary placement of shipping containers for the off-loading and on-loading of cargo ships. This is of major concern for safety, resiliency, and frankly survivability of the people of the State of Hawaii. Without a proper lay-down area nearby for containers, the use of Joint Base Pearl Harbor-Hickam as a proper back-up shipping harbor in case of emergency is insufficient.

That is why Aloha Stadium has been identified as the best, mostly likely, and only realistic location to serve as a temporary center of distribution in case of catastrophic failure of our port at Honolulu Harbor. As plans for the redeveloped Aloha Stadium progress, it is vitally important that this emergency scenario be taken seriously enough to be included in any redevelopment plans.

I have raised this concern repeatedly as early as 2016 and again in 2017, and 2018. Though the planning process has already begun, it is frustrating that I still have not seen any mention of or reference to plans to ensure the parking structure will be built strong enough to serve as an emergency back-up container lay-down area in the event of a natural or man-made disaster that takes out Honolulu Harbor and the container facilities.

It is vitally important that the Stadium Authority and DAGS seek to promote the safety of harbor infrastructure through a partnership with the federal government that identifies, designates, and develops appropriate lands within the boundaries of the new Aloha Stadium development for the contingency use as a shipping container storage

lay-down facility for the emergency use of Joint Base Pearl Harbor-Hickam. In essence, all this requires is ensuring that the parking area is built with strong enough concrete to withstand the heavy stresses and weights such contingency use would require.

It is not only a state security issue but a national security issue to have an adequate emergency harbor plan to provide supplies to the state of Hawaii and its people.

Below is sample language that I used in proposed legislation as far back as 2017:

“WHEREAS, the proposed redevelopment of Aloha Stadium in Halawa provides a good opportunity to build a reinforced stadium parking lot that may serve as the emergency backup container lay-down area that is centrally located, accessible by tractor trailers, equipped with additional power generators, and capable of holding shipping containers, withstanding heavy machinery, and accommodating harbor employees...”

Please do not neglect this simple addition to the master plan. Again, essentially all it means is making sure the concrete of the parking lot is strong enough to serve in this capacity in the case of an emergency, but relying on a potential MOU simply is not enough when it comes to the health, safety, and survivability of the people of Hawaii in the event of catastrophe. The burden is on us to ensure that plans are made and events prepared for that none of us hope will ever be needed; but if they were needed and proper back up facilities and realistic plans were not in place then that would be a betrayal of the public trust in our positions of the highest order.

Last, but not least, on the question of housing, I strongly believe that whatever housing is to be there, it should undoubtedly be 100% workforce housing.

I also strongly support the idea of simply building University of Hawaii its own smaller stadium for far less money, thus addressing two major points in one by fully freeing up this area for genuine Transit Oriented Development (TOD) of workforce housing and enabling the university to benefit from its own stadium and manage their own affairs internally.

Thank you,
State Representative Matt LoPresti, Ph.D.



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INNOVATORS • PLANNERS • ENGINEERS

10422-01

Representative Matt LoPresti
415 South Beretania Street, Room 328
Honolulu, HI 96813

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear Representative LoPresti:

Thank you for your comments dated February 2, 2021, regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *Honolulu Harbor is a vital artery for the distribution of food and goods necessary for the people of our state to survive. In the event of a catastrophic event that renders Honolulu Harbor unusable by disaster, natural or man-made, Joint Base Pearl Harbor Hickam is designated as a back-up harbor in which shipping containers are able to be unloaded.*

It is confirmed that Aloha Stadium is in the Distribution Management Plan (DMP) and Hawaii Emergency Management Agency (HI-EMA) is in the process of finalizing a Memorandum of Understanding (MOU) to secure its use. HI-EMA is also in the process of developing a more comprehensive logistics plan based on the catastrophic shutdown of the port. In addition to the Distribution Plan, there is a strategic document that incorporates the DMP with a Point of Distribution Plan and a Staging Plan in development.

Response 1: We acknowledge your comments and understand that Honolulu Harbor is considered to be a vital artery for the distribution of food and goods necessary for the people of the State to survive. We also understand that in an event that would render Honolulu Harbor unusable, Joint Base Pearl Harbor Hickam (JBPHH) is designated as a back-up harbor where shipping containers could be unloaded.

Moreover, it is our understanding that the Stadium Authority has recently entered into a Memorandum of Agreement (MOA) with the State Department of Defense, State Emergency Management Agency, to provide the use of the Project Site as a State Staging Area for critical emergency supplies for the State in the event of a catastrophic natural or a human-caused emergency or disaster of such magnitude that disrupts the State's regular supply and distribution chain. This includes consideration for provision of adequate container storage and supply movement on-site as coordinated via the State of Hawaii Distribution Management Plan, Version 2, dated September 30, 2021.

Comment 2: *Currently, there is no space at or near Joint Base Pearl Harbor-Hickam that can allow for the temporary placement of shipping containers for the off-loading and on-loading of cargo ships. This is of major concern for safety, resiliency, and frankly survivability of the people of the State of Hawaii. Without a proper lay-down area nearby for containers, the use of Joint Base Pearl Harbor-Hickam as a proper back-up shipping harbor in case of emergency is insufficient.*

That is why Aloha Stadium has been identified as the best, mostly likely, and only realistic location to serve as a temporary center of distribution in case of catastrophic failure of our port at Honolulu Harbor. As plans for the redeveloped Aloha Stadium progress, it is vitally important that this emergency scenario be taken seriously enough to be included in any redevelopment plans.

Response 2: We acknowledge your comments and understand that currently there is inadequate space at JBPHH that would allow for the temporary placement of shipping containers for the off-loading and on-loading of cargo ships. Hence, without a proper lay-down area nearby for containers, the JBPHH as a back-up shipping harbor is inefficient. For these reasons, the Project Site has been identified as the only realistic option to serve as a temporary center of distribution in case of catastrophic failure of Honolulu Harbor. As noted in Response #1 above, it is our understanding that the Stadium Authority has recently entered into a Memorandum of Agreement (MOA) with the State Department of Defense, State Emergency Management Agency, to provide the use of the Project Site as a State Staging Area for critical emergency supplies for the State in the event of a catastrophic natural or a human-caused emergency or disaster of such magnitude that disrupts the State's regular supply and distribution chain. This includes consideration for provision of adequate container storage and supply movement on-site as coordinated via the State of Hawaii Distribution Management Plan, Version 2, dated September 30, 2021. Hence, the final design of the Project Site will be determined by the Stadium Authority, the selected Stadium Developer and Real Estate Developer(s), which will incorporate the provisions of container storage and supply movement on-site.

Comment 3: *I have raised this concern repeatedly as early as 2016 and again in 2017, and 2018. Though the planning process has already begun, it is frustrating that I still have not seen any mention of or reference to plans to ensure the parking structure will be built strong*

enough to serve as an emergency back-up container lay-down area in the event of a natural or man-made disaster that takes out Honolulu Harbor and the container facilities.

It is vitally important that the Stadium Authority and DAGS seek to promote the safety of harbor infrastructure through a partnership with the federal government that identifies, designates, and develops appropriate lands within the boundaries of the new Aloha Stadium development for the contingency use as a shipping container storage lay-down facility for the emergency use of Joint Base Pearl Harbor-Hickam. In essence, all this requires is ensuring that the parking area is built with strong enough concrete to withstand the heavy stresses and weights such contingency use would require.

Response 3: Your comments are acknowledged and we understand that you have raised the concerns around the issues brought up in Comment #1 and Comment #2 above. Please note that as discussed in Response #2 above, the final design of the Project Site will be determined by the Stadium Authority, the selected Stadium Developer and Real Estate Developer(s), which will incorporate the provisions of container storage and supply movement on-site. This information has been incorporated into the Programmatic Final EIS in Sections 1.3.3, 3.2 and Chapter 9 regarding the final design of the Project Site. Hence, should the emergency lay-down area be designated in parking structures, they will be strong enough to withstand the heavy stresses and weights that such contingency use would require.

Comment 4: *It is not only a state security issue but a national security issue to have an adequate emergency harbor plan to provide supplies to the state of Hawaii and its people.*

Below is sample language that I used in proposed legislation as far back as 2017:

“WHEREAS, the proposed redevelopment of Aloha Stadium in Halawa provides a good opportunity to build a reinforced stadium parking lot that may serve as the emergency backup container lay-down area that is centrally located, accessible by tractor trailers, equipped with additional power generators, and capable of holding shipping containers, withstanding heavy machinery, and accommodating harbor employees...”

Please do not neglect this simple addition to the master plan. Again, essentially all it means is making sure the concrete of the parking lot is strong enough to serve in this capacity in the case of an emergency, but relying on a potential MOU simply is not enough when it comes to the health, safety, and survivability of the people of Hawaii in the event of catastrophe. The burden is on us to ensure that plans are made and events prepared for that none of us hope will ever be needed; but if they were needed and proper back up facilities and realistic plans were not in place then that would be a betrayal of the public trust in our positions of the highest order.

Response 4: We acknowledge your comments. As noted in Response #1 above, it is our understanding that the Stadium Authority has recently entered into a Memorandum of Agreement (MOA) with the State Department of Defense, State Emergency Management Agency, to provide the use of the Project Site as a State Staging Area for critical emergency supplies for the State in the event of a catastrophic natural or a human-caused emergency or disaster of such magnitude that disrupts the State's regular supply and distribution chain. This includes consideration for provision of adequate container storage and supply movement on-site as coordinated via the State of Hawaii Distribution Management Plan, Version 2, dated September 30, 2021. Hence, the final design of the Project Site will be determined by the Stadium Authority, the selected Stadium Developer and Real Estate Developer(s), which will incorporate the provisions of container storage and supply movement on-site.

Comment 5: *Last, but not least, on the question of housing, I strongly believe that whatever housing is to be there, it should undoubtedly be 100% workforce housing.*

Response 5: Your comments are acknowledged. Please note that the Proposed Action is envisioned to directly serve regional and State housing demands through the creation of a diverse range of residential options, accounting for upwards of 1,800 new housing units as discussed in Section 2.1 of the Programmatic Draft EIS. However, it should be noted that the extent of residential programming will ultimately be determined by the Stadium Authority and the selected Real Estate Developer(s) which will comply with applicable affordable housing requirements.

Comment 6: *I also strongly support the idea of simply building University of Hawaii its own smaller stadium for far less money, thus addressing two major points in one by fully freeing up this area for genuine Transit Oriented Development (TOD) of workforce housing and enabling the university to benefit from its own stadium and manage their own affairs internally.*

Response 6: We acknowledge your comments. The unexpected impacts of COVID-19 and the mounting maintenance cost issues led to closure of the existing Aloha Stadium to spectator events, and the UH is now temporarily hosting UH football games at its Clarence T.C. Ching Athletics Complex, located on its Lower Campus in Mānoa, until the New Aloha Stadium is constructed. The UH has confirmed that they plan to return to the New Aloha Stadium once constructed and ready to operate in the future. Hence, the UH does not intend to construct their own stadium that would be permanent in nature at this time.

However, please note that the intention of the Proposed Action is the replacement of the existing Aloha Stadium and the development of the site surrounding it for the benefit of the community and the residents and visitors of Hawaii. In keeping with this intent, as noted in Response #1 above, it is our understanding that the Stadium Authority has recently entered into a Memorandum of Agreement (MOA) with the State Department of Defense, State Emergency Management Agency, to provide the use of the Project Site as a State Staging

Area for critical emergency supplies for the State in the event of a catastrophic natural or a human-caused emergency or disaster of such magnitude that disrupts the State's regular supply and distribution chain. This includes consideration for provision of adequate container storage and supply movement on-site as coordinated via the State of Hawaii Distribution Management Plan, Version 2, dated September 30, 2021. Hence, the final design of the Project Site will be determined by the Stadium Authority, the selected Stadium Developer and Real Estate Developer(s), which will incorporate the provisions of container storage and supply movement on-site.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Public Comment](#)
To: [Andrew Blasko](#)
Subject: Fw: EIS comment
Date: Tuesday, February 9, 2021 1:49:24 PM
Attachments: [Stanley Chang NASED DEIS Letter 2021-02-01.docx](#)

From: Sen. Stanley Chang <SenChang@capitol.hawaii.gov>
Sent: Monday, February 1, 2021 3:14 PM
To: Public Comment <publiccomment@wilsonokamoto.com>
Cc: chang1 - Perry <chang1@capitol.hawaii.gov>
Subject: EIS comment

Aloha,

Attached please find my comments on the Aloha Stadium EIS. Mahalo.

Stanley Chang



The Senate

STATE CAPITOL
HONOLULU, HAWAII 96813

February 1, 2021

Via email

NASED.EIS@wilsonokamoto.com

Aloha,

The current plan to surround the new stadium with retail, office space, hotel, and 1,813 condos is economically unrealistic for the foreseeable future, and the EIS should instead include analysis of the environmental impacts of least 200 towers including 100,000 units of housing on the Aloha Stadium site. While we recognize the need to replace Aloha Stadium, a new stadium should be confined to as small a size as possible. The EIS is supposed to determine the maximum quantities of development, therefore, it should evaluate the maximum quantity of housing units feasible with transit-oriented assumptions.

Ending the housing shortage must be the top priority of the State of Hawaii. Not only does housing top surveys of Hawaii's policy priorities, but the State also has a statutory obligation to "[e]ffectively accommodate the housing needs of Hawaii's people" (HRS § 226-19). To fulfill this obligation, Governor Ige, Senator Chang, and other state officials have advocated the use of state owned lands near rail stations to develop high density housing for sale to Hawaii residents. Given the location of a rail station on the Aloha Stadium site, this parcel is an ideal site for this vision.

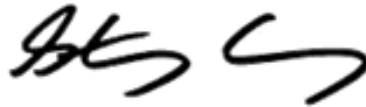
Many comparable facilities around the world today are surrounded by high density development, such as Wankhede Stadium in Mumbai, Madison Square Garden in New York, and Happy Valley Racecourse in Hong Kong. Because a stadium itself would be small--Soldier Field, the home of the Chicago Bears, is only seven acres--over 90 percent of the Aloha Stadium site, as many as 91 acres, can be used for high density housing.

The rise of online shopping and the coronavirus pandemic have greatly reduced demand for brick and mortar retail and office space, both worldwide and in Hawaii. A recent study estimated that retail vacancies on Oahu will grow by 270,000 square feet this year alone. A strip mall or office building is unlikely to generate revenue to pay for the new stadium. By contrast, the new residents of 100,000 housing units will generate enormous amounts of economic activity and

dramatically expand the tax base, thereby supporting the new stadium and other operations of the State.

Thank you very much for the opportunity to provide feedback on this EIS.

Very truly yours,

A handwritten signature in black ink, appearing to be 'Stanley Chang', written in a cursive style.

Stanley Chang
Chair, Committee on Housing



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10422-01

Senator Stanley Chang
415 South Beretania Street, Room 226
Honolulu, HI 96813

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, Oʻahu, Hawaiʻi

Dear Stanley Chang:

Thank you for your comments dated February 1, 2021 regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawaiʻi Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment #1: *The current plan to surround the new stadium with retail, office space, hotel, and 1,813 condos is economically unrealistic for the foreseeable future, and the EIS should instead include analysis of the environmental impacts of least 200 towers including 100,000 units of housing on the Aloha Stadium site. While we recognize the need to replace Aloha Stadium, a new stadium should be confined to as small a size as possible. The EIS is supposed to determine the maximum quantities of development, therefore, it should evaluate the maximum quantity of housing units feasible with transit-oriented assumptions.*

Ending the housing shortage must be the top priority of the State of Hawaii. Not only does housing top surveys of Hawaii's policy priorities, but the State also has a statutory obligation to "[e]ffectively accommodate the housing needs of Hawaii's people" (HRS § 226-19). To fulfill this obligation, Governor Ige, Senator Chang, and other state officials have advocated the use of state owned lands near rail stations to develop high density housing for sale to Hawaii residents. Given the location of a rail station on the Aloha Stadium site, this parcel is an ideal site for this vision.

Response #1: Your comments are acknowledged. Please note that the Proposed Action, which is premised upon the Programmatic Master Plan appended to the Programmatic EIS as Appendix A, reflects the aggregated collection of extensive and exhaustive input from area residents, members of the public, existing Aloha Stadium stakeholders and public

agencies as discussed in Section 2.3 of the Programmatic EIS. Additionally, the Project Team conducted a substantial number of public outreach meetings and has considered public input throughout the EIS process. Hence, the Proposed Action represents the vision of the overall community for the Project Site. Based on community input and various technical studies, the Proposed Action is envisioned to encompass the New Aloha Stadium, approximately 730,000 gross square feet (GSF) of residential space, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF of hotel space. However, as noted throughout the Programmatic EIS, that final design of the Project Site and use and space allocation will be determined by the Stadium Authority, the selected Stadium Developer and Real Estate Developer(s). Please note as discussed at the EIS Scoping Meeting and described in the EIS Preparation Notice published on September 8, 2019, as well as reiterated in Section 1.1 of the Programmatic Draft EIS, *“The Proposed Action encompasses the construction of a new, modern stadium facility that will be supported by complimentary mixed-use development.”* Therefore, the subject Programmatic Draft EIS is intended to assess the potential effects associated with the Proposed Action on various environmental resource categories as prescribed by Section 11-200.1-24.

It is acknowledged that the Programmatic Draft EIS did not evaluate, *“the environmental impacts of least 200 towers including 100,000 units of housing on the Aloha Stadium site,”* as such a program would not meet the goals and objectives of the Proposed Action as described in Section 2.2 of the Programmatic Draft EIS. Nonetheless, the Proposed Action is envisioned to directly serve regional and State housing demands through the creation of a diverse range of residential options, accounting for upwards of 1,800 new housing units as discussed in Section 2.1 of the Programmatic Draft EIS. However, it should be noted that the extent of residential programming will ultimately be determined by the Stadium Authority and the selected Real Estate Developer(s) will comply with applicable affordable housing requirements.

Please note that due to broad comments raised in response to the Programmatic Draft EIS, Section 3.4 has been added to the Programmatic Final EIS which on a conceptual basis, evaluated a conceptual affordable housing project site design alternative program scenario with 20,000 to 100,000 units within the confines of the Project Site. It is readily apparent that this type of programming would not be compatible with the general purpose and need, as well as goals and objectives of the Proposed Action. Moreover, such a program and its anticipated impacts would require the preparation of a separate, comprehensive EIS documentation and evaluation.

With regards to your comment the use of State lands near rail stations, please note that the State of Hawai‘i is the land owner of the Project Site, and in partnership with the selected Stadium Developer and Real Estate Developer(s), may pursue different land-use configurations and strategies than what is presented in the Programmatic EIS to maximize the value of the Proposed Action and address a number of Statewide needs. The State of Hawai‘i, as the land owner, has the ultimate say in how they use their lands to fit their needs. Furthermore, it has not yet been determined how Act 146 will be administered,

specifically, how it relates to implementing a “stadium development district.” However, it is expected that the State of Hawai‘i, in partnership with the selected Stadium Developer and Real Estate Developer(s), will coordinate and work closely with the CCH to implement the Proposed Action, and to minimize any potential impacts on land uses at the Project Site and the Project Region.

Comment #2: *Many comparable facilities around the world today are surrounded by high density development, such as Wankhede Stadium in Mumbai, Madison Square Garden in New York, and Happy Valley Racecourse in Hong Kong. Because a stadium itself would be small--Soldier Field, the home of the Chicago Bears, is only seven acres--over 90 percent of the Aloha Stadium site, as many as 91 acres, can be used for high density housing.*

Response #2: Your comments are acknowledged. As noted in Response #1 above, the State of Hawai‘i, as the land owner, has the ultimate say in how they use their lands to fit their needs. However, it is expected that the State of Hawai‘i, in partnership with the selected Stadium Developer and Real Estate Developer(s), will coordinate and work closely with the CCH to implement the Proposed Action and to minimize any potential impacts on land uses at the Project Site and the Project Region. It is anticipated that the Proposed Action will result in the New Aloha Stadium, approximately 730,000 gross square feet (GSF) of residential space, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF of hotel space, which can be considered high density development across the Project Site.

Comment #3: *The rise of online shopping and the coronavirus pandemic have greatly reduced demand for brick and mortar retail and office space, both worldwide and in Hawaii. A recent study estimated that retail vacancies on Oahu will grow by 270,000 square feet this year alone. A strip mall or office building is unlikely to generate revenue to pay for the new stadium. By contrast, the new residents of 100,000 housing units will generate enormous amounts of economic activity and dramatically expand the tax base, thereby supporting the new stadium and other operations of the State.*

Response #3: Your comments are acknowledged. However, based on the economic and market analysis conducted by Victus Advisors in 2019, the Proposed Action which is anticipated to encompass approximately 730,000 gross square feet (GSF) of residential space, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF of hotel space will create a vibrant district that could, in summary, generate a Net Present Value (NPV) of over \$1.8 billion in total economic output, over \$700 million in personal earnings, and over \$198 million in State and County tax revenues, assuming an 8.0 percent discount over a 25-year period. After the Full Build-Out, up to 1,190 net new annual jobs are anticipated to be supported by operations of the Proposed Action. Hence, it is anticipated that the Proposed Action will also generate enormous amounts of economic activity while also achieving the goals and objectives of the Proposed Action, as well as the Hālawā Area TOD Plan whereas constructing 100,000 housing units at the Project Site would not as discussed in Response #1 above.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in cursive script that reads "Keola Cheng". The ink is dark and the signature is fluid.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Public Comment](#)
To: [Andrew Blasko](#)
Subject: Fw: Feedback on proposed stadium
Date: Tuesday, February 9, 2021 1:52:07 PM

From: Aaron Parks <aaronparks@mindspring.com>
Sent: Sunday, February 7, 2021 10:50 PM
To: Public Comment <publiccomment@wilsonokamoto.com>
Subject: Feedback on proposed stadium

I'm an educated and informed Hawai'i resident and I would like to offer my feedback on FAVOR of the newly proposed stadium and entertainment complex. I know there is some public opposition to this proposal, but in my opinion, much of that is because of the short sightedness of many of my fellow residents. I feel that this complex has the potential to be a boon for the area, attracting both attendees to major events and concerts in the new arena, and to potential new restaurant and retail stores which could spur activity and public involvement.

Hawai'i cannot grow and thrive by following the status quo. Hawai'i needs to pursue aggressive new development, but only projects which benefit the public, not just private enterprise. The proposal includes area for outside recreation and a rail station to provide easy access for commuters. These are excellent ideas and should be retained through any subsequent modifications to the proposal. The rail will be a much more significant and beneficial advancement to our state than people realize or give it credit for. Every major metropolitan area which has been successful in growing its population and importance - even with limited real estate - has done so on the backs of strong, effective public transportation. I know the rail also comes under substantial scrutiny, but both effective rail and strong, popular public spaces (like this entertainment complex) are a key part to maintaining the health and success of our island and our state in future decades.

I hope that as this proposal goes through its successive iterations, it maintains the core components that will make it a beloved destination over years to come - namely, the he multi use stadium and the rail station to provide easy public access to it. I look forward to seeing it completed in years to come.

Sincerely,
Aaron Parks
Kapolei, Hi
Panda375@earthlink.net



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10422-01

Aaron Park
Panda375@earthlink.net

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear Aaron Park:

Thank you for your comments dated February 7, 2021 regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *I’m an educated and informed Hawai‘i resident and I would like to offer my feedback on FAVOR of the newly proposed stadium and entertainment complex. I know there is some public opposition to this proposal, but in my opinion, much of that is because of the short sightedness of many of my fellow residents. I feel that this complex has the potential to be a boon for the area, attracting both attendees to major events and concerts in the new arena, and to potential new restaurant and retail stores which could spur activity and public involvement.*

Response 1: We acknowledge your comments and understand that you see the potential in the Proposed Action. Please note that the Proposed Action is envisioned to encompass the New Aloha Stadium, approximately 730,000 gross square feet (GSF) of residential space, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF of hotel space. In summary, as discussed in Section 4.13.3 of the Programmatic EIS, the Proposed Action (at Full Build-Out) is anticipated to generate a Net Present Value (NPV) of over \$1.8 billion in total economic output, over \$700 million in personal earnings, and over \$198 million in State and County tax revenues, assuming an 8.0 percent discount over a 25-year period. After the Full Build-Out, up to 1,190 net new annual jobs are anticipated to be supported by operations of the Proposed Action.

Comment 2: *Hawai‘i cannot grow and thrive by following the status quo. Hawai‘i needs to pursue aggressive new development, but only projects which benefit the public, not just*

private enterprise. The proposal includes area for outside recreation and a rail station to provide easy access for commuters. These are excellent ideas and should be retained through any subsequent modifications to the proposal.

Response 2: Your comments are acknowledged. The Project Site provides one of the greatest redevelopment opportunities in the State that can provide significant beneficial and economic impacts. The Proposed Action will provide and promote a ‘live / work / play / thrive’ environment, enhance the experience of visiting the New Aloha Stadium and the overall Project Site, and help ensure the overall financial success of the Proposed Action. Please note that as discussed in Response #1 above, the Proposed Action (at Full Build-Out) is anticipated to generate a Net Present Value (NPV) of over \$1.8 billion in total economic output, over \$700 million in personal earnings, and over \$198 million in State and County tax revenues, assuming an 8.0 percent discount over a 25-year period. After the Full Build-Out, up to 1,190 net new annual jobs are anticipated to be supported by operations of the Proposed Action. Moreover, the Project Site.

Comment 3: *The rail will be a much more significant and beneficial advancement to our state than people realize or give it credit for. Every major metropolitan area which has been successful in growing its population and importance - even with limited real estate - has done so on the backs of strong, effective public transportation. I know the rail also comes under substantial scrutiny, but both effective rail and strong, popular public spaces (like this entertainment complex) are a key part to maintaining the health and success of our island and our state in future decades.*

I hope that as this proposal goes through its successive iterations, it maintains the core components that will make it a beloved destination over years to come - namely, the he multi use stadium and the rail station to provide easy public access to it. I look forward to seeing it completed in years to come.

Response 3: Your comments are acknowledged. Please note that as mentioned in Response #2 above, the Project Site provides one of the greatest redevelopment opportunities in the State that can provide significant beneficial and economic impacts. It is expected that the State of Hawai‘i, in partnership with the selected Stadium Developer and Real Estate Developer(s), will coordinate and work closely with the City and County of Honolulu to implement the Proposed Action, while meeting the goals and objectives of both the Proposed Action and the Hālawā Area TOD Plan, and to minimize any potential impacts on land uses at the Project Site and the Project Region. Furthermore, the Proposed Action will endeavor to appropriately leverage the potential of and opportunities for synergized mixed-use development presented by the Hālawā / Aloha Stadium Transit Station currently completing construction.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and

Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Public Comment](#)
To: [Andrew Blasko](#)
Subject: Fw: Aloha Stadium
Date: Thursday, February 11, 2021 1:16:12 PM

From: Alexander Orpilla <alexfloraorp@icloud.com>
Sent: Wednesday, February 10, 2021 9:01 AM
To: Public Comment <publiccomment@wilsonokamoto.com>
Subject: Aloha Stadium

It can be fixed/retrofit phase by phase thereby reducing too much expenses, remember our island is now on deficit

Sent from my iPhone



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INNOVATORS • PLANNERS • ENGINEERS

10422-01

Alexander Orpilla
alexfloraorp@icloud.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear Alexander Orpilla:

Thank you for your comments dated February 10, 2021, regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *It can be fixed/retrofit phase by phase thereby reducing too much expenses, remember our island is now on deficit.*

Response 1: Your comments are unclear as we are unsure to what you are referring to that can be “fixed/retrofit” on a phase by phase basis. We assume that you are referring to “fixing” the existing Aloha Stadium, rather than building a new stadium. Please note that as discussed in Section 2.1 of the Programmatic Draft EIS, a range of structural upgrades have been made to mitigate the corrosion of the existing Aloha Stadium since its construction in the 1970s. However, as of 2019, approximately \$423 million in deferred maintenance had accumulated, including \$121 million needed in Americans with Disabilities Act (ADA)-related improvements and code compliance. The cost of such repairs were estimated to grow at a rate of approximately 5% per year, meaning that funding such repairs requires over \$30 million of annual contributions over the next 25 years. It is for this reason that fixing or retrofitting the existing stadium is no longer feasible. Instead, demolition of the existing stadium and replacing it in its entirety is the more fiscally responsible choice.

In addition, as detailed throughout Chapter 2 of the Programmatic EIS, the Proposed Action also encompasses the construction of complimentary mixed-use development through the Real Estate Development component which will support the New Aloha Stadium. Overall, Proposed Action is envisioned to encompass the New Aloha Stadium, approximately

730,000 gross square feet (GSF) residential space, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF of hotel space. In summary, as discussed in Section 4.13.3 of the Programmatic EIS, the Proposed Action (at Full Build-Out) is anticipated to generate a Net Present Value (NPV) of over \$1.8 billion in total economic output, over \$700 million in personal earnings, and over \$198 million in State and County tax revenues, assuming an 8.0 percent discount over a 25-year period. After the Full Build-Out, up to 1,190 net new annual jobs are anticipated to be supported by operations of the Proposed Action.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Public Comment](#)
To: [Andrew Blasko](#)
Subject: Fw: What do you think about The Aloha Stadium?
Date: Tuesday, February 9, 2021 1:53:08 PM

From: Amanda Canada <amanda@trademediahui.com>
Sent: Monday, February 8, 2021 10:19 AM
To: Public Comment <publiccomment@wilsonokamoto.com>
Subject: What do you think about The Aloha Stadium?

Aloha NASED,

The Aloha Stadium would be best utilized--and bring the most revenue--if built large enough (seating capacity of 60,000) to accommodate a future NFL team.

Mahalo and much aloha,



Amanda Canada

Publisher

287 Mokauea Street | Honolulu, HI 96819

Phone: (808) 738-4932 | Office: (808) 848-0711

www.trademediahui.com

Formerly
Trade Publishing



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C O R P O R A T I O N
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10422-01

Amanda Canada
Publisher- Trade Media Hui
287 Mokauea Street
Honolulu, HI 96819
amanda@trademediahui.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, Oʻahu, Hawaiʻi

Dear Amanda Canada :

Thank you for your comments dated February 8, 2021, regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawaiʻi Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *The Aloha Stadium would be best utilized--and bring the most revenue--if built large enough (seating capacity of 60,000) to accommodate a future NFL team.*

Response 1: Your comments are acknowledged. Please note that the Programmatic Final EIS includes a market feasibility & economic review and analysis prepared by Victus Advisors conducted in conjunction with the master planning and preliminary design efforts for the Proposed Action. This documentation clearly underscores that the existing Aloha Stadium's capacity of 50,000, by far, and in large exceeds current and anticipated future market needs. In observance of the analysis and guidance set forth by Victus Advisors as well as market sounding and user analysis by Stadium and Industry consultants, the unified recommendation is that the construction of a 27,500 - 35,000 seat capacity stadium would best serve current and anticipated future market demand.

Furthermore, before the 2018 fiscal year, Aloha Stadium was not widely considered as a major venue for concert activities. As the Aloha Stadium began to be marketed more heavily as a concert venue over the course of 2019, it was revealed through consultation with entertainment industry professionals that the Aloha Stadium's current capacity of 50,000 seats was a significant deterrent to the candidacy of the existing Aloha Stadium as

venue for major artists. Promoters and performers alike voiced that the ideal range for seating at a stadium-set concert lies between 25,000 and 30,000 seats.

Since the fiscal year of 2018, Aloha Stadium has hosted eight concerts, with seven held within the fiscal year of 2019. Six concerts have been booked/promoted by Live Nation with an average of 30,743 attendees, right in line with feedback provided by industry professionals. Nonetheless, as currently proposed, in addition to a raw 35,000 fixed seat capacity, concert events could potentially utilize field space for additional viewership that could accommodate upwards of 10,000 additional attendees.

With regard to sporting events held at Aloha Stadium, Division 1 Football Bowl Subdivision (D1-FBS) football factors in as the central activity featured. Specifically, Aloha Stadium was the home to the University of Hawai'i Rainbow Warriors Football Program (UH Football) when it was in operation. The University of Hawai'i is a member of the Mountain West Conference, which is considered to be a Mid-Major or Group of Five (G5) conference, and has ranked 81st in attendance among all D1-FBS institutions in the most recent season of play with no attendance restrictions (2019), bordering just under 25,000 attendees for home game attendance. Overall, attendance trends nation-wide are in sharp decline. The 2019 D1-FBS season resulted in the lowest overall attendance in the past 24 years (41,477 per game), with the Mountain West posting its lowest average per game attendance ever (23,232 per game). It is further notable that over the past five years, running from the 2014 season to 2019 season, average UH Football attendance has also trended down, reflecting a decline in average attendance. Moreover, UH Football has not drawn a sell-out crowd since 2007. By contrast, the highest attended game within the past five years attracted approximately 36,411 attendees (2014 season opener), under the context of the capacity of the existing Aloha Stadium (50,000 seats), the highest attended UH Football event held at the Stadium over the course of the last five years would have a little more than a 25% of the seats vacant. By contrast, under the Proposed Action the current capacity of 50,000 seats (35,000 seat stadium), with a similar level of attendance, the Stadium would be 100% filled to capacity. There is a quality all unto-itself to having a sold-out-stadium that cannot be tangibly quantified.

Overall, the proposed New Aloha Stadium (35,000 seat capacity) would create the opportunity to serve as a viable venue for a greater range of events. Possible events include rugby, motor sports, soccer and mixed martial arts. These events typically will not pursue stadiums larger than 35,000, as the demand of their audience typically would not justify the use of a larger venue, particularly under the context of the market that would be locally served here on O'ahu.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and

Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Public Comment](#)
To: [Andrew Blasko](#)
Subject: Fw: New stadium Plans
Date: Thursday, February 11, 2021 1:16:01 PM

From: Amy Casey <caseyamy8@gmail.com>
Sent: Tuesday, February 9, 2021 2:56 PM
To: Public Comment <publiccomment@wilsonokamoto.com>
Subject: New stadium Plans

To Whom It May Concern,

It is not the right time to be planning, budgeting, using money to build a new stadium. There are so many families in need because they lost their jobs and are on unemployment or trying to apply for unemployment. The principals have been asked to cut their educational budget, teachers are going to be displaced, there is a proposal to cut teachers salaries. State workers salaries are also indented to be cut.

There are many other reasons why the new stadium should not be built. The state is still working on the rail and it is not even in use yet. We have been tax more because there is a claim that we need to repair our roads. The people of Hawaii who have been impacted from the State shut downs and other should be helped first. The new stadium should be build five to seven years later after the economy has been built back up. It is not in best interest for State of Hawaii and its people to have something like proposed or build at this time.

Sincerely,
Amy Casey

Sent from my iPhone



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10422-01

Amy Casey
Caseyamy8@gmail.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear Amy Casey:

Thank you for your comments dated February 9, 2021, regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *It is not the right time to be planning, budgeting, using money to build a new stadium. There are so many families in need because they lost their jobs and are on unemployment or trying to apply for unemployment. The principals have been asked to cut their educational budget, teachers are going to be displaced, there is a proposal to cut teachers salaries. State workers salaries are also indented to be cut.*

Response 1: Your comments are acknowledged. The Project Team understands that success of this Proposed Action will be determined by a thorough planning process. Public input is an essential component of the planning process, and with this in mind, the Project Team has made deliberate efforts to actively involve the public in the planning process. This is evidenced by the various public outreach meetings held and the opportunities for input via comment periods that are summarized in Chapter 10 *Consultation* of the Programmatic EIS.

Please note that the impacts of the COVID-19 pandemic have been documented throughout this Programmatic EIS process. Specifically, COVID-19 impacts are discussed in the Executive Summary, Section 1.5, Section 4.18, and more importantly, in Chapter 9 as an unresolved issue, and have been updated to capture changes in conditions since the publication of the Programmatic Draft EIS.

Please note that at the time of the writing for the Programmatic Final EIS, the general consensus is that as more vaccinations are administered, COVID-19 will become more

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contained. As we can see in the State, as well as around the country, activities are returning to normal, to pre-COVID-19 conditions. Hence, the Proposed Action is still very feasible, and in fact, may provide even more beneficial impacts as the State economy begins to recover. In summary, as discussed in Section 4.13.3 of the Programmatic EIS, the Proposed Action (at Full Build-Out) is anticipated to generate a Net Present Value (NPV) of over \$1.8 billion in total economic output, over \$700 million in personal earnings, and over \$198 million in State and County tax revenues, assuming an 8.0 percent discount over a 25-year period. After the Full Build-Out, up to 1,190 net new annual jobs are anticipated to be supported by operations of the Proposed Action.

Comment 2: *There are many other reasons why the new stadium should not be built. The state is still working on the rail and it is not even in use yet. We have been tax more because there is a claim that we need to repair our roads. The people of Hawaii who have been impacted from the State shut downs and other should be helped first. The new stadium should be build five to seven years later after the economy has been built back up. It is not in best interest for State of Hawaii and its people to have something like proposed or build at this time.*

Response 2: Your comments are acknowledged. Please note that the existing Aloha Stadium has stood for over 45 years and is deteriorating structurally, with numerous deferred maintenance issues. It has since fallen out of compliance with current accessibility and building codes and lacks the amenities of other modern Stadiums. As discussed in Section 2.1 of the Programmatic EIS, a range of structural upgrades have been made to mitigate the corrosion of the existing Aloha Stadium since its construction. However, as of 2019, approximately \$423 million in deferred maintenance has accumulated, including \$121 million that is needed in Americans with Disabilities Act (ADA)-related improvements and code compliance. The scope of these repairs is discussed in further detail within the appended NASED PMP and WJE Report included herein as Appendix A-1: NASED Programmatic Master Plan and A-4: WJE Report, respectively. The cost of such repairs were estimated to grow at a rate of approximately 5% per year, meaning that funding such repairs requires over \$30 million of annual contributions over the next 25 years. Moreover, since the publication of Programmatic Draft EIS, the existing Aloha Stadium has been condemned and is no longer safe to host any spectator events adding to the validity and gravity of the situation at hand, and the purpose and need of the Proposed Action.

As noted in Response #1 above, the development of the Proposed Action (Full Build-Out) is anticipated to generate Net Present Value (NPV) of over \$1.8 billion in total economic output, over \$700 million in personal earnings, and over \$198 million in the State and County tax revenues, assuming 8.0 percent discount over 25-year period. After the Full Build-Out, up to 1,190 net new annual jobs are anticipated to be supported by operations of the Proposed Action

Regarding your comments discussing several of the State's programs relating to education, unemployment, and a separate project (HART Transit System) are acknowledged,

However, those projects and issues do not fall within the scope of assessment for the Programmatic EIS. Please note as discussed at the EIS Scoping Meeting and described in the EIS Preparation Notice published on September 8, 2019, as well as reiterated in Section 1.1 of the Programmatic Draft EIS, "*The Proposed Action encompasses the construction of a new, modern stadium facility that will be supported by complimentary mixed-use development.*" Therefore, the subject Programmatic Draft EIS is intended to assess the potential effects associated with the Proposed Action on various environmental resource categories as prescribed by Section 11-200.1-24.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Public Comment](#)
To: [Andrew Blasko](#)
Subject: Fw: Aloha Stadium site DEIS
Date: Tuesday, February 9, 2021 1:53:47 PM
Attachments: [Stadium EIS letter.docx](#)

From: Amy Wake <pastoramywake@gmail.com>
Sent: Monday, February 8, 2021 4:14 PM
To: Public Comment <publiccomment@wilsonokamoto.com>
Subject: Aloha Stadium site DEIS

Thank you for your consideration.
Amy Wake

February 8, 2021
Rev. Amy C. Wake
320 Hao Street
808-561-2260
pastoramywake@gmail.com

SUBJECT: Aloha Stadium site

Aloha,

I'm writing to ask about the draft EIS. It only includes 1813 housing units. Aloha Stadium is such a large space, how did you arrive at that number? You asked the public for input on what we wanted to see studied and we specifically asked you to study the proposal with more housing units, but you did not. The EIS should have assumed a higher maximum total units of low-cost housing units given our community's affordable housing shortage.

As a pastor, I see first-hand the effects of the pandemic and economy downturn. Members are leaving the state because they cannot afford to live here. Others have lost their jobs and are worried about losing their homes. Still others are currently homeless, with no real path to housing because of the lack of affordable housing in our communities.

This is an important opportunity to build 20,000 to 100,000 housing units and have a real impact on the lives of locals and the future of Hawaii. Ending the housing shortage must be the top priority for the State of Hawaii. Given the location of a rail station on the Aloha Stadium site, this parcel is an ideal site. In addition, 20,000-100,000 new home owners will generate enormous amounts of economic activity and dramatically expand the tax base, thereby supporting the new stadium and other operations of the State.

I would like to ask you to consider the environmental impact of significantly larger numbers of housing units (20,000 to 100,000) for the final EIS.

Sincerely,

Amy Wake
Lead Pastor, Trinity United Methodist Church in Pearl City



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10422-01

Amy Wake
Lead Pastor
Trinity United Methodist Church - Pearl City
320 Hao Street
Honolulu, HI 96821
pastoramywake@gmail.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘āhu, Hawai‘i

Dear Pastor Wake:

Thank you for your comments dated February 8, 2021 regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *I'm writing to ask about the draft EIS. It only includes 1813 housing units. Aloha Stadium is such a large space, how did you arrive at that number? You asked the public for input on what we wanted to see studied and we specifically asked you to study the proposal with more housing units, but you did not. The EIS should have assumed a higher maximum total units of low-cost housing units given our community's affordable housing shortage.*

As a pastor, I see first-hand the effects of the pandemic and economy downturn. Members are leaving the state because they cannot afford to live here. Others have lost their jobs and are worried about losing their homes. Still others are currently homeless, with no real path to housing because of the lack of affordable housing in our communities.

Response 1: Your comments are acknowledged. It is acknowledged that there is a need for greater availability of affordable housing on O‘āhu, as well as throughout the State of Hawai‘i, in general. We also acknowledge that many comments regarding more housing, specifically affordable housing, were brought up at both the EIS Scoping Meeting held on September 25, 2019, in conjunction with scoping out the assessment and evaluation for the

Programmatic Draft EIS, and the Master Plan Community Workshops held in December 2019. All comments were considered when preparing the Programmatic Draft EIS with regard to meeting content requirements prescribed in Hawai'i Administrative Rules, Title 11, Chapter 200.1. Hence, they were not ignored.

Please note as discussed at the EIS Scoping Meeting and described in the EIS Preparation Notice published on September 8, 2019, as well as reiterated in Section 1.1 of the Programmatic Draft EIS, "*The Proposed Action encompasses the construction of a new, modern stadium facility that will be supported by complimentary mixed-use development.*" Therefore, the subject Programmatic Draft EIS is intended to assess the potential effects associated with the Proposed Action on various environmental resource categories as prescribed by Section 11-200.1-24. The Proposed Action, which is premised upon the Programmatic Master Plan appended to the Programmatic EIS as Appendix A, reflects the aggregated collection of extensive and exhaustive input from area residents, members of the public, existing Aloha Stadium stakeholders and public agencies as discussed in Section 2.3 of the Programmatic EIS. Hence, the Proposed Action represents the vision of the overall community for the Project Site. Based on community input and various technical studies, the Proposed Action is envisioned to encompass the New Aloha Stadium, approximately 730,000 gross square feet (GSF) of residential space, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF of hotel space. However, as noted throughout the Programmatic EIS, that final design of the Project Site and use and space allocation will be determined by the Stadium Authority, the selected Stadium Developer and Real Estate Developer(s).

It is acknowledged that the Programmatic EIS did not evaluate, "*a higher maximum total units of low-cost housing units*" housing program as such a program would not meet the goals and objectives of the Proposed Action as described in Section 2.2 of the Programmatic Draft EIS. Nonetheless, the Proposed Action is envisioned to directly serve regional and State housing demands through the creation of a diverse range of residential options, accounting for upwards of 1,800 new housing units as discussed in Section 2.1 of the Programmatic Draft EIS. However, it should be noted that the extent of residential programming will ultimately be determined by the Stadium Authority and the selected Real Estate Developer(s) will comply with applicable affordable housing requirements.

Please note that due to broad comments raised in response to the Programmatic Draft EIS, Section 3.4 has been added to the Programmatic Final EIS which on a conceptual basis, evaluated a conceptual affordable housing project site design alternative program scenario with 20,000 to 100,000 units within the confines of the Project Site. It is readily apparent that this type of programming would not be compatible with the general purpose and need, as well as goals and objectives of the Proposed Action. Moreover, such a program and its anticipated impacts would require the preparation of a separate, comprehensive EIS documentation and evaluation.

Comment 2: *This is an important opportunity to build 20,000 to 100,000 housing units and have a real impact on the lives of locals and the future of Hawaii. Ending the housing shortage must be the top priority for the State of Hawaii. Given the location of a rail station on the Aloha Stadium site, this parcel is an ideal site. In addition, 20,000-100,000 new home owners will generate enormous amounts of economic activity and dramatically expand the tax base, thereby supporting the new stadium and other operations of the State.*

I would like to ask you to consider the environmental impact of significantly larger numbers of housing units (20,000 to 100,000) for the final EIS.

Response 2: Your comments are acknowledged. As noted in Response #1 above, due to broad comments raised in response to the Programmatic Draft EIS, Section 3.4 has been added to the Programmatic Final EIS which on a conceptual basis, evaluated a conceptual affordable housing project site design alternative program scenario with 20,000 to 100,000 units within the confines of the Project Site. It is readily apparent that this type of programming would not be compatible with the general purpose and need, as well as goals and objectives of the Proposed Action. Moreover, such a program and its anticipated impacts would require the preparation of a separate, comprehensive EIS documentation and evaluation. Nonetheless, the Proposed Action is envisioned to directly serve regional and State housing demands through the creation of a diverse range of residential options, accounting for upwards of 1,800 new housing units as discussed in Section 2.1 of the Programmatic Draft EIS. However, it should be noted that the extent of residential programming will ultimately be determined by the Stadium Authority, the selected Real Estate Developer(s) and will comply with applicable affordable housing requirements.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Public Comment](#)
To: [Andrew Blasko](#)
Subject: Fw: Aloha Stadium
Date: Tuesday, February 9, 2021 1:52:40 PM

From: abarnes@hawaiiantel.net <abarnes@hawaiiantel.net>
Sent: Monday, February 8, 2021 6:27 AM
To: Public Comment <publiccomment@wilsonokamoto.com>
Subject: Aloha Stadium

Regarding the renovation and plans for a new Aloha Stadium, please consider that we have already witnessed a failed private-public partnership with the rail project. In addition, the citizens of Aiea have had to endure roadway construction along Kamehameha Highway and constant bottlenecks at the junction of Moanalua Road and H-1 in Halawa and traffic exiting from the ewa side in Pearl City. Aiea already has an entertainment, shopping, and eating area: it's called Pearlridge. The old Kam Drive in has sat idle for years, filled with new cars and displaced those who depended on the swap meet. K-Mart at the stadium shopping area has also been vacant for year. This project makes no sense.

We don't need a new super complex, can't afford it, and I am totally against this particular plan. Think about fixing Blaisdell park, taking care of the homeless living on the bike path/Navy easement along Pearl Harbor to Waipahu. That's what is really needed.

Thank you,
Andrea Barnes, Aiea



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10422-01

Andrea Barnes
abarnes@hawaiiintel.net

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear Andrea Barnes:

Thank you for your comments dated February 8, 2021, regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *Regarding the renovation and plans for a new Aloha Stadium, please consider that we have*

already witnessed a failed private-public partnership with the rail project. In addition, the citizens of Aiea have had to endure roadway construction along Kamehameha Highway and constant bottlenecks at the junction of Moanalua Road and H-1 in Halawa and traffic exiting from the ewa side in Pearl City. Aiea already has an entertainment, shopping, and eating area: it's called Pearlridge. The old Kam Drive in has sat idle for years, filled with new cars and displaced those who depended on the swap meet. K-Mart at the stadium shopping area has also been vacant for year. This project makes no sense. We don't need a new super complex, can't afford it, and I am totally against this particular plan. Think about fixing Blaisdell park, taking care of the homeless living on the bike path/Navy easement along Pearl Harbor to Waipahu. That's what is really needed.

Response 1: Your comments are acknowledged and understand that you are in opposition of the Proposed Action. Please note that the Proposed Action, which is premised upon the Programmatic Master Plan appended to the Programmatic EIS as Appendix A, reflects the aggregated collection of extensive and exhaustive input from area residents, members of the public, existing Aloha Stadium stakeholders and public agencies as discussed in Section 2.3 of the Programmatic EIS. Hence, the Proposed Action represents the vision of the overall community for the Project Site. Based on community input and various technical studies, the Proposed Action is envisioned to encompass the New Aloha Stadium,

approximately 730,000 gross square feet (GSF) of residential space, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF of hotel space. However, as noted throughout the Programmatic EIS, that final design of the Project Site and use and space allocation will be determined by the Stadium Authority, the selected Stadium Developer and Real Estate Developer(s). Moreover, the Project Site presents a major opportunity for redevelopment. The Proposed Action, as described in the EIS and the Programmatic Master Plan, has the potential to significantly increase the Project Region's desirability from a hospitality perspective contributing to the vibrancy of the Proposed Action. It is anticipated that a hotel at the Project Site could serve potentially over 1.5 million annual visitors to the New Aloha Stadium; furthermore, the Proposed Action could potentially serve as a catalyst for growth in visitation, attracting tourists and visitors to the Project Site retail and mixed-use environment that would have otherwise not considered coming to the submarket. In summary, as discussed in Section 4.13.3 of the Programmatic EIS, the Proposed Action (at Full Build-Out) is anticipated to generate a Net Present Value (NPV) of over \$1.8 billion in total economic output, over \$700 million in personal earnings, and over \$198 million in State and County tax revenues, assuming an 8.0 percent discount over a 25-year period. After the Full Build-Out, up to 1,190 net new annual jobs are anticipated to be supported by operations of the Proposed Action

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Public Comment](#)
To: [Andrew Blasko](#)
Subject: Fw: Build 100,000 housing units at the Aloha Stadium site
Date: Tuesday, February 9, 2021 1:51:13 PM

From: Andrew Graham <andrewjkgraham@gmail.com>
Sent: Sunday, February 7, 2021 7:09 PM
To: Public Comment <publiccomment@wilsonokamoto.com>
Subject: Build 100,000 housing units at the Aloha Stadium site

02/07/21

Andrew Graham
andrewjkgraham@gmail.com

Aloha,

The current plan to surround the new stadium with retail, office space, hotel, and 1,813 condos is economically unrealistic for the foreseeable future, and the EIS should instead include analysis of the environmental impacts of least 200 towers including 100,000 units of housing on the Aloha Stadium site. While we recognize the need to replace Aloha Stadium, a new stadium should be confined to as small a size as possible. The EIS is supposed to determine the maximum quantities of development, therefore, it should evaluate the maximum quantity of housing units feasible with transit-oriented assumptions.

Ending the housing shortage must be the top priority of the State of Hawaii. Not only does housing top surveys of Hawaii's policy priorities, but the State also has a statutory obligation to "[e]ffectively accommodate the housing needs of Hawaii's people" (HRS § 226-19). To fulfill this obligation, Governor Ige, Senator Chang, and other state officials have advocated the use of state owned lands near rail stations to develop high density housing for sale to Hawaii residents. Given the location of a rail station on the Aloha Stadium site, this parcel is an ideal site for this vision.

Many comparable facilities around the world today are surrounded by high density development, such as Wankhede Stadium in Mumbai, Madison Square Garden in New York, and Happy Valley Racecourse in Hong Kong. Because a stadium itself would be small--Soldier Field, the home of the Chicago Bears, is only seven acres--over 90 percent of the Aloha Stadium site, as many as 91 acres, can be used for high density housing.

The rise of online shopping and the coronavirus pandemic have greatly reduced demand for brick and mortar retail and office space, both worldwide and in Hawaii. A recent study estimated that retail vacancies on Oahu will grow by 270,000 square feet this year alone. A strip mall or office building is unlikely to generate revenue to pay for the new stadium. By contrast, the new residents of 100,000 housing units will generate enormous amounts of economic activity and dramatically expand the tax base, thereby supporting the new stadium and other operations of the State.



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10422-01

Andrew Graham
andrewjkgraham@gmail.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear Andrew Graham:

Thank you for your comments dated February 7, 2021 regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *The current plan to surround the new stadium with retail, office space, hotel, and 1,813 condos is economically unrealistic for the foreseeable future, and the EIS should instead include analysis of the environmental impacts of least 200 towers including 100,000 units of housing on the Aloha Stadium site. While we recognize the need to replace Aloha Stadium, a new stadium should be confined to as small a size as possible. The EIS is supposed to determine the maximum quantities of development, therefore, it should evaluate the maximum quantity of housing units feasible with transit-oriented assumptions.*

Ending the housing shortage must be the top priority of the State of Hawaii. Not only does housing top surveys of Hawaii’s policy priorities, but the State also has a statutory obligation to “[e]ffectively accommodate the housing needs of Hawaii’s people” (HRS § 226-19). To fulfill this obligation, Governor Ige, Senator Chang, and other state officials have advocated the use of state owned lands near rail stations to develop high density housing for sale to Hawaii residents. Given the location of a rail station on the Aloha Stadium site, this parcel is an ideal site for this vision..

Response 1: Your comments are acknowledged. Please note that the Proposed Action, which is premised upon the Programmatic Master Plan appended to the Programmatic EIS as Appendix A, reflects the aggregated collection of extensive and exhaustive input from

area residents, members of the public, existing Aloha Stadium stakeholders and public agencies as discussed in Section 2.3 of the Programmatic EIS. Additionally, the Project Team conducted a substantial number of public outreach meetings and has considered public input throughout the EIS process. Hence, the Proposed Action represents the vision of the overall community for the Project Site. Based on community input and various technical studies, the Proposed Action is envisioned to encompass the New Aloha Stadium, approximately 730,000 gross square feet (GSF) residential space, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF of hotel space. However, as noted throughout the Programmatic EIS, that final design of the Project Site and use and space allocation will be determined by the Stadium Authority, the selected Stadium Developer and Real Estate Developer(s). Please note as discussed at the EIS Scoping Meeting and described in the EIS Preparation Notice published on September 8, 2019, as well as reiterated in Section 1.1 of the Programmatic Draft EIS, “*The Proposed Action encompasses the construction of a new, modern stadium facility that will be supported by complimentary mixed-use development.*” Therefore, the subject Programmatic Draft EIS is intended to assess the potential effects associated with the Proposed Action on various environmental resource categories as prescribed by Section 11-200.1-24.

It is acknowledged that the Programmatic Draft EIS did not evaluate, “*the environmental impacts of least 200 towers including 100,000 units of housing on the Aloha Stadium site,*” as such a program would not meet the goals and objectives of the Proposed Action as described in Section 2.2 of the Programmatic Draft EIS. Nonetheless, the Proposed Action is envisioned to directly serve regional and State housing demands through the creation of a diverse range of residential options, accounting for upwards of 1,800 new housing units as discussed in Section 2.1 of the Programmatic Draft EIS. However, it should be noted that the extent of residential programming will ultimately be determined by the Stadium Authority and the selected Real Estate Developer(s) which will comply with applicable affordable housing requirements.

Please note that due to broad comments raised in response to the Programmatic Draft EIS, Section 3.4 has been added to the Programmatic Final EIS which on a conceptual basis, evaluated a conceptual affordable housing project site design alternative program scenario with 20,000 to 100,000 units within the confines of the Project Site. It is readily apparent that this type of programming would not be compatible with the general purpose and need, as well as goals and objectives of the Proposed Action. Moreover, such a program and its anticipated impacts would require the preparation of a separate, comprehensive EIS documentation and evaluation.

With regards to your comment the use of State lands near rail stations, please note that the State of Hawai‘i is the land owner of the Project Site, and in partnership with the selected Stadium Developer and Real Estate Developer(s), may pursue different land-use configurations and strategies than what is presented in the Programmatic EIS to maximize the value of the Proposed Action and address a number of Statewide needs. The State of Hawai‘i, as the landowner, has the ultimate say in how they use their lands to fit their

needs. Furthermore, it has not yet been determined how Act 146 will be administered, specifically, how it relates to implementing a “stadium development district.” However, it is expected that the State of Hawai‘i, in partnership with the selected Stadium Developer and Real Estate Developer(s), will coordinate and work closely with the CCH to implement the Proposed Action, and to minimize any potential impacts on land uses at the Project Site and the Project Region.

Comment 2: *Many comparable facilities around the world today are surrounded by high density development, such as Wankhede Stadium in Mumbai, Madison Square Garden in New York, and Happy Valley Racecourse in Hong Kong. Because a stadium itself would be small--Soldier Field, the home of the Chicago Bears, is only seven acres--over 90 percent of the Aloha Stadium site, as many as 91 acres, can be used for high density housing.*

Response 2: Your comments are acknowledged. As noted in Response #1 above, the State of Hawai‘i, as the landowner, has the ultimate say in how they use their lands to fit their needs. However, it is expected that the State of Hawai‘i, in partnership with the selected Stadium Developer and Real Estate Developer(s), will coordinate and work closely with the CCH to implement the Proposed Action, and to minimize any potential impacts on land uses at the Project Site and the Project Region. It is anticipated that the Proposed Action will result in the New Aloha Stadium, approximately 730,000 gross square feet (GSF) of residential space, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF of hotel space, which can be considered high density development across the Project Site.

Comment 3: *The rise of online shopping and the coronavirus pandemic have greatly reduced demand for brick and mortar retail and office space, both worldwide and in Hawaii. A recent study estimated that retail vacancies on Oahu will grow by 270,000 square feet this year alone. A strip mall or office building is unlikely to generate revenue to pay for the new stadium. By contrast, the new residents of 100,000 housing units will generate enormous amounts of economic activity and dramatically expand the tax base, thereby supporting the new stadium and other operations of the State.*

Response 3: Your comments are acknowledged. However, based on the economic and market analysis conducted by Victus Advisors in 2019, the Proposed Action which is anticipated to encompass approximately 730,000 gross square feet (GSF) of residential space, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF of hotel space will create a vibrant district that could, in summary, generate a Net Present Value (NPV) of over \$1.8 billion in total economic output, over \$700 million in personal earnings, and over \$198 million in State and County tax revenues, assuming an 8.0 percent discount over a 25-year period. After the Full Build-Out, up to 1,190 net new annual jobs are anticipated to be supported by operations of the Proposed Action. Hence, it is anticipated that the Proposed Action will also generate enormous amounts of economic activity while also achieving the goals and objectives of the Proposed Action, as well as the

Hālawā Area TOD Plan, whereas constructing 100,000 housing units at the Project Site would not as discussed in Response #1 above.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Public Comment](#)
To: [Andrew Blasko](#)
Subject: Fw: Aloha Stadium Comment
Date: Tuesday, February 9, 2021 1:50:39 PM
Attachments: [Faith Action Draft EIS Aloha Stadium Comment.pdf](#)

From: Faith Action HousingNOW! <housing@faithactionhawaii.org>
Sent: Saturday, February 6, 2021 10:25 AM
To: Public Comment <publiccomment@wilsonokamoto.com>
Cc: Ashleigh Loa <aloe@faithactionhawaii.org>
Subject: Aloha Stadium Comment

Aloha,

Attached is the official organization testimony from Faith Action for Community Equity regarding the New Aloha Stadium Entertainment District Draft Environmental Impact Statement.

Mahalo.

Ashleigh Loa
Faith Action Executive Director
aloe@faithactionhawaii.org



Aloha,

Faith Action for Community Equity would like to thank the Department of Accounting and General Services and its EIS contractor for recognizing our organization as a participant in the master planning, EIS scoping, and public commenting process. Faith Action's highest priority regarding the New Aloha Stadium Entertainment District is to ensure that our entire community sees benefits from investment and redevelopment, particularly with a focus on affordable housing that would be abundantly available and affordable for the asset-limited, income-constrained, employed (ALICE) population.

According to the Hawai'i Housing Finance & Development Corporation (HHFDC) *Housing Planning Study* (2019), O'ahu needs 22,168 new residential units, with over half of that demand for households earning up to 80% of the area median income. This 22,000-unit Honolulu County figure does not account for the existing shortage of housing, let alone the need for low-cost housing that would not become a cost burden (as defined by the U.S. Department of Housing and Urban Development, HUD) to local ALICE families.

The socioeconomic impacts of an EIS should not be limited to the "do no harm" principle to disadvantaged populations; instead, the study should prompt the question, "Does the proposed action lift up disadvantaged and marginalized populations?" The Aloha Stadium site, as a large public land resource in a transit-oriented development area should be prioritized for stabilizing our community's most vulnerable citizens with safe, secure, and affordable housing conveniently located near high-frequency transit.

The EIS analysis should account for the state-identified need for housing by examining the impacts or non-impacts of ambitiously addressing the affordable housing shortage. Development of affordable housing does not preclude other plans in the mixed-use development. In fact, affordable housing that working class locals can actually afford alongside convenient housing that higher-income households desire would enhance the sustainability of the district. However, the proportion of housing should be in line with the demand by HUD income classification. The *Revised Ordinances of Honolulu Chapter 38, Affordable Housing Requirement*, or other county-required targets for affordability are a minimum requirement. Our community deserves better than a minimum effort by our State officials.

The historical patterns of development centered around the personal automobile create cost burdens and lifestyles that make it difficult for ALICE families to thrive in their own community. The proposed action is an opportunity for our community to address our state's considerable 50,000-unit housing need without significantly impacting the overall O'ahu environment with car-centric, suburban sprawl.

Faith Action's members remain committed to see that the New Aloha Stadium Entertainment District Master Plan is inclusive of housing priorities that put the needs of Hawai'i residents first.

Ashleigh Loa
Faith Action Executive Director
aloa@faithactionhawaii.org



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C O R P O R A T I O N
INNOVATORS • PLANNERS • ENGINEERS

10422-01

Ashleigh Loa
aloa@faithactionhawaii.org

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, Oʻahu, Hawaiʻi

Dear Ashleigh Loa:

Thank you for your comments dated February 6, 2021 regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawaiʻi Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *Faith Action for Community Equity would like to thank the Department of Accounting and General Services and its EIS contractor for recognizing our organization as a participant in the master planning, EIS scoping, and public commenting process. Faith Action's highest priority regarding the New Aloha Stadium Entertainment District is to ensure that our entire community sees benefits from investment and redevelopment, particularly with a focus on affordable housing that would be abundantly available and affordable for the asset-limited, income-constrained, employed (ALICE) population.*

Response 1: Your comments are acknowledged. Please note that Chapter 10 of the Programmatic EIS outlines and summarizes all consultation that has been conducted to date regarding the Proposed Action. We understand that the Faith Action for Community Equity (FACE) organization highest priority regarding the Proposed Action is to ensure that the community sees benefits from investment and redevelopment, particularly with a focus on affordable housing that would be abundantly available and affordable for the asset-limited, income-constrained, employed (ALICE) population.

Please note that the Proposed Action is envisioned to directly serve regional and State housing demands through the creation of a diverse range of residential options, accounting for upwards of 1,800 new housing units as discussed in Section 2.1 of the Programmatic Draft EIS. However, it should be noted that the extent of residential programming will

ultimately be determined by the Stadium Authority, and the selected Real Estate Developer(s) which will comply with applicable affordable housing requirements.

Comment 2: *According to the Hawai‘i Housing Finance & Development Corporation (HHFDC) Housing Planning Study (2019), O‘ahu needs 22,168 new residential units, with over half of that demand for households earning up to 80% of the area median income. This 22,000-unit Honolulu County figure does not account for the existing shortage of housing, let alone the need for low-cost housing that would not become a cost burden (as defined by the U.S. Department of Housing and Urban Development, HUD) to local ALICE families.*

The socioeconomic impacts of an EIS should not be limited to the “do no harm” principle to disadvantaged populations; instead, the study should prompt the question, “Does the proposed action lift up disadvantaged and marginalized populations?” The Aloha Stadium site, as a large public land resource in a transit-oriented development area should be prioritized for stabilizing our community’s most vulnerable citizens with safe, secure, and affordable housing conveniently located near high-frequency transit.

Response 2: It is acknowledged that there is a need for greater availability of affordable housing on O‘ahu, as well as throughout the State of Hawai‘i, in general.

Your comment regarding the socioeconomic impact assessment discussed in Section 4.13 of the Programmatic EIS is unclear when you refer to the “do not harm” principle. Please note as discussed in Response #1 above, the Proposed Action will provide needed housing options for the growing population in the region. Residential products will provide residents with a wide range of housing choices. Moreover, as noted in Response #1 above, the Stadium Authority, the selected Stadium Developer and Real Estate Developer(s) and will comply with applicable affordable housing requirements. As it relates to the socioeconomic impacts on the population that Programmatic Draft EIS studied and addressed both the adverse and advantageous impacts of the Proposed Action.

Specifically, the Programmatic EIS evaluated environmental justice impacts in Section 4.13.4 which evaluates effects of the Proposed Action on minority populations, which includes those that may be considered within the lower-income class based on dollar-value thresholds set by the United States Census Bureau. As stated within Section 4.13.4 of the Programmatic Draft EIS:

Although EJ minority and low-income populations are present within the identified affected area, based on the analyses presented in this Programmatic Draft EIS, the Proposed Action would have less than significant adverse human health or environmental impacts regardless of the selected option. Negative impacts on the population in the Proposed Action vicinity are not anticipated.

The effects of implementing the Proposed Action would not be appreciably more severe or greater in magnitude to minority or low-income communities. Therefore, no disproportionately high and adverse human health or environmental effects on minority populations and low-income populations would occur. Moreover, the State of Hawai'i has been and will continue to be dedicated to communicating accurate and timely information to communities as design continues to progress to protect human health and the overall environment. The State of Hawai'i has been and will continue to be committed to transparency, integrity, and empathy in work involved with the Proposed Action. Public Participation and community involvement is one of the cornerstones of EJ. Chapter 9 of this Programmatic Draft EIS outlines the State of Hawai'i's community engagement efforts thus far which have been proactive, providing complete information, timely notices, and full disclosure of key decisions and will continue to do so throughout the entirety of the Proposed Action. Hence, the Proposed Action would not negatively impact EJ populations.

Moreover, there could possibly be direct and indirect benefits to these population groups as a result of additional job opportunities that would result from the Proposed Action.

Hence, the Proposed Action will not adversely impact disadvantaged and marginalized people in the vicinity of the Project Site and may possibly provide direct and indirect benefits to these population groups as a result of additional job opportunities and housing options that would result from the Proposed Action.

Comment 3: *The EIS analysis should account for the state-identified need for housing by examining the impacts or non-impacts of ambitiously addressing the affordable housing shortage. Development of affordable housing does not preclude other plans in the mixed-use development. In fact, affordable housing that working class locals can actually afford alongside convenient housing that higher-income households desire would enhance the sustainability of the district. However, the proportion of housing should be in line with the demand by HUD income classification. The Revised Ordinances of Honolulu Chapter 38, Affordable Housing Requirement, or other county-required targets for affordability are a minimum requirement. Our community deserves better than a minimum effort by our State officials.*

Response 3: Please note as discussed at the EIS Scoping Meeting and described in the EIS Preparation Notice published on September 8, 2019, as well as reiterated in Section 1.1 of the Programmatic Draft EIS, “*The Proposed Action encompasses the construction of a new, modern stadium facility that will be supported by complimentary mixed-use development.*” Therefore, the subject Programmatic Draft EIS is intended to assess the potential effects associated with the Proposed Action on various environmental resource categories as prescribed by Section 11-200.1-24.

It is acknowledged that the Programmatic Draft EIS did not evaluate, “*the state-identified need for housing by examining the impacts or non-impacts of ambitiously addressing the affordable housing shortage,*” as this is not within the scope of assessment for the Programmatic EIS. As discussed in Response #1 above, please note that the Proposed Action is envisioned to directly serve regional and State housing demands through the creation of a diverse range of residential options, accounting for upwards of 1,800 new housing units as discussed in Section 2.1 of the Programmatic Draft EIS. However, it should be noted that the extent of residential programming will ultimately be determined by the Stadium Authority and the selected Real Estate Developer(s) which will comply with applicable affordable housing requirements.

However, please note that due to broad comments raised in response to the Programmatic Draft EIS, Section 3.4 has been added to the Programmatic Final EIS which on a conceptual basis, evaluated a conceptual affordable housing project site design alternative program scenario with 20,000 to 100,000 units within the confines of the Project Site. It is readily apparent that this type of programming would not be compatible with the general purpose and need, as well as goals and objectives of the Proposed Action. Moreover, such a program and its anticipated impacts would require the preparation of a separate, comprehensive EIS documentation and evaluation.

Comment 4: *The historical patterns of development centered around the personal automobile create cost burdens and lifestyles that make it difficult for ALICE families to thrive in their own community. The proposed action is an opportunity for our community to address our state’s considerable 50,000-unit housing need without significantly impacting the overall O’ahu environment with car-centric, suburban sprawl.*

Faith Action’s members remain committed to see that the New Aloha Stadium Entertainment District Master Plan is inclusive of housing priorities that put the needs of Hawai‘i residents first.

Response 4: Your comments are acknowledged. As noted in Response #3 above, please note that due to broad comments raised in response to the Programmatic Draft EIS, Section 3.4 has been added to the Programmatic Final EIS which on a conceptual basis, evaluated a conceptual affordable housing project site design alternative program scenario with 20,000 to 100,000 units within the confines of the Project Site. It is readily apparent that this type of programming would not be compatible with the general purpose and need, as well as goals and objectives of the Proposed Action. Moreover, such a program and its anticipated impacts would require the preparation of a separate, comprehensive EIS documentation and evaluation.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and

Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Public Comment](#)
To: [Andrew Blasko](#)
Subject: Fw: EIS Comments for ALOHA STADIUM
Date: Tuesday, February 9, 2021 1:50:14 PM
Attachments: [ALOHA Homes- EIS comments- CCH 2-4-21.docx](#)

From: Betty Lou Larson <bettylou.larson@catholiccharitieshawaii.org>
Sent: Thursday, February 4, 2021 7:05 PM
To: Public Comment <publiccomment@wilsonokamoto.com>
Cc: Tina Andrade <tina@catholiccharitieshawaii.org>
Subject: EIS Comments for ALOHA STADIUM

Thank you for considering our comments for the EIS.

Betty Lou Larson

CATHOLIC CHARITIES HAWAI'I

Social Policy

Legislative Liaison

1822 Ke`eaumoku Street

Honolulu, HI 96822

Direct Line: (808) 373-0356

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bettylou.larson@catholiccharitieshawaii.org

www.CatholicCharitiesHawaii.org

Catholic Charities Hawai'i...helping people in need to help themselves, regardless of their faith.

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TO: **EIS Comments for Aloha Stadium Redevelopment;** 2/4/2021
Nased.eis@wilsonokamoto.com

FROM: Rob Van Tassel, President and CEO, Catholic Charities Hawai'i

Contact: Betty Lou Larson, Legislative Liaison, if you have any questions:

373-0356; bettylou.larson@catholiccharitieshawaii.org

SUBJECT: Build 100,000 affordable housing units at the Aloha Stadium site

I am Rob Van Tassel, with Catholic Charities Hawai'i. Our mission is to provide services and advocacy for the most vulnerable in Hawai'i. Catholic Charities Hawai'i has a long history of working in the areas of affordable housing and homelessness. While we support the replacement of Aloha Stadium, we suggest that better use of the remainder of the land should focus on building for the most critical needs of our State, that is affordable housing. As a State, we MUST find housing solutions that enable our young workers, the future of our State, to continue living in Hawaii. Dense, high-rise living is the wave of the future, especially for our island state. We support the concept of ALOHA Homes which promotes higher density along the rail line, for truly affordable housing for owner occupants.

We understand that the EIS is supposed to determine the maximum quantities of development, therefore, it should evaluate the maximum quantity of housing units feasible with transit-oriented assumptions. Given the location of a rail station on the Aloha Stadium site, this parcel is an ideal site for this vision. Since the build out of this site will take many years, including building high density leasehold condo units could create a win-win situation for the State and for the Stadium. Restaurants and entertainment to entice attendance at the Stadium would be used 365 days/year by the many residents of these condos. Not only the construction of 100,000 units, but the residents who live there will provide dramatic boosts to the State's economy for years to come, not just on game days.

As the EIS considers the maximum quantities of development, we ask you to consider:

- What is the minimum number of acres needed to build a quality stadium, compared with other stadiums also surrounded by high-density developments?
- Is more office space needed on Oahu? The pandemic has shown companies (as well as state government departments) that they can efficiently downsize their office space and costs, with many more employees working virtually.
- Is a hotel really needed at the Stadium? Waikiki's hotels are struggling and this will continue well into the future. Good access to the Stadium from Waikiki and the urban core will be provided by the rail line.
- Analyze the environmental impacts of 200 towers including 100,000 units of housing on the Aloha Stadium site.
- What is the best use of state-owned land in the urban core?
- How would the development of high density affordable condo units impact the Housing goals and priorities of the State.



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10422-01

Betty Lou Larson
Legislative Liaison
Catholic Charities Hawai'i
1822 Keenamoku Street
Honolulu, HI 96822
Bettylou.larson@catholiccharitieshawaii.org

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O'ahu, Hawai'i

Dear Betty Lou Larson:

Thank you for your comments dated February 4, 2021, regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai'i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *I am Rob Van Tassel, with Catholic Charities Hawai'i. Our mission is to provide services and advocacy for the most vulnerable in Hawai'i. Catholic Charities Hawai'i has a long history of working in the areas of affordable housing and homelessness. While we support the replacement of Aloha Stadium, we suggest that better use of the remainder of the land should focus on building for the most critical needs of our State, that is affordable housing. As a State, we MUST find housing solutions that enable our young workers, the future of our State, to continue living in Hawaii. Dense, high-rise living is the wave of the future, especially for our island state. We support the concept of ALOHA Homes which promotes higher density along the rail line, for truly affordable housing for owner occupants.*

Response 1: Your comments are acknowledged. We understand that you are active with Catholic Charities Hawai'i whose mission is to provide services and advocacy for the most vulnerable in the State. We also understand that you support the replacement of the existing Aloha Stadium, you also suggest better use of the remaining acreage to build affordable housing. Please note that the Proposed Action, which is premised upon the Programmatic Master Plan appended to the Programmatic EIS as Appendix A, reflects the aggregated

collection of extensive and exhaustive input from area residents, members of the public, existing Aloha Stadium stakeholders and public agencies as discussed in Section 2.3 of the Programmatic EIS. Hence, the Proposed Action represents the vision of the overall community for the Project Site. Based on community input and various technical studies, the Proposed Action is envisioned to encompass the New Aloha Stadium, approximately 730,000 gross square feet (GSF) of residential space, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF of hotel space. However, as noted throughout the Programmatic EIS, that final design of the Project Site and use and space allocation will be determined by the Stadium Authority, the selected Stadium Developer and Real Estate Developer(s). However, it should be noted that the extent of residential programming will ultimately be determined by the Stadium Authority and the selected Real Estate Developer(s) which will comply with applicable affordable housing requirements.

Comment 2: *We understand that the EIS is supposed to determine the maximum quantities of development, therefore, it should evaluate the maximum quantity of housing units feasible with transit-oriented assumptions. Given the location of a rail station on the Aloha Stadium site, this parcel is an ideal site for this vision. Since the build out of this site will take many years, including building high density leasehold condo units could create a win-win situation for the State and for the Stadium. Restaurants and entertainment to entice attendance at the Stadium would be used 365 days/year by the many residents of these condos. Not only the construction of 100,000 units, but the residents who live there will provide dramatic boosts to the State's economy for years to come, not just on game days.*

Response 2: We respectfully disagree with your comment that an EIS is supposed to determine the maximum quantities of development. An EIS assesses the effects of an action or program on various environmental resources. Please note as discussed at the EIS Scoping Meeting and described in the EIS Preparation Notice published on September 8, 2019, as well as reiterated in Section 1.1 of the Programmatic Draft EIS, "*The Proposed Action encompasses the construction of a new, modern stadium facility that will be supported by complimentary mixed-use development.*" Therefore, the subject Programmatic Draft EIS is intended to assess the potential effects associated with the Proposed Action on various environmental resource categories as prescribed by Section 11-200.1-24. The Proposed Action, which is premised upon the Programmatic Master Plan appended to the Programmatic EIS as Appendix A, reflects the aggregated collection of extensive and exhaustive input from area residents, members of the public, existing Aloha Stadium stakeholders and public agencies as discussed in Section 2.3 of the Programmatic EIS. Hence, the Proposed Action represents the vision of the overall community for the Project Site. Based on community input and various technical studies, the Proposed Action is envisioned to encompass the New Aloha Stadium, approximately 730,000 gross square feet (GSF) of residential space, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF of hotel space. However, as noted throughout the Programmatic EIS, that final design of the Project Site and use and space allocation will be

determined by the Stadium Authority, the selected Stadium Developer and Real Estate Developer(s).

It is acknowledged that the Programmatic EIS did not evaluate, “*the maximum quantity of housing units feasible with transit-oriented assumptions*” as such a program would not meet the goals and objectives of the Proposed Action as described in Section 2.2 of the Programmatic Draft EIS. Nonetheless, the Proposed Action is envisioned to directly serve regional and State housing demands through the creation of a diverse range of residential options, accounting for upwards of 1,800 new housing units as discussed in Section 2.1 of the Programmatic Draft EIS. However, it should be noted that the extent of residential programming will ultimately be determined by the Stadium Authority and the selected Real Estate Developer(s) which will comply with applicable affordable housing requirements.

Please note that due to broad comments raised in response to the Programmatic Draft EIS, Section 3.4 has been added to the Programmatic Final EIS which on a conceptual basis, evaluated a conceptual affordable housing project site design alternative program scenario with 20,000 to 100,000 units within the confines of the Project Site. It is readily apparent that this type of programming would not be compatible with the general purpose and need, as well as goals and objectives of the Proposed Action. Moreover, such a program and its anticipated impacts would require the preparation of a separate, comprehensive EIS documentation and evaluation.

Comment 3: *As the EIS considers the maximum quantities of development, we ask you to consider: What is the minimum number of acres needed to build a quality stadium, compared with other stadiums also surrounded by high-density developments?*

Response 3: As noted in Response #2 above, we respectfully disagree with your comment that an EIS is supposed to determine the maximum quantities of development. An EIS assesses the effects of an action or program on various environmental resources. Please note as discussed at the EIS Scoping Meeting and described in the EIS Preparation Notice published on September 8, 2019, as well as reiterated in Section 1.1 of the Programmatic Draft EIS, “*The Proposed Action encompasses the construction of a new, modern stadium facility that will be supported by complimentary mixed-use development.*” Therefore, the subject Programmatic Draft EIS is intended to assess the potential effects associated with the Proposed Action on various environmental resource categories as prescribed by Section 11-200.1-24.

Regarding your question about the minimum number of acres needed, please note that there is no standard to which to base this on. However, please note that currently the existing Aloha Stadium occupies approximately 25 acres. It is assumed that the proposed New Aloha Stadium may encompass a similar footprint.

Comment 4: *Is more office space needed on Oahu? The pandemic has shown companies (as well as state government departments) that they can efficiently downsize their office space and costs, with many more employees working virtually.*

Response 4: Your comments are acknowledged. Please note that the Proposed Action's conceptual design will include a significant addition of commercial office space that could potentially be leased to and occupied by local medical physicians and medical services including, but not limited to doctor's offices, urgent care clinics, physical rehabilitation centers and dentistry practices, which could serve the community and state, at large. Furthermore, market studies have demonstrated that, the unique mix of uses outlined by the Proposed Action, which include residential opportunities, medical services, restaurants, commercial retail venues and recreational open space could, when combined, create a tangible, complementary synergy that would serve to promote and enrich the attractiveness and desirability of being part of the Proposed Action.

Comment 5: *Is a hotel really needed at the Stadium? Waikiki's hotels are struggling and this will continue well into the future. Good access to the Stadium from Waikiki and the urban core will be provided by the rail line.*

Response 5: We acknowledge your comments. Please note that based on community input and various technical studies, the Proposed Action is envisioned to encompass the New Aloha Stadium, approximately 730,000 gross square feet (GSF) of residential space, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF of hotel space. However, as noted throughout the Programmatic EIS, that final design of the Project Site and use and space allocation will be determined by the Stadium Authority, the selected Stadium Developer and Real Estate Developer(s). The Proposed Action, as described in the EIS and the Programmatic Master Plan, has the potential to significantly increase the Project Region's desirability from a hospitality perspective contributing to the vibrancy of the Proposed Action. It is anticipated that a hotel at the Project Site could serve potentially over 1.5 million annual visitors to the New Aloha Stadium; furthermore, the Proposed Action could potentially serve as a catalyst for growth in visitation, attracting tourists and visitors to the Project Site retail and mixed-use environment that would have otherwise not considered coming to the submarket.

Comment 6: *Analyze the environmental impacts of 200 towers including 100,000 units of housing on the Aloha Stadium site.*

Response 6: As noted in Response #2 above, due to broad comments raised in response to the Programmatic Draft EIS, Section 3.4 has been added to the Programmatic Final EIS which on a conceptual basis, evaluated a conceptual affordable housing project site design alternative program scenario with 20,000 to 100,000 units within the confines of the Project Site. It is readily apparent that this type of programming would not be compatible with the general purpose and need, as well as goals and objectives of the Proposed

Action. Moreover, such a program and its anticipated impacts would require the preparation of a separate, comprehensive EIS documentation and evaluation.

Comment 7: *What is the best use of state-owned land in the urban core?*

Response 7: This question is opinion based, however, the Proposed Action represents a substantial long-term investment in the economy of the State of Hawai'i and the CCH. According to a market study prepared by Victus Advisors (2019), summarized previously within this Programmatic Draft EIS document, it is anticipated that a New Aloha Stadium alone could potentially generate a new economic output over the next 25 years with a net present value of over \$1.8 billion. Further, it is also estimated that in a given year of stabilized operations, a New Aloha Stadium alone would generate \$11.1 million in annual net operating income. At full buildout, the Proposed Action could potentially generate upwards of 1,190 net annual jobs, leading to a consequent \$28.8 million in net annual wages for the residents of O'ahu as serve to generate over \$27 million in net new tax revenues as a byproduct.

Comment 7: *How would the development of high density affordable condo units impact the Housing goals and priorities of the State.*

Response 7: Please note that at discussed in Response #2 above and iterated in Section 1.1 of the Programmatic Draft EIS, "*The Proposed Action encompasses the construction of a new, modern stadium facility that will be supported by complimentary mixed-use development.*" Therefore, the subject Programmatic Draft EIS is intended to assess the potential effects associated with the Proposed Action on various environmental resource categories as prescribed by Section 11-200.1-24. Hence, we cannot provide a comment specifically on how such a program would impact housing goals and priorities of the State. However, it is assumed that such a program would be supportive of certain housing goals and priorities of the State.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

10422-01
Letter to Betty Lou Larson
Page 6

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Blaze Duarte](#)
To: [Public Comment](#)
Subject: NASED Comments
Date: Wednesday, December 23, 2020 11:34:13 PM

I like the project of the new stadium. However, will roads be expanded? Infrastructure is always a concern when new developments are built. I foresee lots of traffic.



WILSON OKAMOTO
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10422-01

Blaze Duarte
blazeduarte@yahoo.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASD)
Hālawā, O‘ahu, Hawai‘i

Dear Blaze Duarte:

Thank you for your comments dated December 23, 2020, regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *I like the project of the new stadium. However, will roads be expanded? Infrastructure is always a concern when new developments are built. I foresee lots of traffic.*

Response 1: Your comments are acknowledged. As it relates to traffic flow into the Project Site, please note that the Programmatic EIS includes a detailed description of the existing traffic conditions and potential traffic impacts associated with the Proposed Action in Section 4.11. Additionally, a Traffic Impact Report (TIR) was prepared by Wilson Okamoto Corporation in May 2020, and updated in December 2021, and is appended to the Programmatic Final EIS as Appendix H.

The intent of TIR was to assess anticipated impacts on regional vehicular traffic conditions and infrastructure as well as multimodal transit facilities within the vicinity of the Project Site that could result from the implementation and operation of the Proposed Action. In summary, the Proposed Action is anticipated to be built out over 10+ years. By the year 2026, traffic conditions in the Project Region are anticipated to remain the same. Although the Stadium Development, accompanied by the Initial Real Estate Development, is expected to generate additional trips to the Project Site, it should be noted that the Project Site is also situated in the vicinity of regional roadways with higher capacities to accommodate additional traffic. In addition, the Project Site is located in an area that is accessible via multiple connections to and from regional roadways, with designated ramps to and from the freeways. As such, site-generated trips are dispersed along the different routes to and from

the Project Site, thereby diluting the increases along the individual roadways. However, it is recommended that the preparation of a Transportation Management Plan which includes traffic circulation, parking, loading, and traffic demand management strategies, as well as a clear public information plan to relay changes to the traffic circulation in the vicinity of the Project Site is recommended to minimize the impact of the special events and other off-peak activities associated with the Proposed Action on the surrounding roadways. Moreover, with the completion of the Hālawā / Aloha Stadium HART Transit Station, and proposed multi-modal facilities under the Proposed Action, alternative transportation methods will be encouraged to further reduce traffic impacts related to single occupancy vehicles. Additionally, The Proposed Action will seek to improve accessibility, connectivity, and mobility within the Project Site and surrounding community by creating a network of pedestrian walkways, bike paths, developing safer routes for mass transit and ride sharing options, and improvement made to major arterials that service the area. The Proposed Action will create multi-modal streets and paths within the Project Site that enhance the sense of place and accessibility of the surrounding community.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Public Comment](#)
To: [Andrew Blasko](#)
Subject: Fw: Stadium
Date: Tuesday, February 9, 2021 1:53:29 PM

From: Bret Bessac <bbessac@yahoo.com>
Sent: Monday, February 8, 2021 1:08 PM
To: Public Comment <publiccomment@wilsonokamoto.com>
Subject: Stadium

Aloha,

The issue is there needs to be a new stadium. The stadium should be similar in size and structure to every football stadium in US cities of the size of Honolulu and with a school of the size of the University of Hawai'i at Manoa. In addition to having football games, many of these stadiums also allow people to attend large concerts, soccer games, monster truck rallies, circuses... depending on the architecture. Other than the stadium, one could make the parking area into grass sports fields. Therefore, children could use it to play football, soccer... on non-venue/tailgate days.

The stadium should not be used to siphon tax money into building contractors to build boondoggles of hotels or retail malls, or any other wastes of cement and money. Even if an uncle in construction really needs the contract.

Mahalo,

Bret Bessac



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10422-01

Brett Bassac
bbessac@yahoo.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear Brett Bassac:

Thank you for your comments dated February 8, 2021, regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *The issue is there needs to be a new stadium. The stadium should be similar in size and structure to every football stadium in US cities of the size of Honolulu and with a school of the size of the University of Hawai'i at Manoa. In addition to having football games, many of these stadiums also allow people to attend large concerts, soccer games, monster truck rallies, circuses... depending on the architecture. Other than the stadium, one could make the parking area into grass sports fields. Therefore, children could use it to play football, soccer... on non-venue/tailgate days.*

Response 1: Your comments are acknowledged. The Programmatic Final EIS includes a market feasibility & economic review and analysis prepared by Victus Advisors conducted in conjunction with master planning and preliminary design efforts for the Proposed Action. This documentation clearly underscores that the existing Aloha Stadium’s capacity of 50,000, by far, and in large exceeds current and anticipated future market needs. In observance of the analysis and guidance set forth by Victus Advisors as well as market sounding and user analysis by Stadium and Industry consultants, the unified recommendation is that the construction of a 27,500 - 35,000 seat capacity stadium would best serve current and anticipated future market demand.

Furthermore, before the 2018 fiscal year, Aloha Stadium was not widely considered as a major venue for concert activities. As the Aloha Stadium began to be marketed more heavily as a concert venue over the course of 2019, it was revealed through consultation

with entertainment industry professionals that the Aloha Stadium's current capacity of 50,000 seats was a significant deterrent to the candidacy of the existing Aloha Stadium as venue for major artists. Promoters and performers alike voiced that the ideal range for seating at a stadium-set concert lies between 25,000 and 30,000 seats.

Since the fiscal year of 2018, Aloha Stadium has hosted eight concerts, with seven held within the fiscal year of 2019. Six concerts have been booked/promoted by Live Nation with an average of 30,743 attendees, right in line with feedback provided by industry professionals. Nonetheless, as currently proposed, in addition to a raw 35,000 fixed seat capacity, concert events could potentially utilize field space for additional viewership that could accommodate upwards of 10,000 additional attendees.

With regard to sporting events held at Aloha Stadium, Division 1 Football Bowl Subdivision (D1-FBS) football factors in as the central activity featured. Specifically, Aloha Stadium was the home to the University of Hawai'i Rainbow Warriors Football Program (UH Football) when it was in operation. The University of Hawai'i is a member of the Mountain West Conference, which is considered to be a Mid-Major or Group of Five (G5) conference, and has ranked 81st in attendance among all D1-FBS institutions in the most recent season of play with no attendance restrictions (2019), bordering just under 25,000 attendees for home game attendance. Overall, attendance trends nation-wide are in sharp decline. The 2019 D1-FBS season resulted in the lowest overall attendance in the past 24 years (41,477 per game), with the Mountain West posting its lowest average per game attendance ever (23,232 per game). It is further notable that over the past five years, running from the 2014 season to 2019 season, average UH Football attendance has also trended down, reflecting a decline in average attendance. Moreover, UH Football has not drawn a sell-out crowd since 2007. By contrast, the highest attended game within the past five years attracted approximately 36,411 attendees (2014 season opener), under the context of the capacity of the existing Aloha Stadium (50,000 seats), the highest attended UH Football event held at the Stadium over the course of the last five years would have a little more than a 25% of the seats vacant. By contrast, under the Proposed Action the current capacity of 50,000 seats (35,000 seat stadium), with a similar level of attendance, the Stadium would be 100% filled to capacity. There is a quality all unto-itself to having a sold-out-stadium that cannot be tangibly quantified.

Overall, the proposed New Aloha Stadium (35,000 seat capacity) would create the opportunity to serve as a viable venue for a greater range of events. Possible events include rugby, motor sports, soccer and mixed martial arts. These events typically will not pursue stadiums larger than 35,000, as the demand of their audience typically would not justify the use of a larger venue, particularly under the context of the market that would be locally served here on O'ahu.

Comment 2: *The stadium should not be used to siphon tax money into building contractors to build boondoggles of hotels or retail malls, or any other wastes of cement and money. Even if an uncle in construction really needs the contract.*

Response 2: Your comments are acknowledged. Please note that the Proposed Action which is anticipated to encompass approximately 730,000 gross square feet (GSF) of residential space, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF of hotel space will create a vibrant district that could, in summary, generate a Net Present Value (NPV) of over \$1.8 billion in total economic output, over \$700 million in personal earnings, and over \$198 million in State and County tax revenues, assuming an 8.0 percent discount over a 25-year period. After the Full Build-Out, up to 1,190 net new annual jobs are anticipated to be supported by operations of the Proposed Action. Hence, it is anticipated that the Proposed Action will also generate enormous amounts of economic activity while also achieving the goals and objectives of the Proposed Action, as well as the Hālawā Area TOD Plan.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Brett Sasaki](#)
To: [Public Comment](#)
Subject: Stadium
Date: Wednesday, December 23, 2020 8:40:36 PM

Nobody asked anyone to build a stadium, go solve a real problem

Sent from my iPhone



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10422-01

Brett Sasaki
brettyan@hotmail.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear Brett Sasaki:

Thank you for your comments dated December 23, 2020, regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *Nobody asked anyone to build a stadium, go solve a real problem*

Response 1: We respectfully disagree with your position on the Proposed Action. Please note that the Proposed Action, which is premised upon the Programmatic Master Plan appended to the Programmatic EIS as Appendix A, reflects the aggregated collection of extensive and exhaustive input from area residents, members of the public, existing Aloha Stadium stakeholders and public agencies as discussed in Section 2.3 of the Programmatic EIS. Additionally, the Project Team conducted a substantial number of public outreach meetings and has considered public input throughout the EIS process. Hence, the Proposed Action represents the vision of the overall community for the Project Site. Based on community input and various technical studies, the Proposed Action is envisioned to encompass the New Aloha Stadium, approximately 730,000 gross square feet (GSF) residential units, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF of hotel space. However, as noted throughout the Programmatic EIS, that final design of the Project Site and use and space allocation will be determined by the Stadium Authority, the selected Stadium Developer and Real Estate Developer(s).

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and

Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Public Comment](#)
To: [Andrew Blasko](#)
Subject: Fw: Public Comment Submission
Date: Tuesday, February 9, 2021 1:50:35 PM

From: Calvin Pham <cfpham@yahoo.com>
Sent: Saturday, February 6, 2021 8:05 AM
To: Public Comment <publiccomment@wilsonokamoto.com>
Subject: Public Comment Submission

Aloha,

I attended the EIS Scoping Meeting on September 25, 2019 as well as one of the master plan community workshops in December 2019. At these meetings, I provided oral and written comments that were solicited by the sponsor agency of the EIS. We, the members of the public, were instructed that these were our opportunities to do two things: tell the State what we wanted to see studied in the EIS (scoping meeting) and talk through our ideas for what we would like to see on the site plan and what features would benefit our community (master plan workshop).

At the Scoping Meeting, we were told that the objective of the EIS is to study impacts so the State can set maximums and minimums for development. Given that instruction, I commented that I would like the State to include in the analysis of the EIS the maximum possible quantity of housing units, particularly aimed at addressing the HHFDC-identified needs by HUD income classification (HHFDC Housing Planning Study, Table 32, 2019). I did not read anywhere in the draft EIS that spoke to an analysis of what the project would be like with a higher quantity of housing, nor did it provide what the maximum possible housing quantity could be that would not result in a significant impact or require mitigation measures. Where is the analysis that I requested after my opinions were sought by the agency and its consultant during the scoping meeting? Is there a good reason why this question could not be answered? Furthermore, I added that we need to think about housing within this proposed action in terms of socioeconomics. If we make a concerted effort to systematically include housing that will be affordable to all HUD income classifications according to the distribution of need in *Housing Planning Study Table 32*, then I believe we can modify assumptions about parking and traffic, thereby modifying results on other study topics such as air quality. I asked for a sensitivity analysis to understand the transit-oriented impacts if we were to assume all new residents of the stadium district are transit-dependent households (due to income constraints, physical mobility, choice, or otherwise). I did not see such sensitivity analysis or anything that would speak to the difference between a development with a high level of transit service versus a development that continues to center around the personal automobile.

Housing strategies that cater disproportionately to middle- and upper-income classes rob lower-income households of access to public goods and services such as the transit some already use. An affordable housing strategy that prioritizes lower-income families should be considered a positive socioeconomic impact in this study, and therefore drive assumptions in analyses. We should not limit the study of

socioeconomic impacts to, “Does the proposed action negatively affect certain segments of the population?” Instead, studying socioeconomic impacts should affirmatively evaluate with the question, “How does the proposed action improve outcomes for certain segments of the population?”

I understand that other commenters at the Scoping Meeting were also adamant that the housing in this development be truly affordable so local families could affordably live in it. I recall someone saying that this can’t turn into another Kaka’ako. I know the EIS can’t declare that this can’t become “another Kaka’ako”, but it can include in the analytical assumptions about housing density, transit usage, and income classification of residents that would enable greater flexibility for development as the State of Hawai’i addresses its housing shortage and housing affordability problem. Our state needs as much flexibility as it can get regarding maximum quantities for housing development on state lands in the primary urban center, therefore the EIS should set us up for making good use of the limited resource that is land.

While I am a geographically proximate community member, I think it is important for us to think of the “community” as the entire island, if not the entire state. The stadium itself is a cultural resource of the state on a 98-acre public land resource. The land is a prime opportunity to address our community’s housing needs. Impacts to the community need to be reimagined as positive impacts, and we need to be including assumptions in the analyses for the site that prioritize low-income households who have the greatest housing and transportation needs to reduce and eliminate household cost burdens.

If we were to, instead, construct new housing on land outside of the primary urban center and sprawl our development, what is the impact to the environment on an island-wide scale? Can the EIS speak to the importance of affordable housing density in transit-oriented development areas as the highest and best use of the 98-acre Aloha Stadium site considering the impacts that would be felt across the rest of the island? Or, are we as a community simply not going to meet the state-published need for housing when we are looking at redevelopment of state land that would be a great candidate for affordable housing? Affordable housing for mobility-limited and transit-dependent low-income households as well as transit-by-choice and car-free/car-light households should not be considered in competition for land resources with the other uses proposed for the site. It is the mixed uses that will make this a thriving, walkable district unlike what we’ve seen in this community but know is necessary to allow our residents to live affordably and sustainably. Housing is simply additive and complimentary to the site but is most importantly an opportunity for our community to have truly affordable, transit-oriented development. While the EIS cannot necessarily speak to the economic feasibility as that is the role of the feasibility study, I believe the best way to sustain the non-residential mixed uses in the proposed action will be with more residents in the district walking and using transit. Housing makes commercial uses successful because people make businesses successful. We must care for our people, and the rest will fall in place.

Please include the previously requested and re-iterated analyses before moving to a final draft of the EIS. Mahalo.

Calvin Foo Pham
Salt Lake Resident
Salt Lake Neighborhood Board Candidate



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10422-01

Calvin Pham
cfpham@yahoo.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASD)
Hālawā, O‘ahu, Hawai‘i

Dear Calvin Pham:

Thank you for your comments dated February 6, 2021 regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment #1: *I attended the EIS Scoping Meeting on September 25, 2019 as well as one of the master plan community workshops in December 2019. At these meetings, I provided oral and written comments that were solicited by the sponsor agency of the EIS. We, the members of the public, were instructed that these were our opportunities to do two things: tell the State what we wanted to see studied in the EIS (scoping meeting) and talk through our ideas for what we would like to see on the site plan and what features would benefit our community (master plan workshop).*

Response #1: We acknowledge and understand that you attended both the EIS Scoping Meeting held on September 25, 2019, in conjunction with scoping out the assessment and evaluation for the Programmatic Draft EIS, and the Master Plan Community Workshops held in December 2019. You are correct in asserting that the purpose of these meetings were to solicit and invite public participation in the various outreach efforts being coordinated for the Proposed Action.

Comment #2: *At the Scoping Meeting, we were told that the objective of the EIS is to study impacts so the State can set maximums and minimums for development. Given that instruction, I commented that I would like the State to include in the analysis of the EIS the maximum possible quantity of housing units, particularly aimed at addressing the HHFDC-identified needs by HUD income classification (HHFDC Housing Planning Study, Table 32, 2019). I did not read anywhere in the draft EIS that spoke to an analysis*

of what the project would be like with a higher quantity of housing, nor did it provide what the maximum possible housing quantity could be that would not result in a significant impact or require mitigation measures. Where is the analysis that I requested after my opinions were sought by the agency and its consultant during the scoping meeting? Is there a good reason why this question could not be answered?

Response #2: Please note that we acknowledge your comments provided at the EIS Scoping Meeting and were considered when preparing the Programmatic Draft EIS with regard to meeting content requirements prescribed in Hawai'i Administrative Rules, Title 11, Chapter 200.1.

Please note as discussed at the EIS Scoping Meeting and described in the EIS Preparation Notice published on September 8, 2019, as well as reiterated in Section 1.1 of the Programmatic Draft EIS, “*The Proposed Action encompasses the construction of a new, modern stadium facility that will be supported by complimentary mixed-use development.*” Therefore, the subject Programmatic Draft EIS is intended to assess the potential effects associated with the Proposed Action on various environmental resource categories as prescribed by Section 11-200.1-24.

It is acknowledged that the Programmatic Draft EIS did not evaluate, “*the maximum possible quantity of housing units, particularly aimed at addressing the HHFDC-identified needs by HUD income classification,*” as such a program would not meet the goals and objectives of the Proposed Action as described in Section 2.2 of the Programmatic Draft EIS. Nonetheless, the Proposed Action is envisioned to directly serve regional and State housing demands through the creation of a diverse range of residential options, accounting for upwards of 1,800 new housing units as discussed in Section 2.1 of the Programmatic Draft EIS. However, it should be noted that the extent of residential programming will ultimately be determined by the Stadium Authority and the selected Real Estate Developer(s) which will comply with applicable affordable housing requirements.

Please note that due to broad comments raised in response to the Programmatic Draft EIS, Section 3.4 has been added to the Programmatic Final EIS which on a conceptual basis, evaluated a conceptual affordable housing project site design alternative program scenario with 20,000 to 100,000 units within the confines of the Project Site. It is readily apparent that this type of programming would not be compatible with the general purpose and need, as well as goals and objectives of the Proposed Action. Moreover, such a program and its anticipated impacts would require the preparation of a separate, comprehensive EIS documentation and evaluation.

Comment #3: *Furthermore, I added that we need to think about housing within this proposed action in terms of socioeconomics. If we make a concerted effort to systematically include housing that will be affordable to all HUD income classifications according to the distribution of need in Housing Planning Study Table 32, then I believe*

we can modify assumptions about parking and traffic, thereby modifying results on other study topics such as air quality.

Response #3: As noted in Response #2 above, the intent of the Proposed Action is to replace the deteriorating Aloha Stadium that will be supported by mixed-use development. The need to replace the Stadium has opened up the unique opportunity for the redevelopment of the entire Project Site. This includes the Real Estate Development component which will encompass mixed-use retail space, office space, recreational space, open space, and residential space. The amount of space allocated to each use within the Real Estate Development component that will support the New Aloha Stadium will ultimately be determined by the Stadium Authority, the selected Stadium Developer and Real Estate Developer(s).

Specifically, with regards to your comment about the Proposed Action and its effects on socio-economics, please note that Section 4.13 of the Programmatic EIS discusses this directly. The Proposed Action will provide needed housing options for the growing population in the region. Residential products will provide residents with a wide range of housing choices. Moreover, as noted in Response #2 above, the Stadium Authority, the selected Real Estate Developer(s) will comply with applicable affordable housing requirements.

As it relates to the effects of the Proposed Action on traffic and air quality, please note that Sections 4.11 and 4.8 respectively discuss the anticipated impacts and recommends appropriate mitigation measures.

Comment #4: *I asked for a sensitivity analysis to understand the transit-oriented impacts if we were to assume all new residents of the stadium district are transit-dependent households (due to income constraints, physical mobility, choice, or otherwise). I did not see such sensitivity analysis or anything that would speak to the difference between a development with a high level of transit service versus a development that continues to center around the personal automobile.*

Response #4: Please note that a Traffic Impact Report (TIR) was prepared by Wilson Okamoto Corporation in May 2020 to identify and assess existing traffic conditions and infrastructure as well as multimodal transit facilities and is discussed in Section 4.11. Specifically, multi-modal facilities are discussed in Section 4.11.2 of the Programmatic EIS. The intent of TIR was to assess anticipated impacts on regional vehicular traffic conditions and infrastructure as well as multimodal transit facilities within the vicinity of the Project Site that could result from the implementation and operation of the Proposed Action.

Specifically, as discussed in Section 4.11.2 of the Programmatic EIS, the Proposed Action is anticipated to enhance existing facilities by improving pedestrian connectivity in the

Project Region, providing bicycle parking on the Project Site, and improve existing transit facilities in the Project Region.

An updated TIR is appended to the Programmatic Final EIS as Appendix H: *Traffic Impact Assessment Report*.

Comment #5: *Housing strategies that cater disproportionately to middle- and upper-income classes rob lower-income households of access to public goods and services such as the transit some already use. An affordable housing strategy that prioritizes lower-income families should be considered a positive socioeconomic impact in this study, and therefore drive assumptions in analyses. We should not limit the study of socioeconomic impacts to, “Does the proposed action negatively affect certain segments of the population?” Instead, studying socioeconomic impacts should affirmatively evaluate with the question, “How does the proposed action improve outcomes for certain segments of the population?”*

Response #5: Your comment is acknowledged. Please note as discussed in Response #3 above, the Proposed Action will provide needed housing options for the growing population in the region. Residential products will provide residents with a wide range of housing choices. Moreover, as noted in Response #2 above, the Stadium Authority and the selected Real Estate Developer(s) will comply with applicable affordable housing requirements. As it relates to the socioeconomic impacts on the population that Programmatic Draft EIS studied and addressed both the adverse and advantageous impacts of the Proposed Action.

Specifically, the Programmatic EIS evaluated environmental justice impacts in Section 4.13.4 which evaluates effects of the Proposed Action on minority populations, which includes those that may be considered within the lower-income class based on dollar-value thresholds set by the United States Census Bureau. As stated within Section 4.13.4 of the Programmatic Draft EIS:

Although EJ minority and low-income populations are present within the identified affected area, based on the analyses presented in this Programmatic Draft EIS, the Proposed Action would have less than significant adverse human health or environmental impacts regardless of the selected option. Negative impacts on the population in the Proposed Action vicinity are not anticipated.

The effects of implementing the Proposed Action would not be appreciably more severe or greater in magnitude to minority or low-income communities. Therefore, no disproportionately high and adverse human health or environmental effects on minority populations and low-income populations would occur. Moreover, the State of Hawai‘i has been and will continue to be dedicated to communicating accurate and timely information to communities as design continues to progress to protect human health and the overall environment. The State of Hawai‘i has been and will

continue to be committed to transparency, integrity, and empathy in work involved with the Proposed Action. Public Participation and community involvement is one of the cornerstones of EJ. Chapter 9 of this Programmatic Draft EIS outlines the State of Hawai'i's community engagement efforts thus far which have been proactive, providing complete information, timely notices, and full disclosure of key decisions and will continue to do so throughout the entirety of the Proposed Action. Hence, the Proposed Action would not negatively impact EJ populations.

Moreover, there could possibly be direct and indirect benefits to these population groups as a result of additional job opportunities that would result from the Proposed Action.

Hence, the Proposed Action will not adversely impact low-income populations in the vicinity of the Project Site and may possibly provide direct and indirect benefits to these population groups as a result of additional job opportunities and housing options that would result from the Proposed Action.

Comment #6: *I understand that other commenters at the Scoping Meeting were also adamant that the housing in this development be truly affordable so local families could affordably live in it. I recall someone saying that this can't turn into another Kaka'ako. I know the EIS can't declare that this can't become "another Kaka'ako", but it can include in the analytical assumptions about housing density, transit usage, and income classification of residents that would enable greater flexibility for development as the State of Hawai'i addresses its housing shortage and housing affordability problem.*

Response #6: We acknowledge your comments. Similarly, as noted in Response #4, transit usage is addressed in the TIAR, and is appended as Appendix H to the Programmatic EIS. Additionally, the median and per capita incomes for the Project Region are disclosed within Section 4.13.2. Housing density within the Project Site will be determined by the Stadium Authority and the selected Real Estate Developer(s). However, under the Proposed Action, which is based upon the program provided in the Programmatic Master Plan, it is anticipated that upon completion the Project Site may include up to 1,800 residential units that provide a wide range of housing choices for all income classes.

Comment #7: *Our state needs as much flexibility as it can get regarding maximum quantities for housing development on state lands in the primary urban center, therefore the EIS should set us up for making good use of the limited resource that is land.*

Response #7: We acknowledge your comments. However, as noted in Response #2 above, and reiterated in Section 1.1 of the Programmatic Draft EIS, "*The Proposed Action encompasses the construction of a new, modern stadium facility that will be supported by complimentary mixed-use development.*" Therefore, the subject Programmatic EIS is

intended to assess the potential effects associated with the Proposed Action on various environmental resource categories as prescribed by Section 11-200.1-24. Hence, it is outside the scope of this Programmatic EIS to assess the potential for housing development on State land within the Primary Urban Center.

Comment #8: *While I am a geographically proximate community member, I think it is important for us to think of the “community” as the entire island, if not the entire state. The stadium itself is a cultural resource of the state on a 98-acre public land resource. The land is a prime opportunity to address our community’s housing needs. Impacts to the community need to be reimagined as positive impacts, and we need to be including assumptions in the analyses for the site that prioritize low-income households who have the greatest housing and transportation needs to reduce and eliminate household cost burdens.*

Response #8: We acknowledge your comments. Please note that the existing Aloha Stadium is considered a significant resource to the surrounding community, as well as the entire State of Hawai‘i as noted throughout the Programmatic EIS. We agree that the Project Site provides one of the greatest redevelopment opportunities in the State that can provide significant beneficial and economic impacts. Specifically, as it relates to your comments on affordable housing for low-income families, as noted in the responses above, the Stadium Authority and selected Real Estate Developer(s) will be responsible for fulfilling all applicable affordable housing requirements related to the Proposed Action.

Comment #9: *If we were to, instead, construct new housing on land outside of the primary urban center and sprawl our development, what is the impact to the environment on an island-wide scale? Can the EIS speak to the importance of affordable housing density in transit-oriented development areas as the highest and best use of the 98-acre Aloha Stadium site considering the impacts that would be felt across the rest of the island? Or, are we as a community simply not going to meet the state-published need for housing when we are looking at redevelopment of state land that would be a great candidate for affordable housing?*

Response #9: Please note that it is not within the scope of the EIS to assess the impact of urban sprawl on the island. The scope of the EIS, as discussed in Response #2 above, is to assess the potential effects associated with the Proposed Action (development of a new stadium and associated mixed-use development) on various environmental resource categories as prescribed by Section 11-200.1-24.

However, it is acknowledged in Section 5.2.3 of the Programmatic Final EIS, with the passage of the Hālawā Area TOD Plan in October 2020, the Hālawā Area TOD Special District overlay was established over the Project Site. The Hālawā Area TOD Special District creates an increased density and diversity of residential land uses near the Hālawā / Aloha Stadium HART Transit Station with new zoning designations and maximum floor

area ratios while discouraging lower density uses. Please note that Section 4.20 has been added to the Programmatic Final EIS which discusses how land use is regulated at the Project Site and how the Proposed Action will impact those land uses. Generally speaking, the State of Hawai‘i is the landowner of the Project Site, and in partnership with the selected Stadium Developer and Real Estate Developer(s), may pursue different land-use configurations and strategies to maximize the value of the Proposed Action and address a number of Statewide needs. The State of Hawai‘i, as the landowner, have the ultimate say in how they use their lands to fit their needs. Furthermore, it has not yet been determined how Act 146 will be administered, specifically, how it relates to implementing a “stadium development district.” However, it is expected that the State of Hawai‘i, in partnership with the selected Stadium Developer and Real Estate Developer(s), will coordinate and work closely with the CCH to implement the Proposed Action, and to minimize any potential impacts on land uses at the Project Site and the Project Region.

As noted in the responses above, the Stadium Authority and the selected Real Estate Developer(s) will be responsible to fulfill all applicable affordable housing requirements. However, at this time, the exact number of affordable housing units has not been determined as the final design of the Project Site and the land-configurations and space allocation are not finalized at this point in time as discussed in Chapter 9 of the Programmatic EIS.

Comment #10: *Affordable housing for mobility-limited and transit-dependent low-income households as well as transit-by-choice and car-free/car-light households should not be considered in competition for land resources with the other uses proposed for the site. It is the mixed uses that will make this a thriving, walkable district unlike what we’ve seen in this community but know is necessary to allow our residents to live affordably and sustainably.*

Response #10: We acknowledge your comments. Please note that the program proposed under the Proposed Action reflects the aggregated collection of extensive and exhaustive input from area residents, members of the public, existing Aloha Stadium stakeholders and public agencies as discussed in Section 2.3 of the Programmatic EIS. Hence, the Proposed Action represents the vision of the community for the Project Site.

Comment #11: *Housing is simply additive and complimentary to the site but is most importantly an opportunity for our community to have truly affordable, transit-oriented development. While the EIS cannot necessarily speak to the economic feasibility as that is the role of the feasibility study, I believe the best way to sustain the non-residential mixed uses in the proposed action will be with more residents in the district walking and using transit. Housing makes commercial uses successful because people make businesses successful. We must care for our people, and the rest will fall in place.*

Response #11: We acknowledge your comments. Please note that the Proposed Action is envisioned to build off of the concepts and community vision realized in the Hālawā Area TOD Plan which seeks to create a vibrant, mixed-use community.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in cursive script that reads "Keola Cheng". The ink is dark and the signature is fluid.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Cariann Naguwa](#)
To: [Public Comment](#)
Subject: Stadium capacity
Date: Wednesday, December 23, 2020 4:33:15 PM

Hi,

Would accommodating more seats at this new venue be an option? Many artists/performers like to perform at stadiums with atleast 42k seating capacity. This would open a lot of doors for more entertainment purposes other than sports games. International performers would also spark interest and tourism can be utilized with a venue worth selling out. We have the advantage of holding big concerts in the beautiful islands, who wouldn't want to come to Hawaii?

Sent from anonymous

Sent from Cariann



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10422-01

Cariann Naguwa
sageandknits@gmail.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear Cariann Naguwa:

Thank you for your comments dated December 23, 2020, regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment #1: *Would accommodating more seats at this new venue be an option? Many artists/performers like to perform at stadiums with at least 42k seating capacity. This would open a lot of doors for more entertainment purposes other than sports games. International performers would also spark interest and tourism can be utilized with a venue worth selling out. We have the advantage of holding big concerts in the beautiful islands, who wouldn't want to come to Hawaii?*

Response #1: Your comments are acknowledged. The Programmatic Final EIS includes a market feasibility & economic review and analysis prepared by Victus Advisors conducted in conjunction with master planning and preliminary design efforts for the Proposed Action. This documentation clearly underscores that the existing Aloha Stadium's capacity of 50,000, by far, and in large exceeds current and anticipated future market needs. In observance of the analysis and guidance set forth by Victus Advisors as well as market sounding and user analysis by Stadium and Industry consultants, the unified recommendation is that the construction of a 27,500 - 35,000 seat capacity stadium would best serve current and anticipated future market demand.

Furthermore, before the 2018 fiscal year, Aloha Stadium was not widely considered as a major venue for concert activities. As the Aloha Stadium began to be marketed more heavily as a concert venue over the course of 2019, it was revealed through consultation with entertainment industry professionals that the Aloha Stadium's current capacity of

50,000 seats was a significant deterrent to the candidacy of the existing Aloha Stadium as a venue for major artists. Promoters and performers alike voiced that the ideal range for seating at a stadium-set concert lies between 25,000 and 30,000 seats.

Since the fiscal year of 2018, Aloha Stadium has hosted eight concerts, with seven held within the fiscal year of 2019. Six concerts have been booked/promoted by Live Nation with an average of 30,743 attendees, right in line with feedback provided by industry professionals. Nonetheless, as currently proposed, in addition to a raw 35,000 fixed seat capacity, concert events could potentially utilize field space for additional viewership that could accommodate upwards of 10,000 additional attendees.

With regard to sporting events held at Aloha Stadium, Division 1 Football Bowl Subdivision (D1-FBS) football factors in as the central activity featured. Specifically, Aloha Stadium was the home to the University of Hawai'i Rainbow Warriors Football Program (UH Football) when it was in operation. The University of Hawai'i is a member of the Mountain West Conference, which is considered to be a Mid-Major or Group of Five (G5) conference, and has ranked 81st in attendance among all D1-FBS institutions in the most recent season of play with no attendance restrictions (2019), bordering just under 25,000 attendees for home game attendance. Overall, attendance trends nation-wide are in sharp decline. The 2019 D1-FBS season resulted in the lowest overall attendance in the past 24 years (41,477 per game), with the Mountain West posting its lowest average per game attendance ever (23,232 per game). It is further notable that over the past five years, running from the 2014 season to 2019 season, average UH Football attendance has also trended down, reflecting a decline in average attendance. Moreover, UH Football has not drawn a sell-out crowd since 2007. By contrast, the highest attended game within the past five years attracted approximately 36,411 attendees (2014 season opener), under the context of the capacity of the existing Aloha Stadium (50,000 seats), the highest attended UH Football event held at the Stadium over the course of the last five years would have a little more than a 25% of the seats vacant. By contrast, under the Proposed Action the current capacity of 50,000 seats (35,000 seat stadium), with a similar level of attendance, the Stadium would be 100% filled to capacity. There is a quality all unto-itself to having a sold-out-stadium that cannot be tangibly quantified.

Overall, the proposed New Aloha Stadium (35,000 seat capacity) would create the opportunity to serve as a viable venue for a greater range of events. Possible events include rugby, motor sports, soccer and mixed martial arts. These events typically will not pursue stadiums larger than 35,000, as the demand of their audience typically would not justify the use of a larger venue, particularly under the context of the market that would be locally served here on O'ahu.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and

Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Carmen Linhares](#)
To: [Public Comment](#)
Subject: Stadium
Date: Saturday, January 23, 2021 8:08:37 AM

Aloha

My comments are to please address homelessness by building more housing, and finish the rail before starting another project.

Mahalo

Carmen Linhares, PhD, CNM, APRN

Sent from my iPhone



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10422-01

Carmen Linhares, PhD
carmen.h.linhares@gmail.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear Dr. Carmen Linhares:

Thank you for your comments dated January 23, 2021, regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment #1: *My comments are to please address homelessness by building more housing*

Response #1: Your comments are acknowledged. It is evident that there is a serious need for additional affordable housing inventory and options across the State. Furthermore, recent events have shown that there is a shortage of affordable housing within and in proximity to the Primary Urban Center. We also acknowledge that many comments regarding more housing, specifically affordable housing, were brought up at both the EIS Scoping Meeting held on September 25, 2019, in conjunction with scoping out the assessment and evaluation for the Programmatic Draft EIS, and the Master Plan Community Workshops held in December 2019. All comments were considered when preparing the Programmatic Draft EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1.

The Proposed Action, which is premised upon the Programmatic Master Plan appended to the Programmatic EIS as Appendix A, reflects the aggregated collection of extensive and exhaustive input from area residents, members of the public, existing Aloha Stadium stakeholders and public agencies as discussed in Section 2.3 of the Programmatic EIS. Hence, the Proposed Action represents the vision of the overall community for the Project Site. Based on community input and various technical studies, the Proposed Action is envisioned to encompass the New Aloha Stadium, approximately 730,000 gross square feet (GSF) of residential space, 680,500 GSF of retail and entertainment space, 216,000

GSF of office space, and 160,000 GSF of hotel hotel space. However, as noted throughout the Programmatic EIS, that final design of the Project Site and use and space allocation will be determined by the Stadium Authority, the selected Stadium Developer and Real Estate Developer(s).

Comment #2: *and finish the rail before starting another project.*

Response #2: Please note that the HART Rail project is outside the scope of the evaluation for this Programmatic EIS. Please note as discussed at the EIS Scoping Meeting and described in the EIS Preparation Notice published on September 8, 2019, as well as reiterated in Section 1.1 of the Programmatic Draft EIS, “*The Proposed Action encompasses the construction of a new, modern stadium facility that will be supported by complimentary mixed-use development.*” Therefore, the subject Programmatic Draft EIS is intended to assess the potential effects associated with the Proposed Action on various environmental resource categories as prescribed by Section 11-200.1-24.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in cursive script that reads "Keola Cheng". The ink is dark and the signature is fluid.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Public Comment](#)
To: [Andrew Blasko](#)
Subject: Fw: Aloha Stadium EIS Public Comments
Date: Tuesday, February 9, 2021 1:50:31 PM

From: C Lee <cathie012@gmail.com>
Sent: Friday, February 5, 2021 11:15 PM
To: Public Comment <publiccomment@wilsonokamoto.com>
Subject: Aloha Stadium EIS Public Comments

To Whom It May Concern:

There were public comments submitted at the scoping meeting and community workshop asking for a higher number to be studied to understand the impacts of including more housing in the plan. Why were these comments ignored? We are in the middle of a housing crisis. Why did the EIS not assume a higher maximum total units of low-cost housing units?

We absolutely need higher density developments to comprehensively address the housing shortage, including the ALICE population.

I'm writing to bring attention to the fact that these factors were not considered sufficiently in the study.

Thank you,

Catherine Lee



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10422-01

Catherine Lee
Cathie012@gmail.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, Oʻahu, Hawaiʻi

Dear Catherine Lee:

Thank you for your comments dated February 5, 2021 regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawaiʻi Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment #1: *There were public comments submitted at the scoping meeting and community workshop asking for a higher number to be studied to understand the impacts of including more housing in the plan. Why were these comments ignored? We are in the middle of a housing crisis. Why did the EIS not assume a higher maximum total units of low-cost housing units? We absolutely need higher density developments to comprehensively address the housing shortage, including the ALICE population. I'm writing to bring attention to the fact that these factors were not considered sufficiently in the study.*

Response #1: It is acknowledged that there is a need for greater availability of affordable housing on Oʻahu, as well as throughout the State of Hawaiʻi, in general. We also acknowledge that many comments regarding more housing, specifically affordable housing, were brought up at both the EIS Scoping Meeting held on September 25, 2019, in conjunction with scoping out the assessment and evaluation for the Programmatic Draft EIS, and the Master Plan Community Workshops held in December 2019. All comments were considered when preparing the Programmatic Draft EIS with regard to meeting content requirements prescribed in Hawaiʻi Administrative Rules, Title 11, Chapter 200.1. Hence, they were not ignored.

Please note as discussed at the EIS Scoping Meeting and described in the EIS Preparation Notice published on September 8, 2019, as well as reiterated in Section 1.1 of the

Programmatic Draft EIS, “*The Proposed Action encompasses the construction of a new, modern stadium facility that will be supported by complimentary mixed-use development.*” Therefore, the subject Programmatic Draft EIS is intended to assess the potential effects associated with the Proposed Action on various environmental resource categories as prescribed by Section 11-200.1-24. The Proposed Action, which is premised upon the Programmatic Master Plan appended to the Programmatic EIS as Appendix A, reflects the aggregated collection of extensive and exhaustive input from area residents, members of the public, existing Aloha Stadium stakeholders and public agencies as discussed in Section 2.3 of the Programmatic EIS. Hence, the Proposed Action represents the vision of the overall community for the Project Site. Based on community input and various technical studies, the Proposed Action is envisioned to encompass the New Aloha Stadium, approximately 730,000 gross square feet (GSF) of residential space, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF of hotel space. However, as noted throughout the Programmatic EIS, that final design of the Project Site and use and space allocation will be determined by the Stadium Authority, the selected Stadium Developer and Real Estate Developer(s).

It is acknowledged that the Programmatic EIS did not evaluate, “*a higher maximum total units of low-cost housing units*” housing program as such a program would not meet the goals and objectives of the Proposed Action as described in Section 2.2 of the Programmatic Draft EIS. Nonetheless, the Proposed Action is envisioned to directly serve regional and State housing demands through the creation of a diverse range of residential options, accounting for upwards of 1,800 new housing units as discussed in Section 2.1 of the Programmatic Draft EIS. However, it should be noted that the extent of residential programming will ultimately be determined by the Stadium Authority and the Real Estate Developer(s) which will comply with applicable affordable housing requirements.

Please note that due to broad comments raised in response to the Programmatic Draft EIS, Section 3.4 has been added to the Programmatic Final EIS which on a conceptual basis, evaluated a conceptual affordable housing project site design alternative program scenario with 20,000 to 100,000 units within the confines of the Project Site. It is readily apparent that this type of programming would not be compatible with the general purpose and need, as well as goals and objectives of the Proposed Action. Moreover, such a program and its anticipated impacts would require the preparation of a separate, comprehensive EIS documentation and evaluation.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Public Comment](#)
To: [Andrew Blasko](#)
Subject: Fw: Aloha Stadium Redevelopment
Date: Tuesday, February 9, 2021 1:53:35 PM

From: c c <cxhconrad@hotmail.com>
Sent: Monday, February 8, 2021 3:03 PM
To: Public Comment <publiccomment@wilsonokamoto.com>
Subject: Aloha Stadium Redevelopment

Aloha,

The public was asked for their input on what was wanted in the studied. In response, it has been asked to study the proposal with more housing units. This has not been done.

The EIS should have assumed a higher maximum total units of low-cost housing units given our community's affordable housing shortage.

Please do this.

Mahalo



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10422-01

CC

cxhconrad@hotmail.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASD)
Hālawā, O‘ahu, Hawai‘i

Dear CC:

Thank you for your comments dated February 8, 2021 regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment #1: *The public was asked for their input on what was wanted in the studied. In response, it has been asked to study the proposal with more housing units. This has not been done. The EIS should have assumed a higher maximum total units of low-cost housing units given our community's affordable housing shortage.*

Response #1: It is acknowledged that there is a need for greater availability of affordable housing on O‘ahu, as well as throughout the State of Hawai‘i, in general. We also acknowledge that many comments regarding more housing, specifically affordable housing, were brought up at both the EIS Scoping Meeting held on September 25, 2019, in conjunction with scoping out the assessment and evaluation for the Programmatic Draft EIS, and the Master Plan Community Workshops held in December 2019. All comments were considered when preparing the Programmatic Draft EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. Hence, they were considered.

Please note as discussed at the EIS Scoping Meeting and described in the EIS Preparation Notice published on September 8, 2019, as well as reiterated in Section 1.1 of the Programmatic Draft EIS, “*The Proposed Action encompasses the construction of a new, modern stadium facility that will be supported by complimentary mixed-use development.*” Therefore, the subject Programmatic Draft EIS is intended to assess the potential effects associated with the Proposed Action on various environmental resource categories as

prescribed by Section 11-200.1-24. The Proposed Action, which is premised upon the Programmatic Master Plan appended to the Programmatic EIS as Appendix A, reflects the aggregated collection of extensive and exhaustive input from area residents, members of the public, existing Aloha Stadium stakeholders and public agencies as discussed in Section 2.3 of the Programmatic EIS. Hence, the Proposed Action represents the vision of the overall community for the Project Site. Based on community input and various technical studies, the Proposed Action is envisioned to encompass the New Aloha Stadium, approximately 730,000 gross square feet (GSF) of residential space, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF of hotel space. However, as noted throughout the Programmatic EIS, that final design of the Project Site and use and space allocation will be determined by the Stadium Authority, the selected Stadium Developer and Real Estate Developer(s).

It is acknowledged that the Programmatic EIS did not evaluate, “*a higher maximum total units of low-cost housing units*” housing program as such a program would not meet the goals and objectives of the Proposed Action as described in Section 2.2 of the Programmatic Draft EIS. Nonetheless, the Proposed Action is envisioned to directly serve regional and State housing demands through the creation of a diverse range of residential options, accounting for upwards of 1,800 new housing units as discussed in Section 2.1 of the Programmatic Draft EIS. However, it should be noted that the extent of residential programming will ultimately be determined by the Stadium Authority and the selected Real Estate Developer(s) which will comply with applicable affordable housing requirements.

Please note that due to broad comments raised in response to the Programmatic Draft EIS, Section 3.4 has been added to the Programmatic Final EIS which on a conceptual basis, evaluated a conceptual affordable housing project site design alternative program scenario with 20,000 to 100,000 units within the confines of the Project Site. It is readily apparent that this type of programming would not be compatible with the general purpose and need, as well as goals and objectives of the Proposed Action. Moreover, such a program and its anticipated impacts would require the preparation of a separate, comprehensive EIS documentation and evaluation.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Public Comment](#)
To: [Andrew Blasko](#)
Subject: Fw: Aloha Stadium site --Build 100,000 affordable housing units for Hawaii residents
Date: Tuesday, February 9, 2021 1:54:04 PM

From: Chad Taniguchi <chadktaniguchi@gmail.com>
Sent: Monday, February 8, 2021 9:17 PM
To: Public Comment <publiccomment@wilsonokamoto.com>
Subject: Aloha Stadium site --Build 100,000 affordable housing units for Hawaii residents

Aloha,

I was one of a few dozen people who paid my own way on Senator Chang's affordable housing study tour to Singapore and Hong Kong two years ago.

Rail stations are where to build workforce housing because they nearly eliminate the commute time gap between where people live and where they work.

Plan for 100,000 homes first, with adequate supermarkets, food courts, and basic needs stores within walking distance. Only if there is room should valuable land be used for a strip mall, luxury condos, office space or hotels -- we already have these in abundance a short rail ride away.

The one thing we don't have is affordable housing for families to live in Hawaii.

Mahalo,
Chad Taniguchi
Kailua



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10422-01

Chad Taniguchi
chadltaniguchi@gmail.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear Chad Taniguchi:

Thank you for your comments dated February 8, 2021, regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment #1: *I was one of a few dozen people who paid my own way on Senator Chang’s affordable housing study tour to Singapore and Hong Kong two years ago.*

Response #1: Your comment is acknowledged.

Comment #2: *Rail stations are where to build workforce housing because they nearly eliminate the commute time gap between where people live and where they work.*

Response #2: Your comments are acknowledged. With regards to your comment the use of lands near rail stations, please note that the State of Hawai‘i is the land owner of the Project Site, and in partnership with the selected Stadium Developer and Real Estate Developer(s), may pursue different land-use configurations and strategies than what is presented in the Programmatic EIS to maximize the value of the Proposed Action and address a number of Statewide needs. The State of Hawai‘i, as the landowner, has the ultimate say in how they use their lands to fit their needs. Furthermore, it has not yet been determined how Act 146 will be administered, specifically, how it relates to implementing a “stadium development district.” However, it is expected that the State of Hawai‘i, in partnership with the selected Stadium Developer and Real Estate Developer(s), will coordinate and work closely with the

CCH to implement the Proposed Action, and to minimize any potential impacts on land uses at the Project Site and the Project Region.

Comment #3: *Plan for 100,000 homes first, with adequate supermarkets, food courts, and basic needs stores within walking distance. Only if there is room should valuable land be used for a strip mall, luxury condos, office space or hotels -- we already have these in abundance a short rail ride away.*

Response #3: Your comments are acknowledged. It is acknowledged that the Programmatic Draft EIS did not evaluate, “*the environmental impacts of least 100,000 units of housing on the Aloha Stadium site,*” as such a program would not meet the goals and objectives of the Proposed Action as described in Section 2.2 of the Programmatic Draft EIS. Nonetheless, the Proposed Action is envisioned to directly serve regional and State housing demands through the creation of a diverse range of residential options, accounting for upwards of 1,800 new housing units as discussed in Section 2.1 of the Programmatic Draft EIS. However, it should be noted that the extent of residential programming will ultimately be determined by the Stadium Authority and the selected Real Estate Developer(s) which will comply with applicable affordable housing requirements.

Please note that due to broad comments raised in response to the Programmatic Draft EIS, Section 3.4 has been added to the Programmatic Final EIS which on a conceptual basis, evaluated a conceptual affordable housing project site design alternative program scenario with 20,000 to 100,000 units within the confines of the Project Site. It is readily apparent that this type of programming would not be compatible with the general purpose and need, as well as goals and objectives of the Proposed Action. Moreover, such a program and its anticipated impacts would require the preparation of a separate, comprehensive EIS documentation and evaluation.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

10422-01

Letter to Chad Taniguchi

Page 2

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Public Comment](#)
To: [Andrew Blasko](#)
Subject: Fw: Comments on Aloha Stadium EIS
Date: Tuesday, February 9, 2021 1:53:50 PM
Attachments: [Comments on Aloha Stadium EIS - testimony.docx](#)

From: icec002@hawaii.rr.com <icec002@hawaii.rr.com>
Sent: Monday, February 8, 2021 5:32 PM
To: Public Comment <publiccomment@wilsonokamoto.com>
Subject: Comments on Aloha Stadium EIS

Mahalo. Please see attached

-- me ke aloha pumehana, Charley

Charley Ice
98-633 Kilinoe Street, Waimalu, Puuloa
08 February 2021

Comments on Aloha Stadium EIS

This EIS does not describe a necessary and broad regional plan for these essential public lands in view of community priorities, but is rather a simple “replace the stadium” study. It creates the misguided proposal for an “Entertainment District”, and misuses the properties available. It describes activities that are misplaced for this location – hotels and general entertainment facilities, while providing minimal attention to real community priorities for the use of State lands, particularly affordable housing and the opportunity to showcase modern technologies as a demonstration that our decision-makers actually “get it”.

Public input confined to non-contextual “customer satisfaction” survey. Use of essential public lands really requires a review of regional community needs, including all aspects of society, best served by convening representatives of social service professionals who hold a perspective on deep community needs. The concept of an “Entertainment District” is irresponsible and silly.

A proper analysis would engage a bottoms-up approach. The aversion to this kind of planning is exemplary of the casual attitude of local elites who cater to global capital rather than to local communities. The pandemic has elevated this reality to its ugly contours, and we should be grown up enough to accept it. We should reject the Plan as presented and begin an accelerated process.

The outlines of a proper result are familiar to those who pay attention to local needs. A good stadium has been a draw for sports and entertainment for all islanders, and no one contests that a majority will be happy to see some foolish early mistakes corrected in a truly classy, not a hubris-laden “world-class” facility. We are already world-class. We don’t have to appeal to the outside world for confirmation. We could really use some world-class thinkers.

The stadium is also used for the ever-popular Swap Meet, which should be retained, along with the opportunity for tailgating at local events. The mature and carbon-absorbing tree canopy in the surrounding parking should be retained, not sacrificed to more buildings. New construction – affordable housing, neighborhood and regional commercial, even light industrial, can make use of the major remaining portion of the total property, while still providing amenities and productive landscape near Hālawa Stream. The necessity of moving the stadium for a rebuild will alter some of the configuration, but the shift should be accommodated by moving all trees in the rebuild zone out into the new parking zone.

Note: the orientation of the stadium and its roof should prioritize shelter from rains blowing leeward, with shade on the leeward side; the current depiction is a little off.

A seriously pressing need for O’ahu is affordable housing. Because the market is incapable of producing affordable housing, essential State lands provide an opportunity to succeed where the market fails. Essential State lands should NOT be used for market housing or hotels. The region may also be used for light industry, as basic fabrication and related functions are needed to support local innovation. As these functions may require incubator status, public lands are appropriate.

Affordable housing goes hand-in-hand with neighborhood and regional commercial activities, and the rail station is perfectly situated for that. A cultural center is another appropriate use that need not be an extravagant use of space but be integrated into a commercial setting. Parking for non-

residents and non-Rail users can be accommodated through parking structures incorporated into the commercial space.

In addition to the 98 acres of the official Aloha Stadium site, the EIS does countenance a regional view of surrounding areas suited to appropriate land uses, yielding approximately 130 total acres, if not an additional acreage immediately adjacent across Moanalua Road at Aiea Elementary and across Kaimakani from the school, which are already connected and conceivably incorporable. In further addition are the Queen Emma properties, currently featuring the Ice Palace, K-Mart, and a number of other commercial facilities, all of which are compatible with the possibilities of a regional center of affordable housing and neighbor/regional commerce. There is a great deal of underused space, including parking lot, which could be redeveloped at an appropriate time by Queen Emma.

The property adjacent to the Rail station is currently a housing development for Pacific Islanders, and a candidate for redevelopment. A thoughtful design might incorporate more amenities and greater density, possibly allied uses.



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10422-01

Charley Ice
98-633 Kilinoe Street
Aiea, HI 96701
Icec002@hawaii.r.r.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear Charley Ice:

Thank you for your comments dated February 8, 2021 regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment #1: *This EIS does not describe a necessary and broad regional plan for these essential public lands in view of community priorities, but is rather a simple “replace the stadium” study. It creates the misguided proposal for an “Entertainment District”, and misuses the properties available. It describes activities that are misplaced for this location – hotels and general entertainment facilities, while providing minimal attention to real community priorities for the use of State lands, particularly affordable housing and the opportunity to showcase modern technologies as a demonstration that our decision-makers actually “get it”.*

Response #1: We respectfully disagree with your comment that the EIS does not represent community priorities for the Project Site. Please note that the Proposed Action, which is premised upon the Programmatic Master Plan appended to the Programmatic EIS as Appendix A, reflects the aggregated collection of extensive and exhaustive input from area residents, members of the public, existing Aloha Stadium stakeholders and public agencies as discussed in Section 2.3 of the Programmatic EIS. Additionally, the Project Team conducted a substantial number of public outreach meetings and has considered public input throughout the EIS process. For more information about public outreach and consultation please refer to Chapter 10 *Consultation* of Programmatic Final EIS. Hence, the Proposed Action represents the vision of the overall community for the Project Site. Based on

community input and various technical studies, the Proposed Action is envisioned to encompass the New Aloha Stadium, approximately 730,000 gross square feet (GSF) of residential space, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF of hotel space. However, as noted throughout the Programmatic EIS, that final design of the Project Site and use and space allocation will be determined by the Stadium Authority, the selected Stadium Developer and Real Estate Developer(s). Moreover, an EIS is not intended to be a plan for development but rather is intended to assess the potential effects associated with the Proposed Action on various environmental resource categories as prescribed by Section 11-200.1-24.

As it relates to your comment about, *“providing minimal attention for the use of State lands, particularly affordable housing and the opportunity to showcase modern technologies”* please note that the State of Hawai‘i is the landowner of the Project Site, and in partnership with the selected Stadium Developer and Real Estate Developer(s), may pursue different land-use configurations and strategies, than what is presented in the Programmatic EIS and Master Plan, to maximize the value of the Proposed Action and address a number of Statewide needs. The State of Hawai‘i, as the landowner, has the ultimate say in how they use their lands to fit their needs. Furthermore, it has not yet been determined how Act 146 will be administered, specifically, how it relates to implementing a “stadium development district.” However, it is expected that the State of Hawai‘i, in partnership with the selected Stadium Developer and Real Estate Developer(s), will coordinate and work closely with the CCH to implement the Proposed Action, and to minimize any potential impacts on land uses at the Project Site and the Project Region. However, the Stadium Authority and the selected Real Estate Developer(s) will comply with all applicable affordable housing requirements.

Comment #2: *Public input confined to non-contextual “customer satisfaction” survey. Use of essential public lands really requires a review of regional community needs, including all aspects of society, best served by convening representatives of social service professionals who hold a perspective on deep community needs. The concept of an “Entertainment District” is irresponsible and silly.*

Response #2: The Project Team understands that public outreach and consultation are integral components of the EIS and Master Planning processes for the Proposed Action. Consequently, meetings were held with community groups and key stakeholders to discuss the Proposed Action. Community groups were consulted and asked to provide their feedback throughout the process. Likewise, input was solicited from key stakeholders representing business, entertainment, government, military, sports, television, tourism, and other industries. Through outreach and consultation with these groups, project decision making was informed throughout the planning process to address the community and stakeholder needs. Hence, as discussed in Response #1 above, the Proposed Action reflects the aggregated collection of extensive and exhaustive input from area residents, members of the public, existing Aloha Stadium stakeholders and public agencies as discussed in Section 2.3 of the Programmatic EIS.

Comment #3: *A proper analysis would engage a bottoms-up approach. The aversion to this kind of planning is exemplary of the casual attitude of local elites who cater to global capital rather than to local communities. The pandemic has elevated this reality to its ugly contours, and we should be grown up enough to accept it. We should reject the Plan as presented and begin an accelerated process.*

Response #3: Your comment is acknowledged. Please note that as discussed in the response above, the Project Team conducted a substantial number of public outreach meetings and has considered public input throughout the EIS process. For more information about public outreach and consultation please refer to Chapter 10 *Consultation* of Programmatic Final EIS.

Comment #4: *The outlines of a proper result are familiar to those who pay attention to local needs. A good stadium has been a draw for sports and entertainment for all islanders, and no one contests that a majority will be happy to see some foolish early mistakes corrected in a truly classy, not a hubris-laden “world-class” facility. We are already world-class. We don’t have to appeal to the outside world for confirmation. We could really use some world-class thinkers.*

Response #4: Your Comment #4 above is unclear and it appears that you misunderstood the use of the term “world class” within the Programmatic EIS. The term “world-class” does not mean decision-makers are seeking approval from the outside world. Within this EIS, “world class,” is used to describe the standard for which the Proposed Action strives for, as the existing Aloha Stadium was once a world-class facility but is no longer as it is deteriorating and is functionally obsolete now as described throughout the Programmatic EIS. Furthermore, the Oxford Languages Dictionary defines “world-class” as (of a person, thing, or activity) of or among the best in the world. Hence, the Stadium Development component of the Proposed Action is envisioned to deliver a facility that can be considered of the highest standard, or “world class.”

Comment #5: *The stadium is also used for the ever-popular Swap Meet, which should be retained, along with the opportunity for tailgating at local events. The mature and carbon-absorbing tree canopy in the surrounding parking should be retained, not sacrificed to more buildings. New construction – affordable housing, neighborhood and regional commercial, even light industrial, can make use of the major remaining portion of the total property, while still providing amenities and productive landscape near Hālawa Stream. The necessity of moving the stadium for a rebuild will alter some of the configuration, but the shift should be accommodated by moving all trees in the rebuild zone out into the new parking zone.*

Note: the orientation of the stadium and its roof should prioritize shelter from rains blowing leeward, with shade on the leeward side; the current depiction is a little off.

Response #5: We acknowledge your comments. Please note that the Swap Meet will be retained under the Proposed Action as it is considered to be an important factor that has contributed towards the social fabric of life at the Project Site.

As it relates to your comments on landscaping, the Stadium Authority, the selected Stadium Developer and Real Estate Developer(s) will be responsible for the final landscape design and configuration. However, it is anticipated that under the Proposed Action, more green space will be provided than what is currently existing conditions and it is encouraged the native landscaping plants be incorporated to the extent feasible.

With regards to your comment about the conceptual New Aloha Stadium design provided in the Programmatic EIS and Master Plan, as stated before, the final design and configuration of the New Aloha Stadium and the Project Site layout will ultimately be determined by the Stadium Authority, the selected Stadium Developer and Real Estate Developer(s). However, please note that this comment, along with all the other comments, and the findings of this Programmatic EIS will be provided to the selected stadium Developer and Real Estate Developer(s) to consider when designing the Project Site.

Comment #6: *A seriously pressing need for O'ahu is affordable housing. Because the market is incapable of producing affordable housing, essential State lands provide an opportunity to succeed where the market fails. Essential State lands should NOT be used for market housing or hotels. The region may also be used for light industry, as basic fabrication and related functions are needed to support local innovation.*

As these functions may require incubator status, public lands are appropriate. Affordable housing goes hand-in-hand with neighborhood and regional commercial activities, and the rail station is perfectly situated for that. A cultural center is another appropriate use that need not be an extravagant use of space but be integrated into a commercial setting. Parking for nonresidents and non-Rail users can be accommodated through parking structures incorporated into the commercial space.

Response #6: We acknowledge your comments regarding what should be developed at the Project Site. It is acknowledged that there is a need for greater availability of affordable housing on O'ahu, as well as throughout the State of Hawai'i, in general. However, please note that, as discussed in Response #1 above, the State of Hawai'i is the landowner of the Project Site, and in partnership with the selected Stadium Developer and Real Estate Developer(s), may pursue different land-use configurations and strategies, than what is presented in the Programmatic EIS and Master Plan, to maximize the value of the Proposed Action and address a number of Statewide needs. The State of Hawai'i, as the landowner, have the ultimate say in how they use their lands to fit their needs. However, as noted in Response #5, this comment, along with all the other comments, and the findings of this Programmatic EIS will be provided to the selected Stadium Developer and Real Estate Developer(s) to consider when designing the Project Site.

Comment #7: *In addition to the 98 acres of the official Aloha Stadium site, the EIS does countenance a regional view of surrounding areas suited to appropriate land uses, yielding approximately 130 total acres, if not an additional acreage immediately adjacent across Moanalua Road at Aiea Elementary and across Kaimakani from the school, which are already connected and conceivably incorporable. In further addition are the Queen Emma properties, currently featuring the Ice Palace, K-Mart, and a number of other commercial facilities, all of which are compatible with the possibilities of a regional center of affordable housing and neighbor/regional commerce. There is a great deal of underused space, including parking lot, which could be redeveloped at an appropriate time by Queen Emma.*

The property adjacent to the Rail station is currently a housing development for Pacific Islanders, and a candidate for redevelopment. A thoughtful design might incorporate more amenities and greater density, possibly allied uses.

Response #7: We acknowledge your comments. However, for the purposes of this Programmatic EIS, under the Proposed Action, the Project Site boundaries are confined to the following Tax Map Keys; [1] 9-9-003:061 and neighboring TMKs [1] 9-9-003:055, 070, and 071 as described in Section 1.3.1 of the Programmatic EIS. The properties that you mention in Comment #7 above, are not within the Project Site boundaries under the Proposed Action and moreover are not all owned or managed by the same entity. Thus, assessing development opportunities for those properties are outside the scope of assessment within this Programmatic EIS.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is fluid and cursive, with the first name "Keola" and last name "Cheng" clearly distinguishable.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Public Comment](#)
To: [Andrew Blasko](#)
Subject: Fw: Comments of Draft PEIS for Aloha Stadium
Date: Tuesday, February 9, 2021 1:54:07 PM
Attachments: [Draft PEIS Aloha Stadium comments.docx](#)

From: Claire Tamamoto <claire2164@gmail.com>
Sent: Monday, February 8, 2021 9:44 PM
To: Public Comment <publiccomment@wilsonokamoto.com>
Subject: Comments of Draft PEIS for Aloha Stadium

Chris, David, etc.

Here are my comments without discussion at ACA meeting. Generally, I like the plans and can only hope that any developer selected will still have the best interests of the community at heart. I also realize one of the main factors influencing the project's many phases is going to be the fiscal issues. Hopefully, we can all continue the conversations and end up with something we can all be proud of. Change is always hard but as my 96 year old Aunt said at a council meeting when she testified about the Aiea Sugar Mill . . . "Change is good, but change without purpose is not."

Take care and stay safe.

Claire

NASED.EIS@wilsonokamoto.com

Comments on Aloha Stadium Redevelopment Draft PEIS from Claire Tamamoto

1. Given the proposed seats size of the new stadium, 30, 000 – 35,000, are we saying that we aren't interested in hosting any NFL games? For marketing purposes, who are our target groups.
2. Timeline for the new stadium: Have plans changes now that the Stadium might not be hosting UH football games? Besides the swap meet are they the number one consistent users of the stadium.
3. If we are not going to use the current stadium for games going forward, can it be demolished immediately and will that open up various configurations and locations for the new stadium?
4. There has been public concern for the noise levels from concerts, etc., so can we entertain facing the open side of the new stadium toward Pearl Harbor and letting the sound travel over the water instead toward the mountains and residences where sound resonates and echoes into the valley.
5. It was mentioned at the NASED community meeting that the developer has the final say as to what comes up. What safeguards does the community have that are our input and concerns are taking into account and more importantly implemented?
6. "C" shape facing the mountains leaves stadium goes exposed to inclement weather.
7. How many entrances will be made and are there any tunnels from the locker rooms to the field?
8. Will there be public access for the open space? If property is leased to a developer, does that preclude use of free open space for community use?
9. If developer is going to make environmental features and get bonus points (government direction for State buildings), there needs to be provisions for long term maintenance of these provisions, i.e. wind solar generators.
10. Parking and traffic patterns still are an issue. Steps need to be taken to address bringing the traffic or parking on site.



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10422-01

Claire Tamamoto
Claire2164@gmail.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear Claire Tamamoto:

Thank you for your comments dated February 8, 2021 regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment #1: *Given the proposed seats size of the new stadium, 30, 000 – 35,000, are we saying that we aren’t interested in hosting any NFL games? For marketing purposes, who are our target groups.*

Response #1: The Programmatic Final EIS includes a market feasibility & economic review and analysis prepared by Victus Advisors conducted in conjunction with master planning and preliminary design efforts for the Proposed Action. This documentation clearly underscores that the existing Aloha Stadium’s capacity of 50,000, by far, and in large exceeds current and anticipated future market needs. In observance of the analysis and guidance set forth by Victus Advisors as well as market sounding and user analysis by Stadium and Industry consultants, the unified recommendation is that the construction of a 27,500 - 35,000 seat capacity stadium would best serve current and anticipated future market demand.

Furthermore, before the 2018 fiscal year, Aloha Stadium was not widely considered as a major venue for concert activities. As the Aloha Stadium began to be marketed more heavily as a concert venue over the course of 2019, it was revealed through consultation with entertainment industry professionals that the Aloha Stadium’s current capacity of 50,000 seats was a significant deterrent to the candidacy of the existing Aloha Stadium as venue for major artists. Promoters and performers alike voiced that the ideal range for seating at a stadium-set concert lies between 25,000 and 30,000 seats.

Since the fiscal year of 2018, Aloha Stadium has hosted eight concerts, with seven held within the fiscal year of 2019. Six concerts have been booked/promoted by Live Nation with an average of 30,743 attendees, right in line with feedback provided by industry professionals. Nonetheless, as currently proposed, in addition to a raw 35,000 fixed seat capacity, concert events could potentially utilize field space for additional viewership that could accommodate upwards of 10,000 additional attendees.

With regard to sporting events held at Aloha Stadium, Division 1 Football Bowl Subdivision (D1-FBS) football factors in as the central activity featured. Specifically, Aloha Stadium was the home to the University of Hawai'i Rainbow Warriors Football Program (UH Football) when it was in operation. The University of Hawai'i is a member of the Mountain West Conference, which is considered to be a Mid-Major or Group of Five (G5) conference, and has ranked 81st in attendance among all D1-FBS institutions in the most recent season of play with no attendance restrictions (2019), bordering just under 25,000 attendees for home game attendance. Overall, attendance trends nation-wide are in sharp decline. The 2019 D1-FBS season resulted in the lowest overall attendance in the past 24 years (41,477 per game), with the Mountain West posting its lowest average per game attendance ever (23,232 per game). It is further notable that over the past five years, running from the 2014 season to 2019 season, average UH Football attendance has also trended down, reflecting a decline in average attendance. Moreover, UH Football has not drawn a sell-out crowd since 2007. By contrast, the highest attended game within the past five years attracted approximately 36,411 attendees (2014 season opener), under the context of the capacity of the existing Aloha Stadium (50,000 seats), the highest attended UH Football event held at the Stadium over the course of the last five years would have a little more than a 25% of the seats vacant. By contrast, under the Proposed Action the current capacity of 50,000 seats (35,000 seat stadium), with a similar level of attendance, the Stadium would be 100% filled to capacity. There is a quality all unto-itself to having a sold-out-stadium that cannot be tangibly quantified.

Overall, the proposed New Aloha Stadium (35,000 seat capacity) would create the opportunity to serve as a viable venue for a greater range of events. Possible events include rugby, motor sports, soccer and mixed martial arts. These events typically will not pursue stadiums larger than 35,000, as the demand of their audience typically would not justify the use of a larger venue, particularly under the context of the market that would be locally served here on O'ahu.

Comment #2: *Timeline for the new Aloha Stadium: Have plans changes now that the Stadium might not be hosting UH football games? Besides the swap meet are they the number one consistent users of the stadium.*

Response #2: At this time, there is no specific timeline for the Proposed Action. In response to your question, the UH Football Program is the most consistent user of the Aloha Stadium. It should be noted that due to the safety concerns and financial challenges the Stadium

Authority has placed a moratorium on spectator events being held within the existing Aloha Stadium. This announcement was made on December 17, 2019. As a result of this, the University of Hawai'i Athletic Department has been forced to temporarily host UH Football home games at its Clarence T.C. Ching Athletics Complex located on its UH Mānoa campus. Originally, it was anticipated that the UH Football Program would play at least three additional seasons in the existing Aloha Stadium while the New Stadium was being built.

Comment #3: *If we are not going to use the current stadium for games going forward, can it be demolished immediately, and will that open up various configurations and locations for the new stadium?*

Response #3: At this time, it is anticipated that the demolition of the existing Aloha Stadium will occur in late 2022, which will allow plans for the Proposed Action to commence quicker. Please note that the demolition of the existing Aloha Stadium to allow for a new configuration selected from a variety of configurations was included in Programmatic EIS and Master Plan. However, the final design and configuration of the Proposed Action will be determined by the Stadium Authority, the selected Stadium Developer and Real Estate Developer(s).

Comment #4: *There has been public concern for the noise levels from concerts, etc., so can we entertain facing the open side of the new stadium toward Pearl Harbor and letting the sound travel over the water instead toward the mountains and residences where sound resonates and echoes into the valley.*

Response #4: Please note that Section 4.9 and Appendix F of the Programmatic EIS assess noise level increases and impacts associated with the Proposed Action based on historical events that occurred at the Project Site, including concerts, football games, and monster truck shows. Under the Proposed Action, it is anticipated that special events will exceed normal background noise levels at the closest residential communities. The louder emissions may be associated with amplified voice and music, crowd noise, motor vehicle and motorcycle engine and exhaust noise, fireworks, fighter aircraft flyovers, etc. The sound levels associated with these special events will vary depending upon the siting of the New Aloha Stadium within the Project Site.

Comment #5: *It was mentioned at the NASED community meeting that the developer has the final say as to what comes up. What safeguards does the community have that are our input and concerns are taking into account and more importantly implemented?*

Response #5: Please note that the Proposed Action, which is premised upon the Programmatic Master Plan appended to the Programmatic EIS as Appendix A, reflects the aggregated collection of extensive and exhaustive input from area residents, members of the public, existing Aloha Stadium stakeholders and public agencies as discussed in Section 2.3 of the Programmatic EIS. Hence, the Proposed Action represents the vision of the

overall community for the Project Site. Based on community input and various technical studies, the Proposed Action is envisioned to encompass the New Aloha Stadium, approximately 730,000 gross square feet (GSF) of residential space, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF of hotel space. However, as noted throughout the Programmatic EIS, that final design of the Project Site and use and space allocation will be determined by the Stadium Authority, the selected Stadium Developer and Real Estate Developer(s). Moreover, the Request for Proposal (RFP) published by the Proposing Agency will include evaluation criteria that will be used by DAGS to properly vet the responses of potential Developer(s). Once the Stadium Developer and Real Estate Developer(s) have been selected, they will be obligated to adhere to the terms of the RFP, the findings of the Programmatic EIS process, as well as to continue consultation and receive direction from the Proposing Agency.

Comment #6: *“C” shape facing the mountains leaves stadium goes exposed to inclement weather.*

Response #6: Please note that the “C” shape design of the New Aloha Stadium as outlined in the Final Programmatic EIS and the Programmatic Master plan is conceptual. It will be the responsibility of the Stadium Authority, the selected Stadium Developer to mutually agree on a stadium design and configuration that will consider weather conditions and its potential effects on patrons.

Comment #7: *How many entrances will be made and are there any tunnels from the locker rooms to the field?*

Response #7: Please note that the current conceptual configuration of Option B the Stadium presents three public entrances. However, the construction of tunnels from the locker rooms to the field as well as the final number of public entrances to the stadium will be determined by the Stadium Authority and the selected Stadium Developer.

Comment #8: *Will there be public access for the open space? If property is leased to a developer, does that preclude use of free open space for community use?*

Response #8: Under the Proposed Action there will be the allocation of space to be used for recreational/open space that will be available for public use.

Comment #9: *If developer is going to make environmental features and get bonus points (government direction for State buildings), there needs to be provisions for long term maintenance of these provisions, i.e. wind solar generators.*

Response #9: Your comments are acknowledged. Please note that the Proposed Action is being developed as two separate actions, comprising the Stadium Development and the Real Estate Development. The Stadium Authority will oversee maintenance and operation of the New Aloha Stadium after construction, and it is anticipated that the leaseholders for the

Real Estate Development will be responsible for maintaining and operating that component of the Proposed Action.

Comment #10: *Parking and traffic patterns still are an issue. Steps need to be taken to address bringing the traffic or parking on site.*

Response #10: We acknowledge your comments. Please note that the Programmatic EIS includes a detailed description of the existing traffic conditions and potential traffic impacts associated with the Proposed Action in Section 4.11. Additionally, a Traffic Impact Report (TIR) was prepared by Wilson Okamoto Corporation in May 2020 and is appended to the Programmatic Final EIS as Appendix H.

The intent of TIR was to assess anticipated impacts on regional vehicular traffic conditions and infrastructure as well as multimodal transit facilities within the vicinity of the Project Site that could result from the implementation and operation of the Proposed Action. In summary, the Proposed Action is anticipated to be built out over 10+ years. By the year 2026, traffic conditions in the Project Region are anticipated to remain the same. Although the Stadium Development, accompanied by the Initial Real Estate Development, is expected to generate additional trips to the Project Site, it should be noted that the Project Site is also situated in the vicinity of regional roadways with higher capacities to accommodate additional traffic. In addition, the Project Site is located in an area that is accessible via multiple connections to and from regional roadways, with designated ramps to and from the freeways. As such, site-generated trips are dispersed along the different routes to and from the Project Site, thereby diluting the increases along the individual roadways. However, it is recommended that the preparation of a Transportation Management Plan which includes traffic circulation, parking, loading, and traffic demand management strategies, as well as a clear public information plan to relay changes to the traffic circulation in the vicinity of the Project Site is recommended to minimize the impact of the special events and other off-peak activities associated with the Proposed Action on the surrounding roadways. Moreover, with the completion of the Hālawā / Aloha Stadium HART Transit Station, and proposed multi-modal facilities under the Proposed Action, alternative transportation methods will be encouraged to further reduce traffic impacts related to single occupancy vehicles.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Dale Gapusan](#)
To: [Public Comment](#)
Subject: Aloha Stadium public input
Date: Thursday, December 24, 2020 7:41:49 AM

Hello,

I am just sharing some ideas for the new stadium. I will just put it plain and simple... Summer Olympics Hawaii capable and the ability to host Major fights. Drive tourism with Major Sports.... In honor of the Hawaii's athletes representing the islands on the big stage!

Aloha,

Dale Gapusan

Sent from iPhone



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10422-01

Dale Gapusan
Dalegap731@gmail.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear Dale Gapusan:

Thank you for your comments dated December 24, 2020 regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment #1: *I am just sharing some ideas for the new stadium. I will just put it plain and simple... Summer Olympics Hawaii capable and the ability to host Major fights. Drive tourism with Major Sports.... In honor of the Hawaii's athletes representing the islands on the big stage!*

Response #1: Your comments are acknowledged. It is anticipated that the New Aloha Stadium will seek to leverage advantage of every available potential opportunity to host major sporting events. Please note that the Programmatic Final EIS includes a market feasibility & economic review and analysis prepared by Victus Advisors conducted in conjunction with master planning and preliminary design efforts for the Proposed Action. This documentation clearly underscores that the existing Aloha Stadium’s capacity of 50,000, by far, and in large exceeds current and anticipated future market needs. In observance of the analysis and guidance set forth by Victus Advisors as well as market sounding and user analysis by Stadium and Industry consultants, the unified recommendation is that the construction of a 27,500 - 35,000 seat capacity stadium would best serve current and anticipated future market demand.

Furthermore, before the 2018 fiscal year, Aloha Stadium was not widely considered as a major venue for concert activities. As the Aloha Stadium began to be marketed more heavily as a concert venue over the course of 2019, it was revealed through consultation with entertainment industry professionals that the Aloha Stadium's current capacity of 50,000 seats was a significant deterrent to the candidacy of the existing Aloha Stadium as venue for major artists. Promoters and performers alike voiced that the ideal range for seating at a stadium-set concert lies between 25,000 and 30,000 seats.

Since the fiscal year of 2018, Aloha Stadium has hosted eight concerts, with seven held within the fiscal year of 2019. Six concerts have been booked/promoted by Live Nation with an average of 30,743 attendees, right in line with feedback provided by industry professionals. Nonetheless, as currently proposed, in addition to a raw 35,000 fixed seat capacity, concert events could potentially utilize field space for additional viewership that could accommodate upwards of 10,000 additional attendees.

With regard to sporting events held at Aloha Stadium, Division 1 Football Bowl Subdivision (D1-FBS) football factors in as the central activity featured. Specifically, Aloha Stadium was the home to the University of Hawai'i Rainbow Warriors Football Program (UH Football) when it was in operation. The University of Hawai'i is a member of the Mountain West Conference, which is considered to be a Mid-Major or Group of Five (G5) conference, and has ranked 81st in attendance among all D1-FBS institutions in the most recent season of play with no attendance restrictions (2019), bordering just under 25,000 attendees for home game attendance. Overall, attendance trends nation-wide are in sharp decline. The 2019 D1-FBS season resulted in the lowest overall attendance in the past 24 years (41,477 per game), with the Mountain West posting its lowest average per game attendance ever (23,232 per game). It is further notable that over the past five years, running from the 2014 season to 2019 season, average UH Football attendance has also trended down, reflecting a decline in average attendance. Moreover, UH Football has not drawn a sell-out crowd since 2007. By contrast, the highest attended game within the past five years attracted approximately 36,411 attendees (2014 season opener), under the context of the capacity of the existing Aloha Stadium (50,000 seats), the highest attended UH Football event held at the Stadium over the course of the last five years would have a little more than a 25% of the seats vacant. By contrast, under the Proposed Action the current capacity of 50,000 seats (35,000 seat stadium), with a similar level of attendance, the Stadium would be 100% filled to capacity. There is a quality all unto-itself to having a sold-out-stadium that cannot be tangibly quantified.

Overall, the proposed New Aloha Stadium (35,000 seat capacity) would create the opportunity to serve as a viable venue for a greater range of events. Possible events include rugby, motor sports, soccer and mixed martial arts. These events typically will not pursue stadiums larger than 35,000, as the demand of their audience typically would not justify the use of a larger venue, particularly under the context of the market that would be locally served here on O'ahu.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Dane Nishimura](#)
To: [Public Comment](#)
Subject: Aloha Stadium Redevelopment
Date: Wednesday, December 23, 2020 10:05:25 PM

Aloha,

I think some type of shade structure or canopy over the stands (ex, Hard Rock Stadium- Miami, FL) would be appreciated by fans from the sun and rain.

-Anon



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10422-01

Dane Nishimura
danenishimura@yahoo.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASD)
Hālawā, O‘ahu, Hawai‘i

Dear Dane Nishimura :

Thank you for your comments dated December 23, 2020 regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment #1: *I think some type of shade structure or canopy over the stands (ex, Hard Rock Stadium- Miami, FL) would be appreciated by fans from the sun and rain.*

Response #1: Your comments are acknowledged. Please note that the final design and configuration of the Proposed Action will be determined by the Stadium Authority and the selected Stadium Developer and Real Estate Developer(s). It is anticipated that the design of the New Aloha Stadium Authority will take into consideration the climate of the Project Region, while making spectators as comfortable as possible, while also balancing construction costs and anticipated maintenance costs.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Darrell Tanaka](#)
To: [Public Comment](#)
Subject: Aloha stadium testimony
Date: Wednesday, December 23, 2020 4:45:22 PM

Please make sure there is enough room for the swap meet to be conducted.

Darrell Tanaka
Maui



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10422-01

Darrell Tanaka
sunshineorchids@gmail.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear Darrell Tanaka:

Thank you for your comments dated December 23, 2020 regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment #1: *Please make sure there is enough room for the swap meet to be conducted.*

Response #1: Your comments are acknowledged. A detailed plan for the Swap Meet in the Proposed Action is given in Appendix A-1 *Programmatic Master Plan*, Chapter 3.5, Subsection *Full Build Swap Meet*. Hence, regardless of the final design of the Project Site, it is anticipated that the Swap Meet will be given a proper space as it is recognized as one of the cornerstones of the Project Site.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

10422-01
Letter to Darrell Tanaka
Page 2

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [David Derauf](#)
To: [Public Comment](#)
Subject: Aloha Stadium
Date: Tuesday, January 26, 2021 10:27:15 AM

Aloha:

We encourage you to look at ALL options to increase high density housing at the stadium site. Nothing is more important than building truly affordable housing for our community right now. More luxury housing is not a priority.

There are examples of this being done well all over the world. Let's show the world that Hawaii stands up for the little guy.

David Derauf MD MPH

Executive Director KKV

The greatest enemy of knowledge is not ignorance, it is the illusion of knowledge
D.Boorstin



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10422-01

David Derauf
dderauf@kkv.net

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, Oʻahu, Hawaiʻi

Dear David Derauf:

Thank you for your comments dated January 26, 2021 regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawaiʻi Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment #1: *We encourage you to look at ALL options to increase high density housing at the stadium site. Nothing is more important than building truly affordable housing for our community right now. More luxury housing is not a priority.*

Response #1: We acknowledge your comments. The need to replace the Stadium has opened up the unique opportunity for the redevelopment of the entire Project Site. This includes the Real Estate Development component which will encompass mixed-use retail space, office space, recreational space, open space, and residential space. The amount of space allocated to each use within the Real Estate Development component that will support the New Aloha Stadium will ultimately be determined by the Stadium Authority, the selected Stadium Developer and Real Estate Developer(s). The Proposed Action is envisioned to directly serve regional and State housing demands through the creation of a diverse range of residential options, accounting for upwards of 1,800 new housing units as discussed in Section 2.1 of the Programmatic Draft EIS. However, it should be noted that the extent of residential programming will ultimately be determined by the Stadium Authority and the selected Real Estate Developer(s) which will comply with applicable affordable housing requirements.

Please note that due to broad comments raised in response to the Programmatic Draft EIS, Section 3.4 has been added to the Programmatic Final EIS which on a conceptual basis, evaluated a conceptual affordable housing project site design alternative program scenario with 20,000 to 100,000 units within the confines of the Project Site. It is readily apparent that this type of programming would not be compatible with the general purpose and need, as well as goals and objectives of the Proposed Action. Moreover, such a program and its anticipated impacts would require the preparation of a separate, comprehensive EIS documentation and evaluation.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in dark ink, reading "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [David Kimo Frankel](#)
To: [Public Comment: david.c.depoinde@hawaii.gov](#)
Subject: DEIS re Aloha Stadium
Date: Monday, December 28, 2020 5:02:01 PM

I expected better compliance with the law from professional planners and state officials.

HAR 200.1-1 requires that you conduct required consultation as “mutual, open and direct, two-way communication, in good faith, to secure the meaningful participation of agencies and the public in the environmental review process.” You completely ignored my comments, not even giving them lip-service, let alone a good faith response.

I assume that you are aware of the rules governing environmental impact statements.

HAR 11-200.1-2 defines “environment” as "humanity's surroundings, inclusive of all the physical, economic, cultural, and social conditions that exist within the area affected by a proposed action, including land, human and animal communities, **health**, air, water, minerals, flora, fauna, ambient noise, and objects of historic, cultural, or aesthetic significance.”

An EIS must discuss primary impacts, secondary impacts and cumulative impacts. *See* HAR 11-200.1-24(l) and the definition of “effects” or “impacts.” *See also* *Molokai Homesteaders Coop. Ass'n v. Cobb*, 63 Haw. 453, 629 P.2d 1134 (1981), *McGlone v. Inaba*, 64 Haw. 27, 35, 636 P.2d 158, 164 (1981); *Sierra Club v. DOT*, 115 Hawai`i 299, 167 P.3d 292 (2007).

Your response letter fails to address the concerns I raised and the content of the DEIS fails to address these concerns as well. Are you intentionally inviting litigation over the EIS?

From: David Kimo Frankel <davidkimofrankel@hawaiiantel.net>
Subject: EISPN
Date: September 20, 2019 at 10:37:08 AM HST
To: NASED.EIS@wilsonokamoto.com

I would like to offer the following comments on the EISPN for the New Aloha Stadium Entertainment District.

The EISPN assumes that a stadium is needed. One of the primary reasons for a stadium is to host football games. Without the stadium, it would be much more difficult for the University of Hawai'i and high schools to play football. Therefore, a secondary impact that the EIS must consider is that football causes a significant number of players to suffer the effects of concussions. While I do not expect the EIS to include thorough medical review of the latest science on concussions, it must acknowledge that the project will facilitate concussions. Using commonly accepted statistical analysis, it can even calculate how many individuals are likely to suffer concussions annually at the stadium.

On the flip side, as the science matures and as lawsuits increase, there is a distinct likelihood that in the next few decades, football will not be played in the way it is now at the high school and collegiate level. There is a distinct possibility that high

schools and even the University of Hawaii will shut down these programs as they grapple with the expense, personal tragedy and societal costs of concussions. If this happens, how often will this new stadium be used?

The EIS should include a graph that shows how attendance at Aloha Stadium has steadily decreased since it was built. While there are many armchair quarterbacks who can provide multiple explanations for the decline, the EIS should acknowledge that in general fewer people want to attend sporting events on O'ahu. That trend may well continue into the future, even with a new stadium.

Finally, the EIS should explore a fourth option. Instead of creating a structure that encourages residents to sit on their butts for hours, consider installing attractions that allow residents to be participants rather than spectators. Instead of a stadium, you could offer a running path, pickleball courts, volleyball courts, sports fields and a dogpark. And you could include more affordable housing.

David Kimo Frankel
1638-A Mikahala Way
Honolulu, HI 96816



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10422-01

David Kimo Frankel
1638-A Mikahala Way
Honolulu, HI 96816
davidkimofrankel@hawaiiantel.net

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear David Kimo Frankel:

Thank you for your comments dated December 28, 2020, regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *I expected better compliance with the law from professional planners and state officials.*

HAR 200.1-1 requires that you conduct required consultation as “mutual, open and direct, two-way communication, in good faith, to secure the meaningful participation of agencies and the public in the environmental review process.” You completely ignored my comments, not even giving them lip-service, let alone a good faith response.

Response 1: Your comments are unclear. Consultation for the Proposed Action has been conducted within the spirit and intent of Hawai‘i Revised Statutes (HRS) Chapter 343, and Hawai‘i Administrative Rules (HAR), Title 11, Chapter 200.1 in a way that has been “mutual, open and direct, and two-way communication” as summarized in Chapter 10 of the Programmatic EIS and reproduced in Appendix E-2, Appendix L, and Appendix M of the Programmatic Final EIS.

With regards to your comments provided on the EIS Preparation Notice (EISPN), please note that a response letter was provided to you and is reproduced in Appendix L. As noted in your response letter, your comments were considered when preparing the Programmatic Draft EIS with regard to meeting content requirements prescribed in Hawai‘i

Administrative Rules, Title 11, Chapter 200.1. Hence they were not ignored as you state in your Comment #1 above.

Your EISPN comments, generally speaking, ask for a statistical analysis and calculate how many individuals would suffer football related concussions due to the Proposed Action. Please note that this is not within the scope of evaluation for the Proposed Action as this is not reasonable to assess. Concussions would occur whether or not the Proposed Action is realized. In other words, the sport of football would continue whether it is hosted in the proposed New Aloha Stadium or another venue. It is generally acknowledged that should football, or any other sport or recreational activity occur within the proposed New Aloha Stadium or potential recreational amenities provided through the Real Estate Development component of the Proposed Action, there is an inherent risk to personal health. Likewise, the same could be said about any road improvement project, there is the risk of car accidents to occur but it is not reasonable to assess within the scope of evaluation of the Programmatic EIS. Moreover, the sport of football, and other sports continually implement best practices and improve equipment to reduce the risk of injury, especially those related to concussions, irrespective of the Proposed Action. Hence, should football be provided in the Stadium Development of the Proposed Action, it is assumed that best practices and equipment related to the sport to reduce concussions will be followed and used.

As it relates to your EISPN comments regarding attendance of Aloha Stadium since it was built, please note that the Programmatic Final EIS includes a market feasibility & economic review and analysis prepared by Victus Advisors conducted in conjunction with master planning and preliminary design efforts for the Proposed Action. This documentation clearly underscores that the existing Aloha Stadium's capacity of 50,000, by far, and in large exceeds current and anticipated future market needs. In observance of the analysis and guidance set forth by Victus Advisors as well as market sounding and user analysis by Stadium and Industry consultants, the unified recommendation is that the construction of a 27,500 - 35,000 seat capacity stadium would best serve current and anticipated future market demand.

Furthermore, before the 2018 fiscal year, Aloha Stadium was not widely considered as a major venue for concert activities. As the Aloha Stadium began to be marketed more heavily as a concert venue over the course of 2019, it was revealed through consultation with entertainment industry professionals that the Aloha Stadium's current capacity of 50,000 seats was a significant deterrent to the candidacy of the existing Aloha Stadium as venue for major artists. Promoters and performers alike voiced that the ideal range for seating at a stadium-set concert lies between 25,000 and 30,000 seats.

Since the fiscal year of 2018, Aloha Stadium has hosted eight concerts, with seven held within the fiscal year of 2019. Six concerts have been booked/promoted by Live Nation with an average of 30,743 attendees, right in line with feedback provided by industry professionals. Nonetheless, as currently proposed, in addition to a raw 35,000 fixed seat

capacity, concert events could potentially utilize field space for additional viewership that could accommodate upwards of 10,000 additional attendees.

With regard to sporting events held at Aloha Stadium, Division 1 Football Bowl Subdivision (D1-FBS) football factors in as the central activity featured. Specifically, Aloha Stadium was the home to the University of Hawai'i Rainbow Warriors Football Program (UH Football) when it was in operation. The University of Hawai'i is a member of the Mountain West Conference, which is considered to be a Mid-Major or Group of Five (G5) conference, and has ranked 81st in attendance among all D1-FBS institutions in the most recent season of play with no attendance restrictions (2019), bordering just under 25,000 attendees for home game attendance. Overall, attendance trends nation-wide are in sharp decline. The 2019 D1-FBS season resulted in the lowest overall attendance in the past 24 years (41,477 per game), with the Mountain West posting its lowest average per game attendance ever (23,232 per game). It is further notable that over the past five years, running from the 2014 season to 2019 season, average UH Football attendance has also trended down, reflecting a decline in average attendance. Moreover, UH Football has not drawn a sell-out crowd since 2007. By contrast, the highest attended game within the past five years attracted approximately 36,411 attendees (2014 season opener), under the context of the capacity of the existing Aloha Stadium (50,000 seats), the highest attended UH Football event held at the Stadium over the course of the last five years would have a little more than a 25% of the seats vacant. By contrast, under the Proposed Action the current capacity of 50,000 seats (35,000 seat stadium), with a similar level of attendance, the Stadium would be 100% filled to capacity.

Overall, the proposed New Aloha Stadium (35,000 seat capacity) would create the opportunity to serve as a viable venue for a greater range of events. Possible events include rugby, motor sports, soccer and mixed martial arts. These events typically will not pursue stadiums larger than 35,000, as the demand of their audience typically would not justify the use of a larger venue, particularly under the context of the market that would be locally served here on O'ahu.

With regards to your EISPN comment about the EIS exploring a fourth option that replaces the stadium with various recreational facilities, please note that the Proposed Action, which is premised upon the Programmatic Master Plan appended to the Programmatic EIS as Appendix A, reflects the aggregated collection of extensive and exhaustive input from area residents, members of the public, existing Aloha Stadium stakeholders and public agencies as discussed in Section 2.3 of the Programmatic EIS. Hence, the Proposed Action represents the vision of the overall community for the Project Site. Based on community input and various technical studies, the Proposed Action is envisioned to encompass the New Aloha Stadium, approximately 730,000 gross square feet (GSF) of residential space, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF of hotel space. However, as noted throughout the Programmatic EIS, that final design of the Project Site and use and space allocation will be determined by the Stadium Authority, the selected Stadium Developer and Real Estate Developer(s).

Comment 2: *I assume that you are aware of the rules governing environmental impact statements.*

*HAR 11-200.1-2 defines "environment" as "humanity's surroundings, inclusive of all the physical, economic, cultural, and social conditions that exist within the area affected by a proposed action, including land, human and animal communities, **health**, air, water, minerals, flora, fauna, ambient noise, and objects of historic, cultural, or aesthetic significance."*

An EIS must discuss primary impacts, secondary impacts and cumulative impacts. See HAR 11-200.1-24(l) and the definition of "effects" or "impacts." See also Molokai Homesteaders

Coop. Ass'n v. Cobb, 63 Haw. 453, 629 P.2d 1134 (1981), McGlone v. Inaba, 64 Haw. 27, 35, 636 P.2d 158, 164 (1981); Sierra Club v. DOT, 115 Hawai'i 299, 167 P.3d 292 (2007).

Response 2: Your comments are acknowledged. As noted in your EISPN response letter, and in Response #1 above, your comments were considered when preparing the Programmatic Draft EIS with regard to meeting content requirements prescribed in Hawai'i Administrative Rules, Title 11, Chapter 200.1.

The Programmatic Draft EIS was prepared after taking into consideration all of the information that was obtained in connection with comments submitted in response to the EISPN, which was published on September 8, 2019, the EISPN public scoping meeting held on September 25, 2019, and in compliance with the EIS content requirements under HAR Title 11, Chapter 200.1.

HRS, section 343-2 defines "environmental impact statement" as,

"...an informational document prepared in compliance with the rules adopted under section 343-6 and which discloses the environmental effects of a proposed action, effects of a proposed action on the economic welfare, social welfare, and cultural practices of the community and State, effects of the economic activities arising out of the proposed action, measures proposed to minimize adverse effects, and alternatives to the action and their environmental effects."

The Programmatic Draft EIS discloses the environmental effects of the Proposed Action, and the impacts of the Proposed Action on the economic welfare, social welfare, and cultural practices of the community and State, as well as the cumulative and secondary effects arising out of the Proposed Action and presents measures to minimize adverse effects as documented throughout Chapter 4 of the Programmatic EIS.

Comment 2: *Your response letter fails to address the concerns I raised and the content of the DEIS fails to address these concerns as well. Are you intentionally inviting litigation over the EIS?*

Response 2: We respectfully disagree with your comment as provided in Response #1 above as it relates to your EISPN comment letter.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: effour@hawaii.rr.com
To: [Public Comment](#)
Subject: NASED comment
Date: Friday, January 29, 2021 1:02:13 PM

Ward entertainment and Kaka'ako are prime examples of why there shouldn't be residential buildings next to entertainment. Most concerts and football games are at night, even into late night, do you really think there will be no complaints.

It will not matter if condo owners and renters know what they are getting into, eventually all events will have to revolve around the residents.

Just my 2 cents, aloha

David Kellogg



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10422-01

David Kellogg
effour@hawaii.rr.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear David Kellogg:

Thank you for your comments dated January 29, 2021, regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *Ward entertainment and Kaka‘ako are prime examples of why there shouldn’t be residential buildings next to entertainment. Most concerts and football games are at night, even into late night, do you really think their will be no complaints.*

Response 1: Your comments are acknowledged. However, please note that your comments are unclear as you do not specify what type of complaints/concerns there may be, therefore, we cannot provide you with a specific response. However, please note that Chapter 4 of the Programmatic EIS assesses the effects of the Proposed Action against a host of environmental resource categories including, but not limited to, traffic, noise, air quality, socioeconomics, climate change, etc. Moreover, this is the purpose of the EIS process, to evaluate an action and analyze potential impacts that may occur and propose appropriate mitigation measures to eliminate or minimize those potential impacts.

Comment 2: *It will not matter if condo owners and renter know what they are getting into, eventually all events will have to revolve around the residents.*

Response 2: Your comments are acknowledged. However, they are unclear. Please note that the Proposed Action, which is premised upon the Programmatic Master Plan appended to the Programmatic EIS as Appendix A, reflects the aggregated collection of extensive and exhaustive input from area residents, members of the public, existing Aloha Stadium

stakeholders and public agencies as discussed in Section 2.3 of the Programmatic EIS. Additionally, the Project Team conducted a substantial number of public outreach meetings and has considered public input throughout the EIS process. Hence, the Proposed Action represents the vision of the overall community for the Project Site based on community input and various technical studies, the Proposed Action is envisioned to encompass the New Aloha Stadium, approximately 730,000 gross square feet (GSF) of residential space, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF of hotel space. However, as noted throughout the Programmatic EIS, that final design of the Project Site and use and space allocation will be determined by the Stadium Authority, the selected Stadium Developer and Real Estate Developer(s). Please note as discussed at the EIS Scoping Meeting and described in the EIS Preparation Notice published on September 8, 2019, as well as reiterated in Section 1.1 of the Programmatic Draft EIS, *“The Proposed Action encompasses the construction of a new, modern stadium facility that will be supported by complimentary mixed-use development.”* Therefore, the subject Programmatic Draft EIS is intended to assess the potential effects associated with the Proposed Action on various environmental resource categories as prescribed by Section 11-200.1-24.

Furthermore, please note that the State of Hawai‘i is the land owner of the Project Site, and in partnership with the selected Stadium Developer and Real Estate Developer(s), may pursue different land-use configurations and strategies than what is presented in the Programmatic EIS to maximize the value of the Proposed Action and address a number of Statewide needs. The State of Hawai‘i, as the landowner, has the ultimate say in how they use their lands to fit their needs. Furthermore, it has not yet been determined how Act 146 will be administered, specifically, how it relates to implementing a “stadium development district.” However, it is expected that the State of Hawai‘i, in partnership with the selected Stadium Developer and Real Estate Developer(s), will coordinate and work closely with the CCH to implement the Proposed Action, and to minimize any potential impacts on land uses at the Project Site and the Project Region.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

10422-01
Letter to David Kellogg
Page 2

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Public Comment](#)
To: [Andrew Blasko](#)
Subject: Fw: My attached comments on the New Aloha Stadium Entertainment District Draft EIS
Date: Tuesday, February 9, 2021 1:49:42 PM
Attachments: [2-1-21 Douglas Meller comments on New Aloha Stadium District Draft EIS.pdf](#)

From: Douglas Meller <douglasmeller@gmail.com>
Sent: Monday, February 1, 2021 6:32 PM
To: Public Comment <publiccomment@wilsonokamoto.com>
Cc: Chris.kinimaka@hawaii.gov <Chris.kinimaka@hawaii.gov>
Subject: My attached comments on the New Aloha Stadium Entertainment District Draft EIS

Douglas Meller
dougasmeller@gmail.com

February 1, 2021

Chris Kinimaka
Department of Accounting and General Services
Chris.kinimaka@hawaii.gov

Keola Cheng
Wilson Okamoto Corporation
NASED.EIS@wilsonokamoto.com

COMMENTS ON NEW ALOHA STADIUM ENTERTAINMENT DISTRICT DRAFT EIS

I request that the Draft EIS disclose the details and relative importance of evaluation factors to be used in the proposed Stadium Authority request for proposals (RFP) under §103D-303(a), Hawaii Revised Statutes. I assume that the University of Hawaii, affordable housing advocates, and fans who care about the cost of parking and admission for sports events would welcome the opportunity to review and comment on proposed evaluation factors BEFORE the RFP is finalized.

According to the attached email from the State Procurement Office, §3-122-16.03(b), Hawaii Administrative Rules, requires disclosure of RFP evaluation factors when a RFP is issued. But neither state law nor DAGS Procurement Rules prohibit public disclosure, review, and comment on proposed RFP evaluation factors before a RFP is finalized.

from: **Douglas Meller** <dougasmeller@gmail.com>
to: state.procurement.office@hawaii.gov
date: Aug 25, 2020, 4:37 PM
subject: public disclosure of the details of a request for proposals (RFP)
mailed- gmail.com
by:

*Does the general public have the right to learn the details and relative importance of evaluation factors set forth in a request for proposals (RFP) under §103D-303(a), Hawaii Revised Statutes, **BEFORE** proposals have been submitted and a contract has been awarded? . . .*

from: **Kahakui, Bonnie**
A <bonnie.a.kahakui@hawaii.gov>

to: "douglasmeller@gmail.com"
<douglasmeller@gmail.com>
date: Aug 28, 2020, 4:04 PM
subject: RE: [EXTERNAL] public disclosure
of the details of a request for
proposals (RFP)
mailed- hawaii.gov
by:

Good Afternoon,

Pursuant to Hawaii Administrative Rules (HAR) 3-122-16.03(b) a copy of a solicitation is available for public inspection. When preparing a Request for Proposals (RFPs) the request must include among other things:

*(7) The **relative importance of price and other evaluation criteria; and specific evaluation criteria** to be used in evaluation of proposals which may include but is not limited to:*

- (A) Technical capability and approach for meeting performance requirements;*
- (B) Competitiveness and reasonableness of price;*
- (C) Managerial capabilities; and*
- (D) Best value factors;*

During the open solicitation period, is when questions can be posed to the procuring agency.

Offeror's proposals are not available for public inspection until the solicitation has been awarded, pursuant to HAR 3-122-58.

Mahalo!

*Bonnie Kahakui
Assistant Administrator
State Procurement Office
Phone: (808) 587-4702*

Thank you for the opportunity to comment.

From: [Public Comment](#)
To: [Andrew Blasko](#)
Subject: Fw: 2/2/21 corrected comments on Draft NASED EIS
Date: Tuesday, February 9, 2021 1:49:48 PM
Attachments: [2-2-21 corrected Douglas Meller comments on New Aloha Stadium District Draft EIS.docx.pdf](#)

From: Douglas Meller <douglasmeller@gmail.com>
Sent: Tuesday, February 2, 2021 8:22 AM
To: Chris.kinimaka@hawaii.gov <Chris.kinimaka@hawaii.gov>; Public Comment <publiccomment@wilsonokamoto.com>
Subject: 2/2/21 corrected comments on Draft NASED EIS

Please respond to my attached 2/2/21 corrected comments and discard the 2/1/21 comments I sent last night. My 2/1/21 comments on the Draft EIS requested that the Draft EIS include RFP evaluation factors. My attached 2/2/21 comments on the Draft EIS request that the Final EIS include RFP evaluation factors.

Douglas Meller
dougasmeller@gmail.com

February 2, 2021

Chris Kinimaka
Department of Accounting and General Services
Chris.kinimaka@hawaii.gov

Keola Cheng
Wilson Okamoto Corporation
NASED.EIS@wilsonokamoto.com

COMMENTS ON NEW ALOHA STADIUM ENTERTAINMENT DISTRICT DRAFT EIS

I request that the Final EIS disclose the details and relative importance of evaluation factors to be used in the proposed Stadium Authority request for proposals (RFP) under §103D-303(a), Hawaii Revised Statutes. I assume that the University of Hawaii, affordable housing advocates, and fans who care about the cost of parking and admission for sports events would welcome the opportunity to review and comment on proposed evaluation factors BEFORE the RFP is finalized.

According to the attached email from the State Procurement Office, §3-122-16.03(b), Hawaii Administrative Rules, requires disclosure of RFP evaluation factors when a RFP is issued. But neither state law nor DAGS Procurement Rules prohibit public disclosure, review, and comment on proposed RFP evaluation factors before a RFP is finalized.

from: **Douglas Meller** <dougasmeller@gmail.com>
to: state.procurement.office@hawaii.gov
date: Aug 25, 2020, 4:37 PM
subject: public disclosure of the details of a request for proposals (RFP)
mailed- gmail.com
by:

*Does the general public have the right to learn the details and relative importance of evaluation factors set forth in a request for proposals (RFP) under §103D-303(a), Hawaii Revised Statutes, **BEFORE** proposals have been submitted and a contract has been awarded? . . .*

from: **Kahakui, Bonnie**
A <bonnie.a.kahakui@hawaii.gov>

to: "douglasmeller@gmail.com"
<douglasmeller@gmail.com>
date: Aug 28, 2020, 4:04 PM
subject: RE: [EXTERNAL] public disclosure
of the details of a request for
proposals (RFP)
mailed- hawaii.gov
by:

Good Afternoon,

Pursuant to Hawaii Administrative Rules (HAR) 3-122-16.03(b) a copy of a solicitation is available for public inspection. When preparing a Request for Proposals (RFPs) the request must include among other things:

*(7) The **relative importance of price and other evaluation criteria; and specific evaluation criteria** to be used in evaluation of proposals which may include but is not limited to:*

- (A) Technical capability and approach for meeting performance requirements;*
- (B) Competitiveness and reasonableness of price;*
- (C) Managerial capabilities; and*
- (D) Best value factors;*

During the open solicitation period, is when questions can be posed to the procuring agency.

Offeror's proposals are not available for public inspection until the solicitation has been awarded, pursuant to HAR 3-122-58.

Mahalo!

*Bonnie Kahakui
Assistant Administrator
State Procurement Office
Phone: (808) 587-4702*

Thank you for the opportunity to comment.



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10422-01

Douglas Meller
Douglas Meller@gmail.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear Douglas Meller:

Thank you for your comments dated February 1, 2021, regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *I request that the Draft EIS disclose the details and relative importance of evaluation factors to be used in the proposed Stadium Authority request for proposals (RFP) under §103D-303(a), Hawaii Revised Statutes. I assume that the University of Hawaii, affordable housing advocates, and fans who care about the cost of parking and admission for sports events would welcome the opportunity to review and comment on proposed evaluation factors BEFORE the RFP is finalized.*

Response 1: Your comments are acknowledged. Please note that Section 1.6 has been added to the Programmatic Final EIS to outline and describe the procurement process for the Proposed Action based on details that are known at this time and what is pertinent to the scope of the Programmatic EIS process.

Comment 2: *According to the attached email from the State Procurement Office, §3-122-16.03(b), Hawaii Administrative Rules, requires disclosure of RFP evaluation factors when a RFP is issued. But neither state law nor DAGS Procurement Rules prohibit public disclosure, review, and comment on proposed RFP evaluation factors before a RFP is finalized.*

Response 2: Your comments are acknowledged. Please note that while the RFP process for both the Stadium Development and the Real Estate Development components of the

Proposed are related to the Programmatic EIS process, it is not within the scope of the Programmatic EIS to evaluate the RFP process or contents therein. The scope of the Programmatic EIS process is to evaluate the effects of the Proposed Action, which encompasses, as discussed at the EIS Scoping Meeting and described in the EIS Preparation Notice published on September 8, 2019, as well as reiterated in Section 1.1 of the Programmatic Draft EIS, “...*the construction of a new, modern stadium facility that will be supported by complimentary mixed-use development.*” Therefore, the subject Programmatic Draft EIS is intended to assess the potential effects associated with the Proposed Action on various environmental resource categories as prescribed by Section 11-200.1-24.

Hence, your input on the RFP process should be directed to the Proposing Agency. Additionally, a Stadium Developer and Real Estate Developer(s) has not yet been selected, and therefore the Programmatic EIS cannot fully disclose the information relating to the final selection of a Stadium Developer and Real Estate Developer(s). Furthermore, Offeror’s Proposals are not available for public inspection until the solicitation has been awarded, pursuant to HAR 3-122-58.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in dark ink, reading "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Public Comment](#)
To: [Andrew Blasko](#)
Subject: Fw: Stadium comments
Date: Tuesday, February 9, 2021 1:50:57 PM

From: Dwain Uyeda <uyedadwain@gmail.com>
Sent: Sunday, February 7, 2021 6:44 PM
To: Public Comment <publiccomment@wilsonokamoto.com>
Subject: Stadium comments

I think it's a bad idea for hotels and retail at the new stadium. The residents of the hotel will have complaints all the time when there is games, concerts, and other events like the monster trucks. The residents of Aiea, and Halawa all can here what's going on at the stadium so if you have residential or hotel guests it will be worst. Full of complaints of the noise. Also the retail side most people will go shopping at a mall not a stadium. This is Hawaii and look how we took care of the stadium and parking lot. All were neglected for long time and now deemed unsafe. My friend Barney's father died while building the stadium and I don't think if he was alive he would approve. I hope you folks think things thorough and not just rush in thinking of dollars. Thanks for listening. Aloha Dwain Uyeda



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10422-01

Dwain Uyeda
uyedadwain@gmail.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear Dwain Uyeda:

Thank you for your comments dated February 7, 2021, regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment #1: *I think it's a bad idea for hotels and retail at the new stadium. The residents of the hotel will have complaints all the time when there is games, concerts, and other events like the monster trucks.*

Response #1: We acknowledge your comments. Please note that the Proposed Action could significantly increase the Project Region’s desirability from a hospitality perspective contributing to the vibrancy of the Proposed Action. It is anticipated that a hotel at the Project Site could serve potentially over 1.5 million annual visitors to the New Aloha Stadium; furthermore, the Proposed Action could potentially serve as a catalyst for growth in visitation, attracting tourists and visitors to the Project Site retail and mixed-use environment that would have otherwise not considered coming to the submarket. However, please note that an on-site hotel would be a sought after amenity for visiting teams and organizations who come to town for events while also increasing the number of visitors to the Project Site who may want to patronize a restaurant or buy a souvenir at the Swap Meet.

Moreover, please note that Section 4.9 and Appendix F of the Programmatic EIS assess noise level increases and impacts associated with the Proposed Action based on historical events that occurred at the Project Site, including concerts, football games, and monster truck shows. Under the Proposed Action, it is anticipated that special events will exceed normal background noise levels at the closest residential communities. The louder emissions may be associated with amplified voice and music, crowd noise, motor vehicle

and motorcycle engine and exhaust noise, fireworks, fighter aircraft flyovers, etc. The sound levels associated with these special events will vary depending upon the siting of the New Aloha Stadium within the Project Site.

Comment #2: *The residents of Aiea, and Halawa all can here what's going on at the stadium so if you have residential or hotel guests it will be worst. Full of complaints of the noise.*

Response #2: As discussed in Response #1 above, Section 4.9 and Appendix F of the Programmatic EIS assess noise level increases and impacts associated with the Proposed Action based on historical events that occurred at the Project Site, including concerts, football games, and monster truck shows. Under the Proposed Action, it is anticipated that special events will exceed normal background noise levels at the closest residential communities. The louder emissions may be associated with amplified voice and music, crowd noise, motor vehicle and motorcycle engine and exhaust noise, fireworks, fighter aircraft flyovers, etc. The sound levels associated with these special events will vary depending upon the siting of the New Aloha Stadium within the Project Site.

Comment #3: *Also the retail side most people will go shopping at a mall not a stadium.*

Response #3: Your comments are acknowledged. Please note that the Real Estate Development component of the Proposed Action is envisioned to encompass the New Aloha Stadium, approximately 730,000 gross square feet (GSF) of residential units, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF of hotel space. Hence, the Proposed Action will include more than just the Stadium Development and include uses that will attract daily visitors. However, as noted throughout the Programmatic EIS, that final design of the Project Site and use and space allocation will be determined by the Stadium Authority, the selected Stadium Developer and Real Estate Developer(s).

Comment #4: *This is Hawaii and look how we took care of the stadium and parking lot. All were neglected for long time and now deemed unsafe. My friend Barney's father died while building the stadium and I don't think if he was alive he would approve. I hope you folks think things thorough and not just rush in thinking of dollars.*

Response #4: Your comments are acknowledged. Please note that the general intent of the Proposed Action is to replace the existing, obsolete Aloha Stadium, and create a supporting mixed-use entertainment district. Furthermore, it is acknowledged that these concerns relating to safety and operation of the existing Aloha Stadium were an original driving impetus behind the push for the subject Proposed Action. Moreover, as the deterioration of the existing Aloha Stadium has only further progressed since the initial planning stages for the Proposed Action, the validity and gravity of this impetus carries much more weight as well.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Public Comment](#)
To: [Andrew Blasko](#)
Subject: Fw: (ACTION) NASED EIS Public Comment - Feb 8 2021
Date: Tuesday, February 9, 2021 1:54:00 PM
Attachments: [Aloha Stadium EIS Letter 8Feb2021 DASigned.pdf](#)

From: DP Armstrong <waiakekua@gmail.com>
Sent: Monday, February 8, 2021 8:30 PM
To: Public Comment <publiccomment@wilsonokamoto.com>
Cc: chris.kinimaka@hawaii.gov <chris.kinimaka@hawaii.gov>
Subject: (ACTION) NASED EIS Public Comment - Feb 8 2021

Aloha Mr. Chang,

The Inspiration Hawai'i Museum is offering a comment letter in support of the Draft Programmatic EIS for the New Aloha Stadium Entertainment District (NASED).

Best,
Dylan Armstrong, Acting Secretary
Inspiration Hawai'i Museum

Inspiration Hawai'i Museum - Board of Advisors

Tim Johns	Myles Shibata	Lance Wilhelm	Pili aloha Lee Loy	Michael Carroll	Leela Goldstein
Maya Rogers	Bart Howk	Chace Shigemasa	Dylan Armstrong	Gloria Borland	

February 8, 2021

TO: Ms. Chris Kinimaka, P.E.
Department of Accounting and General Services, State of Hawai'i
1151 Punchbowl Street, Honolulu, HI 96813

SUBJECT: Comments on the New Aloha Stadium Entertainment District Programmatic Draft EIS

The Inspiration Hawai'i Museum (IHM) Board of Advisors is pleased to support the Programmatic Draft Environmental Impact Statement (EIS) for a New Aloha Stadium Entertainment District (NASED).

Our board's focus to develop a new museum that will showcase the exceptional and ground-breaking figures that Hawai'i has produced and shared with the world. We strive for NASED to provide this museum space.

In 2015, redevelopment planning efforts by the City and County of Honolulu found that residents near Aloha Stadium supported the creation of a new museum for residents and visitors. Over the next year, grassroots support spread across O'ahu. In 2017, the Final Plan for Transit-Oriented Development at the Halawa Rail Station near Aloha Stadium incorporated the museum. The determined Outcomes of the Public Master Planning Community Workshop, found in Volume 2 of this EIS, "[i]nclude a museum or other cultural interpretation" to enhance the community.¹ Additionally, the Programmatic Master Plan envisions "the establishment of new cultural facilities, such as museums, galleries, or attractions, the likes of which would also serve to draw new residents to the district." The IHM Board of Advisors are building on this now five-year grassroots effort. As described in *The Environmental Notice*,² the "build out of the Proposed Action... will ultimately deliver a vibrant, thriving community-centric entertainment district that will offer a range of resident and visitor amenities, invigorate economic development and job creation, and celebrate the State's spirit of achievement and resiliency as well as the history and culture of Aloha Stadium and the communities that surround it." An Inspiration Hawai'i Museum would capture that spirit with biography-driven exhibits for visitors and residents alike to enjoy.

Sincerely,



DYLAN T. ARMSTRONG, ACTING SECRETARY
INSPIRATION HAWAII MUSEUM - BOARD OF ADVISORS
E-mail: waiakekua@gmail.com
Website: <https://www.inspirationhawaiimuseum.org>

¹ State of Hawai'i, Department of Accounting and General Services. Programmatic Draft Environmental Impact Statement : New Aloha Stadium Entertainment District (NASED). Honolulu, HI 2010. http://oeqc2.doh.hawaii.gov/Doc_Library/2020-12-23-OA-DEIS-New-Aloha-Stadium-Entertainment-District-Vol-2.pdf.

² State of Hawai'i: Office of Environmental Quality Control. The Environmental Notice. Honolulu, HI 2010. http://oeqc2.doh.hawaii.gov/the_environmental_notice/2020-12-23-ten.pdf.



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10422-01

Dylan Armstrong
Acting Secretary
Inspiration Hawaii Museum
Waiakekua@gmail.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear Dylan Armstrong:

Thank you for your comments dated February 8, 2021 regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment #1: *The determined Outcomes of the Public Master Planning Community Workshop, found in Volume 2 of this EIS, “[i]nclude a museum or other cultural interpretation” to enhance the community. Additionally, the Programmatic Master Plan envisions “the establishment 1 of new cultural facilities, such as museums, galleries, or attractions, the likes of which would also serve to draw new residents to the district.” The IHM Board of Advisors are building on this now five-year grassroots effort. As described in The Environmental Notice, 2 the “build out of the Proposed Action... will ultimately deliver a vibrant, thriving community-centric entertainment district that will offer a range of resident and visitor amenities, invigorate economic development and job creation, and celebrate the State’s spirit of achievement and resiliency as well as the history and culture of Aloha Stadium and the communities that surround it.” An Inspiration Hawai‘i Museum would capture that spirit with biography-driven exhibits for visitors and residents alike to enjoy.*

Response #1: Your comments are acknowledged. Please note that the Proposed Action, which is premised upon the Programmatic Master Plan appended to the Programmatic EIS as Appendix A, reflects the aggregated collection of extensive and exhaustive input from area residents, members of the public, existing Aloha Stadium stakeholders and public agencies as discussed in Section 2.3 of the Programmatic EIS. Hence, the Proposed Action

represents the vision of the overall community for the Project Site. Based on community input and various technical studies, the Proposed Action is envisioned to encompass the New Aloha Stadium, approximately 730,000 gross square feet (GSF) of residential space, 680,500 GSF of retail and entertainment space (which may include a museum), 216,000 GSF of office space, and 160,000 GSF of hotel space. However, as noted throughout the Programmatic EIS, that final design of the Project Site and use and space allocation will be determined by the Stadium Authority, the selected Stadium Developer and Real Estate Developer(s).

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Earl Tanaka](#)
To: [Public Comment](#)
Subject: Response for Questions
Date: Thursday, January 21, 2021 1:03:16 PM

Thank you for this opportunity. My questions are:

1. Is it cast in concrete that the new stadium will be built on the proposed site? My preference is to have the football stadium built on campus.
2. Will UH Athletics have to pay a rental fee or other charges such as the cost of security and custodial services to play their games at the proposed new stadium? If yes, why?
3. I normally take the shuttle to the games, but I wonder if the plans allow for tailgating.
4. How will the integrated stadium with commercial development impact parking and traffic? It seems to me that this integrated complex will face huge traffic problems for game days. How will this be mitigated?
5. How will parking be managed on game days? Those attending games will just have to fend for themselves or will there will be designated areas?
6. Will there be adequate parking?
7. How will complaints from surrounding residents of crowd noise be handled? You going to tell the football crowd to keep the noise down?
8. It seems that people outside of the stadium may be able to throw things into the stadium. What are the plans to ensure the safety of those attending games?

Aloha

Earl Tanaka
Ewa Beach

s



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10422-01

Earl Tanaka
Ewa Beach Resident
earltanaka22@yahoo.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, Oʻahu, Hawaiʻi

Dear Earl Tanaka:

Thank you for your comments dated January 21, 2021 regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawaiʻi Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment #1: *Is it cast in concrete that the new stadium will be built on the proposed site? My preference is to have the football stadium built on campus.*

Response #1: As discussed in Section 3.1 of the Programmatic Final EIS, a site study, entitled “Aloha Stadium: Planning for New Stadium & Site Redevelopment” was conducted in February 2019 by Crawford Architects, Callison and RTKL Associates, AHL, and WT Partnership to analyze and assess the relative merits and drawbacks of the Project Site in Hālawā against a range of alternative location options across the island of Oʻahu. Comparison metrics for the various sites included site access, transit connections, regional demographic and development opportunities, and incentives.

Of the sites that were assessed, which included the UH Mānoa campus the UH West Oʻahu campus, the Ala Wai Golf Course, Kapiʻolani Regional Park, and the Kalaeloa Airport, the current Project Site in Hālawā rated the highest in all categories. Hālawā is the most equipped for development potential to meet the goals and objectives of the Proposed Action given the availability of open space on site, direct access to major roadways, and its centralized location within an already established urban environment. Consequently, all other sites outside of the Project Site in Hālawā were eliminated from further consideration in master planning efforts for the Proposed Action. The direction set forth for the scope of

assessment of the Proposed Action encompassed within this Programmatic EIS document is therefore limited solely to the Project Site.

Comment#2: *Will UH Athletics have to pay a rental fee or other charges such as the cost of security and Custodial services to play their games at the proposed new stadium? If yes, why?*

Response #2: It is anticipated that the University of Hawai'i (UH) will have to pay a fee for the use of the stadium. It is important to note that the UH is not responsible for the maintenance and management of the Aloha Stadium, thus it doesn't not take on the burden of these costs. Prior to the condemning of the existing Aloha Stadium, UH paid approximately \$90,000 to \$100,000 dollars a game for operational expenses, including security, box office, staffing and clean up, but is not charged rent and does not share stadium revenues. Additionally, UH receives revenue from game day parking and can sell advertisement space along the sidelines and end zones of the field. UH does not receive revenue from concessions as they too are tenants of the concessions spaces and are independent of the University.

Comment #3: *I normally take the shuttle to the games, but I wonder if the plans allow for tailgating.*

Response #3: We acknowledge your comments. Under the Proposed Action it is anticipated that the redevelopment of the existing Project Site would result in the loss of the existing large parking lot surrounding the existing Aloha Stadium that has been used for "tailgating" historically. However, the three conceptual designs of the Project Site in the Programmatic Master Plan provide open space and surface parking that could potentially allow people to congregate prior to events held at the New Aloha Stadium.

Comment #4: *How will the integrated stadium with commercial development impact parking and traffic? It seems to me that this integrated complex will face huge traffic problems for game days. How will this be mitigated?*

Response #4: We acknowledge your comments. Please note that the Programmatic EIS includes a detailed description of the existing traffic conditions and potential traffic impacts associated with the Proposed Action in Section 4.11. Additionally, a Traffic Impact Report (TIR) was prepared by Wilson Okamoto Corporation in May 2020, which was updated in December 2021, and is appended to the Programmatic Final EIS as Appendix H.

The intent of TIR was to assess anticipated impacts on regional vehicular traffic conditions and infrastructure as well as multimodal transit facilities within the vicinity of the Project Site that could result from the implementation and operation of the Proposed Action. In summary, the Proposed Action is anticipated to be built out over 10+ years. By the year 2026, traffic conditions in the Project Region are anticipated to remain the same. Although

the Stadium Development, accompanied by the Initial Real Estate Development, is expected to generate additional trips to the Project Site, it should be noted that the Project Site is also situated in the vicinity of regional roadways with higher capacities to accommodate additional traffic. In addition, the Project Site is located in an area that is accessible via multiple connections to and from regional roadways, with designated ramps to and from the freeways. As such, site-generated trips are dispersed along the different routes to and from the Project Site, thereby diluting the increases along the individual roadways. However, it is recommended that the preparation of a Transportation Management Plan which includes traffic circulation, parking, loading, and traffic demand management strategies, as well as a clear public information plan to relay changes to the traffic circulation in the vicinity of the Project Site is recommended to minimize the impact of the special events and other off-peak activities associated with the Proposed Action on the surrounding roadways. Moreover, with the completion of the Hālawā / Aloha Stadium HART Transit Station, and proposed multi-modal facilities under the Proposed Action, alternative transportation methods will be encouraged to further reduce traffic impacts related to single occupancy vehicles.

Comment #5: *How will parking be managed on game days? Those attending games will just have to fend for themselves or will there will be designated areas?*

Response #5: As noted in Response #4 above, it is recommended that the preparation of a Transportation Management Plan which includes traffic circulation, parking, loading, and traffic demand management strategies, as well as a clear public information plan to relay changes to the traffic circulation in the vicinity of the Project Site is recommended to minimize the impact of the special events and other off-peak activities associated with the Proposed Action on the surrounding roadways.

Comment #6: *Will there be adequate parking?*

Response #6: It is anticipated that a parking study will be conducted by the eventual selected Stadium Developer and Real Estate Developer(s) as they finalize the design and programming of the Proposed Action. This parking study is anticipated to look at off-street parking and site generated parking demand, while considering TOD principals, including on-site parking requirements. Regardless of the final design of the Project Site, parking requirements will be met.

Comment #7: *How will complaints from surrounding residents of crowd noise be handled? You going to tell the football crowd to keep the noise down?*

Response #7: Please note that Section 4.9 and Appendix F of the Programmatic EIS assess noise level increases and impacts associated with the Proposed Action based on historical events that occurred at the Project Site, including concerts, football games, and monster truck shows. Under the Proposed Action, it is anticipated that special events will exceed

normal background noise levels at the closest residential communities. The louder emissions may be associated with amplified voice and music, crowd noise, motor vehicle and motorcycle engine and exhaust noise, fireworks, fighter aircraft flyovers, etc. The sound levels associated with these special events will vary depending upon the siting of the New Aloha Stadium within the Project Site.

Comment #8: *It seems that people outside of the stadium may be able to throw things into the stadium.*

What are the plans to ensure the safety of those attending games?

Response #8: Security and safety of the patrons to the Project Site is of the highest priority. The final design of the Project Site has not yet been determined, however, it is anticipated that the Stadium Authority, the selected Stadium Developer and Real Estate Developer(s) will mutually agree upon a design that is safe and secure.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Public Comment](#)
To: [Andrew Blasko](#)
Subject: Fw: Aloha Stadium
Date: Tuesday, February 9, 2021 1:52:46 PM

From: Earl Ventura <earl.ventura@gmail.com>
Sent: Monday, February 8, 2021 7:09 AM
To: Public Comment <publiccomment@wilsonokamoto.com>
Subject: Aloha Stadium

Aloha Stadium should be moved to Campbell industrial/Kaelaeloa area where its bigger. Include a drag strip, motorcross area, and other venues. Traffic probably be better as well.

Earl Ventura



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10422-01

Earl Ventura
earl.ventura@gmail.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASD)
Hālawā, Oʻahu, Hawaiʻi

Dear Earl Ventura:

Thank you for your comments dated February 8, 2021, regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawaiʻi Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment #1: *Aloha Stadium should be moved to Campbell industrial/Kaelaeloa area where its bigger.*

Include a drag strip, motorcross area, and other venues. Traffic probably be better as well.

Response #1: Your comments are acknowledged. As discussed in Section 3.1 of the Programmatic Final EIS, a site study, entitled “Aloha Stadium: Planning for New Stadium & Site Redevelopment” was conducted in February 2019 by Crawford Architects, Callison and RTKL Associates, AHL, and WT Partnership to analyze and assess the relative merits and drawbacks of the Project Site in Hālawā against a range of alternative location options across the island of Oʻahu. Comparison metrics for the various sites included site access, transit connections, regional demographic and development opportunities, and incentives.

Of the sites that were assessed, which included the UH Mānoa campus, the UH West Oʻahu campus, the Ala Wai Golf Course, Kapiʻolani Regional Park, and the Kaelaeloa Airport, the current Project Site in Hālawā rated the highest in all categories. Hālawā is the most equipped for development potential to meet the goals and objectives of the Proposed Action given the availability of open space on site, direct access to major roadways, and its centralized location within an already established urban environment. Consequently, all other sites outside of the Project Site in Hālawā were eliminated from further consideration in master planning efforts for the Proposed Action. The direction set forth for the scope of

assessment of the Proposed Action encompassed within this Programmatic EIS document is therefore limited solely to the Project Site.

Regarding your comment about what amenities and attractions should be included under the Proposed Action, please note that the Proposed Action is envisioned to encompass the New Aloha Stadium, approximately 730,000 gross square feet (GSF) of residential space, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF of hotel space. However, as noted throughout the Programmatic EIS, that final design of the Project Site and use and space allocation will be determined by the Stadium Authority, the selected Stadium Developer and Real Estate Developer(s).

Regarding your comments relating to traffic, please note that the Programmatic EIS includes a detailed description of the existing traffic conditions and potential traffic impacts associated with the Proposed Action in Section 4.11. Additionally, a Traffic Impact Report (TIR) was prepared by Wilson Okamoto Corporation in May 2020, which was updated in December 2021, and is appended to the Programmatic Final EIS as Appendix H.

The intent of TIR was to assess anticipated impacts on regional vehicular traffic conditions and infrastructure as well as multimodal transit facilities within the vicinity of the Project Site that could result from the implementation and operation of the Proposed Action. In summary, the Proposed Action is anticipated to be built out over 10+ years. By the year 2026, traffic conditions in the Project Region are anticipated to remain the same. Although the Stadium Development, accompanied by the Initial Real Estate Development, is expected to generate additional trips to the Project Site, it should be noted that the Project Site is also situated in the vicinity of regional roadways with higher capacities to accommodate additional traffic. In addition, the Project Site is located in an area that is accessible via multiple connections to and from regional roadways, with designated ramps to and from the freeways. As such, site-generated trips are dispersed along the different routes to and from the Project Site, thereby diluting the increases along the individual roadways. However, it is recommended that the preparation of a Transportation Management Plan which includes traffic circulation, parking, loading, and traffic demand management strategies, as well as a clear public information plan to relay changes to the traffic circulation in the vicinity of the Project Site is recommended to minimize the impact of the special events and other off-peak activities associated with the Proposed Action on the surrounding roadways. Moreover, with the completion of the Hālawā / Aloha Stadium HART Transit Station, and proposed multi-modal facilities under the Proposed Action, alternative transportation methods will be encouraged to further reduce traffic impacts related to single occupancy vehicles.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Liz Nelson](#)
To: [Public Comment](#)
Subject: EIS for Aloha Stadium
Date: Saturday, January 23, 2021 4:14:14 PM

Aloha Mr. Nokamoto,

I am submitting comments about the EIS for Aloha Stadium. My name is Elizabeth Nelson and I am a member of Faith Action for Community Action. We have been concerned about Affordable Housing in Hawaii for many years and were hoping that the proposed Aloha Stadium project would be a perfect place to construct tall buildings on this State land for truly Affordable Housing.

At community meetings, we were told that the study was to determine the maximum development quantities and we specifically asked to study the impact of 20,000 units. Where is the analysis for 20,000 units?

This Aloha Stadium project seems to be a perfect place to have 20,000 units for truly Affordable Housing. The rail station will be close, this is State land and seems to have enough land to build tall structures to house Affordable units.

I would encourage this EIS to include a study of the impact of 20,000 units.

Thank you. Elizabeth Nelson



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10422-01

Elizabeth Nelson
hawaiilizzie@gmail.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear Elizabeth Nelson:

Thank you for your comments dated January 23, 2021, regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *At community meetings, we were told that the study was to determine the maximum development quantities and we specifically asked to study the impact of 20,000 units. Where is the analysis for 20,000 units? This Aloha Stadium project seems to be a perfect place to have 20,000 units for truly Affordable Housing. The rail station will be close, this is State land and seems to have enough land to build tall structures to house Affordable units. I would encourage this EIS to include a study of the impact of 20,000 units.*

Response 1: Please note that we acknowledge the comments provided at the EIS Scoping Meeting and were considered when preparing the Programmatic Draft EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1.

Please note as discussed at the EIS Scoping Meeting and described in the EIS Preparation Notice published on September 8, 2019, as well as reiterated in Section 1.1 of the Programmatic Draft EIS, “*The Proposed Action encompasses the construction of a new, modern stadium facility that will be supported by complimentary mixed-use development.*” Therefore, the subject Programmatic Draft EIS is intended to assess the potential effects associated with the Proposed Action on various environmental resource categories as prescribed by Section 11-200.1-24.

It is acknowledged that the Programmatic Draft EIS did not evaluate, “*the impact of 20,000 units*,” as such a program would not meet the goals and objectives of the Proposed Action as described in Section 2.2 of the Programmatic Draft EIS. Nonetheless, the Proposed Action is envisioned to directly serve regional and State housing demands through the creation of a diverse range of residential options, accounting for upwards of 1,800 new housing units as discussed in Section 2.1 of the Programmatic Draft EIS. However, it should be noted that the extent of residential programming will ultimately be determined by the Stadium Authority and the selected Real Estate Developer(s) which will comply with applicable affordable housing requirements.

Please note that due to broad comments raised in response to the Programmatic Draft EIS, Section 3.4 has been added to the Programmatic Final EIS which on a conceptual basis, evaluated a conceptual affordable housing project site design alternative program scenario with 20,000 to 100,000 units within the confines of the Project Site. It is readily apparent that this type of programming would not be compatible with the general purpose and need, as well as goals and objectives of the Proposed Action. Moreover, such a program and its anticipated impacts would require the preparation of a separate, comprehensive EIS documentation and evaluation.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Public Comment](#)
To: [Andrew Blasko](#)
Subject: Fw: Aloha Stadium EIS comments
Date: Tuesday, February 9, 2021 1:53:38 PM
Attachments: [Aloha Stadium EIS comments.docx](#)

From: Ellen Carson <egcarson@icloud.com>
Sent: Monday, February 8, 2021 3:27 PM
To: Public Comment <publiccomment@wilsonokamoto.com>
Subject: Aloha Stadium EIS comments

Please provide the attached to be public comments on the Aloha Stadium EIS. Thank you

Ellen Carson

**From Ellen Godbey Carson
1080 S. Beretania St. Apt GPH2
Honolulu, HI 96814
(808) 223-1800**

SUBJECT: Aloha Stadium EIS: Please add high density housing at the Aloha Stadium site

Aloha,

I am writing to request the EIS for the Aloha Stadium site be expanding to include high density housing towers that would permit tens of thousands of new residential units to be included in the site. Hawaii is in a crisis of affordable housing because we do not have sufficient housing stock for local residents. This site is unique in its location near mass transit, that could accommodate up to 100,000 new units to meet the island's housing needs. I traveled to Singapore and Hong Kong with Senator Stanley Chang's legislative delegation to look for alternative housing models that could be adaptable to Hawaii. Singapore's high density, transit oriented housing towers could be a major strategy in our island's answer to our housing crisis. The EIS should be expended to include these additional units.

The current plan to surround the new stadium with retail, office space, hotel, and 1,813 condos is economically unrealistic for the foreseeable future, and the EIS should instead include analysis of the environmental impacts of including high rise towers including up to 100,000 units of housing on the Aloha Stadium site. While we recognize the need to replace Aloha Stadium, a new stadium should be confined to as small a size as possible. The EIS is supposed to determine the maximum quantities of development, therefore, it should evaluate the maximum quantity of housing units feasible with transit-oriented assumptions.

Ending the housing shortage must be the top priority of the State of Hawaii. Not only does housing top surveys of Hawaii's policy priorities, but the State also has a statutory obligation to "[e]ffectively accommodate the housing needs of Hawaii's people" (HRS § 226-19). To fulfill this obligation, Governor Ige, Senator Chang, and other state officials have advocated the use of state owned lands near rail stations to develop high density housing for sale to Hawaii residents. Given the location of a rail station on the Aloha Stadium site, this parcel is an ideal site for this vision.

New residents of 100,000 housing units will generate enormous amounts of economic activity and dramatically expand the tax base, thereby supporting the new stadium and other operations of the State.

Thank you for your consideration of these critical community needs.
Respectfully submitted,

Ellen Godbey Carson



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10422-01

Ellen Carson
Egcarson@icloud.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASD)
Hālawā, O‘ahu, Hawai‘i

Dear Ellen Carson:

Thank you for your comments dated February 8, 2021, regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *I am writing to request the EIS for the Aloha Stadium site be expanding to include high density housing towers that would permit tens of thousands of new residential units to be included in the site. Hawaii is in a crisis of affordable housing because we do not have sufficient housing stock for local residents. This site is unique in its location near mass transit, that could accommodate up to 100,000 new units to meet the island’s housing needs. I traveled to Singapore and Hong Kong with Senator Stanley Chang’s legislative delegation to look for alternative housing models that could be adaptable to Hawaii. Singapore’s high density, transit oriented housing towers could be a major strategy in our island’s answer to our housing crisis. The EIS should be expended to include these additional units.*

The current plan to surround the new stadium with retail, office space, hotel, and 1,813 condos is economically unrealistic for the foreseeable future, and the EIS should instead include analysis of the environmental impacts of least 200 towers including 100,000 units of housing on the Aloha Stadium site. While we recognize the need to replace Aloha Stadium, a new stadium should be confined to as small a size as possible. The EIS is supposed to determine the maximum quantities of development, therefore, it should evaluate the maximum quantity of housing units feasible with transit-oriented assumptions.

Ending the housing shortage must be the top priority of the State of Hawaii. Not only does housing top surveys of Hawaii’s policy priorities, but the State also has a statutory

obligation to “[e]ffectively accommodate the housing needs of Hawaii’s people” (HRS § 226-19). To fulfill this obligation, Governor Ige, Senator Chang, and other state officials have advocated the use of state owned lands near rail stations to develop high density housing for sale to Hawaii residents. Given the location of a rail station on the Aloha Stadium site, this parcel is an ideal site for this vision.

Response 1: Your comments are acknowledged. Please note that the Proposed Action, which is premised upon the Programmatic Master Plan appended to the Programmatic EIS as Appendix A, reflects the aggregated collection of extensive and exhaustive input from area residents, members of the public, existing Aloha Stadium stakeholders and public agencies as discussed in Section 2.3 of the Programmatic EIS. Additionally, the Project Team conducted a substantial number of public outreach meetings and has considered public input throughout the EIS process. Hence, the Proposed Action represents the vision of the overall community for the Project Site. Based on community input and various technical studies, the Proposed Action is envisioned to encompass the New Aloha Stadium, approximately 730,000 gross square feet (GSF) of residential space, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF of hotel space. However, as noted throughout the Programmatic EIS, that final design of the Project Site and use and space allocation will be determined by the Stadium Authority, the selected Stadium Developer and Real Estate Developer(s). Please note as discussed at the EIS Scoping Meeting and described in the EIS Preparation Notice published on September 8, 2019, as well as reiterated in Section 1.1 of the Programmatic Draft EIS, *“The Proposed Action encompasses the construction of a new, modern stadium facility that will be supported by complimentary mixed-use development.”* Therefore, the subject Programmatic Draft EIS is intended to assess the potential effects associated with the Proposed Action on various environmental resource categories as prescribed by Section 11-200.1-24.

It is acknowledged that the Programmatic Draft EIS did not evaluate, *“the environmental impacts of least 200 towers including 100,000 units of housing on the Aloha Stadium site,”* as such a program would not meet the goals and objectives of the Proposed Action as described in Section 2.2 of the Programmatic Draft EIS. Nonetheless, the Proposed Action is envisioned to directly serve regional and State housing demands through the creation of a diverse range of residential options, accounting for upwards of 1,800 new housing units as discussed in Section 2.1 of the Programmatic Draft EIS. However, it should be noted that the extent of residential programming will ultimately be determined by the Stadium Authority and the selected Real Estate Developer(s) which will comply with applicable affordable housing requirements.

Please note that due to broad comments raised in response to the Programmatic Draft EIS, Section 3.4 has been added to the Programmatic Final EIS which on a conceptual basis, evaluated a conceptual affordable housing project site design alternative program scenario with 20,000 to 100,000 units within the confines of the Project Site. It is readily apparent that this type of programming would not be compatible with the general purpose and need, as well as goals and objectives of the Proposed Action. Moreover, such a program and its

anticipated impacts would require the preparation of a separate, comprehensive EIS documentation and evaluation.

With regards to your comment the use of State lands near rail stations, please note that the State of Hawai'i is the landowner of the Project Site, and in partnership with the selected Stadium Developer and Real Estate Developer(s), may pursue different land-use configurations and strategies than what is presented in the Programmatic EIS to maximize the value of the Proposed Action and address a number of Statewide needs. The State of Hawai'i, as the landowner, has the ultimate say in how they use their lands to fit their needs. Furthermore, it has not yet been determined how Act 146 will be administered, specifically, how it relates to implementing a "stadium development district." However, it is expected that the State of Hawai'i, in partnership with the selected Stadium Developer and Real Estate Developer(s), will coordinate and work closely with the CCH to implement the Proposed Action, and to minimize any potential impacts on land uses at the Project Site and the Project Region.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Public Comment](#)
To: [Andrew Blasko](#)
Subject: Fw: Build 100,000 housing units at the Aloha Stadium site
Date: Tuesday, February 9, 2021 1:54:15 PM

From: Erik Horn <erikhorn@hawaii.edu>
Sent: Monday, February 8, 2021 11:03 PM
To: Public Comment <publiccomment@wilsonokamoto.com>
Subject: Build 100,000 housing units at the Aloha Stadium site

2/8/2021 Erik Horn 129 South Kalaheo Ave 808-542-8929 Aloha,

The current plan to surround the new stadium with retail, office space, hotel, and 1,813 condos is economically unrealistic for the foreseeable future, and the EIS should instead include analysis of the environmental impacts of least 200 towers including 100,000 units of housing on the Aloha Stadium site. While we recognize the need to replace Aloha Stadium, a new stadium should be confined to as small a size as possible. The EIS is supposed to determine the maximum quantities of development, therefore, it should evaluate the maximum quantity of housing units feasible with transit-oriented assumptions.

Ending the housing shortage must be the top priority of the State of Hawaii. Not only does housing top surveys of Hawaii's policy priorities, but the State also has a statutory obligation to "[e]ffectively accommodate the housing needs of Hawaii's people" (HRS § 226-19). To fulfill this obligation, Governor Ige, Senator Chang, and other state officials have advocated the use of state owned lands near rail stations to develop high density housing for sale to Hawaii residents. Given the location of a rail station on the Aloha Stadium site, this parcel is an ideal site for this vision.

Many comparable facilities around the world today are surrounded by high density development, such as Wankhede Stadium in Mumbai, Madison Square Garden in New York, and Happy Valley Racecourse in Hong Kong. Because a stadium itself would be small--Soldier Field, the home of the Chicago Bears, is only seven acres--over 90 percent of the Aloha Stadium site, as many as 91 acres, can be used for high density housing.

The rise of online shopping and the coronavirus pandemic have greatly reduced demand for brick and mortar retail and office space, both worldwide and in Hawaii. A recent study estimated that retail vacancies on Oahu will grow by 270,000 square feet this year alone. A strip mall or office building is unlikely to generate revenue to pay for the new stadium. By contrast, the new residents of 100,000 housing units will generate enormous amounts of economic activity and dramatically expand the tax base, thereby supporting the new stadium and other operations of the State.

Erik Horn, Approving this message.



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10422-01

Erik Horn
erikhorn@hawaii.edu

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASD)
Hālawā, O‘ahu, Hawai‘i

Dear Erik Horn:

Thank you for your comments dated February 8, 2021, regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *The current plan to surround the new stadium with retail, office space, hotel, and 1,813 condos is economically unrealistic for the foreseeable future, and the EIS should instead include analysis of the environmental impacts of least 200 towers including 100,000 units of housing on the Aloha Stadium site. While we recognize the need to replace Aloha Stadium, a new stadium should be confined to as small a size as possible. The EIS is supposed to determine the maximum quantities of development, therefore, it should evaluate the maximum quantity of housing units feasible with transit-oriented assumptions.*

Ending the housing shortage must be the top priority of the State of Hawaii. Not only does housing top surveys of Hawaii’s policy priorities, but the State also has a statutory obligation to “[e]ffectively accommodate the housing needs of Hawaii’s people” (HRS § 226-19). To fulfill this obligation, Governor Ige, Senator Chang, and other state officials have advocated the use of state owned lands near rail stations to develop high density housing for sale to Hawaii residents. Given the location of a rail station on the Aloha Stadium site, this parcel is an ideal site for this vision.

Response 1: Your comments are acknowledged. Please note that the Proposed Action, which is premised upon the Programmatic Master Plan appended to the Programmatic EIS as Appendix A, reflects the aggregated collection of extensive and exhaustive input from area residents, members of the public, existing Aloha Stadium stakeholders and public agencies as discussed in Section 2.3 of the Programmatic EIS. Additionally, the Project

Team conducted a substantial number of public outreach meetings and has considered public input throughout the EIS process. Hence, the Proposed Action represents the vision of the overall community for the Project Site. Based on community input and various technical studies, the Proposed Action is envisioned to encompass the New Aloha Stadium, approximately 730,000 gross square feet (GSF) of residential space, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF of hotel space. However, as noted throughout the Programmatic EIS, that final design of the Project Site and use and space allocation will be determined by the Stadium Authority, the selected Stadium Developer and Real Estate Developer(s). Please note as discussed at the EIS Scoping Meeting and described in the EIS Preparation Notice published on September 8, 2019, as well as reiterated in Section 1.1 of the Programmatic Draft EIS, *“The Proposed Action encompasses the construction of a new, modern stadium facility that will be supported by complimentary mixed-use development.”* Therefore, the subject Programmatic Draft EIS is intended to assess the potential effects associated with the Proposed Action on various environmental resource categories as prescribed by Section 11-200.1-24.

It is acknowledged that the Programmatic Draft EIS did not evaluate, *“the environmental impacts of least 200 towers including 100,000 units of housing on the Aloha Stadium site,”* as such a program would not meet the goals and objectives of the Proposed Action as described in Section 2.2 of the Programmatic Draft EIS. Nonetheless, the Proposed Action is envisioned to directly serve regional and State housing demands through the creation of a diverse range of residential options, accounting for upwards of 1,800 new housing units as discussed in Section 2.1 of the Programmatic Draft EIS. However, it should be noted that the extent of residential programming will ultimately be determined by the Stadium Authority and the selected Real Estate Developer(s) which will comply with applicable affordable housing requirements.

Please note that due to broad comments raised in response to the Programmatic Draft EIS, Section 3.4 has been added to the Programmatic Final EIS which on a conceptual basis, evaluated a conceptual affordable housing project site design alternative program scenario with 20,000 to 100,000 units within the confines of the Project Site. It is readily apparent that this type of programming would not be compatible with the general purpose and need, as well as goals and objectives of the Proposed Action. Moreover, such a program and its anticipated impacts would require the preparation of a separate, comprehensive EIS documentation and evaluation.

With regards to your comment the use of State lands near rail stations, please note that the State of Hawai‘i is the land owner of the Project Site, and in partnership with the selected Stadium Developer and Real Estate Developer(s), may pursue different land-use configurations and strategies than what is presented in the Programmatic EIS to maximize the value of the Proposed Action and address a number of Statewide needs. The State of Hawai‘i, as the landowner, has the ultimate say in how they use their lands to fit their needs. Furthermore, it has not yet been determined how Act 146 will be administered, specifically, how it relates to implementing a “stadium development district.” However, it

is expected that the State of Hawai'i, in partnership with the selected Stadium Developer and Real Estate Developer(s), will coordinate and work closely with the CCH to implement the Proposed Action, and to minimize any potential impacts on land uses at the Project Site and the Project Region.

Comment 2: *Many comparable facilities around the world today are surrounded by high density development, such as Wankhede Stadium in Mumbai, Madison Square Garden in New York, and Happy Valley Racecourse in Hong Kong. Because a stadium itself would be small--Soldier Field, the home of the Chicago Bears, is only seven acres--over 90 percent of the Aloha Stadium site, as many as 91 acres, can be used for high density housing.*

Response 2: Your comments are acknowledged. As noted in Response #1 above, the State of Hawai'i, as the land owner, has the ultimate say in how they use their lands to fit their needs. However, it is expected that the State of Hawai'i, in partnership with the selected Stadium Developer and Real Estate Developer(s), will coordinate and work closely with the CCH to implement the Proposed Action and to minimize any potential impacts on land uses at the Project Site and the Project Region. It is anticipated that the Proposed Action will result in the New Aloha Stadium, approximately 730,000 gross square feet (GSF) residential space, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF of hotel space, which can be considered high density development across the Project Site.

Comment 3: *The rise of online shopping and the coronavirus pandemic have greatly reduced demand for brick and mortar retail and office space, both worldwide and in Hawaii. A recent study estimated that retail vacancies on Oahu will grow by 270,000 square feet this year alone. A strip mall or office building is unlikely to generate revenue to pay for the new stadium. By contrast, the new residents of 100,000 housing units will generate enormous amounts of economic activity and dramatically expand the tax base, thereby supporting the new stadium and other operations of the State.*

Response 3: Your comments are acknowledged. However, based on the economic and market analysis conducted by Victus Advisors in 2019, the Proposed Action which is anticipated to encompass approximately 730,000 gross square feet (GSF) of residential space, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF of hotel space will create a vibrant district that could, in summary, generate a Net Present Value (NPV) of over \$1.8 billion in total economic output, over \$700 million in personal earnings, and over \$198 million in State and County tax revenues, assuming an 8.0 percent discount over a 25-year period. After the Full Build-Out, up to 1,190 net new annual jobs are anticipated to be supported by operations of the Proposed Action. Hence, it is anticipated that the Proposed Action will also generate enormous amounts of economic activity while also achieving the goals and objectives of the Proposed Action, as well as the Hālawā Area TOD Plan whereas constructing 100,000 housing units at the Project Site would not as discussed in Response #1 above.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Galen Fox](#)
To: [Public Comment](#)
Cc: chris.kinimaka@hawaii.gov; info@ehawaii.gov
Subject: Comments on New Aloha Stadium Entertainment District Draft EIS
Date: Thursday, January 21, 2021 10:29:12 AM

Comments refer to pp. 5-76, 5-79, “satisfies” study of housing density options

Referring to the Primary Urban Center Development Plan, the draft EIS on [page 5-76](#) and again on [page 5-79](#) states the site is “high density.” Yet the EIS only includes 1,800 housing units. That equates to a mere 18 units per acre; nothing near the 140 units per acre mentioned on page 5-76, not to mention 250 units per acre densities already present elsewhere in Honolulu.

When we were told at the community meetings that the EIS was to determine the maximum development quantities, we specifically asked to study the impact of 20,000 units. Where is the analysis for 20,000 units?

Why does the EIS not include figures that demonstrate how much more affordable housing can be included, particularly given the site’s prime transit usage advantage? What about adding assumptions that prioritize lower income, transit-dependent households?



WILSON OKAMOTO
C O R P O R A T I O N
INNOVATORS • PLANNERS • ENGINEERS

10422-01

Galen Fox
galenwfox@gmail.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear Galen Fox:

Thank you for your comments dated January 21, 2021, regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *Referring to the Primary Urban Center Development Plan, the draft EIS on page 5-76 and again on page 5-79 states the site is “high density.” Yet the EIS only includes 1,800 housing units. That equates to a mere 18 units per acre; nothing near the 140 units per acre mentioned on page 5-76, not to mention 250 units per acre densities already present elsewhere in Honolulu.*

Response 1: We respectfully disagree with your comments regarding the Proposed Action fulfillment of the Primary Urban Center Development Plan (PUCD Plan). We assume your comment is relating to PUCD Plan Policy 3.2.2.3 In-Town Residential Neighborhoods on Page 5-76 which reads:

Density. Areas close to transit lines and the major east-west arterials should be zoned for medium-density residential, which may range from 13 to 90 units per acre, or high-density residential mixed use, which may range up to 140 units per acre. Neighborhoods in these zones would also include reinforcing uses which support resident lifestyle and livelihood choices, such as convenience or neighborhood stores, dining establishments, professional and/or business services, or other similar activities.

As you stated the current unit count per acre at the proposed 1,800 housing units is roughly 18 units per acre. This is within the 13 to 90 unit per acre requirement to be considered

medium density and thus supports the PUCD Plan which is why the Proposed Action is supportive of this policy.

Comment 2: *When we were told at the community meetings that the EIS was to determine the maximum development quantities, we specifically asked to study the impact of 20,000 units. Where is the analysis for 20,000 units? Why does the EIS not include figures that demonstrate how much more affordable housing can be included, particularly given the site's prime transit usage advantage? What about adding assumptions that prioritize lower income, transit-dependent households?*

Response 2: Your comments are acknowledged. Please note that the Proposed Action, which is premised upon the Programmatic Master Plan appended to the Programmatic EIS as Appendix A, reflects the aggregated collection of extensive and exhaustive input from area residents, members of the public, existing Aloha Stadium stakeholders and public agencies as discussed in Section 2.3 of the Programmatic EIS. Additionally, the Project Team conducted a substantial number of public outreach meetings and has considered public input throughout the EIS process. Hence, the Proposed Action represents the vision of the overall community for the Project Site. Based on community input and various technical studies, the Proposed Action is envisioned to encompass the New Aloha Stadium, approximately 730,000 gross square feet (GSF) of residential space, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF of hotel space. However, as noted throughout the Programmatic EIS, that final design of the Project Site and use and space allocation will be determined by the Stadium Authority, the selected Stadium Developer and Real Estate Developer(s). Please note as discussed at the EIS Scoping Meeting and described in the EIS Preparation Notice published on September 8, 2019, as well as reiterated in Section 1.1 of the Programmatic Draft EIS, *"The Proposed Action encompasses the construction of a new, modern stadium facility that will be supported by complimentary mixed-use development."* Therefore, the subject Programmatic Draft EIS is intended to assess the potential effects associated with the Proposed Action on various environmental resource categories as prescribed by Section 11-200.1-24.

It is acknowledged that the Programmatic Draft EIS did not evaluate, *"the impact of 20,000 units,"* as such a program would not meet the goals and objectives of the Proposed Action as described in Section 2.2 of the Programmatic Draft EIS. Nonetheless, the Proposed Action is envisioned to directly serve regional and State housing demands through the creation of a diverse range of residential options, accounting for upwards of 1,800 new housing units as discussed in Section 2.1 of the Programmatic Draft EIS. However, it should be noted that the extent of residential programming will ultimately be determined by the Stadium Authority and the selected Real Estate Developer(s) which will comply with applicable affordable housing requirements.

Please note that due to broad comments raised in response to the Programmatic Draft EIS, Section 3.4 has been added to the Programmatic Final EIS which on a conceptual basis, evaluated a conceptual affordable housing project site design alternative program scenario with

20,000 to 100,000 units within the confines of the Project Site. It is readily apparent that this type of programming would not be compatible with the general purpose and need, as well as goals and objectives of the Proposed Action. Moreover, such a program and its anticipated impacts would require the preparation of a separate, comprehensive EIS documentation and evaluation.

With regards to your comment the use of State lands near rail stations, please note that the State of Hawai'i is the land owner of the Project Site, and in partnership with the selected Stadium Developer and Real Estate Developer(s), may pursue different land-use configurations and strategies than what is presented in the Programmatic EIS to maximize the value of the Proposed Action and address a number of Statewide needs. The State of Hawai'i, as the land owner, has the ultimate say in how they use their lands to fit their needs. Furthermore, it has not yet been determined how Act 146 will be administered, specifically, how it relates to implementing a "stadium development district." However, it is expected that the State of Hawai'i, in partnership with the selected Stadium Developer and Real Estate Developer(s), will coordinate and work closely with the CCH to implement the Proposed Action, and to minimize any potential impacts on land uses at the Project Site and the Project Region.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Glenn Fujita](#)
To: [Public Comment](#)
Subject: New Stadium
Date: Wednesday, December 23, 2020 3:09:12 PM

Thank you for allowing public comment. To say the stadium never fills to capacity so we'll downsize is a lose- lose mentality. To go with anything less than current size all but guarantees failure-lost opportunities. So to those who can see the future and say Pro Bowl is not coming so why build so big, they're guaranteeing there's no chance NFL or other entities won't ever explore coming to Hawaii? If you build to 30,000 -35,000, you will be guaranteeing they don't look to Hawaii and will look elsewhere as the stadium would be sub-standard due to small capacity. These people are guaranteeing UH football will not ever become a "draw", so don't build to 50,000? From its creation, a 35,000 seat stadium is sub-standard. We would be going backwards and killing UH sports - not only football but all sports as they depend on football revenue. Main goal should be developing a facility that's all about maintaining UH athletics.

Sent from my iPhone



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10422-01

Glenn Fujita
gandrufujita@gmail.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear Glenn Fujita:

Thank you for your comments dated December 23, 2020, regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment #1: *To say the stadium never fills to capacity so we’ll downsize is a lose-lose mentality. To go with anything less than current size all but guarantees failure-lost opportunities. So to those who can see the future and say Pro Bowl is not coming so why build so big, they’re guaranteeing there’s no chance NFL or other entities won’t ever explore coming to Hawaii? If you build to 30,000 -35,000, you will be guaranteeing they don’t look to Hawaii and will look elsewhere as the stadium would be sub-standard due to small capacity. These people are guaranteeing UH football will not ever become a “draw”, so don’t build to 50,000? From its creation, a 35,000 seat stadium is sub-standard. We would be going backwards and killing UH sports - not only football but all sports as they depend on football revenue. Main goal should be developing a facility that’s all about maintaining UH athletics.*

Response #1: Your comments are acknowledged. The Programmatic Final EIS includes a market feasibility & economic review and analysis prepared by Victus Advisors conducted in conjunction with master planning and preliminary design efforts for the Proposed Action. This documentation clearly underscores that the existing Aloha Stadium’s capacity of 50,000, by far, and in large exceeds current and anticipated future market needs. In observance of the analysis and guidance set forth by Victus Advisors as well as market sounding and user analysis by Stadium and Industry consultants, the unified recommendation is that the construction of a 27,500 - 35,000 seat capacity stadium would best serve current and anticipated future market demand.

Furthermore, before the 2018 fiscal year, Aloha Stadium was not widely considered as a major venue for concert activities. As the Aloha Stadium began to be marketed more heavily as a concert venue over the course of 2019, it was revealed through consultation with entertainment industry professionals that the Aloha Stadium's current capacity of 50,000 seats was a significant deterrent to the candidacy of the existing Aloha Stadium as venue for major artists. Promoters and performers alike voiced that the ideal range for seating at a stadium-set concert lies between 25,000 and 30,000 seats.

Since the fiscal year of 2018, Aloha Stadium has hosted eight concerts, with seven held within the fiscal year of 2019. Six concerts have been booked/promoted by Live Nation with an average of 30,743 attendees, right in line with feedback provided by industry professionals. Nonetheless, as currently proposed, in addition to a raw 35,000 fixed seat capacity, concert events could potentially utilize field space for additional viewership that could accommodate upwards of 10,000 additional attendees.

With regard to sporting events held at Aloha Stadium, Division 1 Football Bowl Subdivision (D1-FBS) football factors in as the central activity featured. Specifically, Aloha Stadium was the home to the University of Hawai'i Rainbow Warriors Football Program (UH Football) when it was in operation. The University of Hawai'i is a member of the Mountain West Conference, which is considered to be a Mid-Major or Group of Five (G5) conference, and has ranked 81st in attendance among all D1-FBS institutions in the most recent season of play with no attendance restrictions (2019), bordering just under 25,000 attendees for home game attendance. Overall, attendance trends nation-wide are in sharp decline. The 2019 D1-FBS season resulted in the lowest overall attendance in the past 24 years (41,477 per game), with the Mountain West posting its lowest average per game attendance ever (23,232 per game). It is further notable that over the past five years, running from the 2014 season to 2019 season, average UH Football attendance has also trended down, reflecting a decline in average attendance. Moreover, UH Football has not drawn a sell-out crowd since 2007. By contrast, the highest attended game within the past five years attracted approximately 36,411 attendees (2014 season opener), under the context of the capacity of the existing Aloha Stadium (50,000 seats), the highest attended UH Football event held at the Stadium over the course of the last five years would have a little more than a 25% of the seats vacant. By contrast, under the Proposed Action the current capacity of 50,000 seats (35,000 seat stadium), with a similar level of attendance, the Stadium would be 100% filled to capacity. There is a quality all unto-itself to having a sold-out-stadium that cannot be tangibly quantified.

Overall, the proposed New Aloha Stadium (35,000 seat capacity) would create the opportunity to serve as a viable venue for a greater range of events. Possible events include rugby, motor sports, soccer and mixed martial arts. These events typically will not pursue stadiums larger than 35,000, as the demand of their audience typically would not justify the use of a larger venue, particularly under the context of the market that would be locally served here on O'ahu.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in cursive script, reading "Keola Cheng". The ink is dark and the signature is fluid.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Greg Kaneko](#)
To: [Public Comment](#)
Subject: Cold water dispensers
Date: Friday, January 22, 2021 2:57:50 PM

Please put in a lot of cold water dispensers for the viewing crowd. Water bottles filled with water and ice are not allowed in the stadium so please install high quality high column cold water dispensers. We the public are only allowed to bring in EMPTY water bottles.

[Sent from Yahoo Mail for iPad](#)



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10422-01

Greg Kaneko
gykanek@yahoo.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear Greg Kaneko:

Thank you for your comments dated January 22, 2021, regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment #1: *Please put in a lot of cold water dispensers for the viewing crowd. Water bottles filled with water and ice are not allowed in the stadium so please install high quality high column cold water dispensers. We the public are only allowed to bring in EMPTY water bottles.*

Response #1: We acknowledge your comments. Please note that the Proposed Action will follow all requirements related to providing potable water sources for its patrons. The final design and quantity of water dispensers will be determined by the Stadium Authority, the selected Stadium Developer.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Greyson Lum](#)
To: [Public Comment](#)
Subject: Aloha Stadium Entertainment District
Date: Friday, January 22, 2021 9:29:10 AM
Attachments: [BAKER-E Design Group.pdf](#)

Hello,

I am writing to you regarding the future entertainment district for the new Aloha Stadium. My name is Greyson Lum. I represent a design group based in Honolulu, Los Angeles and Brooklyn. We are creative team specializing in Themed entertainment. We have designed work for Disney, Universal, Warner brothers theme parks and specialize in entertainment planning. If you need to reach out to us we would be happy to consult with your team.

Thank you for your time.

Greyson Lum
Lead Baker
BAKER-E
<https://www.baker-e.com/>



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10422-01

Greyson Lum
greysonlum@baker-e.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear Greyson Lum:

Thank you for your comments dated January 22, 2021, regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *I represent a design group based in Honolulu, Los Angeles and Brooklyn. We are creative team specializing in Themed entertainment. We have designed work for Disney, Universal, Warner brothers theme parks and specialize in entertainment planning. If you need to reach out to us we would be happy to consult with your team.*

Response 1: We acknowledge your comments and understand that you represent a design group based in Honolulu, Los Angeles, and Brooklyn that specialize in themed entertainment. Please note that this letter will be appended to the Programmatic Final EIS which will be provided to the eventual selected Stadium Developer and Real Estate Developer(s) for consideration when designing and programming the Project Site.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Public Comment](#)
To: [Andrew Blasko](#)
Subject: Fw: Aloha Stadium
Date: Tuesday, February 9, 2021 1:53:05 PM

From: Herb Schreiner <herbschreiner808@gmail.com>
Sent: Monday, February 8, 2021 10:03 AM
To: Public Comment <publiccomment@wilsonokamoto.com>
Subject: Aloha Stadium

Please just build a state of the art stadium and parking lot with easier traffic flow into and out of the stadium. There is no need for the hotels, apartments & entertainment district. Make the stadium weather friendly and useable for most sports and events. Include a retractable ceiling better lighting and sound system. Thank you for allowing feedback.

Mahalo & Aloha,

Herb Schreiner
1161 Wainiha Street Apt. E
Honolulu, HI 96825
Cell: 808-381-3674
herbschreiner808@gmail.com



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C O R P O R A T I O N
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10422-01

Herb Schreiner
1161 Wainiha Street, Apt E
Honolulu, HI 96825
Herbschreiner808@gmail.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, Oʻahu, Hawaiʻi

Dear Herb Schreiner:

Thank you for your comments dated February 8, 2021, regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawaiʻi Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment #1: *Please just build a state of the art stadium and parking lot with easier traffic flow into and out of the stadium.*

Response #1: We acknowledge your comments. Please note that the Stadium Development component of the Proposed Action is envisioned to deliver a facility that can be considered of the highest standard, or “state of the art.”

As it relates to traffic flow into the Project Site, please note that the Programmatic EIS includes a detailed description of the existing traffic conditions and potential traffic impacts associated with the Proposed Action in Section 4.11. Additionally, a Traffic Impact Report (TIR) was prepared by Wilson Okamoto Corporation in May 2020 which was updated in December 2021, and is appended to the Programmatic Final EIS as Appendix H.

The intent of TIR was to assess anticipated impacts on regional vehicular traffic conditions and infrastructure as well as multimodal transit facilities within the vicinity of the Project Site that could result from the implementation and operation of the Proposed Action. In summary, the Proposed Action is anticipated to be built out over 10+ years. By the year 2026, traffic conditions in the Project Region are anticipated to remain the same. Although the Stadium Development, accompanied by the Initial Real Estate Development, is expected

to generate additional trips to the Project Site, it should be noted that the Project Site is also situated in the vicinity of regional roadways with higher capacities to accommodate additional traffic. In addition, the Project Site is located in an area that is accessible via multiple connections to and from regional roadways, with designated ramps to and from the freeways. As such, site-generated trips are dispersed along the different routes to and from the Project Site, thereby diluting the increases along the individual roadways. However, it is recommended that the preparation of a Transportation Management Plan which includes traffic circulation, parking, loading, and traffic demand management strategies, as well as a clear public information plan to relay changes to the traffic circulation in the vicinity of the Project Site is recommended to minimize the impact of the special events and other off-peak activities associated with the Proposed Action on the surrounding roadways. Moreover, with the completion of the Hālawā / Aloha Stadium HART Transit Station, and proposed multi-modal facilities under the Proposed Action, alternative transportation methods will be encouraged to further reduce traffic impacts related to single occupancy vehicles.

Comment #2: *There is no need for the hotels, apartments & entertainment district.*

Response #2: We acknowledge your comments. Please note that based on community input and various technical studies, the Proposed Action is envisioned to encompass the New Aloha Stadium, approximately 730,000 gross square feet (GSF) of residential space, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF of hotel space. However, as noted throughout the Programmatic EIS, that final design of the Project Site and use and space allocation will be determined by the Stadium Authority, the selected Stadium Developer and Real Estate Developer(s). The Proposed Action, as described in the EIS and the Programmatic Master Plan, has the potential to significantly increase the Project Region's desirability from a hospitality perspective contributing to the vibrancy of the Proposed Action. It is anticipated that a hotel at the Project Site could serve potentially over 1.5 million annual visitors to the New Aloha Stadium; furthermore, the Proposed Action could potentially serve as a catalyst for growth in visitation, attracting tourists and visitors to the Project Site retail and mixed-use environment that would have otherwise not considered coming to the submarket.

Comment #3: *Make the stadium weather friendly and useable for most sports and events. Include a retractable ceiling better lighting and sound system.*

Response #3: We acknowledge your comments. As noted in Response #1 above, the Stadium Development component of the Proposed Action is envisioned to deliver a facility that can be considered of the highest standard, or "state of the art." However, please note the final design of the New Aloha Stadium and its components will be determined by the Stadium Authority, the selected Stadium Developer.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical

studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in cursive script, reading "Keola Cheng". The ink is dark and the signature is fluid.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Ikaika Wilson](#)
To: [Public Comment](#)
Subject: Comments/feedback for future aloha stadium
Date: Wednesday, December 23, 2020 8:18:27 PM

Aloha,

I read the news article about feedback for the aloha stadium proposed plans. The one thing we are forgetting about is parking. Building new infrastructure and hotels are one thing, however if you have a stadium with no parking available. It will be hard for those who are willing to commute.



WILSON OKAMOTO
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10422-01

Ikaika Wilson
ikaika.wilson@student.chaminade.edu

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASD)
Hālawā, O‘ahu, Hawai‘i

Dear Ikaika Wilson:

Thank you for your comments dated December 23, 2020, regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *I read the news article about feedback for the aloha stadium proposed plans. The one thing we are forgetting about is parking. Building new infrastructure and hotels are one thing, however if you have a stadium with no parking available. It will be hard for those who are willing to commute.*

Response 1: Your comments are acknowledged. Please note that it is anticipated that a parking study will be conducted by the eventual selected Stadium Developer and Real Estate Developer(s) as they finalize the design and programming of the Proposed Action. This parking study is anticipated to look at off-street parking and site generated parking demand, while considering TOD principals.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

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Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [J Vadset](#)
To: [Public Comment](#)
Subject: Aloha stadium
Date: Thursday, December 24, 2020 8:42:46 AM

First, the drawings look incredible. Will the state remove the halawa housing project? It's a safety issue for pedestrians. Traffic flow to the stadium? And most importantly ease and adequate parking should be the biggest concern, and would help people to love the new complex. Also input from the workers at the stadium I would hope is heard as there insight to all the maintenance issues may help not revisiting these issues in the future, the actual workers. I believe a simple stadium concrete built vs metal is the way to go in Hawaii. We were told about all kinds of things when originally built that never happened. And lastly is it big enough to draw back the pro bowl?

Sent from my iPhone



WILSON OKAMOTO
C O R P O R A T I O N
INNOVATORS • PLANNERS • ENGINEERS

10422-01

J Vadset
jvadset@gmail.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear J Vadset:

Thank you for your comments dated December 24, 2020, regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment #1: *First, the drawings look incredible. Will the state remove the halawa housing project? It's a safety issue for pedestrians.*

Response #1: Your comments are acknowledged. Please note that your comment about “removing” the Hālawā housing project is unclear. We assume that you are referring to the Pu‘uwai Momi Housing Project which is situated on Tax Map Key [1] 9-9-003:056 and is adjacent to the Project Site. Please note that the Pu‘uwai Momi Housing Project is outside the Project Site boundaries and therefore outside the scope of assessment under this Programmatic EIS. The scope of this Programmatic EIS is, as discussed in Section 1.1 of the Programmatic Draft EIS, to assess “...the construction of a new, modern stadium facility that will be supported by complimentary mixed-use development.” Therefore, the subject Programmatic Draft EIS is intended to assess the potential effects associated with the Proposed Action on various environmental resource categories as prescribed by Section 11-200.1-24.

However, it is acknowledged in Section 4.19.3 of the Programmatic EIS that over the next decade, the Hawai‘i Public Housing Authority (HPHA) aims to tear down and rebuild public housing projects that are within a half mile proximity of the HART rail line. The Pu‘uwai Momi Housing Project is one such site subject to this mandate. Currently comprised of 260 units, it is forecasted to be redeveloped to encompass some 1,200 – 1,600 new affordable units which could cumulatively effect the Proposed Action.

Comment #2: *Traffic flow to the stadium? And most importantly ease and adequate parking should be the biggest concern, and would help people to love the new complex.*

Response #2: We acknowledge your comments. As it relates to traffic flow into the Project Site, please note that the Programmatic EIS includes a detailed description of the existing traffic conditions and potential traffic impacts associated with the Proposed Action in Section 4.11. Additionally, a Traffic Impact Report (TIR) was prepared by Wilson Okamoto Corporation in May 2020 which was updated in December 2021, and is appended to the Programmatic Final EIS as Appendix H.

The intent of TIR was to assess anticipated impacts on regional vehicular traffic conditions and infrastructure as well as multimodal transit facilities within the vicinity of the Project Site that could result from the implementation and operation of the Proposed Action. In summary, the Proposed Action is anticipated to be built out over 10+ years. By the year 2026, traffic conditions in the Project Region are anticipated to remain the same. Although the Stadium Development, accompanied by the Initial Real Estate Development, is expected to generate additional trips to the Project Site, it should be noted that the Project Site is also situated in the vicinity of regional roadways with higher capacities to accommodate additional traffic. In addition, the Project Site is located in an area that is accessible via multiple connections to and from regional roadways, with designated ramps to and from the freeways. As such, site-generated trips are dispersed along the different routes to and from the Project Site, thereby diluting the increases along the individual roadways. However, it is recommended that the preparation of a Transportation Management Plan which includes traffic circulation, parking, loading, and traffic demand management strategies, as well as a clear public information plan to relay changes to the traffic circulation in the vicinity of the Project Site is recommended to minimize the impact of the special events and other off-peak activities associated with the Proposed Action on the surrounding roadways. Moreover, with the completion of the Hālawā / Aloha Stadium HART Transit Station, and proposed multi-modal facilities under the Proposed Action, alternative transportation methods will be encouraged to further reduce traffic impacts related to single occupancy vehicles.

Comment #3: *Also input from the workers at the stadium I would hope is heard as there insight to all the maintenance issues may help not revisiting these issues in the future, the actual workers.*

Response #3: We acknowledge your comments. Please note that the Aloha Stadium maintenance crew members have been participating in the RFP process and will continue to do so.

Comment #4: *I believe a simple stadium concrete built vs metal is the way to go in Hawaii. We were told about all kinds of things when originally built that never happened.*

Response #4: We acknowledge your comments. Please note that the methods and materials used in construction of the Proposed Action will be determined by the Stadium Authority and the selected Stadium Developer.

Comment #5: *And lastly is it big enough to draw back the pro bowl?*

Response #5: The Programmatic Final EIS includes a market feasibility & economic review and analysis prepared by Victus Advisors conducted in conjunction with master planning and preliminary design efforts for the Proposed Action. This documentation clearly underscores that the existing Aloha Stadium's capacity of 50,000, by far, and in large exceeds current and anticipated future market needs. In observance of the analysis and guidance set forth by Victus Advisors as well as market sounding and user analysis by Stadium and Industry consultants, the unified recommendation is that the construction of a 27,500 - 35,000 seat capacity stadium would best serve current and anticipated future market demand.

Furthermore, before the 2018 fiscal year, Aloha Stadium was not widely considered as a major venue for concert activities. As the Aloha Stadium began to be marketed more heavily as a concert venue over the course of 2019, it was revealed through consultation with entertainment industry professionals that the Aloha Stadium's current capacity of 50,000 seats was a significant deterrent to the candidacy of the existing Aloha Stadium as a venue for major artists. Promoters and performers alike voiced that the ideal range for seating at a stadium-set concert lies between 25,000 and 30,000 seats.

Since the fiscal year of 2018, Aloha Stadium has hosted eight concerts, with seven held within the fiscal year of 2019. Six concerts have been booked/promoted by Live Nation with an average of 30,743 attendees, right in line with feedback provided by industry professionals. Nonetheless, as currently proposed, in addition to a raw 35,000 fixed seat capacity, concert events could potentially utilize field space for additional viewership that could accommodate upwards of 10,000 additional attendees.

With regard to sporting events held at Aloha Stadium, Division 1 Football Bowl Subdivision (D1-FBS) football factors in as the central activity featured. Specifically, Aloha Stadium was the home to the University of Hawai'i Rainbow Warriors Football Program (UH Football) when it was in operation. The University of Hawai'i is a member of the Mountain West Conference, which is considered to be a Mid-Major or Group of Five (G5) conference, and has ranked 81st in attendance among all D1-FBS institutions in the most recent season of play with no attendance restrictions (2019), bordering just under 25,000 attendees for home game attendance. Overall, attendance trends nation-wide are in sharp decline. The 2019 D1-FBS season resulted in the lowest overall attendance in the past 24 years (41,477 per game), with the Mountain West posting its lowest average per game attendance ever

(23,232 per game). It is further notable that over the past five years, running from the 2014 season to 2019 season, average UH Football attendance has also trended down, reflecting a decline in average attendance. Moreover, UH Football has not drawn a sell-out crowd since 2007. By contrast, the highest attended game within the past five years attracted approximately 36,411 attendees (2014 season opener), under the context of the capacity of the existing Aloha Stadium (50,000 seats), the highest attended UH Football event held at the Stadium over the course of the last five years would have a little more than a 25% of the seats vacant. By contrast, under the Proposed Action the current capacity of 50,000 seats (35,000 seat stadium), with a similar level of attendance, the Stadium would be 100% filled to capacity. There is a quality all unto-itself to having a sold-out-stadium that cannot be tangibly quantified.

Overall, the proposed New Aloha Stadium (35,000 seat capacity) would create the opportunity to serve as a viable venue for a greater range of events. Possible events include rugby, motor sports, soccer and mixed martial arts. These events typically will not pursue stadiums larger than 35,000, as the demand of their audience typically would not justify the use of a larger venue, particularly under the context of the market that would be locally served here on O‘ahu.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in dark ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Jalem Correia](#)
To: [Public Comment](#)
Subject: Build 100,000 housing units at the Aloha Stadium site
Date: Tuesday, January 26, 2021 12:46:55 PM

Aloha,

The current plan to surround the new stadium with retail, office space, hotel, and 1,813 condos is economically unrealistic for the foreseeable future, and the EIS should instead include analysis of the environmental impacts of least 200 towers including 100,000 units of housing on the Aloha Stadium site. While we recognize the need to replace Aloha Stadium, a new stadium should be confined to as small a size as possible. The EIS is supposed to determine the maximum quantities of development, therefore, it should evaluate the maximum quantity of housing units feasible with transit-oriented assumptions.

Ending the housing shortage must be the top priority of the State of Hawaii. Not only does housing top surveys of Hawaii's policy priorities, but the State also has a statutory obligation to "[e]ffectively accommodate the housing needs of Hawaii's people" (HRS § 226-19). To fulfill this obligation, Governor Ige, Senator Chang, and other state officials have advocated the use of state owned lands near rail stations to develop high density housing for sale to Hawaii residents. Given the location of a rail station on the Aloha Stadium site, this parcel is an ideal site for this vision.

Many comparable facilities around the world today are surrounded by high density development, such as Wankhede Stadium in Mumbai, Madison Square Garden in New York, and Happy Valley Racecourse in Hong Kong. Because a stadium itself would be small--Soldier Field, the home of the Chicago Bears, is only seven acres--over 90 percent of the Aloha Stadium site, as many as 91 acres, can be used for high density housing.

The rise of online shopping and the coronavirus pandemic have greatly reduced demand for brick and mortar retail and office space, both worldwide and in Hawaii. A recent study estimated that retail vacancies on Oahu will grow by 270,000 square feet this year alone. A strip mall or office building is unlikely to generate revenue to pay for the new stadium. By contrast, the new residents of 100,000 housing units will generate enormous amounts of economic activity and dramatically expand the tax base, thereby supporting the new stadium and other operations of the State.

Mahalo nui loa!

Best of health and many blessings,
Jalem Correia
4725 Bougainville Drive #164
Honolulu, HI 96818
(808) 392-6458

--

Jalem "Keo" Correia
4725 Bougainville Drive #164
Honolulu, HI 96818
(808) 392-6458



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10422-01

Jalem Correia
4725 Bougainville Dr., #164
Honolulu, HI 96818
jalem.correia@gmail.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear Jalem Correia:

Thank you for your comments dated January 26, 2020, regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *The current plan to surround the new stadium with retail, office space, hotel, and 1,813 condos is economically unrealistic for the foreseeable future, and the EIS should instead include analysis of the environmental impacts of least 200 towers including 100,000 units of housing on the Aloha Stadium site. While we recognize the need to replace Aloha Stadium, a new stadium should be confined to as small a size as possible. The EIS is supposed to determine the maximum quantities of development, therefore, it should evaluate the maximum quantity of housing units feasible with transit-oriented assumptions.*

Ending the housing shortage must be the top priority of the State of Hawaii. Not only does housing top surveys of Hawaii’s policy priorities, but the State also has a statutory obligation to “[e]ffectively accommodate the housing needs of Hawaii’s people” (HRS § 226-19). To fulfill this obligation, Governor Ige, Senator Chang, and other state officials have advocated the use of state owned lands near rail stations to develop high density housing for sale to Hawaii residents. Given the location of a rail station on the Aloha Stadium site, this parcel is an ideal site for this vision.

Response 1: Your comments are acknowledged. Please note that the Proposed Action, which is premised upon the Programmatic Master Plan appended to the Programmatic EIS as Appendix A, reflects the aggregated collection of extensive and exhaustive input from

area residents, members of the public, existing Aloha Stadium stakeholders and public agencies as discussed in Section 2.3 of the Programmatic EIS. Additionally, the Project Team conducted a substantial number of public outreach meetings and has considered public input throughout the EIS process. Hence, the Proposed Action represents the vision of the overall community for the Project Site. Based on community input and various technical studies, the Proposed Action is envisioned to encompass the New Aloha Stadium, approximately 730,000 gross square feet (GSF) of residential space, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF hotel keys. However, as noted throughout the Programmatic EIS, that final design of the Project Site and use and space allocation will be determined by the Stadium Authority, the selected Stadium Developer and Real Estate Developer(s). Please note as discussed at the EIS Scoping Meeting and described in the EIS Preparation Notice published on September 8, 2019, as well as reiterated in Section 1.1 of the Programmatic Draft EIS, “*The Proposed Action encompasses the construction of a new, modern stadium facility that will be supported by complimentary mixed-use development.*” Therefore, the subject Programmatic Draft EIS is intended to assess the potential effects associated with the Proposed Action on various environmental resource categories as prescribed by Section 11-200.1-24.

It is acknowledged that the Programmatic Draft EIS did not evaluate, “*the environmental impacts of least 200 towers including 100,000 units of housing on the Aloha Stadium site,*” as such a program would not meet the goals and objectives of the Proposed Action as described in Section 2.2 of the Programmatic Draft EIS. Nonetheless, the Proposed Action is envisioned to directly serve regional and State housing demands through the creation of a diverse range of residential options, accounting for upwards of 1,800 new housing units as discussed in Section 2.1 of the Programmatic Draft EIS. However, it should be noted that the extent of residential programming will ultimately be determined by the Stadium Authority and the selected Real Estate Developer(s) which will comply with applicable affordable housing requirements.

Please note that due to broad comments raised in response to the Programmatic Draft EIS, Section 3.4 has been added to the Programmatic Final EIS which on a conceptual basis, evaluated a conceptual affordable housing project site design alternative program scenario with 20,000 to 100,000 units within the confines of the Project Site. It is readily apparent that this type of programming would not be compatible with the general purpose and need, as well as goals and objectives of the Proposed Action. Moreover, such a program and its anticipated impacts would require the preparation of a separate, comprehensive EIS documentation and evaluation.

With regards to your comment the use of State lands near rail stations, please note that the State of Hawai‘i is the land owner of the Project Site, and in partnership with the selected Stadium Developer and Real Estate Developer(s), may pursue different land-use configurations and strategies than what is presented in the Programmatic EIS to maximize the value of the Proposed Action and address a number of Statewide needs. The State of Hawai‘i, as the land owner, has the ultimate say in how they use their lands to fit their

needs. Furthermore, it has not yet been determined how Act 146 will be administered, specifically, how it relates to implementing a “stadium development district.” However, it is expected that the State of Hawai‘i, in partnership with the selected Stadium Developer and Real Estate Developer(s), will coordinate and work closely with the CCH to implement the Proposed Action, and to minimize any potential impacts on land uses at the Project Site and the Project Region.

Comment 2: *Many comparable facilities around the world today are surrounded by high density development, such as Wankhede Stadium in Mumbai, Madison Square Garden in New York, and Happy Valley Racecourse in Hong Kong. Because a stadium itself would be small--Soldier Field, the home of the Chicago Bears, is only seven acres--over 90 percent of the Aloha Stadium site, as many as 91 acres, can be used for high density housing.*

Response 2: Your comments are acknowledged. As noted in Response #1 above, the State of Hawai‘i, as the land owner, has the ultimate say in how they use their lands to fit their needs. However, it is expected that the State of Hawai‘i, in partnership with the selected Stadium Developer and Real Estate Developer(s), will coordinate and work closely with the CCH to implement the Proposed Action and to minimize any potential impacts on land uses at the Project Site and the Project Region. It is anticipated that the Proposed Action will result in the New Aloha Stadium, approximately 730,000 gross square feet (GSF) of residential space, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF of hotel space, which can be considered high density development across the Project Site.

Comment 3: *The rise of online shopping and the coronavirus pandemic have greatly reduced demand for brick and mortar retail and office space, both worldwide and in Hawaii. A recent study estimated that retail vacancies on Oahu will grow by 270,000 square feet this year alone. A strip mall or office building is unlikely to generate revenue to pay for the new stadium. By contrast, the new residents of 100,000 housing units will generate enormous amounts of economic activity and dramatically expand the tax base, thereby supporting the new stadium and other operations of the State.*

Response 3: Your comments are acknowledged. However, based on the economic and market analysis conducted by Victus Advisors in 2019, the Proposed Action which is anticipated to encompass approximately 730,000 GSF of residential space, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF of hotel space will create a vibrant district that could, in summary, generate a Net Present Value (NPV) of over \$1.8 billion in total economic output, over \$700 million in personal earnings, and over \$198 million in State and County tax revenues, assuming an 8.0 percent discount over a 25-year period. After the Full Build-Out, up to 1,190 net new annual jobs are anticipated to be supported by operations of the Proposed Action. Hence, it is anticipated that the Proposed Action will also generate enormous amounts of economic activity while also achieving the goals and objectives of the Proposed Action, as well as the Hālawā Area

TOD Plan whereas constructing 100,000 housing units at the Project Site would not as discussed in Response #1 above.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Public Comment](#)
To: [Andrew Blasko](#)
Subject: Fw: Proposed Stadium
Date: Tuesday, February 9, 2021 1:53:02 PM

From: Jayme Hurst-Kauwalu <pookela.jayme@gmail.com>
Sent: Monday, February 8, 2021 10:00 AM
To: Public Comment <publiccomment@wilsonokamoto.com>
Subject: Proposed Stadium

As a resident of Oahu, I believe this stadium & all the extras are absolutely unnecessary. Fix the stadium, maybe rebuild it with everything new. But all the extra hotels and such are NOT NEEDED. Our island is already packed & buildings are taking over everywhere you look. This island is only so small & all this building isn't helping RESIDENTS. A new stadium yes, making it safer. But NO EXTRAS... Hotels, etc.

Sent from my iPhone



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10422-01

Jayme Hurst-Kauwalu
Pookela.jayme@gmail.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear Jayme Hurst-Kauwalu:

Thank you for your comments dated February 8, 2021, regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment #1: *As a resident of Oahu, I believe this stadium & all the extras are absolutely unnecessary. Fix the stadium, maybe rebuild it with everything new. But all the extra hotels and such are NOT NEEDED.*

Response #1: We acknowledge your comments. Please note that based on community input and various technical studies, the Proposed Action is envisioned to encompass the New Aloha Stadium, approximately 730,000 gross square feet (GSF) of residential space, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF of hotel space. However, as noted throughout the Programmatic EIS, that final design of the Project Site and use and space allocation will be determined by the Stadium Authority, the selected Stadium Developer and Real Estate Developer(s). The Proposed Action, as described in the EIS and the Programmatic Master Plan, has the potential to significantly increase the Project Region’s desirability from a hospitality perspective contributing to the vibrancy of the Proposed Action. It is anticipated that a hotel at the Project Site could serve potentially over 1.5 million annual visitors to the New Aloha Stadium; furthermore, the Proposed Action could potentially serve as a catalyst for growth in visitation, attracting tourists and visitors to the Project Site retail and mixed-use environment that would have otherwise not considered coming to the submarket.

Comment #2: *Our island is already packed & buildings are taking over everywhere you look. This island is only so small & all this building isn't helping RESIDENTS. A new stadium yes, making it safer. But NO EXTRAS... Hotels, etc.*

Response #2: We acknowledge your comments. However, please note that the Proposed Action is anticipated to have a direct economic impact on the Project Region, as well as the State. In summary, as discussed in Section 4.13.3 of the Programmatic EIS, the Proposed Action (at Full Build-Out) is anticipated to generate a Net Present Value (NPV) of over \$1.8 billion in total economic output, over \$700 million in personal earnings, and over \$198 million in State and County tax revenues, assuming an 8.0 percent discount over a 25-year period. After the Full Build-Out, up to 1,190 net new annual jobs are anticipated to be supported by operations of the Proposed Action

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Public Comment](#)
To: [Andrew Blasko](#)
Subject: Fw: No the New Aloha Stadium
Date: Tuesday, February 9, 2021 1:52:13 PM

From: Jenifer Jenkins <jenkinsjenifer@gmail.com>
Sent: Sunday, February 7, 2021 11:08 PM
To: Public Comment <publiccomment@wilsonokamoto.com>
Subject: No the New Aloha Stadium



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10422-01

Jenifer Jenkins
jenkinsjenifer@gmail.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear Jenifer Jenkins:

Thank you for your comments dated February 7, 2021, regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment #1: *No the New Aloha Stadium*

Response #1: We acknowledge your comments. Please note that Section 3.5 of the Programmatic Final EIS discusses the impacts and outcomes of the No Action alternative whereby no New Aloha Stadium would be constructed, nor would the Real Estate Development. The existing Project Site conditions would remain the same. As discussed in Section 3.5 of the Programmatic Final EIS, the No Action alternative would deprive the State, County, and general public of the significant beneficial economic, environmental, and social benefits associated with the development and operation of the Proposed Action as discussed throughout Chapter 4.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Public Comment](#)
To: [Andrew Blasko](#)
Subject: Fw: Entertainment District opinion
Date: Tuesday, February 9, 2021 1:53:56 PM

From: jj j <justme9033@gmail.com>
Sent: Monday, February 8, 2021 8:18 PM
To: Public Comment <publiccomment@wilsonokamoto.com>
Subject: Entertainment District opinion

Aloha

Not in favor of proposal. Please take care of restoring land and power back to the Hawaiian peoples.
No more development.



WILSON OKAMOTO
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10422-01

JJ J
justme9033@gmail.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASD)
Hālawā, O‘ahu, Hawai‘i

Dear JJ J :

Thank you for your comments dated February 8, 2021, regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *Not in favor of proposal. Please take care of restoring land and power back to the Hawaiian peoples. No more development.*

Response 1: Your comments are acknowledged and understand that you are in opposition of the Proposed Action. Please note that Section 3.5 of the Programmatic Final EIS presents and evaluates the effects of the No Action alternative whereby existing site conditions would remain and virtually nothing would change. The existing Aloha Stadium would remain closed and would likely never operate again, as the existing Aloha Stadium had accumulated as of the year 2019, \$423 million in deferred maintenance, including \$121 million needed in ADA-related improvements and code compliance would continue to grow. Additionally, the cost of such repairs was estimated (in 2017) to grow at a rate of approximately 5% per year, meaning that funding such repairs requires over \$30 million of annual contributions over the next 25 years. The lack of available funding for this maintenance work has resulted in the effective closure of the existing Aloha Stadium.

The No Action alternative would deprive the State, County, and general public of the significant beneficial economic, environmental, and social benefits associated with the development and operation of the Proposed Action as discussed throughout Chapter 4.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical

studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in cursive script, reading "Keola Cheng". The ink is dark and the signature is fluid.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [John Kawamoto](#)
To: [Public Comment](#)
Subject: Aloha Stadium DEIS
Date: Thursday, December 24, 2020 10:21:15 AM

Aloha,

The links in the article about the Aloha Stadium DEIS are erroneous because they don't go to where it says they go to.

John

From: [John Kawamoto](#)
To: [Public Comment](#)
Subject: NASED DEIS Comments
Date: Tuesday, January 26, 2021 10:56:45 AM
Attachments: [Aloha Stadium DEIS comments 012021.docx](#)

Aloha,

Attached are my comments on the NASED DEIS.

John Kawamoto
1128-B Ninth Ave.
Honolulu, HI 96816
(808) 852-2656
jk1492@gmail.com

ALOHA STADIUM ENTERTAINMENT DISTRICT DEIS COMMENTS

John Kawamoto

jk1492@gmail.com

(808) 852-2656

DEIS does not address issues resulting from COVID-19 about the feasibility of the project

For the greater part of 2020, pandemic conditions stemming from the unprecedented spread of the novel COVID-19 virus have continued to impact the functions of daily life on a global level. The COVID-19 pandemic has had far-reaching consequences beyond efforts to stop the spread of the disease itself and to isolate it. Pandemic conditions have contributed to what is now considered to be the largest global recession in history, with more than a third of the world population on lockdown at a given point in time. (Page 1-14)

At the time of the preparation of this Programmatic EIS, there is no consensus or prognosis for when global pandemic conditions will subside. Nonetheless, it is anticipated that the State and District Developer(s) may need to adapt to and consider the implications of changing pandemic conditions on the commercial approach, construction, and operation of the NASED moving forward. (Page 1-14)

UH Football games, which are the most consistent data point reference for overall stadium use, have averaged just under 25,000 spectators per game over the last five years. (Pages 2-2 to 2-3)

Based on the analysis and assumption [sic] in the Economic and Fiscal Impact Analysis, the New Aloha Stadium is anticipated to generate approximately \$11.1 million in annual net operating income in a stabilized year of operations after funding for a long-term capital reserve for future capital improvements. . . . Compared to FY 2019 operations, the revenue of the New Aloha Stadium is anticipated to increase by 88 percent (+\$9,572,956), and expenses will decrease by 4 percent (- \$279,381). As a result, the annual Net Operating Income (NOI) for the New Aloha Stadium is anticipated to increase by 268 percent (+\$8,102,337). (Pages 4-115 to 4-116)

Operations of the New Aloha Stadium are anticipated to result in approximately \$142,000 and \$18,000 of annual GET revenue to the State of Hawai'i and the CCH, respectively. In addition, attendees of events at the New Aloha Stadium from outside of the island or the State are anticipated to spend money in lodging in the region, which will result in Transient Accommodations Tax (TAT) revenue. The TAT revenue to the State of Hawai'i from the new Aloha Stadium operations is estimated to be \$969,000 annually. (Page 4-116)

Operations of the mixed-use development are anticipated to result in approximately \$988,000 (\$878,000 for the State and \$110,000 for the County) and \$2.6 million (\$2.3 million for the State and \$284,000 for the County) of annual GET revenue in Initial Development and at Full Build-Out, respectively. Annual TAT revenue to the State of Hawai'i for Initial Development is estimated at \$471,000 and \$1.2 million at the Full Build-Out. In addition, the increase of property tax revenue to the CCH as a result of the mixed-use development is estimated at

approximately \$9 million for Initial Development and \$23.4 million upon completion of Remaining Development. (Page 4-118)

In summary, the development of the Proposed Action (Full Built-Out) is anticipated to generate Net Present Value (NPV) of over \$1.8 billion in total economic output, over \$700 million in personal earnings, and over \$198 million in State and County tax revenues, assuming an 8.0 percent discount over a 25-year period. After the Full BuildOut, up to 1,190 net new annual jobs are anticipated to be supported by operations of the Proposed Action. (Page 4-119)

The DEIS is dated Dec. 16, 2020. The following day, Dec. 17, 2020, the Aloha Stadium Authority issued the following statement:

The Aloha Stadium Authority announced its decision today to reduce operations and place a moratorium on new events at the Stadium. These changes are being adopted in response to COVID-19 safety restrictions that have severely limited revenue generation opportunities.

On Jan. 11, 2021, the University of Hawaii issued the following statement:

The University of Hawai'i at Mānoa is moving forward with plans to host football games on campus at the Clarence T.C. Ching Athletics Complex beginning with the upcoming season.

The athletics department is working with the UH Mānoa Office of Project Delivery to design plans that would increase seating capacity; replace existing turf, install a new scoreboard and speaker system; upgrade the press box; and other amenities needed to host Division I college football games.

Comments

The DEIS recognizes the “need to adapt to and consider the implications of changing pandemic conditions on the commercial approach, construction, and operation of the NASED moving forward.” (Page 1-14) Yet the DEIS makes a projection of future net operating income based on 2019 conditions, prior to the pandemic. (Page 4-116) Although conditions have changed drastically due to Covid, there is very little evidence that the needed adaptations were made to the project.

In particular, according to the DEIS, “UH Football games...are the most consistent data point reference for overall stadium use...” (Page 2-2) The New Aloha Stadium Entertainment District relies on UH Football games. However, according to a statement issued by the University of Hawaii on Jan. 11, 2021,

The University of Hawai'i at Mānoa is moving forward with plans to host football games on campus at the Clarence T.C. Ching Athletics Complex beginning with the upcoming season.

The athletics department is working with the UH Mānoa Office of Project Delivery to design plans that would increase seating capacity; replace existing turf, install a new scoreboard and speaker system; upgrade the press box; and other amenities needed to host Division I college football games.

The University of Hawaii will make a considerable investment to enable UH Football games to be played on campus. If the facility can accommodate all who want to attend – and UH Football attendance has been declining – UH Football may never move back to Aloha Stadium.

Why does the study not address the changing conditions, such as the potential loss of UH Football, that affect the financial feasibility of the New Aloha Stadium Entertainment District?

Page 2-7

The comprehensive Proposed Action total build out is projected to encompass approximately 1,813 residential units, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 621 hotel keys.

Comment: At the community workshops, a number of people expressed a desire for extensive housing to be built on the site, particularly affordable housing. That is no surprise, as affordable housing has been identified as one of the top priorities of the people of Hawaii in various surveys. Hawaii faces a shortage of tens of thousands of housing units that are affordable to working families.

What is the justification for including only 1,813 residential units in the study when public comments show you were asked to study the environmental impacts of a higher quantity of units? Why was there no sensitivity analysis, as was asked, to determine the socioeconomic impacts of prioritizing affordable housing over market rate housing? Why were these comments made at the community workshops ignored in the DEIS?

Page 5-17

Not Applicable: Stimulate and promote feasible approaches that increase affordable rental and for sale housing choices for extremely low-, very low-, lower-, moderate-, and above-moderate-income households. –Hawai'i State Plan, §226-19 Objectives and policies for socio-cultural advancement – housing.

Comment: Hawaii faces a shortage of tens of thousands of housing units that are affordable to Hawaii's working families. Much of the site is not needed for the stadium and affiliated parking, so it can be used for affordable housing. Why is this objective of the State Plan "not applicable" for the proposed action as presented on page 5-17?

The 1,813 figure for residential units the draft EIS should be analyzed at a higher target that allows the proposed action to satisfy the State Plan objective to increase housing choices. Why is the impact of a higher number of units not studied to help address the critical need and State Plan objective?

Page 5-28

Not Applicable: Create incentives for development which would increase home ownership and rental opportunities for Hawai'i's low and moderate-income households, gap-group households, and residents with special needs. –Hawai'i State Plan, §226-106 Affordable housing.

Comment: Hawaii faces a shortage of tens of thousands of housing units that are affordable to Hawaii's working families. Much of the site is not needed for the stadium and affiliated parking, so it can be used for affordable housing. The redevelopment is an opportunity to increase housing opportunities, including incentivized housing for low- and moderate-income households. There was a public comment asking for affordable housing to be included in the purpose and need of the DEIS. Why is this affordable housing objective of the State Plan "not applicable" for the proposed action as presented on page 5-28? The proposed action should be modified so this objective will be satisfied. The 1,813 figure for residential units should be studied at a higher maximum to address the HHFDC-published needs for housing.

Page 5-28

Not Applicable: Encourage improved coordination between various agencies and levels of government to deal with housing policies and regulations. –Hawai'i State Plan, §226-106 Affordable housing.

Comment: Since a large part of the site is not needed for the stadium and affiliated parking, it presents an opportunity to coordinate with other agencies and levels of government to fulfill other state and county priorities, particularly housing. Why is this objective of the State Plan "not applicable" for the proposed action as presented on page 5-28?

Page 5-58

Not Applicable: Encourage the production and maintenance of affordable rental housing. Encourage the provision of affordable housing design for the elderly and the handicapped. – City and County of Honolulu, General Plan – Objectives and Policies.

Comment: Affordable rental housing should be a priority of the proposed action. The housing quantity in the plan should be increased so that it will satisfy this objective of the General Plan. The mixed-use, transit-oriented, pedestrian-oriented redevelopment would be an ideal place for housing designed to people with limited mobility, including the elderly and handicapped. Walkability would make it easier to take short trips on foot.

Why are these objectives of the General Plan “not applicable” for the proposed action as presented on page 5-58?

Page 5-76

Satisfies: Density. Areas close to transit lines and the major east-west arterials should be zoned for medium-density residential, which may range from 13 to 90 units per acre, or high-density residential mixed use, which may range up to 140 units per acre. –Primary Urban Center Development Plan

Comment: The draft EIS states the site is “high density,” but the study includes only 1,813 housing units, which equates to 18 units per acre, which is not “high density.” How does this proposal satisfy the high-density standard set in the Primary Urban Center Development Plan as indicated on page 5-76? A higher number of units should be studied in the DEIS so that they are truly studying the impacts of high density as they claim.

Page 5-79

Not Applicable: Provide incentives and cost savings for affordable housing. Provide exemptions from zoning and building codes for housing projects that meet established standards of affordability, on a case-by-case basis. –Primary Urban Center Development Plan

Comment: The proposed action should be studied by assuming exemptions from codes in order to study the highest possible number of total residential units on the site. Why is the objective incentivizing affordable housing and providing exemptions from zoning and building codes as stated in the Primary Urban Center Development Plan “not applicable” for the proposed action as presented on page 5-79?

Page 5-79

Satisfies: Provide for high-density housing options in mixed-use development around transit stations. This type of “transit-oriented development” facilitates transit use and allows for increased densities without generating increased vehicular congestion. –Primary Urban Center Development Plan

Comment: The draft EIS states the site is “high density,” but the study includes only 1,813 housing units, which equates to 18 units per acre, which is not “high density.” How does this proposal satisfy the high-density standard set in the Primary Urban Center Development Plan as indicated on page 5-79? Why does the study not include figures that demonstrate how much more affordable housing can be included based on assumptions about transit usage? A person at one of the public meetings asked to do a sensitivity analysis of the traffic impacts based on an assumption of housing prioritization at the site for low-income car-free and car-light households. Why was this valid question not addressed?



WILSON OKAMOTO
C O R P O R A T I O N
INNOVATORS • PLANNERS • ENGINEERS

10422-01

John Kawamoto
jk1492@gmail.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear Mr. Kawamoto:

Thank you for your comments dated December 24, 2020, and January 26, 2021 regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the scope and content of the Draft EIS:

December 24, 2020

Comment #1: *The links in the article about the Aloha Stadium DEIS are erroneous because they don't go to where it says they go to.*

Response #1: Unfortunately, your comments were not specific as to which article you are referring to. That being said, for the primary source of information about the Proposed Action, please look at the DEIS that has been published on Environmental Review Program’s (formerly the Office of Environmental Quality Control) website. These links will take you to the Published Draft EIS Volumes:

Volume I: http://oeqc2.doh.hawaii.gov/Doc_Library/2020-12-23-OA-DEIS-New-Aloha-Stadium-Entertainment-District-Vol-1.pdf

Volume II: http://oeqc2.doh.hawaii.gov/Doc_Library/2020-12-23-OA-DEIS-New-Aloha-Stadium-Entertainment-District-Vol-2.pdf

Volume III: http://oeqc2.doh.hawaii.gov/Doc_Library/2020-12-23-OA-DEIS-New-Aloha-Stadium-Entertainment-District-Vol-3.pdf

January 26, 2021

Comment #2: *DEIS does not address issues resulting from COVID-19 about the feasibility of the project.*

The DEIS recognizes the “need to adapt to and consider the implications of changing pandemic conditions on the commercial approach, construction, and operation of the NASED moving forward.” (Page 1-14) Yet the DEIS makes a projection of future net operating income based on 2019 conditions, prior to the pandemic. (Page 4-116) Although conditions have changed drastically due to Covid, there is very little evidence that the needed adaptations were made to the project.

Response #2: Please note that the impacts of the COVID-19 pandemic have been documented throughout this Programmatic EIS process. Specifically, COVID-19 impacts are discussed in the Executive Summary, Section 1.5, Section 4.18, and more importantly, in Chapter 9 as an unresolved issue, and have been updated to capture changes in conditions since the publication of the Programmatic Draft EIS.

Please note that at the time of the writing for the Programmatic Final EIS, the general consensus is that as more vaccinations are administered, COVID-19 will become more contained. As we can see in the State, as well as around the country, activities are returning to normal, to pre-COVID-19 conditions when impacts of the Proposed Action were projected out. Hence, the Proposed Action is still very feasible, and in fact, may provide even more beneficial impacts as the State economy begins to recover.

Comment #3: *In particular, according to the DEIS, “UH Football games...are the most consistent data point reference for overall stadium use...” (Page 2-2) The New Aloha Stadium Entertainment District relies on UH Football games. However, according to a statement issued by the University of Hawaii on Jan. 11, 2021,*

The University of Hawai‘i at Mānoa is moving forward with plans to host football games on campus at the Clarence T.C. Ching Athletics Complex beginning with the upcoming season. The athletics department is working with the UH Mānoa Office of Project Delivery to design plans that would increase seating capacity; replace existing turf, install a new scoreboard and speaker system; upgrade the press box; and other amenities needed to host Division I college football games.

The University of Hawaii will make a considerable investment to enable UH Football games to be played on campus. If the facility can accommodate all who want to attend – and UH Football attendance has been declining – UH Football may never move back to Aloha Stadium. Why does the study not address the changing conditions, such as the potential loss

of UH Football, that affect the financial feasibility of the New Aloha Stadium Entertainment District?

Response #3: We acknowledge your comments. However, please note that the University of Hawai‘i (UH) had anticipated that the UH could continue to host home football games in the existing Aloha Stadium, as the New Aloha Stadium was to be constructed concurrently. However, the unexpected impacts of COVID-19 and the mounting maintenance cost issues led to closure of the existing Aloha Stadium to spectator events, and the UH is now temporarily hosting UH football games at its Clarence T.C. Ching Athletics Complex, located on its Lower Campus in Mānoa, until the New Aloha Stadium is constructed. Hence, UH has confirmed that they plan to return to the New Aloha Stadium once constructed and ready to operate in the future.

Comment #4: *At the community workshops, a number of people expressed a desire for extensive housing to be built on the site, particularly affordable housing. That is no surprise, as affordable housing has been identified as one of the top priorities of the people of Hawaii in various surveys. Hawaii faces a shortage of tens of thousands of housing units that are affordable to working families.*

What is the justification for including only 1,813 residential units in the study when public comments show you were asked to study the environmental impacts of a higher quantity of units? Why was there no sensitivity analysis, as was asked, to determine the socioeconomic impacts of prioritizing affordable housing over market rate housing? Why were these comments made at the community workshops ignored in the DEIS?

Response #4: It is acknowledged that there is a need for greater availability of affordable housing on O‘ahu, as well as throughout the State of Hawai‘i, in general. We also acknowledge that many comments regarding more housing, specifically affordable housing, were brought up at both the EIS Scoping Meeting held on September 25, 2019, in conjunction with scoping out the assessment and evaluation for the Programmatic Draft EIS, and the Master Plan Community Workshops held in December 2019. All comments were considered when preparing the Programmatic Draft EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. Hence, they were not ignored.

Please note as discussed at the EIS Scoping Meeting and described in the EIS Preparation Notice published on September 8, 2019, as well as reiterated in Section 1.1 of the Programmatic Draft EIS, “*The Proposed Action encompasses the construction of a new, modern stadium facility that will be supported by complimentary mixed-use development.*” Therefore, the subject Programmatic Draft EIS is intended to assess the potential effects associated with the Proposed Action on various environmental resource categories as prescribed by Section 11-200.1-24. The Proposed Action, which is premised upon the Programmatic Master Plan appended to the Programmatic EIS as Appendix A, reflects the aggregated collection of extensive and exhaustive input from area residents, members of the public, existing Aloha Stadium stakeholders and public agencies as discussed in

Section 2.3 of the Programmatic EIS. Hence, the Proposed Action represents the vision of the overall community for the Project Site. Based on community input and various technical studies, the Proposed Action is envisioned to encompass the New Aloha Stadium, approximately 730,000 gross square feet (GSF) of residential space, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF of hotel space. However, as noted throughout the Programmatic EIS, that final design of the Project Site and use and space allocation will be determined by the Stadium Authority and the selected Stadium Developer and Real Estate Developer(s).

It is acknowledged that the Programmatic Draft EIS did not evaluate the maximum possible quantity of housing units, as such a program would not meet the goals and objectives of the Proposed Action as described in Section 2.2 of the Programmatic Draft EIS. Nonetheless, the Proposed Action is envisioned to directly serve regional and State housing demands through the creation of a diverse range of residential options, accounting for upwards of 1,800 new housing units as discussed in Section 2.1 of the Programmatic Draft EIS. However, it should be noted that the extent of residential programming will ultimately be determined by the Stadium Authority and the selected Real Estate Developer(s) which will comply with applicable affordable housing requirements.

Please note that due to broad comments raised in response to the Programmatic Draft EIS, Section 3.4 has been added to the Programmatic Final EIS which on a conceptual basis, evaluated a conceptual affordable housing project site design alternative program scenario with 20,000 to 100,000 units within the confines of the Project Site. It is readily apparent that this type of programming would not be compatible with the general purpose and need, as well as goals and objectives of the Proposed Action. Moreover, such a program and its anticipated impacts would require the preparation of a separate, comprehensive EIS documentation and evaluation.

Comment #5: *Hawaii faces a shortage of tens of thousands of housing units that are affordable to Hawaii's working families. Much of the site is not needed for the stadium and affiliated parking, so it can be used for affordable housing. Why is this objective of the State Plan "not applicable" for the proposed action as presented on page 5-17?*

Response #5: We acknowledge your comments. As noted in Response #4 above, it is evident that there is a serious need for additional affordable housing inventory and options across the State. Furthermore, recent events have shown that there is a shortage of affordable housing within and in proximity to the Primary Urban Center. The Proposed Action, which is premised upon the Programmatic Master Plan appended to the Programmatic EIS as Appendix A, reflects the aggregated collection of extensive and exhaustive input from area residents, members of the public, existing Aloha Stadium stakeholders and public agencies as discussed in Section 2.3 of the Programmatic EIS. Hence, the Proposed Action represents the vision of the overall community for the Project Site. Based on community input and various technical studies, the Proposed Action is envisioned to encompass the New Aloha Stadium, approximately 730,000 gross square feet (GSF) of residential space, 680,500 GSF

of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF of hotel space. However, as noted throughout the Programmatic EIS, that final design of the Project Site and use and space allocation will be determined by the Stadium Authority, the selected Stadium Developer and Real Estate Developer(s).

It is acknowledged that the Programmatic Draft EIS did not evaluate the maximum possible quantity of housing units, as such a program would not meet the goals and objectives of the Proposed Action as described in Section 2.2 of the Programmatic Draft EIS. Nonetheless, the Proposed Action is envisioned to directly serve regional and State housing demands through the creation of a diverse range of residential options, accounting for upwards of 1,800 new housing units as discussed in Section 2.1 of the Programmatic Draft EIS. However, it should be noted that the extent of residential programming will ultimately be determined by the Stadium Authority and the selected Real Estate Developer(s) which will comply with applicable affordable housing requirements.

Your question regarding the objectives of the State Plan on page 5-17 of the Programmatic Draft EIS are unclear as you do not point to a specific objective or policy, therefore, we cannot specifically speak as to why the Proposed Action is or is not applicable to a specific objective. Moreover, it is anticipated that the Proposed Action will effectively accommodate the housing needs of Hawai'i's people to the extent feasible.

Comment #6: *Hawaii faces a shortage of tens of thousands of housing units that are affordable to Hawaii's working families. Much of the site is not needed for the stadium and affiliated parking, so it can be used for affordable housing. The redevelopment is an opportunity to increase housing opportunities, including incentivized housing for low- and moderate income households.*

There was a public comment asking for affordable housing to be included in the purpose and need of the DEIS. Why is this affordable housing objective of the State Plan "not applicable" for the proposed action as presented on page 5-28? The proposed action should be modified so this objective will be satisfied. The 1,813 figure for residential units should be studied at a higher maximum to address the HHFDC-published needs for housing.

Response #6: As noted in Response #4 above, it is evident that there is a serious need for additional affordable housing inventory and options across the State. Furthermore, recent events have shown that there is a shortage of affordable housing within and in proximity to the Primary Urban Center. Moreover, as noted in Response #3 above, and as discussed at the EIS Scoping Meeting and described in the EIS Preparation Notice published on September 8, 2019, as well as reiterated in Section 1.1 of the Programmatic Draft EIS, "*The Proposed Action encompasses the construction of a new, modern stadium facility that will be supported by complimentary mixed-use development.*" Therefore, the subject Programmatic Draft EIS is intended to assess the potential effects associated with the Proposed Action on various environmental resource categories as prescribed by Section 11-200.1-24. Hence, the purpose and need of the Proposed Action is not to provide affordable housing but rather replace an obsolete stadium and support a new stadium with

complimentary mixed-used development, which may include affordable housing units. As noted in Response #4 above, the Proposed Action is envisioned to directly serve regional and State housing demands through the creation of a diverse range of residential options, accounting for upwards of 1,800 new housing units as discussed in Section 2.1 of the Programmatic Draft EIS. However, it should be noted that the extent of residential programming will ultimately be determined by the Stadium Authority and the selected Real Estate Developer(s) which will comply with applicable affordable housing requirements.

Your question regarding the affordable housing objectives of the State Plan on page 5-28 of the Programmatic Draft EIS are unclear as you do not point to a specific objective or policy, therefore, we cannot specifically speak as to why the Proposed Action is or is not applicable to a specific objective. As shown in Table 5-2, the Proposed Action is applicable to three of the eight affordable housing objectives as it relates to §226-106.

It is acknowledged that the Programmatic Draft EIS did not evaluate, “*the maximum possible quantity of housing units, particularly aimed at addressing the HHFDC-identified needs by HUD income classification,*” as such a program would not meet the goals and objectives of the Proposed Action as described in Section 2.2 of the Programmatic Draft EIS. Nonetheless, the Proposed Action is envisioned to directly serve regional and State housing demands through the creation of a diverse range of residential options, accounting for upwards of 1,800 new housing units as discussed in Section 2.1 of the Programmatic Draft EIS. However, it should be noted that the extent of residential programming will ultimately be determined by the Stadium Authority and the selected Real Estate Developer(s) which will comply with applicable affordable housing requirements.

Please note that due to broad comments raised in response to the Programmatic Draft EIS, Section 3.4 has been added to the Programmatic Final EIS which on a conceptual basis, evaluated a conceptual affordable housing project site design alternative program scenario with 20,000 to 100,000 units within the confines of the Project Site. It is readily apparent that this type of programming would not be compatible with the general purpose and need, as well as goals and objectives of the Proposed Action. Moreover, such a program and its anticipated impacts would require the preparation of a separate, comprehensive EIS documentation and evaluation.

Comment #7: *Since a large part of the site is not needed for the stadium and affiliated parking, it presents an opportunity to coordinate with other agencies and levels of government to fulfill other state and county priorities, particularly housing. Why is this objective of the State Plan “not applicable” for the proposed action as presented on page 5-28?*

Response #7: Your question regarding the affordable housing objectives of the State Plan on page 5-28 of the Programmatic Draft EIS are unclear as you do not point to a specific objective or policy, therefore, we cannot specifically speak as to why the Proposed Action

is or is not applicable to a specific objective. As shown in Table 5-2, the Proposed Action is applicable to three of the eight affordable housing objectives as it relates to §226-106. With regards to your comment about State and County priorities, please note that the State of Hawai‘i, as the land owner, has the ultimate say in how they use their lands to fit their needs. Furthermore, it has not yet been determined how Act 146 will be administered, specifically, how it relates to implementing a “stadium development district.” However, it is expected that the State of Hawai‘i, in partnership with the selected Stadium Developer and Real Estate Developer(s), will coordinate and work closely with the CCH to implement the Proposed Action, and to minimize any potential impacts on land uses at the Project Site and the Project Region.

Comment #8: *Affordable rental housing should be a priority of the proposed action. The housing quantity in the plan should be increased so that it will satisfy this objective of the General Plan. The mixed-use, transit-oriented, pedestrian-oriented redevelopment would be an ideal place for housing designed to people with limited mobility, including the elderly and handicapped. Walkability would make it easier to take short trips on foot.*

Response #8: We acknowledge your comments. However, please note that the purpose and need of the Proposed Action, as noted in Response #6 above, is not to provide affordable housing but rather replace an obsolete stadium and support a new stadium with complimentary mixed-used development, which may include affordable housing units. As noted in Response #4 above, the Proposed Action is envisioned to directly serve regional and State housing demands through the creation of a diverse range of residential options, accounting for upwards of 1,800 new housing units as discussed in Section 2.1 of the Programmatic Draft EIS. However, it should be noted that the extent of residential programming will ultimately be determined by the Stadium Authority and the selected Real Estate Developer(s) which will comply with applicable affordable housing requirements.

As it relates to your comments about transit-oriented development (TOD), please note that the Proposed Action is envisioned to build off of the concepts and community vision realized in the Hālawa Area TOD Plan, prepared by the City and County of Honolulu, which seeks to create a vibrant, mixed-use community.

Comment #9: *The draft EIS states the site is “high density,” but the study includes only 1,813 housing units, which equates to 18 units per acre, which is not “high density.” How does this proposal satisfy the high-density standard set in the Primary Urban Center Development Plan as indicated on page 5-76? A higher number of units should be studied in the DEIS so that they are truly studying the impacts of high density as they claim.*

Response #9: We respectfully disagree with your comments regarding the Proposed Action fulfillment of the Primary Urban Center Development Plan (PUCD Plan). We assume your comment is relating to PUCD Plan Policy 3.2.2.3 In-Town Residential Neighborhoods on Page 5-76 which reads:

Density. Areas close to transit lines and the major east-west arterials should be zoned for medium-density residential, which may range from 13 to 90 units per acre, or high-density residential mixed use, which may range up to 140 units per acre. Neighborhoods in these zones would also include reinforcing uses which support resident lifestyle and livelihood choices, such as convenience or neighborhood stores, dining establishments, professional and/or business services, or other similar activities.

As you stated the current unit count per acre at the proposed 1,800 housing units is roughly 18 units per acre. This is within the 13 to 90 unit per acre requirement to be considered medium density and thus supports the PUCD Plan which is why the Proposed Action is supportive of this policy.

Comment #10: *The Proposed Action should be studied by assuming exemptions from codes in order to study the highest possible number of total residential units on the site. Why is the objective incentivizing affordable housing and providing exemptions from zoning and building codes as stated in the Primary Urban Center Development Plan “not applicable” for the proposed action as presented on page 5-79?*

Response #10: As noted in Response #6 above, as well as reiterated in Section 1.1 of the Programmatic Draft EIS, “*The Proposed Action encompasses the construction of a new, modern stadium facility that will be supported by complimentary mixed-use development.*” Therefore, the subject Programmatic Draft EIS is intended to assess the potential effects associated with the Proposed Action on various environmental resource categories as prescribed by Section 11-200.1-24.

Your question regarding incentivizing affordable housing and providing exemptions from zoning and building codes presented on Page 5-79 of the Programmatic Draft EIS is unclear. However, we assume that you are referring to Policy 3.3.2 which states:

Provide incentives and cost savings for affordable housing. Provide exemptions from zoning and building codes for housing projects that meet established standards of affordability, on a case-by-case basis.

Please note that the Proposed Action is not applicable as it is not the objective of the Proposed Action to provide exemptions from zoning and building codes for housing projects. As noted above, the purpose and need of the Proposed Action is to replace an obsolete stadium and to support a new stadium with complimentary mixed-use development.

Comment #11: *The draft EIS states the site is “high density,” but the study includes only 1,813 housing units, which equates to 18 units per acre, which is not “high density.” How does this proposal satisfy the high-density standard set in the Primary Urban Center Development Plan as indicated on page 5-79? Why does the study not include figures that demonstrate how much more affordable housing can be included based on assumptions*

about transit usage? A person at one of the public meetings asked to do a sensitivity analysis of the traffic impacts based on an assumption of housing prioritization at the site for low-income car-free and car-light households. Why was this valid question not addressed?

Response #11: Your comment is unclear as you do not indicate which policy / objective you are referring to. However, we assume that you are referring to the set of 3.3.2 policies. Specifically, the Primary Urban Center Development Plan objective in question reads:

Provide for high-density housing options in mixed-use developments around transit stations. This type of “transit-oriented development” facilitates transit use and allows for increased densities without generating increased vehicular congestion.

Similarly, to our response to your Comment #7, your calculated number of units per acre is made on the assumption that the residential units would be evenly spread through the development of the Project Site. With this in mind, at a minimum the residential units provided within the Real Estate Development component of the Proposed Action would be considered to be medium density. However, the majority of residential units outlined in all three conceptual designs are placed along the Hālawā / Aloha Stadium Hart Transit Station and line. Thus, the residential housing density surrounding a transit stadium, or in this case the Hālawā / Aloha Stadium Hart Transit Station would be anticipated to be within the high-density criteria of 90 to 140 units per acre. As a result, the Proposed Action would support this objective.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Chris Kinimaka, Department of Accounting and General Services
Stacey Jones, Crawford Architects

From: [Public Comment](#)
To: [Andrew Blasko](#)
Subject: Fw: Comments for stadium
Date: Tuesday, February 9, 2021 1:50:23 PM

From: Joyce Yuen <chewieaki@aol.com>
Sent: Friday, February 5, 2021 5:57 PM
To: Public Comment <publiccomment@wilsonokamoto.com>
Subject: Comments for stadium

The plan that has parking around the new stadium is the best for kupuna and others who are not able to walk far and have been strong supporters of UH athletic programs. There are hundreds of people in this group.

Other plans have parking quite a distance from the entrance and might discourage older and disabled supporters from attending.

[Sent from the all new Aol app for iOS](#)



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10422-01

Joyce Yuen
chewieaki@aol.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear Joyce Yuen:

Thank you for your comments dated February 5, 2021, regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *The plan that has parking around the new stadium is the best for kupuna and others who are not able to walk far and have been strong supporters of UH athletic programs. There are hundreds of people in this group.*

Response 1: Your comments are acknowledged. Please note that it is anticipated that a parking study will be conducted by the eventual selected Stadium Developer and Real Estate Developer(s) as they finalize the design and programming of the Proposed Action. This parking study is anticipated to look at off-street parking and site generated parking demand, while considering TOD principals.

Comment 2: *Other plans have parking quite a distance from the entrance and might discourage older and disabled supporters from attending.*

Response 2: Your comments are acknowledged. As noted in Response #1 above, it is anticipated that a parking study will be conducted by the eventual selected Stadium Developer and Real Estate Developer(s) as they finalize the design and programming of the Proposed Action. This parking study is anticipated to look at off-street parking and site generated parking demand, while considering TOD principals.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical

studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in cursive script, reading "Keola Cheng". The ink is dark and the signature is fluid.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Public Comment](#)
To: [Andrew Blasko](#)
Subject: Fw: Aloha Stadium Project comments
Date: Tuesday, February 9, 2021 1:49:14 PM
Attachments: [Aloha Stadium Testimony.docx](#)

From: Judah Hoffenberg <jhoffenberg21@punahou.edu>
Sent: Monday, February 1, 2021 10:45 AM
To: Public Comment <publiccomment@wilsonokamoto.com>
Subject: Aloha Stadium Project comments

1 February 2021
Judah A. Hoffenberg
578 D Hahaione st. 96825
(808)683-8720

SUBJECT: Build 100,000 housing units at the Aloha Stadium site

Aloha,

The current plan to surround the new stadium with retail, office space, hotel, and 1,813 condos is economically unrealistic for the foreseeable future, and the EIS should instead include analysis of the environmental impacts of least 200 towers including 100,000 units of housing on the Aloha Stadium site. While we recognize the need to replace Aloha Stadium, a new stadium should be confined to as small a size as possible. The EIS is supposed to determine the maximum quantities of development, therefore, it should evaluate the maximum quantity of housing units feasible with transit-oriented assumptions.

Ending the housing shortage must be the top priority of the State of Hawaii. Not only does housing top surveys of Hawaii's policy priorities, but the State also has a statutory obligation to "[e]ffectively accommodate the housing needs of Hawaii's people" (HRS § 226-19). To fulfill this obligation, Governor Ige, Senator Chang, and other state officials have advocated the use of state owned lands near rail stations to develop high density housing for sale to Hawaii residents. Given the location of a rail station on the Aloha Stadium site, this parcel is an ideal site for this vision.

Many comparable facilities around the world today are surrounded by high density development, such as Wankhede Stadium in Mumbai, Madison Square Garden in New York, and Happy Valley Racecourse in Hong Kong. Because a stadium itself would be small--Soldier Field, the home of the Chicago Bears, is only seven acres--over 90 percent of the Aloha Stadium site, as many as 91 acres, can be used for high density housing.

The rise of online shopping and the coronavirus pandemic have greatly reduced demand for brick and mortar retail and office space, both worldwide and in Hawaii. A recent study estimated that retail vacancies on Oahu will grow by 270,000 square feet this year alone. A strip mall or office building is unlikely to generate revenue to pay for the new stadium. By contrast, the new residents of 100,000 housing units will generate enormous amounts of economic activity and dramatically expand the tax base, thereby supporting the new stadium and other operations of the State.

It is in the best interest of the people of Hawaii to build accessible housing units at the Aloha Stadium site.



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10422-01

Judah Hoffenberg
Jhoffenberg12@punahou.edu

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear Judah Hoffenberg:

Thank you for your comments dated February 9, 2021, regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *The current plan to surround the new stadium with retail, office space, hotel, and 1,813 condos is economically unrealistic for the foreseeable future, and the EIS should instead include analysis of the environmental impacts of least 200 towers including 100,000 units of housing on the Aloha Stadium site. While we recognize the need to replace Aloha Stadium, a new stadium should be confined to as small a size as possible. The EIS is supposed to determine the maximum quantities of development, therefore, it should evaluate the maximum quantity of housing units feasible with transit-oriented assumptions.*

Ending the housing shortage must be the top priority of the State of Hawaii. Not only does housing top surveys of Hawaii’s policy priorities, but the State also has a statutory obligation to “[e]ffectively accommodate the housing needs of Hawaii’s people” (HRS § 226-19). To fulfill this obligation, Governor Ige, Senator Chang, and other state officials have advocated the use of state owned lands near rail stations to develop high density housing for sale to Hawaii residents. Given the location of a rail station on the Aloha Stadium site, this parcel is an ideal site for this vision.

Response 1: Your comments are acknowledged. Please note that the Proposed Action, which is premised upon the Programmatic Master Plan appended to the Programmatic EIS as Appendix A, reflects the aggregated collection of extensive and exhaustive input from area residents, members of the public, existing Aloha Stadium stakeholders and public agencies as discussed in Section 2.3 of the Programmatic EIS. Additionally, the Project

Team conducted a substantial number of public outreach meetings and has considered public input throughout the EIS process. Hence, the Proposed Action represents the vision of the overall community for the Project Site. Based on community input and various technical studies, the Proposed Action is envisioned to encompass the New Aloha Stadium, approximately 730,000 gross square feet (GSF) of residential space, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 of GSF hotel. However, as noted throughout the Programmatic EIS, that final design of the Project Site and use and space allocation will be determined by the Stadium Authority and the selected Stadium Developer and Real Estate Developer(s). Please note as discussed at the EIS Scoping Meeting and described in the EIS Preparation Notice published on September 8, 2019, as well as reiterated in Section 1.1 of the Programmatic Draft EIS, *“The Proposed Action encompasses the construction of a new, modern stadium facility that will be supported by complimentary mixed-use development.”* Therefore, the subject Programmatic Draft EIS is intended to assess the potential effects associated with the Proposed Action on various environmental resource categories as prescribed by Section 11-200.1-24.

It is acknowledged that the Programmatic Draft EIS did not evaluate, *“the environmental impacts of least 200 towers including 100,000 units of housing on the Aloha Stadium site,”* as such a program would not meet the goals and objectives of the Proposed Action as described in Section 2.2 of the Programmatic Draft EIS. Nonetheless, the Proposed Action is envisioned to directly serve regional and State housing demands through the creation of a diverse range of residential options, accounting for upwards of 1,800 new housing units as discussed in Section 2.1 of the Programmatic Draft EIS. However, it should be noted that the extent of residential programming will ultimately be determined by the Stadium Authority and the selected Real Estate Developer(s) which will comply with applicable affordable housing requirements.

Please note that due to broad comments raised in response to the Programmatic Draft EIS, Section 3.4 has been added to the Programmatic Final EIS which, on a conceptual basis, evaluated a conceptual affordable housing project site design alternative program scenario with 20,000 to 100,000 units within the confines of the Project Site. It is readily apparent that this type of programming would not be compatible with the general purpose and need, as well as goals and objectives of the Proposed Action. Moreover, such a program and its anticipated impacts would require the preparation of a separate, comprehensive EIS documentation and evaluation.

With regards to your comment the use of State lands near rail stations, please note that the State of Hawai‘i is the land owner of the Project Site, and in partnership with the selected Stadium Developer and Real Estate Developer(s), may pursue different land-use configurations and strategies than what is presented in the Programmatic EIS to maximize the value of the Proposed Action and address a number of Statewide needs. The State of Hawai‘i, as the land owner, has the ultimate say in how they use their lands to fit their needs. Furthermore, it has not yet been determined how Act 146 will be administered, specifically, how it relates to implementing a “stadium development district.” However, it

is expected that the State of Hawai'i, in partnership with the selected Stadium Developer and Real Estate Developer(s), will coordinate and work closely with the CCH to implement the Proposed Action, and to minimize any potential impacts on land uses at the Project Site and the Project Region.

Comment 2: *Many comparable facilities around the world today are surrounded by high density development, such as Wankhede Stadium in Mumbai, Madison Square Garden in New York, and Happy Valley Racecourse in Hong Kong. Because a stadium itself would be small--Soldier Field, the home of the Chicago Bears, is only seven acres--over 90 percent of the Aloha Stadium site, as many as 91 acres, can be used for high density housing.*

Response 2: Your comments are acknowledged. As noted in Response #1 above, the State of Hawai'i, as the land owner, has the ultimate say in how they use their lands to fit their needs. However, it is expected that the State of Hawai'i, in partnership with the selected Stadium Developer and Real Estate Developer(s), will coordinate and work closely with the CCH to implement the Proposed Action and to minimize any potential impacts on land uses at the Project Site and the Project Region. It is anticipated that the Proposed Action will result in the New Aloha Stadium, approximately 730,000 gross square feet (GSF) of residential space, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF of hotel space, which can be considered high density development across the Project Site.

Comment 3: *The rise of online shopping and the coronavirus pandemic have greatly reduced demand for brick and mortar retail and office space, both worldwide and in Hawaii. A recent study estimated that retail vacancies on Oahu will grow by 270,000 square feet this year alone. A strip mall or office building is unlikely to generate revenue to pay for the new stadium. By contrast, the new residents of 100,000 housing units will generate enormous amounts of economic activity and dramatically expand the tax base, thereby supporting the new stadium and other operations of the State. It is in the best interest of the people of Hawaii to build accessible housing units at the Aloha Stadium site*

Response 3: Your comments are acknowledged. However, based on the economic and market analysis conducted by Victus Advisors in 2019, the Proposed Action which is anticipated to encompass approximately 730,000 gross square feet (GSF) of residential space, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF of hotel space will create a vibrant district that could, in summary, generate a Net Present Value (NPV) of over \$1.8 billion in total economic output, over \$700 million in personal earnings, and over \$198 million in State and County tax revenues, assuming an 8.0 percent discount over a 25-year period. After the Full Build-Out, up to 1,190 net new annual jobs are anticipated to be supported by operations of the Proposed Action. Hence, it is anticipated that the Proposed Action will also generate enormous amounts of economic activity while also achieving the goals and objectives of the Proposed Action, as well as the

Hālawā Area TOD Plan whereas constructing 100,000 housing units at the Project Site would not as discussed in Response #1 above.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Public Comment](#)
To: [Andrew Blasko](#)
Subject: Fw: Stadium
Date: Tuesday, February 9, 2021 1:53:25 PM

From: Junior Nahoopii <juniornahoopii@yahoo.com>
Sent: Monday, February 8, 2021 1:07 PM
To: Public Comment <publiccomment@wilsonokamoto.com>
Subject: Stadium

Whoever's idea or plan was it to build a new stadium when the money could be used to help families & small businesses that is having a hard time. Yes it will bring some jobs but not enough for everyone who is having a hard time. People first not pockets first.

[Sent from Yahoo Mail on Android](#)



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10422-01

Junior Nahoopii
juniornahoopii@yahoo.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear Junior Nahoopii:

Thank you for your comments dated February 8, 2021, regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment #1: *Whoever's idea or plan was it to build a new stadium when the money could be used to help families & small businesses that is having a hard time. Yes it will bring some jobs but not enough for everyone who is having a hard time. People first not pockets first.*

Response #1: We acknowledge your comments. Please note that the purpose and need of the Proposed Action, is to replace an obsolete stadium and support a new stadium with complimentary mixed-used development. Please note that at the time of the writing for the Programmatic Final EIS, the general consensus is that as more vaccinations are administered, COVID-19 will become more contained. As we can see in the State, as well as around the country, activities are returning to normal, to pre-COVID-19 conditions when unemployment rates were much lower. Hence, the Proposed Action is still very feasible, and in fact, may provide even more beneficial impacts as the State economy begins to recover. Specifically, the Proposed Action is anticipated to have a direct economic impact on the Project Region, as well as the State. In summary, as discussed in Section 4.13.3 of the Programmatic EIS, the Proposed Action (at Full Build-Out) is anticipated to generate a Net Present Value (NPV) of over \$1.8 billion in total economic output, over \$700 million in personal earnings, and over \$198 million in State and County tax revenues, assuming an 8.0 percent discount over a 25-year period. After the Full Build-Out, up to 1,190 net new annual jobs are anticipated to be supported by operations of the Proposed Action.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: proudpeacock@hawaiiantel.net
To: [Public Comment](#)
Subject: Spending for the Aloha Stadium
Date: Thursday, December 24, 2020 11:10:36 PM

I am disgusted to hear that you the state want to spend money on the Aloha Stadium at this time. Everything is half done, people are in dire need, Unemployment is a disaster, the grocery cards are messed up, people are having a hardship and our governor has no clue of what to do. I do understand that certain monies are allocated to different jobs but somebody needs to take the bull by the horns and say "to hell with this we need to clean this mess up and do it now. Stop spending 1.5 million dollars on the trees at Ala Moana Regional park, the trees are beautiful, leave them alone. suspend the rail which is a disaster, and put the money that is supposed to go to frivolous and unnecessary things like painting the streets red and green and concentrate on what this State needs to get the people of these islands in a better situation and as far as I am concern that is more important than where the money is going today. The governor is only making the situation worse and he needs to back off or stand down. I have lived here a total of 28 years and I am ashamed of what is going with miss-appropriations of the peoples money. I am 74 years young and I am shocked that no one has figured that out yet!! Wake up people, you can straighten monies after priorities are done. Be careful who handles the money and make sure that who is in that department to be checked and double checked. I have said my piece and I hope that whoever reads this if it is read, will use some common sense and stop throwing good money after bad because in my eyes there is none.

My name is Karen Verdina

I am a taxpayer of this State



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10422-01

Karen Verdina
proudpeacock@hawaiiintel.net

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear Karen Verdina:

Thank you for your comments dated December 24, 2020 regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment #1: *I am disgusted to hear that you the state want to spend money on the Aloha Stadium at this time. Everything is half done, people are in dire need, Unemployment is a disaster, the grocery cards are messed up, people are having a hardship and our governor has no clue of what to do. I do understand that certain monies are allocated to different jobs but somebody needs to take the bull by the horns and say "to hell with this we need to clean this mess up and do it now.*

Response #1: We acknowledge your comments regarding the hardships that have been experienced during the COVID-19 Pandemic. While the State of Hawai‘i received \$1.25 billion dollars from the CARES Act Coronavirus Relief Fund, please note that how the State decides to use its monies is outside the scope of assessment of this EIS. Moreover, please note that at the time of the writing for the Programmatic Final EIS, the general consensus is that as more vaccinations are administered, COVID-19 will become more contained. As we can see in the State, as well as around the country, activities are returning to normal, to pre-COVID-19 conditions. Hence, the Proposed Action is still very feasible, and in fact, may provide even more beneficial impacts as the State economy begins to recover.

Comment #2: *Stop spending 1.5 million dollars on the trees at Ala Moana Regional park, the trees are beautiful, leave them alone. suspend the rail which is a disaster, and put the money that is supposed to go to frivolous and unnecessary things like painting the streets red and green and concentrate on what this State needs to get the people of these islands in*

a better situation and as far as I am concern that is more important than where the money is going today.

Response #2: We acknowledge your comments. Please note that the monies that go into the Ala Moana Regional Park, construction of the rail, and painting street are appropriated by the City and County of Honolulu, not the State. However, your comments are outside the scope of assessment for this Programmatic EIS. Please note as discussed at the EIS Scoping Meeting and described in the EIS Preparation Notice published on September 8, 2019, as well as reiterated in Section 1.1 of the Programmatic Draft EIS, “*The Proposed Action encompasses the construction of a new, modern stadium facility that will be supported by complimentary mixed-use development.*” Therefore, the subject Programmatic Draft EIS is intended to assess the potential effects associated with the Proposed Action on various environmental resource categories as prescribed by Section 11-200.1-24.

As it relates to the State’s efforts to improve the economic health of residents, the Proposed Action is anticipated to create a direct positive economic impact to the Project Region, as well as the State. In summary, the development of the Proposed Action (Full Build-Out) is anticipated to generate a Net Present Value (NPV) of over \$1.8 billion in total economic output, over \$700 million in personal earnings, and over \$198 million in State and County tax revenues, assuming an 8.0 percent discount over a 25-year period. After the Full Build-Out, up to 1,190 net new annual jobs are anticipated to be supported by operations of the Proposed Action.

Comment #3: *The governor is only making the situation worse and he needs to back off or stand down. I have lived here a total of 28 years and I am ashamed of what is going with miss-appropriations of the peoples money. I am 74 years young and I am shocked that no one has figured that out yet!! Wake up people, you can straighten monies after priorities are done. Be careful who handles the money and make sure that who is in that department to be checked and double checked. I have said my piece and I hope that whoever reads this if it is read, will use some common sense and stop throwing good money after bad because in my eyes there is none.*

Response #3: Your comments are acknowledged. As noted in Response #2 above, how State and City and County monies are appropriated are outside the scope of assessment for this Programmatic EIS. Please note as discussed at the EIS Scoping Meeting and described in the EIS Preparation Notice published on September 8, 2019, as well as reiterated in Section 1.1 of the Programmatic Draft EIS, “*The Proposed Action encompasses the construction of a new, modern stadium facility that will be supported by complimentary mixed-use development.*” Therefore, the subject Programmatic Draft EIS is intended to assess the potential effects associated with the Proposed Action on various environmental resource categories as prescribed by Section 11-200.1-24.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical

studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in cursive script, reading "Keola Cheng". The ink is dark blue or black, and the signature is fluid and legible.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Public Comment](#)
To: [Andrew Blasko](#)
Subject: Fw: Aloha Stadium
Date: Tuesday, February 9, 2021 1:52:43 PM

From: Katherine Bird <birdk002@hawaii.rr.com>
Sent: Monday, February 8, 2021 7:02 AM
To: Public Comment <publiccomment@wilsonokamoto.com>
Subject: Aloha Stadium

I oppose to the development of the NASED Aloha Stadium project. The Aloha Stadium should be moved to the University of Hawaii West Oahu campus that way it would be connected to UH like UH Manoa should be moved there as well. The Manoa area could be sold. The Halawa Area should be used for affordable housing that is what Oahu needs more affordable housing. It would work perfect with the rail there. Aloha Stadium has never had enough parking. With your planes I do not see enough parking.



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10422-01

Katherine Bird
Birdk002@hawaii.edu

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear Katherine Bird:

Thank you for your comments dated February 8, 2021 regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment #1: *I oppose to the development of the NASED Aloha Stadium project. The Aloha Stadium should be moved to the University of Hawaii West Oahu campus that way it would be connected to UH like UH Manoa should be moved there as well. The Manoa area could be sold.*

Response #1: We acknowledge your comments. As discussed in Section 3.1 of the Programmatic Final EIS, a site study, entitled “Aloha Stadium: Planning for New Stadium & Site Redevelopment” was conducted in February 2019 by Crawford Architects, Callison and RTKL Associates, AHL, and WT Partnership to analyze and assess the relative merits and drawbacks of the Project Site in Hālawā against a range of alternative location options across the island of O‘ahu. Comparison metrics for the various sites included site access, transit connections, regional demographic and development opportunities, and incentives.

Of the sites that were assessed, which included the UH Mānoa campus, the UH West O‘ahu campus, the Ala Wai Golf Course, Kapi‘olani Regional Park, and the Kalaeloa Airport, the current Project Site in Hālawā rated the highest in all categories. Hālawā is the most equipped for development potential to meet the goals and objectives of the Proposed Action given the availability of open space on site, direct access to major roadways, and its centralized location within an already established urban environment. Consequently, all other sites outside of the Project Site in Hālawā were eliminated from further consideration in master planning efforts for the Proposed Action. The direction set forth for the scope of

assessment of the Proposed Action encompassed within this Programmatic EIS document is therefore limited solely to the Project Site.

Comment #2: *The Hālawā Area should be used for affordable housing that is what Oahu needs more affordable housing. It would work perfect with the rail there.*

Response #2: We acknowledge your comments regarding what should be developed at the Project Site. It is evident that there is a serious need for additional affordable housing inventory and options across the State. Furthermore, recent events have shown that there is a shortage of affordable housing within and in proximity to the Primary Urban Center.

Please note that the Proposed Action, which is premised upon the Programmatic Master Plan appended to the Programmatic EIS as Appendix A, reflects the aggregated collection of extensive and exhaustive input from area residents, members of the public, existing Aloha Stadium stakeholders and public agencies as discussed in Section 2.3 of the Programmatic EIS. Hence, the Proposed Action represents the vision of the overall community for the Project Site. Based on community input and various technical studies, the Proposed Action is envisioned to encompass the New Aloha Stadium, approximately 730,000 gross square feet (GSF) of residential space, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF of hotel space. However, as noted throughout the Programmatic EIS, that final design of the Project Site and use and space allocation will be determined by the Stadium Authority, the selected Stadium Developer and Real Estate Developer(s). Nonetheless, the Proposed Action is envisioned to directly serve regional and State housing demands through the creation of a diverse range of residential options, accounting for upwards of 1,800 new housing units as discussed in Section 2.1 of the Programmatic Draft EIS. However, it should be noted that the extent of residential programming will ultimately be determined by the Stadium Authority and the selected Real Estate Developer(s) which will comply with applicable affordable housing requirements.

Comment #3: *Aloha Stadium has never had enough parking. With your planes I do not see enough parking.*

Response #3: Your comment relating to parking is acknowledged. It will be the responsibility of the Stadium Developer and Real Estate Developers to create a final design and master plan for the New Aloha Stadium Entertainment District that will fulfill all State and County parking requirements.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Public Comment](#)
To: [Andrew Blasko](#)
Subject: Fw: Aloha Stadium Redevelopment
Date: Tuesday, February 9, 2021 1:53:20 PM

From: Kathleen Sato <katsat@hawaii.rr.com>
Sent: Monday, February 8, 2021 10:57 AM
To: Public Comment <publiccomment@wilsonokamoto.com>
Subject: Aloha Stadium Redevelopment

February 8, 2021

Kathleen Sato and Mamoru Sato
4429A Sierra Dr, Honolulu HI 96816
(808)728-5836

SUBJECT: Support for building 100,000 housing units at the Aloha Stadium site

Aloha,

We believe that the current plan to surround the new stadium with retail, office space, hotel, and luxury condos is economically unrealistic for the foreseeable future, and the EIS should instead strive to use this opportunity to build a new stadium AND develop 100,000 affordable housing units for the people of Hawaii. Hawaii has far too many luxury condos primarily owned by part-time residents who do little to utilize neighborhood small businesses—witness the problems of Ward Centre and its overwhelming number of million-dollar-plus condos with their multiple lawsuits and disappearing retail stores. Additionally few tourists would want to stay in a stadium hotel near industrial areas and far from the beach and major tourist attractions. More important, Hawaii has a tragically small number of affordable homes.

We therefore support Senator Stanley Chang in asserting that the EIS should instead include analysis of the environmental impacts Senator Stanley Chang to study the environmental impacts of least 200 towers including 100,000 units of housing on the Aloha Stadium site. As Senator Chang has written:

“The EIS is supposed to determine the maximum quantities of development; therefore, it should evaluate the maximum quantity of housing units feasible with transit-oriented assumptions. Ending the housing shortage must be the top priority of the State of Hawaii. Not only does housing top surveys of Hawaii’s policy priorities, but the State also has a statutory obligation to “[e]ffectively accommodate the housing needs of Hawaii’s people” (HRS § 226-19). To fulfill this obligation, Governor Ige, Senator Chang, and other state officials have advocated the use of state owned lands near rail stations to develop high density housing for sale to Hawaii residents. Given the location of a rail station on the Aloha Stadium site, this parcel is an ideal site for this vision. Many comparable facilities around the world today are surrounded by high density development, such as Wankhede Stadium in Mumbai, Madison Square Garden in New York, and Happy Valley

Racecourse in Hong Kong. Because a stadium itself would be small--Soldier Field, the home of the Chicago Bears, is only seven acres--over 90 percent of the Aloha Stadium site, as many as 91 acres, can be used for high density housing.

The rise of online shopping and the coronavirus pandemic have greatly reduced demand for brick and mortar retail and office space, both worldwide and in Hawaii. A recent study estimated that retail vacancies on Oahu will grow by 270,000 square feet this year alone. A strip mall or office building is unlikely to generate revenue to pay for the new stadium. By contrast, the new residents of 100,000 housing units will generate enormous amounts of economic activity and dramatically expand the tax base, thereby supporting the new stadium and other operations of the State.”

The development of the Aloha Stadium site is a prime opportunity to tackle Hawaii’s most pressing problems—affordable housing, economic growth, homelessness, family stability. The central location, size and scope of this project—as well as the State-ownership of this prime land—are all vital assets that make it a once-in-a-lifetime opportunity to make Hawaii a better place to life for all of its residents. Please don’t get sidetracked by unnecessary, costly, risky and private-profit-motivated interests and do instead what’s right for the people of Hawaii.

Best wishes,

Kathleen and Mamoru Sato



WILSON OKAMOTO
C O R P O R A T I O N
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10422-01

Kathleen Sato
katsat@hawaii.rr.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear Kathleen Sato:

Thank you for your comments dated February 8, 2021, regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *We believe that the current plan to surround the new stadium with retail, office space, hotel, and luxury condos is economically unrealistic for the foreseeable future, and the EIS should instead strive to use this opportunity to build a new stadium AND develop 100,000 affordable housing units for the people of Hawaii. Hawaii has far too many luxury condos primarily owned by part-time residents who do little to utilize neighborhood small businesses—witness the problems of Ward Centre and its overwhelming number of million-dollar-plus condos with their multiple lawsuits and disappearing retail stores. Additionally few tourists would want to stay in a stadium hotel near industrial areas and far from the beach and major tourist attractions. More important, Hawaii has a tragically small number of affordable homes.*

We therefore support Senator Stanley Chang in asserting that the EIS should instead include analysis of the environmental impacts. Senator Stanley Chang to study the environmental impacts of least 200 towers including 100,000 units of housing on the Aloha Stadium site. As Senator Chang has written: “The EIS is supposed to determine the maximum quantities of development; therefore, it should evaluate the maximum quantity of housing units feasible with transit-oriented assumptions. Ending the housing shortage must be the top priority of the State of Hawaii. Not only does housing top surveys of Hawaii’s policy priorities, but the State also has a statutory obligation to “[e]ffectively accommodate the housing needs of Hawaii’s people” (HRS § 226-19). To fulfill this obligation, Governor Ige, Senator Chang, and other state officials have advocated the use of state owned lands

near rail stations to develop high density housing for sale to Hawaii residents. Given the location of a rail station on the Aloha Stadium site, this parcel is an ideal site for this vision.

Response 1: Your comments are acknowledged. Please note that the Proposed Action, which is premised upon the Programmatic Master Plan appended to the Programmatic EIS as Appendix A, reflects the aggregated collection of extensive and exhaustive input from area residents, members of the public, existing Aloha Stadium stakeholders and public agencies as discussed in Section 2.3 of the Programmatic EIS. Additionally, the Project Team conducted a substantial number of public outreach meetings and has considered public input throughout the EIS process. Hence, the Proposed Action represents the vision of the overall community for the Project Site. Based on community input and various technical studies, the Proposed Action is envisioned to encompass the New Aloha Stadium, approximately 730,000 gross square feet (GSF) of residential space, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF of hotel space. However, as noted throughout the Programmatic EIS, that final design of the Project Site and use and space allocation will be determined by the Stadium Authority, the selected Stadium Developer and Real Estate Developer(s). Please note as discussed at the EIS Scoping Meeting and described in the EIS Preparation Notice published on September 8, 2019, as well as reiterated in Section 1.1 of the Programmatic Draft EIS, “*The Proposed Action encompasses the construction of a new, modern stadium facility that will be supported by complimentary mixed-use development.*” Therefore, the subject Programmatic Draft EIS is intended to assess the potential effects associated with the Proposed Action on various environmental resource categories as prescribed by Section 11-200.1-24.

It is acknowledged that the Programmatic Draft EIS did not evaluate, “*the environmental impacts of least 200 towers including 100,000 units of housing on the Aloha Stadium site,*” as such a program would not meet the goals and objectives of the Proposed Action as described in Section 2.2 of the Programmatic Draft EIS. Nonetheless, the Proposed Action is envisioned to directly serve regional and State housing demands through the creation of a diverse range of residential options, accounting for upwards of 1,800 new housing units as discussed in Section 2.1 of the Programmatic Draft EIS. However, it should be noted that the extent of residential programming will ultimately be determined by the Stadium Authority and the selected Real Estate Developer(s) which will comply with applicable affordable housing requirements.

Please note that due to broad comments raised in response to the Programmatic Draft EIS, Section 3.4 has been added to the Programmatic Final EIS which on a conceptual basis, evaluated a conceptual affordable housing project site design alternative program scenario with 20,000 to 100,000 units within the confines of the Project Site. It is readily apparent that this type of programming would not be compatible with the general purpose and need, as well as goals and objectives of the Proposed Action. Moreover, such a program and its anticipated impacts would require the preparation of a separate, comprehensive EIS documentation and evaluation.

With regards to your comment the use of State lands near rail stations, please note that the State of Hawai‘i is the land owner of the Project Site, and in partnership with the selected Stadium Developer and Real Estate Developer(s), may pursue different land-use configurations and strategies than what is presented in the Programmatic EIS to maximize the value of the Proposed Action and address a number of Statewide needs. The State of Hawai‘i, as the land owner, has the ultimate say in how they use their lands to fit their needs. Furthermore, it has not yet been determined how Act 146 will be administered, specifically, how it relates to implementing a “stadium development district.” However, it is expected that the State of Hawai‘i, in partnership with the selected Stadium Developer and Real Estate Developer(s), will coordinate and work closely with the CCH to implement the Proposed Action, and to minimize any potential impacts on land uses at the Project Site and the Project Region.

Comment 2: *Many comparable facilities around the world today are surrounded by high density development, such as Wankhede Stadium in Mumbai, Madison Square Garden in New York, and Happy Valley Racecourse in Hong Kong. Because a stadium itself would be small--Soldier Field, the home of the Chicago Bears, is only seven acres--over 90 percent of the Aloha Stadium site, as many as 91 acres, can be used for high density housing.*

Response 2: Your comments are acknowledged. As noted in Response #1 above, the State of Hawai‘i, as the land owner, has the ultimate say in how they use their lands to fit their needs. However, it is expected that the State of Hawai‘i, in partnership with the selected Stadium Developer and Real Estate Developer(s), will coordinate and work closely with the CCH to implement the Proposed Action, while meeting the goals and objectives of both the Proposed Action and the Hālawā Area TOD Plan, and to minimize any potential impacts on land uses at the Project Site and the Project Region. It is anticipated that the Proposed Action will result in the New Aloha Stadium, approximately 730,000 gross square feet (GSF) of residential space, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF of hotel space, which can be considered high density development across the Project Site.

Comment 3: *The rise of online shopping and the coronavirus pandemic have greatly reduced demand for brick and mortar retail and office space, both worldwide and in Hawaii. A recent study estimated that retail vacancies on Oahu will grow by 270,000 square feet this year alone. A strip mall or office building is unlikely to generate revenue to pay for the new stadium. By contrast, the new residents of 100,000 housing units will generate enormous amounts of economic activity and dramatically expand the tax base, thereby supporting the new stadium and other operations of the State.*

Response 3: Your comments are acknowledged. However, based on the economic and market analysis conducted by Victus Advisors in 2019, the Proposed Action which is anticipated to encompass approximately 730,000 gross square feet (GSF) residential space, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF of hotel space will create a vibrant district that could, in summary, generate a Net

Present Value (NPV) of over \$1.8 billion in total economic output, over \$700 million in personal earnings, and over \$198 million in State and County tax revenues, assuming an 8.0 percent discount over a 25-year period. After the Full Build-Out, up to 1,190 net new annual jobs are anticipated to be supported by operations of the Proposed Action. Hence, it is anticipated that the Proposed Action will also generate enormous amounts of economic activity while also achieving the goals and objectives of the Proposed Action, as well as the Hālawā Area TOD Plan whereas constructing 100,000 housing units at the Project Site would not as discussed in Response #1 above.

Comment 4: *The development of the Aloha Stadium site is a prime opportunity to tackle Hawaii's most pressing problems—affordable housing, economic growth, homelessness, family stability. The central location, size and scope of this project—as well as the State-ownership of this prime land—are all vital assets that make it a once-in-a-lifetime opportunity to make Hawaii a better place to live for all of its residents. Please don't get sidetracked by unnecessary, costly, risky and private-profit motivated interests and do instead what's right for the people of Hawaii.*

Response 4: Your comments are acknowledged. We generally agree that the Proposed Action presents a major opportunity to redevelop the Project Site as noted throughout the Programmatic EIS. However, as noted in the responses above, the State of Hawai'i, as the land owner, has the ultimate say in how they use their lands to fit their needs. However, it is expected that the State of Hawai'i, in partnership with the selected Stadium Developer and Real Estate Developer(s), will coordinate and work closely with the CCH to implement the Proposed Action and to minimize any potential impacts on land uses at the Project Site and the Project Region.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Public Comment](#)
To: [Andrew Blasko](#)
Subject: Fw: Aloha stadium
Date: Wednesday, February 17, 2021 12:08:45 PM

From: k J <kfj22@msn.com>
Sent: Saturday, February 13, 2021 5:31 AM
To: Public Comment <publiccomment@wilsonokamoto.com>
Subject: Aloha stadium

Having a stadium where the Rainbow Warriors play is essential. [While my](#) daughter attended UH all we heard was how poorly the football games were attended. When we were able to attend a game, we were excited and couldn't wait. We left KoOlina over 2 hours before the game was set to start. We then sat in the line on the freeway, then wrapped around the stadium and past the stadium to over 2 or 3 miles away where there was still NO PARKING. By this time it was HALF TIME. We drove to the beach instead.

If you cannot get people into the stadium, parked, and purchasing a ticket in 2 hours, you have lost your audience. While attending a swap meet, we saw the parking lot was used for the rail system storage and parking was minimal.

Until you fix the parking OR get the rail finished (another whole issue) or increase bus access by 100 fold, there is no reason to spend any money as you cannot handle additional people especially while using the parking lot as a storage shed.

Sincerely,
Kathy Jackson
A disappointed fan

Sent from my Verizon, Samsung Galaxy smartphone



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10422-01

Kathy Jackson
Kfj22@msn.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear Kathy Jackson:

Thank you for your comments dated February 13, 2021, regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *Having a stadium where the Rainbow Warriors play is essential. While my daughter attended UH all we heard was how poorly the football games were attended.*

Responses #1: We acknowledge your comments. Please note that the University of Hawai‘i (UH) had anticipated that the UH could continue to host home football games in the existing Aloha Stadium, as the New Aloha Stadium was to be constructed concurrently. However, the unexpected impacts of COVID-19 and the mounting maintenance cost issues led to closure of the existing Aloha Stadium to spectator events, and the UH is now temporarily hosting UH football games at its Clarence T.C. Ching Athletics Complex, located on its Lower Campus in Mānoa, until the New Aloha Stadium is constructed. Hence, UH has confirmed that they plan to return to the New Aloha Stadium once constructed and ready to operate in the future.

Comment 2: *When we were able to attend a game, we were excited and couldn't wait. We left Ko‘olina over 2 hours before the game was set to start. We then sat in the line on the freeway, then wrapped around the stadium and past the stadium to over 2 or 3 miles away where there was still NO PARKING. By this time it was HALF TIME. We drove to the beach instead. If you cannot get people into the stadium, parked, and purchasing a ticket in 2 hours, you have lost your audience*

Response 2: Your comments are acknowledged. Please note that existing traffic conditions at the Project Site have been identified as a significant problem by members of the community such as yourself. Please note that the Programmatic EIS includes a detailed description of the existing traffic conditions and potential traffic impacts associated with the Proposed Action in Section 4.11. Additionally, a Traffic Impact Assessment Report (TIR) was prepared by Wilson Okamoto Corporation in May 2020 which was updated in December 2021, and is appended to the Programmatic Final EIS as Appendix H.

The intent of TIR was to assess anticipated impacts on regional vehicular traffic conditions and infrastructure as well as multimodal transit facilities within the vicinity of the Project Site that could result from the implementation and operation of the Proposed Action. In summary, the Proposed Action is anticipated to be built out over 10+ years. By the year 2026, traffic conditions in the Project Region are anticipated to remain the same. Although the Stadium Development, accompanied by the Initial Real Estate Development, is expected to generate additional trips to the Project Site, it should be noted that the Project Site is also situated in the vicinity of regional roadways with higher capacities to accommodate additional traffic. In addition, the Project Site is located in an area that is accessible via multiple connections to and from regional roadways, with designated ramps to and from the freeways. As such, site-generated trips are dispersed along the different routes to and from the Project Site, thereby diluting the increases along the individual roadways. However, it is recommended that the preparation of a Transportation Management Plan which includes traffic circulation, parking, loading, and traffic demand management strategies, as well as a clear public information plan to relay changes to the traffic circulation in the vicinity of the Project Site is recommended to minimize the impact of the special events and other off-peak activities associated with the Proposed Action on the surrounding roadways. Moreover, with the completion of the Hālawā / Aloha Stadium HART Transit Station, and proposed multi-modal facilities under the Proposed Action, alternative transportation methods will be encouraged to further reduce traffic impacts related to single occupancy vehicles.

As it relates to your comment on parking, please note that it is anticipated that a parking study will be conducted by the eventual selected Stadium Developer and Real Estate Developer(s) as they finalize the design and programming of the Proposed Action. This parking study is anticipated to look at off-street parking and site generated parking demand, while considering TOD principals.

Comment 3: *While attending a swap meet, we saw the parking lot was used for the rail system storage and parking was minimal. Until you fix the parking OR get the rail finished (another whole issue) or increase bus access by 100 fold, there is no reason to spend any money as you cannot handle additional people especially while using the parking lot as a storage shed.*

Response 3: Your comments are acknowledged. As noted in Response #2 above, it is anticipated that a parking study will be conducted by the eventual selected Stadium

Developer and Real Estate Developer(s) as they finalize the design and programming of the Proposed Action. This parking study is anticipated to look at off-street parking and site generated parking demand, while considering TOD principals.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in cursive script that reads "Keola Cheng". The ink is dark and the signature is fluid.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Public Comment](#)
To: [Andrew Blasko](#)
Subject: Fw: Unresolved Questions
Date: Tuesday, February 9, 2021 1:50:10 PM

From: Kathleen Jaycox <jaycox@hawaii.edu>
Sent: Thursday, February 4, 2021 10:28 AM
To: Public Comment <publiccomment@wilsonokamoto.com>
Subject: Unresolved Questions

Aloha --

I am submitting comments about the DEIS for Aloha stadium redevelopment. It seems as if the request for public comment was not put forth with serious intent. This redevelopment is a key area which could be used to help address the extreme shortage of affordable housing on Oahu. Yet in so many places of the DEIS, the term "not applicable" is used to dismiss any consideration of more dwelling units. If so much is truly "not applicable," then the public deserves to hear in greater detail why this is so.

I do hope this issue will be subject to further public scrutiny.

Kathy Jaycox



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10422-01

Kathy Jaycox
jaycox@hawaii.edu

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASD)
Hālawā, O‘ahu, Hawai‘i

Dear Kathy Jaycox:

Thank you for your comments dated February 4, 2021, regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *I am submitting comments about the DEIS for Aloha stadium redevelopment. It seems as if the request for public comment was not put forth with serious intent. This redevelopment is a key area which could be used to help address the extreme shortage of affordable housing on O‘ahu. Yet in so many places of the DEIS, the term "not applicable" is used to dismiss any consideration of more dwelling units. If so much is truly "not applicable," then the public deserves to hear in greater detail why this is so. I do hope this issue will be subject to further public scrutiny.*

Response 1: Your comments are acknowledged. Please note that the Proposed Action, which is premised upon the Programmatic Master Plan appended to the Programmatic EIS as Appendix A, reflects the aggregated collection of extensive and exhaustive input from area residents, members of the public, existing Aloha Stadium stakeholders and public agencies as discussed in Section 2.3 of the Programmatic EIS. Additionally, the Project Team conducted a substantial number of public outreach meetings and has considered public input throughout the EIS process. Hence, the Proposed Action represents the vision of the overall community for the Project Site. Based on community input and various technical studies, the Proposed Action is envisioned to encompass the New Aloha Stadium, approximately 730,000 gross square feet (GSF) of residential space, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF of hotel space. However, as noted throughout the Programmatic EIS, that final design of the Project Site and use and space allocation will be determined by the Stadium Authority, the selected

Stadium Developer and Real Estate Developer(s). Please note as discussed at the EIS Scoping Meeting and described in the EIS Preparation Notice published on September 8, 2019, as well as reiterated in Section 1.1 of the Programmatic Draft EIS, “*The Proposed Action encompasses the construction of a new, modern stadium facility that will be supported by complimentary mixed-use development.*” Therefore, the subject Programmatic Draft EIS is intended to assess the potential effects associated with the Proposed Action on various environmental resource categories as prescribed by Section 11-200.1-24.

Please note that due to broad comments raised in response to the Programmatic Draft EIS, Section 3.4 has been added to the Programmatic Final EIS which on a conceptual basis, evaluated a conceptual affordable housing project site design alternative program scenario with 20,000 to 100,000 units within the confines of the Project Site. It is readily apparent that this type of programming would not be compatible with the general purpose and need, as well as goals and objectives of the Proposed Action. Moreover, such a program and its anticipated impacts would require the preparation of a separate, comprehensive EIS documentation and evaluation.

Your comment about the Proposed Action using the term “not applicable” is unclear. We assume that you are referring to Chapter 5 of the Programmatic Draft EIS which discusses the Proposed Action’s consistency and conformance with various State and City and County of Honolulu plans, policies, and land-use controls. Please note that in many instances, the purpose of the Proposed Action and the proposed programming therein is not applicable to many objectives and policies as shown in the various tables presented in Chapter 5. However, you do not question or comment on specific objectives and policies, therefore we cannot provide you specific responses as to why the Proposed Action may or may not be applicable to certain objectives or policies.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in cursive script, reading "Keola Cheng". The ink is dark blue or black, and the signature is fluid and connected.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Kawika DeLima](#)
To: [Public Comment](#)
Subject: ???
Date: Thursday, December 24, 2020 10:53:27 PM

Why only 35,000 seats? That's the size of a Division 2 or 3 stadium. As for a location for the Warriors to play during the 2021 season, why not have it on Maui! [Mail on Android](#)

From: [Kawika DeLima](#)
To: [Public Comment](#)
Subject: Suggestion!
Date: Thursday, December 24, 2020 11:01:46 PM

Why not move the UH football team to Maui for the 2021 season....

[Sent from Yahoo Mail on Android](#)



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10422-01

Kawika DeLima
kawikadelima@ymail.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASD)
Hālawā, O‘ahu, Hawai‘i

Dear Kawika DeLima:

Thank you for your comments dated December 24, 2020, regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *Why only 35,000 seats? That's the size of a Division 2 or 3 stadium.*

Response 1: Your comments are acknowledged. Please note that the Programmatic Final EIS includes a market feasibility & economic review and analysis prepared by Victus Advisors conducted in conjunction with master planning and preliminary design efforts for the Proposed Action. This documentation clearly underscores that the existing Aloha Stadium’s capacity of 50,000, by far, and in large exceeds current and anticipated future market needs. In observance of the analysis and guidance set forth by Victus Advisors as well as market sounding and user analysis by Stadium and Industry consultants, the unified recommendation is that the construction of a 27,500 - 35,000 seat capacity stadium would best serve current and anticipated future market demand.

Furthermore, before the 2018 fiscal year, Aloha Stadium was not widely considered as a major venue for concert activities. As the Aloha Stadium began to be marketed more heavily as a concert venue over the course of 2019, it was revealed through consultation with entertainment industry professionals that the Aloha Stadium’s current capacity of 50,000 seats was a significant deterrent to the candidacy of the existing Aloha Stadium as a venue for major artists. Promoters and performers alike voiced that the ideal range for seating at a stadium-set concert lies between 25,000 and 30,000 seats.

Since the fiscal year of 2018, Aloha Stadium has hosted eight concerts, with seven held within the fiscal year of 2019. Six concerts have been booked/promoted by Live Nation with an average of 30,743 attendees, right in line with feedback provided by industry professionals. Nonetheless, as currently proposed, in addition to a raw 35,000 fixed seat capacity, concert events could potentially utilize field space for additional viewership that could accommodate upwards of 10,000 additional attendees.

With regard to sporting events held at Aloha Stadium, Division 1 Football Bowl Subdivision (D1-FBS) football factors in as the central activity featured. Specifically, Aloha Stadium was the home to the University of Hawai'i Rainbow Warriors Football Program (UH Football) when it was in operation. The University of Hawai'i is a member of the Mountain West Conference, which is considered to be a Mid-Major or Group of Five (G5) conference, and has ranked 81st in attendance among all D1-FBS institutions in the most recent season of play with no attendance restrictions (2019), bordering just under 25,000 attendees for home game attendance. Overall, attendance trends nation-wide are in sharp decline. The 2019 D1-FBS season resulted in the lowest overall attendance in the past 24 years (41,477 per game), with the Mountain West posting its lowest average per game attendance ever (23,232 per game). It is further notable that over the past five years, running from the 2014 season to 2019 season, average UH Football attendance has also trended down, reflecting a decline in average attendance. Moreover, UH Football has not drawn a sell-out crowd since 2007. By contrast, the highest attended game within the past five years attracted approximately 36,411 attendees (2014 season opener), under the context of the capacity of the existing Aloha Stadium (50,000 seats), the highest attended UH Football event held at the Stadium over the course of the last five years would have a little more than a 25% of the seats vacant. By contrast, under the Proposed Action the current capacity of 50,000 seats (35,000 seat stadium), with a similar level of attendance, the Stadium would be 100% filled to capacity. There is a quality all unto-itself to having a sold-out-stadium that cannot be tangibly quantified.

Overall, the proposed New Aloha Stadium (35,000 seat capacity) would create the opportunity to serve as a viable venue for a greater range of events. Possible events include rugby, motor sports, soccer and mixed martial arts. These events typically will not pursue stadiums larger than 35,000, as the demand of their audience typically would not justify the use of a larger venue, particularly under the context of the market that would be locally served here on O'ahu.

Comment 2: *As for a location for the Warriors to play during the 2021 season, why not have it on Maui!*

Response 2: Your comments are acknowledged. Please note that it was not in the scope of the Programmatic EIS to assess alternative locations of UH Football for the 2021. However, please note that the University of Hawai'i (UH) had anticipated that the UH could continue to host home football games in the existing Aloha Stadium, as the New Aloha Stadium was to be constructed concurrently. However, the unexpected impacts of COVID-19 and the

mounting maintenance cost issues led to closure of the existing Aloha Stadium to spectator events, and the UH is now temporarily hosting UH football games at its Clarence T.C. Ching Athletics Complex, located on its Lower Campus in Mānoa, until the New Aloha Stadium is constructed. Hence, UH has confirmed that they plan to return to the New Aloha Stadium once constructed and ready to operate in the future.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Public Comment](#)
To: [Andrew Blasko](#)
Subject: Fw: Please support affordable housing at Aloha Stadium
Date: Tuesday, February 9, 2021 1:54:12 PM

From: Keith Webster <keithwebster@hawaii.rr.com>
Sent: Monday, February 8, 2021 10:16 PM
To: Public Comment <publiccomment@wilsonokamoto.com>
Subject: Please support affordable housing at Aloha Stadium

February 8, 2021

Keith Webster
47-748 Hui Kelu St. #5
Kaneohe, HI 96744
(808) 295-1702

SUBJECT: Urgent need for affordable housing at Stadium site

Aloha,

Hawaii is in an odd situation where many of the people who work here and keep our community and economy strong can't really afford to live here. The price of housing is not in-line with the wages paid in most of our industries. For Hawaii to retain its character and family nature we need to provide affordable housing for the next generation and for many of our kapuna. The need is great and no one solution will resolve the shortage but the Aloha Stadium site could be a major help to our people and economy.

The stadium only takes up a small portion of the property. Affordable housing can be designed into the additional development stages. With a rail station, residents need for cars is reduced which lessens the impact on roads while significantly reducing the cost of living for residents. The large on-site community will also help make the site's commercial areas more profitable and could help achieve the goal of covering the ongoing maintenance costs of the new stadium.

Building this housing soon while we are working our way out of a recession allows us to leverage long-term financing to solve two problems, the housing shortage and the restart of our economy during and after COVID.

Please use your skills and knowledge to provide a significant amount - maybe 100,000 units of affordable housing at this site as a way to pay for ongoing stadium maintenance, support the next generation of Hawaii residents (and our future economy) and provide significant construction projects within the urban footprint to help restart our economy.

Sincerely,

Keith Webster



WILSON OKAMOTO
C O R P O R A T I O N
INNOVATORS • PLANNERS • ENGINEERS

10422-01

Keith Webster
keithwebster@hawaii.rr.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASD)
Hālawā, O‘ahu, Hawai‘i

Dear Keith Webster:

Thank you for your comments dated February 8, 2021, regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *Hawaii is in an odd situation where many of the people who work here and keep our community and economy strong can't really afford to live here. The price of housing is not in-line with the wages paid in most of our industries. For Hawaii to retain its character and family nature we need to provide affordable housing for the next generation and for many of our kapuna. The need is great and no one solution will resolve the shortage but the Aloha Stadium site could be a major help to our people and economy.*

The stadium only takes up a small portion of the property. Affordable housing can be designed into the additional development stages. With a rail station, residents need for cars is reduced which lessens the impact on roads while significantly reducing the cost of living for residents. The large onsite community will also help make the site's commercial areas more profitable and could help achieve the goal of covering the ongoing maintenance costs of the new stadium. Building this housing soon while we are working our way out of a recession allows us to leverage long-term financing to solve two problems, the housing shortage and the restart of our economy during and after COVID.

Please use your skills and knowledge to provide a significant amount - maybe 100,000 units of affordable housing at this site as a way to pay for ongoing stadium maintenance, support the next generation of Hawaii residents (and our future economy) and provide significant construction projects within the urban footprint to help restart our economy.

Response 1: Your comments are acknowledged. Please note that the Proposed Action, which is premised upon the Programmatic Master Plan appended to the Programmatic EIS as Appendix A, reflects the aggregated collection of extensive and exhaustive input from area residents, members of the public, existing Aloha Stadium stakeholders and public agencies as discussed in Section 2.3 of the Programmatic EIS. Additionally, the Project Team conducted a substantial number of public outreach meetings and has considered public input throughout the EIS process. Hence, the Proposed Action represents the vision of the overall community for the Project Site. Based on community input and various technical studies, the Proposed Action is envisioned to encompass the New Aloha Stadium, approximately 730,000 gross square feet (GSF) of residential space, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF of hotel space. However, as noted throughout the Programmatic EIS, that final design of the Project Site and use and space allocation will be determined by the Stadium Authority, the selected Stadium Developer and Real Estate Developer(s). Please note as discussed at the EIS Scoping Meeting and described in the EIS Preparation Notice published on September 8, 2019, as well as reiterated in Section 1.1 of the Programmatic Draft EIS, *“The Proposed Action encompasses the construction of a new, modern stadium facility that will be supported by complimentary mixed-use development.”* Therefore, the subject Programmatic Draft EIS is intended to assess the potential effects associated with the Proposed Action on various environmental resource categories as prescribed by Section 11-200.1-24.

Please note that due to broad comments raised in response to the Programmatic Draft EIS, Section 3.4 has been added to the Programmatic Final EIS which on a conceptual basis, evaluated a conceptual affordable housing project site design alternative program scenario with 20,000 to 100,000 units within the confines of the Project Site. It is readily apparent that this type of programming would not be compatible with the general purpose and need, as well as goals and objectives of the Proposed Action. Moreover, such a program and its anticipated impacts would require the preparation of a separate, comprehensive EIS documentation and evaluation.

With regards to your comment the use of State lands near rail stations, please note that the State of Hawai‘i is the land owner of the Project Site, and in partnership with the selected Stadium Developer and Real Estate Developer(s), may pursue different land-use configurations and strategies than what is presented in the Programmatic EIS to maximize the value of the Proposed Action and address a number of Statewide needs. The State of Hawai‘i, as the land owner, has the ultimate say in how they use their lands to fit their needs. Furthermore, it has not yet been determined how Act 146 will be administered, specifically, how it relates to implementing a “stadium development district.” However, it is expected that the State of Hawai‘i, in partnership with the selected Stadium Developer and Real Estate Developer(s), will coordinate and work closely with the CCH to implement the Proposed Action, and to minimize any potential impacts on land uses at the Project Site and the Project Region.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Public Comment](#)
To: [Andrew Blasko](#)
Subject: Fw: Aloha Stadium EIS Comments
Date: Tuesday, February 9, 2021 1:49:51 PM
Attachments: [AlohaStadiumEIScomments.pdf](#)

From: Kevin Carney <kevin.carney@eahhousing.org>
Sent: Tuesday, February 2, 2021 8:46 AM
To: Public Comment <publiccomment@wilsonokamoto.com>
Cc: Kevin Carney <kevin.carney@eahhousing.org>
Subject: Aloha Stadium EIS Comments

Comments on Aloha Stadium redevelopment are attached.



Kevin R. Carney, (PB), NAHP-E

Vice President, Hawaii

RB-16444

Office: (808) 523-8826 Fax: (808) 523-8827 |

kevin.carney@eahhousing.org

www.eahhousing.org | [Twitter](#) | [Facebook](#) | [Youtube](#)

1001 Bishop St., Suite 2880, Honolulu, HI 96813

EAH Housing | HI Lic. RB-16985 | CalBRE Lic. 853495

“The mission of EAH Housing is to expand the range of opportunities for all by developing, managing and promoting quality affordable housing and diverse communities.”

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February 2, 2021

Wilson Okamoto Corporation
1907 S Beretania St # 400, Honolulu, HI 96826
Attn: Aloha Stadium Redevelopment Environmental Impact Statement
nased.eis@wilsonokamoto.com

SUBJECT: Build 100,000 Housing Units at Aloha Stadium

To Whom It May Concern:

Thank you for this opportunity to submit comments on the proposed redevelopment of the Aloha Stadium site. We believe that the current plan to surround the new stadium with retail, office, hotel, and 1,813 condos is economically unrealistic. We would like to see the EIS include analysis of the environmental impacts of additional housing, particularly 20,000 units of rental housing to serve incomes at 80% of the area median income (AMI) and below in addition to 80,000 condominiums serving incomes above 80% of the AMI. Serving the lower income groups with housing will help to provide the ridership that the new rail system will need to help to sustain itself.

While we recognize the need to replace Aloha Stadium, a new stadium should be confined to as small a size as possible. The EIS is supposed to determine the maximum quantities of development, therefore, it should evaluate the maximum quantity of housing units feasible with transit-oriented assumptions.

Ending the housing shortage must be the top priority of the State of Hawaii. Not only does housing top surveys of Hawaii's policy priorities, but the State also has a statutory obligation to "effectively accommodate the housing needs of Hawaii's people" (HRS § 226-19). To fulfill this obligation, Governor Ige, Senator Chang, and other state officials have advocated the use of state-owned lands near rail stations to develop high density housing for sale to Hawaii residents. Given the location of a rail station on the Aloha Stadium site, this parcel is an ideal site for this vision.

Many comparable facilities around the world today are surrounded by high density development, such as Wankhede Stadium in Mumbai, Madison Square Garden in New York, and Happy Valley Racecourse in Hong Kong. Because a stadium itself would be small--Soldier Field, the home of the Chicago Bears, is only seven acres--over 90 percent of the Aloha Stadium site, as many as 91 acres, can be used for high density housing.

The rise of online shopping and the coronavirus pandemic have greatly reduced demand for brick-and-mortar retail and office space, both worldwide and in Hawaii. A recent study estimated that retail vacancies on Oahu will grow by 270,000 square feet this year alone. A strip mall or office building is unlikely to generate revenue to pay for the new stadium. By contrast, the new residents of 100,000 housing units will generate enormous

amounts of economic activity and dramatically expand the tax base, thereby supporting the new stadium and other operations of the State.

Thank you again for the opportunity to submit our thoughts on this critical redevelopment.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kevin R. Carney", with a long horizontal flourish extending to the right.

Kevin R. Carney, RB-16444
(PB), NAHP-E
Vice President, Hawaii



WILSON OKAMOTO
C O R P O R A T I O N
INNOVATORS • PLANNERS • ENGINEERS

10422-01

Kevin Carney
kevin.carney@eahhousing.org

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear Kevin Carney:

Thank you for your comments dated February 2, 2021, regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *The current plan to surround the new stadium with retail, office space, hotel, and 1,813 condos is economically unrealistic for the foreseeable future, and the EIS should instead include analysis of the environmental impacts of least 200 towers including 100,000 units of housing on the Aloha Stadium site. While we recognize the need to replace Aloha Stadium, a new stadium should be confined to as small a size as possible. The EIS is supposed to determine the maximum quantities of development, therefore, it should evaluate the maximum quantity of housing units feasible with transit-oriented assumptions.*

Ending the housing shortage must be the top priority of the State of Hawaii. Not only does housing top surveys of Hawaii’s policy priorities, but the State also has a statutory obligation to “[e]ffectively accommodate the housing needs of Hawaii’s people” (HRS § 226-19). To fulfill this obligation, Governor Ige, Senator Chang, and other state officials have advocated the use of state owned lands near rail stations to develop high density housing for sale to Hawaii residents. Given the location of a rail station on the Aloha Stadium site, this parcel is an ideal site for this vision.

Response 1: Your comments are acknowledged. Please note that the Proposed Action, which is premised upon the Programmatic Master Plan appended to the Programmatic EIS as Appendix A, reflects the aggregated collection of extensive and exhaustive input from area residents, members of the public, existing Aloha Stadium stakeholders and public agencies as discussed in Section 2.3 of the Programmatic EIS. Additionally, the Project

Team conducted a substantial number of public outreach meetings and has considered public input throughout the EIS process. Hence, the Proposed Action represents the vision of the overall community for the Project Site. Based on community input and various technical studies, the Proposed Action is envisioned to encompass the New Aloha Stadium, approximately 730,000 gross square feet (GSF) of residential space, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF of hotel space. However, as noted throughout the Programmatic EIS, that final design of the Project Site and use and space allocation will be determined by the Stadium Authority, the selected Stadium Developer and Real Estate Developer(s). Please note as discussed at the EIS Scoping Meeting and described in the EIS Preparation Notice published on September 8, 2019, as well as reiterated in Section 1.1 of the Programmatic Draft EIS, *“The Proposed Action encompasses the construction of a new, modern stadium facility that will be supported by complimentary mixed-use development.”* Therefore, the subject Programmatic Draft EIS is intended to assess the potential effects associated with the Proposed Action on various environmental resource categories as prescribed by Section 11-200.1-24.

It is acknowledged that the Programmatic Draft EIS did not evaluate, *“the environmental impacts of least 200 towers including 100,000 units of housing on the Aloha Stadium site,”* as such a program would not meet the goals and objectives of the Proposed Action as described in Section 2.2 of the Programmatic Draft EIS. Nonetheless, the Proposed Action is envisioned to directly serve regional and State housing demands through the creation of a diverse range of residential options, accounting for upwards of 1,800 new housing units as discussed in Section 2.1 of the Programmatic Draft EIS. However, it should be noted that the extent of residential programming will ultimately be determined by the Stadium Authority and the selected Real Estate Developer(s) which will comply with applicable affordable housing requirements.

Please note that due to broad comments raised in response to the Programmatic Draft EIS, Section 3.4 has been added to the Programmatic Final EIS which on a conceptual basis, evaluated a conceptual affordable housing project site design alternative program scenario with 20,000 to 100,000 units within the confines of the Project Site. It is readily apparent that this type of programming would not be compatible with the general purpose and need, as well as goals and objectives of the Proposed Action. Moreover, such a program and its anticipated impacts would require the preparation of a separate, comprehensive EIS documentation and evaluation.

With regards to your comment the use of State lands near rail stations, please note that the State of Hawai‘i is the land owner of the Project Site, and in partnership with the selected Stadium Developer and Real Estate Developer(s), may pursue different land-use configurations and strategies than what is presented in the Programmatic EIS to maximize the value of the Proposed Action and address a number of Statewide needs. The State of Hawai‘i, as the land owner, has the ultimate say in how they use their lands to fit their needs. Furthermore, it has not yet been determined how Act 146 will be administered, specifically, how it relates to implementing a “stadium development district.” However, it

is expected that the State of Hawai'i, in partnership with the selected Stadium Developer and Real Estate Developer(s), will coordinate and work closely with the CCH to implement the Proposed Action, and to minimize any potential impacts on land uses at the Project Site and the Project Region.

Comment 2: *Many comparable facilities around the world today are surrounded by high density development, such as Wankhede Stadium in Mumbai, Madison Square Garden in New York, and Happy Valley Racecourse in Hong Kong. Because a stadium itself would be small--Soldier Field, the home of the Chicago Bears, is only seven acres--over 90 percent of the Aloha Stadium site, as many as 91 acres, can be used for high density housing.*

Response 2: Your comments are acknowledged. As noted in Response #1 above, the State of Hawai'i, as the land owner, has the ultimate say in how they use their lands to fit their needs. However, it is expected that the State of Hawai'i, in partnership with the selected Stadium Developer and Real Estate Developer(s), will coordinate and work closely with the CCH to implement the Proposed Action and to minimize any potential impacts on land uses at the Project Site and the Project Region. It is anticipated that the Proposed Action will result in the New Aloha Stadium, approximately 730,000 gross square feet (GSF) of residential space, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF of hotel space, which can be considered high density development across the Project Site.

Comment 3: *The rise of online shopping and the coronavirus pandemic have greatly reduced demand for brick and mortar retail and office space, both worldwide and in Hawaii. A recent study estimated that retail vacancies on Oahu will grow by 270,000 square feet this year alone. A strip mall or office building is unlikely to generate revenue to pay for the new stadium. By contrast, the new residents of 100,000 housing units will generate enormous amounts of economic activity and dramatically expand the tax base, thereby supporting the new stadium and other operations of the State.*

Response 3: Your comments are acknowledged. However, based on the economic and market analysis conducted by Victus Advisors in 2019, the Proposed Action which is anticipated to encompass approximately 730,000 gross square feet (GSF) of residential space, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF of hotel space will create a vibrant district that could, in summary, generate a Net Present Value (NPV) of over \$1.8 billion in total economic output, over \$700 million in personal earnings, and over \$198 million in State and County tax revenues, assuming an 8.0 percent discount over a 25-year period. After the Full Build-Out, up to 1,190 net new annual jobs are anticipated to be supported by operations of the Proposed Action. Hence, it is anticipated that the Proposed Action will also generate enormous amounts of economic activity while also achieving the goals and objectives of the Proposed Action, as well as the Hālawā Area TOD Plan whereas constructing 100,000 housing units at the Project Site would not as discussed in Response #1 above.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Public Comment](#)
To: [Andrew Blasko](#)
Subject: Fw: Build 100,000 housing units at the Aloha Stadium site
Date: Tuesday, February 9, 2021 1:53:41 PM

From: Kev Polk <kevpolk@gmail.com>
Sent: Monday, February 8, 2021 3:57 PM
To: Public Comment <publiccomment@wilsonokamoto.com>
Subject: Build 100,000 housing units at the Aloha Stadium site

2/8/2021
Kevin S. Polk
486 N Stanwood Rd
Columbus, OH, 43209
(740) 566-2331

Aloha,

I hope you have seen more than a few copies of the paragraphs below. I have read and endorse every one of them, but would also like to add a personal note. I grew up in Honolulu, attending Jefferson Elementary, Washington Middle School and McKinley High School. I worked at UH in the 1990s, but had to move to the mainland after many strenuous but failed attempts to buy a modest apartment in Honolulu. Leaving my dreams of starting a family where I grew up was one of the greatest heartaches of my life. I've read that tens of thousands of others moved the same year I did, for similar reasons, and I'm sure they faced similar anguish or worse. It's an economic story, but let's not forget that the face of it is human and tragic.

The current plan to surround the new stadium with retail, office space, hotel, and 1,813 condos is economically unrealistic for the foreseeable future, and the EIS should instead include analysis of the environmental impacts of least 200 towers including 100,000 units of housing on the Aloha Stadium site. While we recognize the need to replace Aloha Stadium, a new stadium should be confined to as small a size as possible. The EIS is supposed to determine the maximum quantities of development, therefore, it should evaluate the maximum quantity of housing units feasible with transit-oriented assumptions.

Ending the housing shortage must be the top priority of the State of Hawaii. Not only does housing top surveys of Hawaii's policy priorities, but the State also has a statutory obligation to "[e]ffectively accommodate the housing needs of Hawaii's people" (HRS § 226-19). To fulfill this obligation, Governor Ige, Senator Chang, and other state officials have advocated the use of state owned lands near rail stations to develop high density housing for sale to Hawaii residents. Given the location of a rail station on the Aloha Stadium site, this parcel is an ideal site for this vision.

Many comparable facilities around the world today are surrounded by high density development, such as Wankhede Stadium in Mumbai, Madison Square Garden in New York, and Happy Valley Racecourse in Hong Kong. Because a stadium itself would be small--Soldier Field, the home of the Chicago Bears, is only seven acres--over 90 percent of the Aloha Stadium site, as many as 91 acres, can be used for high density housing.

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brick and mortar retail and office space, both worldwide and in Hawaii. A recent study estimated that retail vacancies on Oahu will grow by 270,000 square feet this year alone. A strip mall or office building is unlikely to generate revenue to pay for the new stadium. By contrast, the new residents of 100,000 housing units will generate enormous amounts of economic activity and dramatically expand the tax base, thereby supporting the new stadium and other operations of the State.



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10422-01

Kevin S. Polk
kevpolk@gmail.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear Kevin S. Polk:

Thank you for your comments dated February 8, 2019, regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *I hope you have seen more than a few copies of the paragraphs below. I have read and endorse every one of them, but would also like to add a personal note. I grew up in Honolulu, attending Jefferson Elementary, Washington Middle School and McKinley High School. I worked at UH in the 1990s, but had to move to the mainland after many strenuous but failed attempts to buy a modest apartment in Honolulu. Leaving my dreams of starting a family where I grew up was one of the greatest heartaches of my life. I've read that tens of thousands of others moved the same year I did, for similar reasons, and I'm sure they faced similar anguish or worse. It's an economic story, but let's not forget that the face of it is human and tragic.*

Response 1: Your comments are acknowledged and understand that you lived and worked here during the 1990s but, unfortunately, left the State for various reasons, which provide context to your comments below.

Comment 2: *The current plan to surround the new stadium with retail, office space, hotel, and 1,813 condos is economically unrealistic for the foreseeable future, and the EIS should instead include analysis of the environmental impacts of least 200 towers including 100,000 units of housing on the Aloha Stadium site. While we recognize the need to replace Aloha Stadium, a new stadium should be confined to as small a size as possible. The EIS is supposed to determine the maximum quantities of development, therefore, it should evaluate the maximum quantity of housing units feasible with transit-oriented assumptions.*

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Comment 4: *The rise of online shopping and the coronavirus pandemic have greatly reduced demand for brick and mortar retail and office space, both worldwide and in Hawaii. A recent study estimated that retail vacancies on Oahu will grow by 270,000 square feet this year alone. A strip mall or office building is unlikely to generate revenue to pay for the new stadium. By contrast, the new residents of 100,000 housing units will generate enormous amounts of economic activity and dramatically expand the tax base, thereby supporting the new stadium and other operations of the State.*

Response 4: Your comments are acknowledged. However, based on the economic and market analysis conducted by Victus Advisors in 2019, the Proposed Action which is anticipated to encompass approximately 730,000 gross square feet (GSF) of residential space, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF of hotel space will create a vibrant district that could, in summary, generate a Net Present Value (NPV) of over \$1.8 billion in total economic output, over \$700 million in personal earnings, and over \$198 million in State and County tax revenues, assuming an 8.0 percent discount over a 25-year period. After the Full Build-Out, up to 1,190 net new annual jobs are anticipated to be supported by operations of the Proposed Action. Hence, it is anticipated that the Proposed Action will also generate enormous amounts of economic activity while also achieving the goals and objectives of the Proposed Action, as well as the Hālawā Area TOD Plan whereas constructing 100,000 housing units at the Project Site would not as discussed in Response #2 above.

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We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in cursive script that reads "Keola Cheng". The ink is dark and the signature is fluid.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

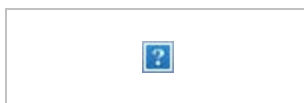
From: [Kylie Dodge](#)
To: [Public Comment](#)
Subject: Feedback/Ideas for the Upcoming Stadium Project
Date: Wednesday, December 23, 2020 3:50:07 PM
Attachments: [Outlook-t504njeo.png](#)
[RAD-Titan-IntroTown-Brochure-0920KylieDodge.pdf](#)
[TITAN RAD Product Comparison_KylieDodge92020.pdf](#)

Aloha! would like to personally introduce you to our security technology which was designed with the state of Hawai'i in mind, especially as it reopens to tourism and events. This technology would be easily and symbiotically integrated into the new Aloha Stadium rejuvenation project and would not only offer an immediate ROI but ensure safety, security, and concierge services right out of the box. Our devices have the ability to enforce the mask mandate and to perform temperature checks using robotics which reduces the potential risk of conflict, discrimination, and violence, among countless other issues. We have an organization in place to enhance safety and security on all levels while reducing risk and cost. Our robotic devices are multilingual (English, Japanese, Chinese, Spanish, French, Hindi) can be installed anywhere, from individual stadium facilities (they have already been utilized in NFL stadiums to date), to ramps, bridges, elevators, parking structures, and more. These devices are very versatile and will help to protect the safety and well-being of your guests and employees, all while working in conjunction with the security personnel that you already have in place at the Aloha Stadium. The mask mandate and temperature check requirement will likely be present long term, so these devices will serve well on multiple levels, both during and post covid.

Robotic Assistance Devices' mission is to deliver artificial intelligence-based solutions that empower organizations to solve complex challenges while delivering immediate return on investment. Our company was founded on the belief that next-generation solutions can help organizations streamline operations, increase ROI, and strengthen business. RAD technology improves the simplicity and economics of patrolling and guard services and allows experienced personnel to focus on more strategic tasks. Customers augment the capabilities of existing staffs and gain higher levels of situational awareness, all at drastically reduced cost. I would like the opportunity to set up a set up a brief personal demonstration of our solutions with you so that you can see how we could potentially integrate these devices into your resorts very efficiently and economically, especially during these challenging times. I look forward to your response. Please let me know what questions you have for me and what additional information you need.

Mahalo nui loa,

Kylie L.C. Dodge
Business Development Manager
808.234.3065 Direct Mobile



www.TitanSecurityTechnologies.com
808.845.2704 Direct Office

808.988.1065 Secured Administration Fax

WELCOME TO RAD TOWN

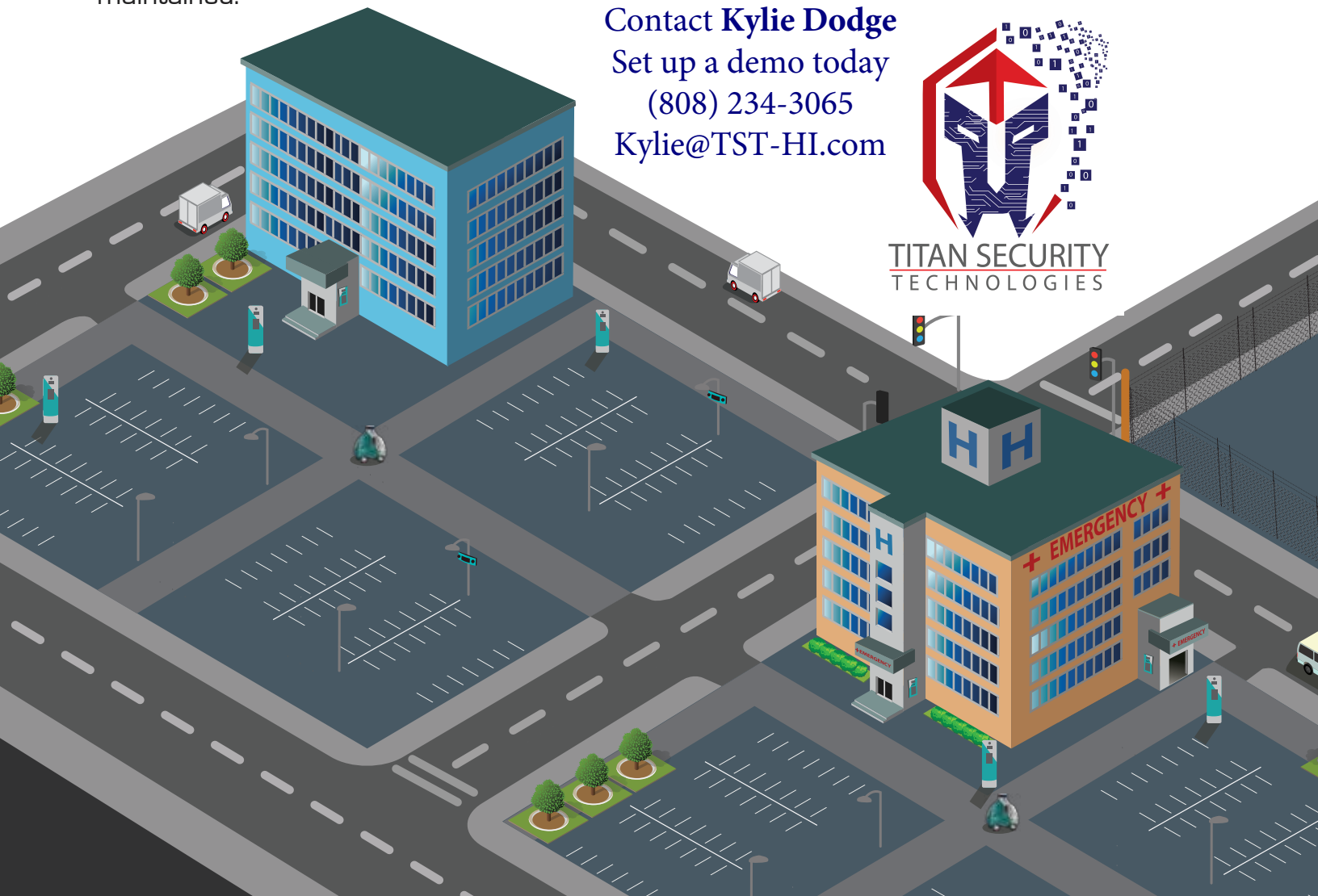
A Modern Integration of Guarding & Guard-centric Technologies

In this town, RAD devices perform a multitude of security and concierge related functions in addition to video surveillance, access control and other physical security industry functions. RAD Town is a collection of city blocks that each represent a significant market opportunity.

Each city block demonstrates a unique deployment of RAD security solutions. All RAD hardware runs on RAD's software ecosystem which simply and easily puts complete situational awareness, autonomous alerting and remote functionality in the hands of onsite or remote guards and/or other facility staff.

There is no other town like RAD Town. Affordable. Secure. No infrastructure required. Instantly autonomously responsive. Completely integrated. 100% RAD designed, built and maintained.

Contact Kylie Dodge
Set up a demo today
(808) 234-3065
Kylie@TST-HI.com



The Evolution Of Artificial Intelligence And Security

Robotic Assistance Devices (RAD) delivers artificial intelligence-based solutions that empower organizations to enjoy the benefits of workflow automation, advanced security and supplemental concierge services. RAD's eco-system of hardware, software, cloudware and mobileware is maintenance free for end-users. Simple to deploy, simple to use. Uniquely cellular optimized, means that no network infrastructure is needed. Pick and choose from family of hardware solutions to create the ultimate, and most affordable solution available.



SCOT

Security Control & Observation Tower



A standalone remote, portable, self-sufficient intelligence observation tower designed to expand an organization's security reach instantly.



WALLY

Wall Mounted SCOT Unit for Front Lobby Use



This wall mounted unit seamlessly integrates with all other RAD devices and provides edge-to-edge 180° field of vision. As easy to install and scale as all RAD hardware, Wally deploys RAD's innovative artificial intelligence-based technologies to enhance an organization's situational awareness, communication and control.



ROAMEO

Rugged Observation Assistance Mobile Electronic Officer



The RAD Eco-System of functions is now mobile on a rugged long-last intelligent platform! RADBoT is suitable to patrol on any typical surface including uneven/cracked asphalt or concrete, crushed rock up to 10" diameter, grass, dirt and snow (all within certain limits).



AVA

Autonomous Verified Access



AVA takes full advantage of the RAD Software Suite aimed at providing a comprehensive Access Control package that's ideal for corporate campuses, parking structures, exterior areas, lobbies and buildings; anywhere that increased visibility is needed and delivered at a fraction of the cost.



ROSA

Responsive Observation Security Agent



ROSA is the first and only completely self-contained security and communication device in the market. Providing a 180° field of view from the device so you can see more of your site. ROSA delivers the ultimate security experience via RAD's in-house developed software suite, including RADSOC and RADSight.

ROBOTIC ASSISTANCE DEVICES

RAD Product Comparison

	ROSA	AVA	WALLY	WALLY HSO	SCOT 2.0	ROAMEO
Concierge Capabilities		✓	✓	✓	✓	✓
Human Detection	✓	✓	✓	✓	✓	✓
Human Suspect Spotter						✓
License Plate Recognition	✓	✓	✓	✓	✓	✓
Long Range Zoom capabilities	✓	✓			✓	✓
Restricted Area & Zone Management	✓	✓	✓	✓	✓	✓
Perimeter Intrusion Detection, Response & Alerting	✓	✓	✓	✓	✓	✓
Vehicle Detection	✓	✓	✓	✓	✓	✓
7' Standing Device					✓	
Mask Detection	✓	✓	✓	✓	✓	✓
360 degree visibility	✓	✓	✓	✓		✓
All Terrain Mobility Device						✓
Wall/Pole Mount	✓	✓	✓	✓	✓	



Kylie Dodge
 808-234-3065
 Kylie@TST-HI.com
 www.TitanSecurityTechnologies.com



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10422-01

Kylie Dodge
kylie@tst-hi.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear Kylie Dodge:

Thank you for your comments dated December 23, 2020, regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *Aloha! would like to personally introduce you to our security technology which was designed with the state of Hawai‘i in mind, especially as it reopens to tourism and events. This technology would be easily and symbiotically integrated into the new Aloha Stadium rejuvenation project and would not only offer an immediate ROI but ensure safety, security, and concierge services right out of the box. Our devices have the ability to enforce the mask mandate and to perform temperature checks using robotics which reduces the potential risk of conflict, discrimination, and violence, among countless other issues. We have an organization in place to enhance safety and security on all levels while reducing risk and cost. Our robotic devices are multilingual (English, Japanese, Chinese, Spanish, French, Hindi) can be installed anywhere, from individual stadium facilities (they have already been utilized in NFL stadiums to date), to ramps, bridges, elevators, parking structures, and more. These devices are very versatile and will help to protect the safety and well-being of your guests and employees, all while working in conjunction with the security personnel that you already have in place at the Aloha Stadium. The mask mandate and temperature check requirement will likely be present long term, so these devices will serve well on multiple levels, both during and post covid.*

Robotic Assistance Devices’ mission is to deliver artificial intelligence-based solutions that empower organizations to solve complex challenges while delivering immediate return on investment. Our company was founded on the belief that next-generation solutions can help organizations streamline operations, increase ROI, and strengthen business. RAD technology improves the simplicity and economics of patrolling and guard services and

allows experienced personnel to focus on more strategic tasks. Customers augment the capabilities of existing staffs and gain higher levels of situational awareness, all at drastically reduced cost. I would like the opportunity to set up a set up a brief personal demonstration of our solutions with you so that you can see how we could potentially integrate these devices into your resorts very efficiently and economically, especially during these challenging times. I look forward to your response. Please let me know what questions you have for me and what additional information you need

Response 1: We acknowledge your comments relating to the use of robotic assistance devices for security. In regard to safety and security, the Project Site is expected to include features that promote public safety such as adequate lighting and design to minimize “blind” spots, emergency help-points (i.e. Blue Boxes) and security cameras to ensure the safety of the public. This will create a safe and friendly atmosphere for visitors of the New Aloha Stadium Entertainment District. However, please note that this letter will be passed along to the eventual selected Stadium Developer and Real Estate Developer(s) for consideration when finalizing the design and programming of the Proposed Action, as well as the operations.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in cursive script that reads "Keola Cheng". The ink is dark and the signature is fluid.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Laura Gerwitz](#)
To: [Public Comment](#)
Subject: Aloha stadium
Date: Wednesday, January 27, 2021 3:43:42 PM

January 27, 2021

Laura Gerwitz

**1619 Kamamalu Ave., #404
Honolulu, HI 96813**

808-550-0231

SUBJECT: Build 100,000 housing units at the Aloha Stadium site

Aloha,

The current plan to surround the new stadium with retail, office space, hotel, and 1,813 condos is economically unrealistic for the foreseeable future, and the EIS should instead include analysis of the environmental impacts of least 200 towers including 100,000 units of housing on the Aloha Stadium site. While we recognize the need to replace Aloha Stadium, a new stadium should be confined to as small a size as possible. The EIS is supposed to determine the maximum quantities of development, therefore, it should evaluate the maximum quantity of housing units feasible with transit-oriented assumptions.

Ending the housing shortage must be the top priority of the State of Hawaii. Not only does housing top surveys of Hawaii's policy priorities, but the State also has a statutory obligation to "[e]ffectively accommodate the housing needs of Hawaii's people" (HRS § 226-19). To fulfill this obligation, Governor Ige, Senator Chang, and other state officials have advocated the use of state- owned lands near rail stations to develop high density housing for sale to Hawaii residents. Given the location of a rail station on the Aloha Stadium site, this parcel is an ideal site for this vision.

Many comparable facilities around the world today are surrounded by high density development, such as Wankhede Stadium in Mumbai, Madison Square Garden in New York, and Happy Valley Racecourse in Hong Kong. Because a stadium itself would be small--Soldier Field, the home of the Chicago Bears, is only seven acres--over 90 percent of the Aloha Stadium site, as many as 91 acres, can be used for high density housing.

The rise of online shopping and the coronavirus pandemic have greatly reduced demand for brick-and-mortar retail and office space, both worldwide and in Hawaii. A recent study estimated that retail vacancies on Oahu will grow by 270,000 square feet this year alone. A strip mall or office building is unlikely to generate revenue to pay for the new stadium. By contrast, the new residents of 100,000 housing units will generate enormous amounts of economic activity and dramatically expand the tax base, thereby supporting the new stadium and other operations of the State.

Sincerely,
Laura Gerwitz



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10422-01

Laura Gerwitz
1619 Kamamalu Ave, #404
Honolulu, HI 96813
lgerwitz99@yahoo.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, Oʻahu, Hawaiʻi

Dear Laura Gerwitz :

Thank you for your comments dated December 24, 2020, regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawaiʻi Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *The current plan to surround the new stadium with retail, office space, hotel, and 1,813 condos is economically unrealistic for the foreseeable future, and the EIS should instead include analysis of the environmental impacts of least 200 towers including 100,000 units of housing on the Aloha Stadium site. While we recognize the need to replace Aloha Stadium, a new stadium should be confined to as small a size as possible. The EIS is supposed to determine the maximum quantities of development, therefore, it should evaluate the maximum quantity of housing units feasible with transit-oriented assumptions.*

Ending the housing shortage must be the top priority of the State of Hawaii. Not only does housing top surveys of Hawaii's policy priorities, but the State also has a statutory obligation to "[e]ffectively accommodate the housing needs of Hawaii's people" (HRS § 226-19). To fulfill this obligation, Governor Ige, Senator Chang, and other state officials have advocated the use of state owned lands near rail stations to develop high density housing for sale to Hawaii residents. Given the location of a rail station on the Aloha Stadium site, this parcel is an ideal site for this vision.

Response 1: Your comments are acknowledged. Please note that the Proposed Action, which is premised upon the Programmatic Master Plan appended to the Programmatic EIS as Appendix A, reflects the aggregated collection of extensive and exhaustive input from area residents, members of the public, existing Aloha Stadium stakeholders and public

agencies as discussed in Section 2.3 of the Programmatic EIS. Additionally, the Project Team conducted a substantial number of public outreach meetings and has considered public input throughout the EIS process. Hence, the Proposed Action represents the vision of the overall community for the Project Site. Based on community input and various technical studies, the Proposed Action is envisioned to encompass the New Aloha Stadium, approximately 730,000 gross square feet (GSF) of residential space, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF of hotel space. However, as noted throughout the Programmatic EIS, that final design of the Project Site and use and space allocation will be determined by the Stadium Authority, the selected Stadium Developer and Real Estate Developer(s). Please note as discussed at the EIS Scoping Meeting and described in the EIS Preparation Notice published on September 8, 2019, as well as reiterated in Section 1.1 of the Programmatic Draft EIS, *“The Proposed Action encompasses the construction of a new, modern stadium facility that will be supported by complimentary mixed-use development.”* Therefore, the subject Programmatic Draft EIS is intended to assess the potential effects associated with the Proposed Action on various environmental resource categories as prescribed by Section 11-200.1-24.

It is acknowledged that the Programmatic Draft EIS did not evaluate, *“the environmental impacts of least 200 towers including 100,000 units of housing on the Aloha Stadium site,”* as such a program would not meet the goals and objectives of the Proposed Action as described in Section 2.2 of the Programmatic Draft EIS. Nonetheless, the Proposed Action is envisioned to directly serve regional and State housing demands through the creation of a diverse range of residential options, accounting for upwards of 1,800 new housing units as discussed in Section 2.1 of the Programmatic Draft EIS. However, it should be noted that the extent of residential programming will ultimately be determined by the Stadium Authority and the selected Real Estate Developer(s) which will comply with applicable affordable housing requirements.

Please note that due to broad comments raised in response to the Programmatic Draft EIS, Section 3.4 has been added to the Programmatic Final EIS which on a conceptual basis, evaluated a conceptual affordable housing project site design alternative program scenario with 20,000 to 100,000 units within the confines of the Project Site. It is readily apparent that this type of programming would not be compatible with the general purpose and need, as well as goals and objectives of the Proposed Action. Moreover, such a program and its anticipated impacts would require the preparation of a separate, comprehensive EIS documentation and evaluation.

With regards to your comment the use of State lands near rail stations, please note that the State of Hawai‘i is the land owner of the Project Site, and in partnership with the selected Stadium Developer and Real Estate Developer(s), may pursue different land-use configurations and strategies than what is presented in the Programmatic EIS to maximize the value of the Proposed Action and address a number of Statewide needs. The State of Hawai‘i, as the land owner, has the ultimate say in how they use their lands to fit their needs. Furthermore, it has not yet been determined how Act 146 will be administered,

specifically, how it relates to implementing a “stadium development district.” However, it is expected that the State of Hawai‘i, in partnership with the selected Stadium Developer and Real Estate Developer(s), will coordinate and work closely with the CCH to implement the Proposed Action, and to minimize any potential impacts on land uses at the Project Site and the Project Region.

Comment 2: *Many comparable facilities around the world today are surrounded by high density development, such as Wankhede Stadium in Mumbai, Madison Square Garden in New York, and Happy Valley Racecourse in Hong Kong. Because a stadium itself would be small--Soldier Field, the home of the Chicago Bears, is only seven acres--over 90 percent of the Aloha Stadium site, as many as 91 acres, can be used for high density housing.*

Response 2: Your comments are acknowledged. As noted in Response #1 above, the State of Hawai‘i, as the land owner, has the ultimate say in how they use their lands to fit their needs. However, it is expected that the State of Hawai‘i, in partnership with the selected Stadium Developer and Real Estate Developer(s), will coordinate and work closely with the CCH to implement the Proposed Action and to minimize any potential impacts on land uses at the Project Site and the Project Region. It is anticipated that the Proposed Action will result in the New Aloha Stadium, approximately 730,000 gross square feet (GSF) of residential space, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF of hotel space, which can be considered high density development across the Project Site.

Comment 3: *The rise of online shopping and the coronavirus pandemic have greatly reduced demand for brick and mortar retail and office space, both worldwide and in Hawaii. A recent study estimated that retail vacancies on Oahu will grow by 270,000 square feet this year alone. A strip mall or office building is unlikely to generate revenue to pay for the new stadium. By contrast, the new residents of 100,000 housing units will generate enormous amounts of economic activity and dramatically expand the tax base, thereby supporting the new stadium and other operations of the State.*

Response 3: Your comments are acknowledged. However, based on the economic and market analysis conducted by Victus Advisors in 2019, the Proposed Action which is anticipated to encompass approximately 730,000 gross square feet (GSF) of residential space, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF of hotel space will create a vibrant district that could, in summary, generate a Net Present Value (NPV) of over \$1.8 billion in total economic output, over \$700 million in personal earnings, and over \$198 million in State and County tax revenues, assuming an 8.0 percent discount over a 25-year period. After the Full Build-Out, up to 1,190 net new annual jobs are anticipated to be supported by operations of the Proposed Action. Hence, it is anticipated that the Proposed Action will also generate enormous amounts of economic activity while also achieving the goals and objectives of the Proposed Action, as well as the Hālawā Area TOD Plan whereas constructing 100,000 housing units at the Project Site would not as discussed in Response #1 above.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in cursive script, reading "Keola Cheng". The ink is dark and the signature is fluid.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: leovidpro@hawaii.rr.com
To: [Public Comment](#)
Subject: Aloha Stadium Entertainment District
Date: Wednesday, December 30, 2020 11:51:13 AM

Aloha:

Building a new stadium is totally inappropriate at this time as there are no guarantees when mass gathering will be advised or permitted.

At this time and for the foreseeable future sports teams need only a field and team change facilities.

The field at Aloha stadium can surely be brought up to professional standards for soccer, football, and baseball.

For entertainment all that is needed is a stage with the proper set-up for audio - visual.

And who knows how future stadiums will have to be configured to safeguard the fans in a mass environment.

Whatever plans may already be in the works are certainly not suited for their intended use in a post Covid environment.

What with the amazing cost overruns on Rail and other priorities to ensure the safety of the population post Covid certainly trump the need for a new stadium and entertainment facility.

Doubt that investors will be attracted to what could be a totally failed venture from the get go.

And by the way how can an EIS be complete if it does not take into account the ramifications of Covid?

To say it is complete is totally illusory and misleading.

Understanding what it will take to build for entertainment is at least several years away.

Common sense dictates against this project.

With Aloha, Leo Hura
808-393-0687



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10422-01

Leo Hura

leovidpro@hawaii.rr.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, Oʻahu, Hawaiʻi

Dear Leo Hura:

Thank you for your comments dated December 30, 2020, regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawaiʻi Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *Building a new stadium is totally inappropriate at this time as there are no guarantees when mass gathering will be advised or permitted. At this time and for the foreseeable future sports teams need only a field and team change facilities. The field at Aloha stadium can surely be brought up to professional standards for soccer, football, and baseball. For entertainment all that is needed is a stage with the proper set-up for audio - visual.*

Response 1: Your comments are acknowledged. Please note that we respectfully disagree with your comments as it relates to bringing the existing Aloha Stadium to professional standards for various events. Please note that as discussed in Section 2.1 of the Programmatic Draft EIS, a range of structural upgrades have been made to mitigate the corrosion of the existing Aloha Stadium since its construction in the 1970s. However, as of 2019, approximately \$423 million in deferred maintenance had accumulated, including \$121 million needed in Americans with Disabilities Act (ADA)-related improvements and code compliance. The cost of such repairs were estimated to grow at a rate of approximately 5% per year, meaning that funding such repairs requires over \$30 million of annual contributions over the next 25 years. It is for this reason that fixing or retrofitting the existing stadium is no longer feasible. Instead, demolition of the existing stadium and replacing it in its entirety is the more fiscally responsible choice.

In addition, as detailed throughout Chapter 2 of the Programmatic EIS, the Proposed Action also encompasses the construction of complimentary mixed-use development through the

Real Estate Development component which will support the New Aloha Stadium. Overall, Proposed Action is envisioned to encompass the New Aloha Stadium, approximately 730,000 gross square feet (GSF) of residential space, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF of hotel space. In summary, as discussed in Section 4.13.3 of the Programmatic EIS, the Proposed Action (at Full Build-Out) is anticipated to generate a Net Present Value (NPV) of over \$1.8 billion in total economic output, over \$700 million in personal earnings, and over \$198 million in State and County tax revenues, assuming an 8.0 percent discount over a 25-year period. After the Full Build-Out, up to 1,190 net new annual jobs are anticipated to be supported by operations of the Proposed Action.

As it relates to COVID-19 impacts, please note that the impacts of the COVID-19 pandemic have been documented throughout this Programmatic EIS process. Specifically, COVID-19 impacts are discussed in the Executive Summary, Section 1.5, Section 4.18, and more importantly, in Chapter 9 as an unresolved issue, and have been updated to capture changes in conditions since the publication of the Programmatic Draft EIS.

Please note that at the time of the writing for the Programmatic Final EIS, the general consensus is that as more vaccinations are administered, COVID-19 will become more contained. As we can see in the State, as well as around the country, activities are returning to normal, to pre-COVID-19 conditions when impacts of the Proposed Action were projected out. Hence, the Proposed Action is still very feasible, and in fact, may provide even more beneficial impacts as the State economy begins to recover.

Comment 2: *And who knows how future stadiums will have to be configured to safeguard the fans in a mass environment. Whatever plans may already be in the works are certainly not suited for their intended use in a post Covid environment.*

Response 2: Your comment relating to mass gathering is acknowledged. Future stadium events will follow all CDC and State Department of Health guidelines to ensure the safety of event patrons, staff and performers. However, as noted in Response #1 above, we can see in the State, as well as around the country, activities are returning to normal, to pre-COVID-19 conditions.

Comment 3: *What with the amazing cost overruns on Rail and other priorities to ensure the safety of the population post Covid certainly trump the need for a new stadium and entertainment facility.*

Response 3: Your comments are acknowledged. Please note, as discussed in Section 2.5 of the Programmatic Final EIS, that funds for Proposed Action were, as of July 8, 2019, by signing into law HB1586 HD1 SD2 CD1, appropriated (\$350,000,000) to improve the Project Site for public use and to assist with the construction of the 'Stadium Development District'. However, with the passage of HB1348 (2021) by the senate and signing into law

as Act 146 by Governor Ige, the Stadium Development appropriation has been lowered to \$170,000,000.

The Proposing Agency intends to use this appropriation to leverage private sector investment in the District and deliver the New Aloha Stadium, along with other elements of the Proposed Action, through public-private-partnership arrangements.

Comment 4: *Doubt that investors will be attracted to what could be a totally failed venture from the get go.*

Response 4: Your comment is acknowledged. However, please note that several entities have participated in the procurement process, as discussed in Section 1.6 of the Programmatic Final EIS, as there is much interest in the private sector to develop and implement the Proposed Action.

Comment 5: *And by the way how can an EIS be complete if it does not take into account the ramifications of Covid?*

Response 5: As discussed in Response #1 above, please note that the impacts of the COVID-19 pandemic have been documented throughout this Programmatic EIS process. Specifically, COVID-19 impacts are discussed in the Executive Summary, Section 1.5, Section 4.18, and more importantly, in Chapter 9 as an unresolved issue, and have been updated to capture changes in conditions since the publication of the Programmatic Draft EIS.

Please note that at the time of the writing for the Programmatic Final EIS, the general consensus is that as more vaccinations are administered, COVID-19 will become more contained. As we can see in the State, as well as around the country, activities are returning to normal, to pre-COVID-19 conditions when impacts of the Proposed Action were projected out. Hence, the Proposed Action is still very feasible, and in fact, may provide even more beneficial impacts as the State economy begins to recover.

Comment 6: *To say it is complete is totally illusory and misleading. Understanding what it will take to build for entertainment is at least several years away. Common sense dictates against this project.*

Response 6: Your comments are acknowledged. However, please note that this EIS is intended to be a Programmatic EIS. As discussed in Section 1.2 of the Programmatic Draft EIS:

When additional project-level details are determined or changed, additional project-level environmental review documentation, which may take the form of a Supplemental EIS or Environmental Assessments, may be required if it is determined that significant changes have been made to the project-level designs

such that the contemplated project-level actions are no longer substantially similar to those evaluated in this Programmatic Draft EIS. Such project-level environmental review documents, if required, will analyze a narrower project-level proposal as related to the broad (programmatic) proposal identified within this Programmatic Draft EIS.

This approach, known as “tiering,” is intended to expedite resolution of big-picture issues so that any subsequent documentation can focus on any project-level impacts and issues, as necessary. Those big-picture issues and analyses do not have to be repeated in the subsequent environmental reviews, but rather can be referenced from the programmatic document. Tiering allows any necessary project-level environmental review documents to be conducted closer in time to the actual construction phase, or as funds become available for construction. Tiering also expands the opportunities for public and agency input by breaking the environmental analyses into multiple levels. Individuals interested in the overarching big-picture questions have an opportunity to participate in the Programmatic Draft EIS, and those who are interested in localized impact and mitigation issues can focus their efforts on the specific project-level analyses, when they become available in the future.

Hence, it is anticipated that forthcoming environmental documentation will be required as project-level details are known to further assess project-level impacts.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Leonard Wong](#)
To: [Public Comment](#)
Subject: NEW ALOHA STADIUM
Date: Monday, December 28, 2020 12:40:11 PM

Dear Mr. Okamoto,

We are all excited about our new stadium. We are also anxious to know if solar system with batteries are being considered in the design of the new stadium. This would be an excellent chance to do our share to wean the State off fossil fuel and minimize climate change. Can you imagine how awesome it would be if the electrical needs of the stadium is powered from the sun?

I hope this letter will make a difference for our future.

Mahalo in advance for your concern.

Leonard Wong



WILSON OKAMOTO
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10422-01

Leonard Wong
leonardmarty@gmail.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear Leonard Wong :

Thank you for your comments dated December 28, 2020, regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *We are all excited about our new stadium. We are also anxious to know if solar system with batteries are being considered in the design of the new stadium. This would be an excellent chance to do our share to wean the State off fossil fuel and minimize climate change. Can you imagine how awesome it would be if the electrical needs of the stadium is powered from the sun?*

Response 1: Your comments are acknowledged. Optimizing the Proposed Action’s use of renewable energy is just one strategy the Stadium will use to move toward a sustainable future. The Programmatic Master Plan appended as Appendix A-1, in Section 2.3 *Sustainability and Resilience* provides a deeper discussion of proposed sustainability strategies and designs that will be explored by the Proposed Action. Moreover, as discussed throughout the Programmatic EIS, it is also anticipated that the selected Stadium Developer and Real Estate Developer(s) will, at a minimum, obtain United States Green Building Council’s (USGBC) Leadership in Energy and Environmental Design (LEED) Building Design and Construction (BD+C) Green Building Rating System (the “LEED Rating System”) Silver certification (“LEED Silver Certification”) for each building.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Linda Umstead](#)
To: [Public Comment](#)
Subject: Aloha Stadium plans
Date: Wednesday, December 23, 2020 8:51:12 PM

I like them generally.

I have a future vision of Honolulu in my painting series "Rising Seas" which envisions Honolulu in the year 2120. In it I imagine the seas have risen some 25 feet. Diamond Head is an island. In the crater there is a big entertainment complex similar to your idea. It includes a large casino complex.

I look forward to showing it in the next year. Stay tuned!

Aloha
Linda Umstead
Mililani, Hawaii





WILSON OKAMOTO
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10422-01

Linda Umstead
lindaumsteadillustrations@gmail.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear Linda Umstead :

Thank you for your comments dated December 23, 2020, regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

Comment 1: *I like them generally.*

I have a future vision of Honolulu in my painting series "Rising Seas" which envisions Honolulu in the year 2120. In it I imagine the seas have risen some 25 feet. Diamond Head is an island. In the crater there is a big entertainment complex similar to your idea. It includes a large casino complex.

I look forward to showing it in the next year. Stay tuned!

Response 1: We acknowledge your comments and appreciate your participation in the EIS process. Please note that Section 4.4.1 of the Programmatic EIS discusses sea level rise impacts for both the 3.2-foot and 6-foot sea level rise scenarios as projected by leading climate change scientists.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Public Comment](#)
To: [Andrew Blasko](#)
Subject: Fw: "New Aloha Stadium Entertainment District" (NASED)
Date: Tuesday, February 9, 2021 1:52:32 PM

From: Lisa Franklin <lisanaojohisa8@gmail.com>
Sent: Sunday, February 7, 2021 11:44 PM
To: Public Comment <publiccomment@wilsonokamoto.com>
Subject: "New Aloha Stadium Entertainment District" (NASED)

Aloha Mr. Okamoto,

I am in agreement of building a New Aloha Stadium (NASED) and I have been voicing my own opinion on this matter before HART, that NASED should have been built long before HART.

Note: The HART should have started from Aloha Tower to The Bus Depot at Dillingham (phase 1); from Dillingham to NASED (phase 2); from NASED to Pearl Ridge/Pear City (phase 3); etc. In my opinion the idea was to have each phase have a starting and ending point with stops in between where residents, motorists, visitors, and tourists could physically go to one point of interest and arrive somewhere to go to (airport), visit, shop, sightsee, hotels, NASED, etc. while the rest of the phases are being built! The revenue generated from the usage of HART would help to maintain and hopefully offset the City cost to pay for the continuance to the next phase. Why on earth was the HART built backwards where motorists have no place to go until the HART is complete?!!!

The reality we are faced with now is that jobs will be created to build NASED and thereafter completion will have a positive impact for the state, economy, and residents. The HART should continue to be placed on hold until revenue generated from NASED (hotels, restaurants, sporting events, concerts, entertainment gatherings, etc.) can be used to continue with HART as well as maintenance and rebuilding the state's infrastructure.

I'm hoping that NASED will be built, using environmental friendly materials and products, recycled materials, solar, etc. Keeping in mind and understanding the surrounding environment, landscape, and culture are also important to the residents on O'ahu. That NASED be built with state of the art technology and security in this growing competitive economic world.

Thank you,
Lisa Franklin

Sent from my iPhone



WILSON OKAMOTO
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10422-01

Lisa Franklin
lisanaojohisa8@gmail.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear Lisa Franklin:

Thank you for your comments dated February 7, 2021 regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *I am in agreement of building a New Aloha Stadium (NASED) and I have been voicing my own opinion on this matter before HART, that NASED should have been built long before HART.*

Response 1: Your position on the Proposed Action and the HART project are acknowledged. Although, the alignment of the construction scheduled for the HART project is not within the scope of the evaluation for this Programmatic EIS. Please note as discussed at the EIS Scoping Meeting and described in the EIS Preparation Notice published on September 8, 2019, as well as reiterated in Section 1.1 of the Programmatic Draft EIS, “*The Proposed Action encompasses the construction of a new, modern stadium facility that will be supported by complimentary mixed-use development.*” Therefore, the subject Programmatic Draft EIS is intended to assess the potential effects associated with the Proposed Action on various environmental resource categories as prescribed by Section 11-200.1-24.

Comment 2: *Note: The HART should have started from Aloha Tower to The Bus Depot at Dillingham (phase 1); from Dillingham to NASED (phase 2); from NASED to Pearl Ridge/Pear City (phase 3); etc. In my opinion the idea was to have each phase have a starting and ending point with stops in between where residents, motorists, visitors, and tourists could physically go to one point of interest and arrive somewhere to go to (airport), visit, shop, sightsee, hotels, NASED, etc. while the rest of the phases are being built! The*

revenue generated from the usage of HART would help to maintain and hopefully offset the City cost to pay for the continuance to the next phase. Why on earth was the HART built backwards where motorists have no place to go until the HART is complete?!!!

Response 2: Your comments are acknowledged. However, as noted in Response #1 above, the HART project is not within the scope of the evaluation for this Programmatic EIS. Please note as discussed at the EIS Scoping Meeting and described in the EIS Preparation Notice published on September 8, 2019, as well as reiterated in Section 1.1 of the Programmatic Draft EIS, “*The Proposed Action encompasses the construction of a new, modern stadium facility that will be supported by complimentary mixed-use development.*” Therefore, the subject Programmatic Draft EIS is intended to assess the potential effects associated with the Proposed Action on various environmental resource categories as prescribed by Section 11-200.1-24.

Comment 3: *The reality we are faced with now is that jobs will be created to build NASED and thereafter completion will have a positive impact for the state, economy, and residents. The HART should continue to be placed on hold until revenue generated from NASED (hotels, restaurants, sporting events, concerts, entertainment gatherings, etc.) can be used to continue with HART as well as maintenance and rebuilding the state’s infrastructure.*

Response 3: Your comments are acknowledged. Please note that the Proposed Action is anticipated to have a direct economic impact on the Project Region, as well as the State. In summary, as discussed in Section 4.13.3 of the Programmatic EIS, the Proposed Action (at Full Build-Out) is anticipated to generate a Net Present Value (NPV) of over \$1.8 billion in total economic output, over \$700 million in personal earnings, and over \$198 million in State and County tax revenues, assuming an 8.0 percent discount over a 25-year period. After the Full Build-Out, up to 1,190 net new annual jobs are anticipated to be supported by operations of the Proposed Action

Comment 4: *I’m hoping that NASED will be built, using environmental friendly materials and products, recycled materials, solar, etc.*

Response 4: Please note that energy efficient design and energy conservation measures will be implemented across the Project Site under Developer Procurement. As stated in Chapter 5 of the Programmatic Draft EIS, it is anticipated that the selected Stadium Developer and Real Estate Developer(s) shall use one of the following building life cycle assessment (LCA) tools, or their equivalent, to provide total GHG emission as well as document other environmental impacts of the building materials and their construction. Specifically, the selected Stadium Developer and Real Estate Developer(s) shall prepare and submit annual LCA reports, outlining the total carbon emissions generated by the construction work, determined in accordance with a defined methodology consistent with BMPs. It is also anticipated that the selected Stadium Developer and Real Estate Developer(s) will, at a minimum, obtain United States Green Building Council’s (USGBC) Leadership in Energy and Environmental Design (LEED) Building Design and Construction (BD+C) Green

Building Rating System (the “LEED Rating System”) Silver certification (“LEED Silver Certification”) for each building.

Comment 5: *Keeping in mind and understanding the surrounding environment, landscape, and culture are also important to the residents on O’ahu. That NASED be built with state of the art technology and security in this growing competitive economic world.*

Response 5: It is anticipated that the development of the Proposed Action will incorporate landscaping that features plants that are endemic to the Hawaiian Islands as well as designs that incorporate and promote the values of Hawaiian culture. However, the selected Stadium Developer and Real Estate Developer(s) will determine the final design of the Proposed Action.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Mary Kawasaki](#)
To: [Public Comment](#)
Subject: Stadium design
Date: Saturday, December 26, 2020 10:40:34 AM

I really like the rendering that is in the star advertiser today 12/26. Look very functional for the size that we need.

Mary Kawasaki



WILSON OKAMOTO
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10422-01

Mary Kawasaki
mary.kawasaki@hotmail.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASD)
Hālawā, O‘ahu, Hawai‘i

Dear Mary Kawaski :

Thank you for your comments dated December 26, 2020, regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *I really like the rendering that is in the star advertiser today 12/26. Look very functional for the size that we need.*

Response 1: We acknowledge your comment relating to the conceptual design of the Proposed Action. It should be noted that the designs published in the Programmatic Draft EIS and Programmatic Master Plan are only conceptual in nature and the selected Stadium Developer and Real Estate Developer(s) will determine the final design for the Proposed Action.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Matt](#)
To: [Public Comment](#)
Subject: Public comments for NASED
Date: Thursday, December 24, 2020 9:47:11 AM

Looking at the plans and seeing all the trees in the large parking lot got be thinking...

1. In the long run...would the tree roots push up the parking lot, like many do in hawaii. The short term, probably not.
2. Would it not be better to half the parking lot covered by solar panels instead? Also provides shade for those walking the parking lots. Maybe some of the savings in tax incentives and electricity could be reinvested in the maintenance and upkeep. Additionally, it could help with filling the need for jobs in the renewable energy sector.



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10422-01

Matt
mabeiermeister@gmail.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASD)
Hālawā, O‘ahu, Hawai‘i

Dear Matt:

Thank you for your comments dated December 24, 2020, regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *In the long run...would the tree roots push up the parking lot, like many do in hawaii. The short term, probably not.*

Response 1: It is acknowledged that planting large trees can result in the buckling and cracking of the paved parking surfaces. In this event, it is anticipated the trees and parking service would require maintenance to mitigate again any impacts caused by the tree roots. The final landscaping and design of the Project Site will be determined by the selected Stadium Developer and Real Estate Developer(s).

Comment 2: *Would it not be better to half the parking lot covered by solar panels instead? Also provides shade for those walking the parking lots. Maybe some of the savings in tax incentives and electricity could be reinvested in the maintenance and upkeep. Additionally, it could help with filling the need for jobs in the renewable energy sector.*

Response 2: Please note that energy efficient design and energy conservation measures will be implemented across the Project Site under Developer Procurement. As stated in Chapter 5 of the Programmatic Draft EIS, it is anticipated that the selected Stadium Developer and Real Estate Developer(s) shall use one of the following building life cycle assessment (LCA) tools, or their equivalent, to provide total GHG emission as well as document other environmental impacts of the building materials and their construction. Specifically, the selected Stadium Developer and Real Estate Developer(s) shall prepare and submit annual LCA reports, outlining the total carbon emissions generated by the construction work,

determined in accordance with a defined methodology consistent with BMPs. It is also anticipated that the selected stadium Developer and Real Estate Developer(s) will, at a minimum, obtain United States Green Building Council's (USGBC) Leadership in Energy and Environmental Design (LEED) Building Design and Construction (BD+C) Green Building Rating System (the "LEED Rating System") Silver certification ("LEED Silver Certification") for each building.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Matthew Cooke](#)
To: [Public Comment](#)
Subject: Aloha Stadium
Date: Wednesday, December 23, 2020 5:05:09 PM

If Aloha Stadium has reached its life expectancy, than it has become a safety issue. If so, Take it down and rebuild anew. Maintenance for the current Aloha Stadium seems more than likely a money pit.

Sent from my iPad



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10422-01

Matthew Cooke
mrc8283@aol.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear Matt Cooke:

Thank you for your comments dated December 23, 2020, regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *If Aloha Stadium has reached its life expectancy, than it has become a safety issue. If so, Take it down and rebuild anew. Maintenance for the current Aloha Stadium seems more than likely a money pit.*

Response 1: We concur with your comments. As discussed in Section 2.1 of the Programmatic Draft EIS the existing Aloha Stadium has stood for over 45 years and is deteriorating structurally, with numerous deferred maintenance issues. It has fallen out of compliance with current accessibility and building codes and lacks the amenities of other modern stadiums. While it was once hailed as a first-class, state-of-the-art facility, the existing Aloha Stadium has effectively served its mission as a gathering place well beyond its practical life-span as a multi-purpose venue. Its numerous unaddressed deferred maintenance items are contributing to its obsolescence, and substantial ongoing investment is required to keep it functioning, accessible, and safe for public use.

In 2018, DAGS commissioned a planning study that was prepared by Wiss, Janney Elstner Associates, Inc. (WJE). This planning study identified several deficiencies (of varying degrees of severity), as well as several items that required attention to protect public safety. Noted deficiencies of the existing Aloha Stadium included, but were not limited to deteriorated areas and corrosion, structural issues, necessary replacement of seats and other stadium equipment, non-compliant code conditions, and the considerable nature of maintenance costs that would be required to abate the ongoing corrosion of the structure.

This study highlighted the urgency of systemic problems that were continuing to grow as a result of deferred maintenance and chronic corrosive conditions and provided prioritized recommended repairs.

Although a range of structural upgrades have been made to mitigate the corrosion of the existing Aloha Stadium since its construction, approximately \$423 million in deferred maintenance has accumulated to date, including \$121 million that is needed in Americans with Disabilities Act (ADA)-related improvements and code compliance. The scope of these repairs is discussed in further detail within the appended NASED Programmatic Master Plan (PMP) and WJE Report included herein as Appendix A-1: NASED Programmatic Master Plan and A-4: WJE Report, respectively. The cost of such repairs were estimated to grow at a rate of approximately 5% per year, meaning that funding such repairs requires over \$30 million of annual contributions over the next 25 years. Failure to fund the necessary health and safety repairs will eventually lead to closing down portions of the stadium (Foley, 2017). Since 2008, the State has spent approximately \$117 million towards maintaining the existing stadium, a figure that includes on-going maintenance efforts. Nonetheless, this capital expenditure has not adequately addressed all of the existing Aloha Stadium's deficiencies.

By contrast, construction of a New Aloha Stadium facility is estimated to cost approximately \$324.5 million (2017 dollars), including \$260 million for building hard costs (including a 10% contingency), in addition to costs associated with: furniture, fixtures and equipment (FF&E), demolition, minor excavation, utility relocation, and abandonment), \$15 million for site preparation, and \$49.5 million in soft costs. This new multipurpose stadium would provide a comprehensive array of fan amenities and support spaces to market new events, including more seating options, increased concessions, and improved facility circulation. Moreover, this new facility would be fully ADA compliant and would decrease overall operational expenses through more efficient building systems. Infrastructure improvement costs are, however, not factored into these cost projections.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

10422-01
Letter to Matt Cooke
Page 3

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Public Comment](#)
To: [Andrew Blasko](#)
Subject: Fw: Aloha Stadium Redevelopment Project Input
Date: Tuesday, February 9, 2021 1:52:36 PM

From: Matthew Galacia <mgalacia@gmail.com>
Sent: Monday, February 8, 2021 12:03 AM
To: Public Comment <publiccomment@wilsonokamoto.com>
Subject: Aloha Stadium Redevelopment Project Input

Aloha,

I like the vision of putting together a new stadium, hotels and other amenities to support a more robust attraction. I feel in order to attract the likes of professional levels, they need to redevelop in a way that would be highly professional and provide a local experience. I believe one market they could tap into would be the nba. They should look into designing or developing a basketball arena or multi-purpose arena to try to attract the likes of nba teams as well as host concerts much like the existing blaisdell. It would be nice to see the development project not only attract the NFL pro bowl back to the islands but just imagine if there was an arena for nba / international teams to host exhibitions as well as concerts. Imagine an arena where the hhsaa would have a state tournament...at the aloha stadium redevelopment district. I just think since there are hotels / condos already planned there, it would be nice to have another form of revenue and provide another venue so it's not limited to making money only during football season. Please please, don't let UH be the only school to have to play in their home stadium and have to pay...ahhhh! But imagine a district that can attract both nfl and nba teams with a new football stadium AND arena (for basketball and volleyball). Imagine team USA coming to play exhibitions in the football stadium and concurrently in the arena. It would be nice to see!

Respectfully,

MG

Sent from my iPad



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10422-01

Matthew Galacia
mgalacia@gmail.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear Matthew Galacia:

Thank you for your comments dated February 8, 2021 regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *I like the vision of putting together a new stadium, hotels and other amenities to support a more robust attraction. I feel in order to attract the likes of professional levels, they need to redevelop in a way that would be highly professional and provide a local experience.*

Response 1: We acknowledge your comments. Based on community input and various technical studies, the Proposed Action is envisioned to encompass the New Aloha Stadium, approximately 730,000 gross square feet (GSF) of residential space, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF of hotel space. However, as noted throughout the Programmatic EIS, that final design of the Project Site and use and space allocation will be determined by the Stadium Authority, the selected Stadium Developer and Real Estate Developer(s). Please note that the State of Hawai‘i is the land owner of the Project Site, and in partnership with the selected Stadium Developer and Real Estate Developer(s), may pursue different land-use configurations and strategies than what is presented in the Programmatic EIS to maximize the value of the Proposed Action and address a number of Statewide needs. The State of Hawai‘i, as the land owner, has the ultimate say in how they use their lands to fit their needs. Furthermore, it has not yet been determined how Act 146 will be administered, specifically, how it relates to implementing a “stadium development district.” However, it is expected that the State of Hawai‘i, in partnership with the selected Stadium Developer and Real Estate Developer(s),

will coordinate and work closely with the CCH to implement the Proposed Action, and to minimize any potential impacts on land uses at the Project Site and the Project Region.

Comment 2: *I believe one market they could tap into would be the nba. They should look into designing or developing a basketball arena or multi-purpose arena to try to attract the likes of nba teams as well as host concerts much like the existing blaisdell. It would be nice to see the development project not only attract the NFL pro bowl back to the islands but just imagine if there was an arena for nba / international teams to host exhibitions as well as concerts. Imagine an arena where the hhsaa would have a state tournament...at the aloha stadium redevelopment district. I just think since there are hotels / condos already planned there, it would be nice to have another form of revenue and provide another venue so it's not limited to making money only during football season.*

Response 2: We acknowledge your comments. However, it is not anticipated that an arena would be constructed at the Project Site. The Programmatic Final EIS includes a market feasibility & economic review and analysis prepared by Victus Advisors conducted in conjunction with master planning and preliminary design efforts for the Proposed Action. This documentation clearly underscores that the existing Aloha Stadium's capacity of 50,000, by far, and in large exceeds current and anticipated future market needs. In observance of the analysis and guidance set forth by Victus Advisors as well as market sounding and user analysis by Stadium and Industry consultants, the unified recommendation is that the construction of a 27,500 - 35,000 seat capacity stadium would best serve current and anticipated future market demand.

Furthermore, before the 2018 fiscal year, Aloha Stadium was not widely considered as a major venue for concert activities. As the Aloha Stadium began to be marketed more heavily as a concert venue over the course of 2019, it was revealed through consultation with entertainment industry professionals that the Aloha Stadium's current capacity of 50,000 seats was a significant deterrent to the candidacy of the existing Aloha Stadium as a venue for major artists. Promoters and performers alike voiced that the ideal range for seating at a stadium-set concert lies between 25,000 and 30,000 seats.

Since the fiscal year of 2018, Aloha Stadium has hosted eight concerts, with seven held within the fiscal year of 2019. Six concerts have been booked/promoted by Live Nation with an average of 30,743 attendees, right in line with feedback provided by industry professionals. Nonetheless, as currently proposed, in addition to a raw 35,000 fixed seat capacity, concert events could potentially utilize field space for additional viewership that could accommodate upwards of 10,000 additional attendees.

With regard to sporting events held at Aloha Stadium, Division 1 Football Bowl Subdivision (D1-FBS) football factors in as the central activity featured. Specifically, Aloha Stadium was the home to the University of Hawai'i Rainbow Warriors Football Program (UH Football) when it was in operation. The University of Hawai'i is a member of the Mountain West Conference, which is considered to be a Mid-Major or Group of Five (G5) conference,

and has ranked 81st in attendance among all D1-FBS institutions in the most recent season of play with no attendance restrictions (2019), bordering just under 25,000 attendees for home game attendance. Overall, attendance trends nation-wide are in sharp decline. The 2019 D1-FBS season resulted in the lowest overall attendance in the past 24 years (41,477 per game), with the Mountain West posting its lowest average per game attendance ever (23,232 per game). It is further notable that over the past five years, running from the 2014 season to 2019 season, average UH Football attendance has also trended down, reflecting a decline in average attendance. Moreover, UH Football has not drawn a sell-out crowd since 2007. By contrast, the highest attended game within the past five years attracted approximately 36,411 attendees (2014 season opener), under the context of the capacity of the existing Aloha Stadium (50,000 seats), the highest attended UH Football event held at the Stadium over the course of the last five years would have a little more than a 25% of the seats vacant. By contrast, under the Proposed Action the current capacity of 50,000 seats (35,000 seat stadium), with a similar level of attendance, the Stadium would be 100% filled to capacity. There is a quality all unto-itself to having a sold-out-stadium that cannot be tangibly quantified.

Overall, the proposed New Aloha Stadium (35,000 seat capacity) would create the opportunity to serve as a viable venue for a greater range of events. Possible events include rugby, motor sports, soccer and mixed martial arts. These events typically will not pursue stadiums larger than 35,000, as the demand of their audience typically would not justify the use of a larger venue, particularly under the context of the market that would be locally served here on O‘ahu.

Comment 4: *Please please, don't let UH be the only school to have to play in their home stadium and have to pay...ahhhh!*

Response 4: Your comments are acknowledged. However, it is anticipated that the University of Hawai'i (UH) will have to pay a fee for the use of the stadium. It is important to note that the UH is not responsible for the maintenance and management of the Aloha Stadium, thus it doesn't not take on the burden of these costs. Prior to the condemnation of the existing Aloha Stadium, UH paid approximately \$90,000 to \$100,000 dollars a game for operational expenses, including security, box office, staffing and clean up, but is not charged rent and does not share stadium revenues. Additionally, UH receives revenue from game day parking and can sell advertisement space along the sidelines and end zones of the field. UH does not receive revenue from concessions as they too are tenants of the concessions spaces and are independent of the University.

Comment 5: *But imagine a district that can attract both nfl and nba teams with a new football stadium AND arena (for basketball and volleyball). Imagine team USA coming to play exhibitions in the football stadium and concurrently in the arena. It would be nice to see!*

Response 5: Your comments are acknowledged. As noted in Response #3 above, it is not anticipated that an arena would be constructed at the Project Site. The Programmatic Final EIS includes a market feasibility & economic review and analysis prepared by Victus Advisors conducted in conjunction with master planning and preliminary design efforts for the Proposed Action.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Public Comment](#)
To: [Andrew Blasko](#)
Subject: Fw: Aloha Stadium
Date: Tuesday, February 9, 2021 1:52:57 PM

From: Melvin Leon Guerrero <melvinleonguerrero@me.com>
Sent: Monday, February 8, 2021 8:56 AM
To: Public Comment <publiccomment@wilsonokamoto.com>
Subject: Aloha Stadium

I have lived less than a 1/4 from the Aloha Stadium since 2007. My family and I have enjoyed walking to football games, concerts, shopping at the swap meet, etc. all the fun activities that the stadium brings us. We absolutely love the idea of the site turning into an entertainment district with condos on site. We would love to see it more lively, abundance of people/residents, constant events or activities planned and being a constant district of city lights and fun.

In light of the pandemic I would encourage the stadium have more pods, suites, sectioned areas, club rooms, etc where people can feel safe with just their family. They can be small sections of 6 people max. Just as long so that people can be with their family and enjoy different events. I would pay a premium to have that exclusivity for my family. It would be nice to have some near the field and not just in the higher areas of the stadium. In addition, I would highly recommend the thought of having functions, parties, events that people can rent space for birthdays, anniversary's, weddings etc.

I envision some stores there like mini cafes, a stadium gift shop, local food, etc. I think that will keep things lively.

Lastly looking towards the future, a lane throughout the district dedicated to mobile items like small hoverboards, golf carts, bikes, strollers, wheelchairs, skateboards, electric scooters, etc.

Melvin

Sent from my iPhone



WILSON OKAMOTO
C O R P O R A T I O N
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10422-01

Melvin Leon Guerrero
melvinleonguerrero@me.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear Melvin Leon Guerrero:

Thank you for your comments dated February 8, 2021, regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *I have lived less than a 1/4 from the Aloha Stadium since 2007. My family and I have enjoyed walking to football games, concerts, shopping at the swap meet, etc. all the fun activities that the stadium brings us. We absolutely love the idea of the site turning into an entertainment district with condos on site. We would love to see it more lively, abundance of people/residents, constant events or activities planned and being a constant district of city lights and fun.*

Response 1: Your comments are acknowledged and we understand that you are supportive of the Proposed Action.

Comment 2: *In light of the pandemic, I would encourage the stadium have more pods, suites, sectioned areas, club rooms, etc where people can feel safe with just their family. They can be small sections of 6 people max. Just as long so that people can be with their family and enjoy different events. I would pay a premium to have that exclusivity for my family. It would be nice to have some near the field and not just in the higher areas of the stadium.*

Response 2: Your comments are acknowledged. As noted throughout the Programmatic EIS, the final design of the Stadium Development component of the Proposed Action will be determined by the Stadium Authority, the selected Stadium Developer and Real Estate

Developer(s). However, it is anticipated that the new Aloha Stadium will feature more club and premium seating as compared to the existing Aloha Stadium.

As it relates to COVID-19 impacts, please note that the impacts of the COVID-19 pandemic have been documented throughout this Programmatic EIS process. Specifically, COVID-19 impacts are discussed in the Executive Summary, Section 1.5, Section 4.18, and more importantly, in Chapter 9 as an unresolved issue, and have been updated to capture changes in conditions since the publication of the Programmatic Draft EIS.

Please note that at the time of the writing for the Programmatic Final EIS, the general consensus is that as more vaccinations are administered, COVID-19 will become more contained. As we can see in the State, as well as around the country, activities are returning to normal, to pre-COVID-19 conditions when impacts of the Proposed Action were projected out. Hence, the Proposed Action is still very feasible, and in fact, may provide even more beneficial impacts as the State economy begins to recover.

Please note however, future stadium events will follow all CDC and State Department of Health guidelines to ensure the safety of event patrons, staff and performers.

Comment 3: *In addition, I would highly recommend the thought of having functions, parties, events that people can rent space for birthdays, anniversary's, weddings etc.*

Response 3: Your comment is acknowledged. The availability for space to be rented for private events within the Stadium Development will be managed by the Stadium Authority and within the Real Estate Development will be managed by the selected Real Estate Developer(s).

Comment 4: *I envision some stores there like mini cafes, a stadium gift shop, local food, etc. I think that will keep things lively.*

Response 4: Your comments are acknowledged. the Proposed Action which is anticipated to encompass approximately 730,000 gross square feet (GSF) of residential space, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF of hotel space will create a vibrant district which may include entertainment venues, retail stores, restaurants, housing, hotels, recreational sites, cultural amenities, green space, etc.

Comment 5: *Lastly looking towards the future, a lane throughout the district dedicated to mobile items like small hoverboards, golf carts, bikes, strollers, wheelchairs, skateboards, electric scooters, etc.*

Response 5: Your comments are acknowledged. The Proposed Action places heavy emphasis on Transit-Oriented Development. The Programmatic Master plan outlines site guidelines that include the pedestrian and bike pathways. Additionally, the Project Site will follow all ADA requirements to allow accessibility for wheelchairs. The selected Stadium

Developer and Real Estate Developer(s) will integrate strategies to include alternative modes of transportation within the Project Site.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Michael Yee](#)
To: [Public Comment](#)
Cc: [Stanley Chang](#)
Subject: Fwd: What will Aloha Stadium look like?
Date: Tuesday, January 26, 2021 11:34:29 AM
Attachments: [Microsoft Word - NASED DEIS - Form Letter.docx.pdf](#)

See attached.

Michael Yee | Partner

MCYIA Interior Architecture and Design

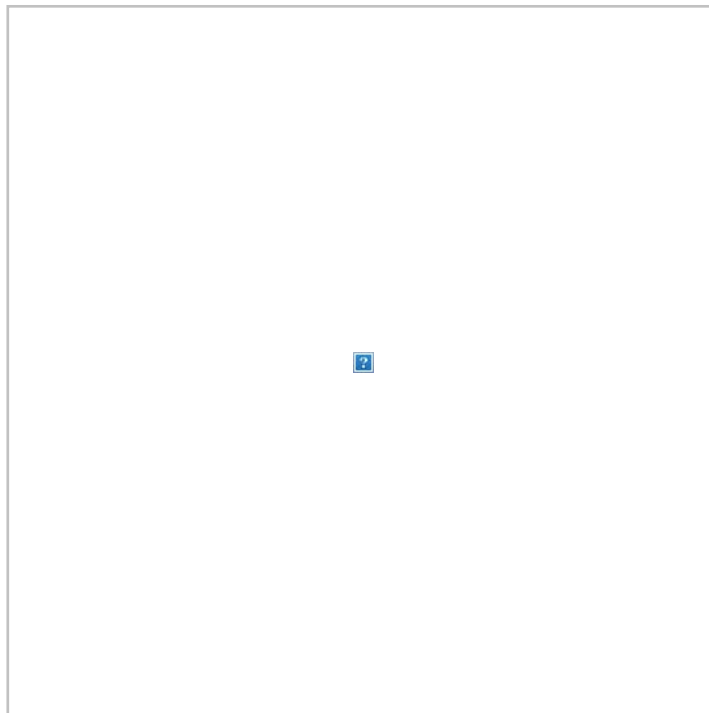
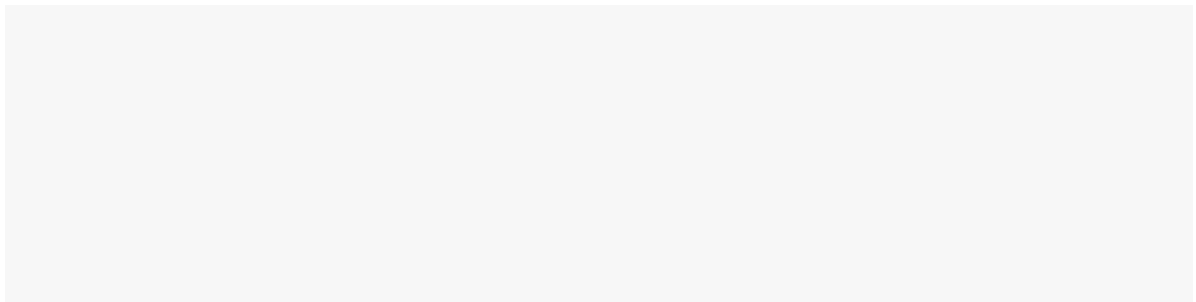
1050 Queen Street | Suite 201 | Honolulu, HI 96814

808.200.1100 phone | 808.741.0111 mobile

www.mcyia.com

Begin forwarded message:

From: Senator Stanley Chang <senchang@capitol.hawaii.gov>
Subject: What will Aloha Stadium look like?
Date: January 26, 2021 at 10:03:55 AM HST
To: <myee@mcya.com>
Reply-To: Senator Stanley Chang <senchang@capitol.hawaii.gov>



Aloha friends,

I'm writing to ask for your help on one of the most critical housing decisions that will be made this year. Will the [Aloha Stadium redevelopment](#) waste 60+ acres of state owned land on a new strip mall, 1,800 luxury condos, an office building, and a hotel? Or will we finally end our housing shortage by building 100,000 new units of non-profit housing for local people?

Public feedback on these documents is crucial, especially with a project like this one. It isn't an overstatement: this project will determine the future of housing for hundreds of thousands of people throughout the State of Hawaii.

We need your help now to submit your comments in support of 100,000 units of housing on the Stadium site. You can just copy and paste this [sample letter](#) and email it to nased.eis@wilsonokamoto.com. **The deadline for submitting comments is Thursday, February 8.**

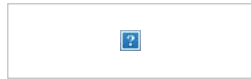
For more information on the existing plans, you can register for two information sessions that will "discuss the EIS process, the accompanying conceptual Master Plan and how comments and questions regarding the EIS can be submitted for consideration." To register to attend either meeting, please follow the links below:

- Community Meeting on Jan. 26 (7 to 9 PM): <https://bit.ly/2KpGjmx>
- Community Meeting on Jan. 28 (7 to 9 PM): <https://bit.ly/2Kpyzks>

Please don't forget to send your comments in support of 100,000 housing units at the Aloha Stadium by next Thursday, February 8.

Thank you for your support--and for ensuring that one job is enough for every future generation of local people.

Sincerely,



Senator Stanley Chang
Chair, Committee on Housing
Hawaii State Senate



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Our mailing address is:
415 S. Beretania Street, Honolulu, Hawaii 96813

Want to change how you receive these emails?
You can [update your preferences](#) or [unsubscribe from this list](#)

January 26, 2020
Michael Yee
1050 Queen St, Suite 201
Honolulu, HI 96814
(808) 200-1100

SUBJECT: Build 100,000 housing units at the Aloha Stadium site

Aloha,

The current plan to surround the new stadium with retail, office space, hotel, and 1,813 condos is economically unrealistic for the foreseeable future, and the EIS should instead include analysis of the environmental impacts of least 200 towers including 100,000 units of housing on the Aloha Stadium site. While we recognize the need to replace Aloha Stadium, a new stadium should be confined to as small a size as possible. The EIS is supposed to determine the maximum quantities of development, therefore, it should evaluate the maximum quantity of housing units feasible with transit-oriented assumptions.

Ending the housing shortage must be the top priority of the State of Hawaii. Not only does housing top surveys of Hawaii's policy priorities, but the State also has a statutory obligation to "[e]ffectively accommodate the housing needs of Hawaii's people" (HRS § 226-19). To fulfill this obligation, Governor Ige, Senator Chang, and other state officials have advocated the use of state owned lands near rail stations to develop high density housing for sale to Hawaii residents. Given the location of a rail station on the Aloha Stadium site, this parcel is an ideal site for this vision.

Many comparable facilities around the world today are surrounded by high density development, such as Wankhede Stadium in Mumbai, Madison Square Garden in New York, and Happy Valley Racecourse in Hong Kong. Because a stadium itself would be small--Soldier Field, the home of the Chicago Bears, is only seven acres--over 90 percent of the Aloha Stadium site, as many as 91 acres, can be used for high density housing.

The rise of online shopping and the coronavirus pandemic have greatly reduced demand for brick and mortar retail and office space, both worldwide and in Hawaii. A recent study estimated that retail vacancies on Oahu will grow by 270,000 square feet this year alone. A strip mall or office building is unlikely to generate revenue to pay for the new stadium. By contrast, the new residents of 100,000 housing units will generate enormous amounts of economic activity and dramatically expand the tax base, thereby supporting the new stadium and other operations of the State.



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10422-01

Michael Yee
1050 Queen St, Suite 201
Honolulu, HI 96814
myee@mcyia.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear Michael Yee:

Thank you for your comments dated January 26, 2021, regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the scope and content of the Draft EIS:

Comment 1: *The current plan to surround the new stadium with retail, office space, hotel, and 1,813 condos is economically unrealistic for the foreseeable future, and the EIS should instead include analysis of the environmental impacts of least 200 towers including 100,000 units of housing on the Aloha Stadium site. While we recognize the need to replace Aloha Stadium, a new stadium should be confined to as small a size as possible. The EIS is supposed to determine the maximum quantities of development, therefore, it should evaluate the maximum quantity of housing units feasible with transit-oriented assumptions.*

Ending the housing shortage must be the top priority of the State of Hawaii. Not only does housing top surveys of Hawaii’s policy priorities, but the State also has a statutory obligation to “[e]ffectively accommodate the housing needs of Hawaii’s people” (HRS § 226-19). To fulfill this obligation, Governor Ige, Senator Chang, and other state officials have advocated the use of state owned lands near rail stations to develop high density housing for sale to Hawaii residents. Given the location of a rail station on the Aloha Stadium site, this parcel is an ideal site for this vision.

Response 1: Your comments are acknowledged. Please note that the Proposed Action, which is premised upon the Programmatic Master Plan appended to the Programmatic EIS as Appendix A, reflects the aggregated collection of extensive and exhaustive input from

From: [Public Comment](#)
To: [Andrew Blasko](#)
Subject: Fw: Stadium Proposal District
Date: Tuesday, February 9, 2021 1:53:14 PM

From: Metcalf, Nancy <NancyM@cbpacific.com>
Sent: Monday, February 8, 2021 10:47 AM
To: Public Comment <publiccomment@wilsonokamoto.com>
Subject: Stadium Proposal District

I believe that the only focus at this time should be a new Stadium with approx.. 35,000 seats. We need to give the UH a place to play and it could also be a venue for concerts. Getting into designing an entire new area for entertainment, retail, etc., will just prolong the loss of a stadium. PLEASE FOCUS ON THE STADIUM ONLY!!

Nancy Metcalf

Sent from [Mail](#) for Windows 10

***Wire Fraud is Real*. Before wiring any money, call the intended recipient at a number you know is valid to confirm the instructions.** Additionally, please note that the sender does not have authority to bind a party to a real estate contract via written or verbal communication.

area residents, members of the public, existing Aloha Stadium stakeholders and public agencies as discussed in Section 2.3 of the Programmatic EIS. Additionally, the Project Team conducted a substantial number of public outreach meetings and has considered public input throughout the EIS process. Hence, the Proposed Action represents the vision of the overall community for the Project Site. Based on community input and various technical studies, the Proposed Action is envisioned to encompass the New Aloha Stadium, approximately 730,00 gross square feet (GSF) of residential space, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF of hotel space. However, as noted throughout the Programmatic EIS, that final design of the Project Site and use and space allocation will be determined by the Stadium Authority, the selected Stadium Developer and Real Estate Developer(s). Please note as discussed at the EIS Scoping Meeting and described in the EIS Preparation Notice published on September 8, 2019, as well as reiterated in Section 1.1 of the Programmatic Draft EIS, *“The Proposed Action encompasses the construction of a new, modern stadium facility that will be supported by complimentary mixed-use development.”* Therefore, the subject Programmatic Draft EIS is intended to assess the potential effects associated with the Proposed Action on various environmental resource categories as prescribed by Section 11-200.1-24.

It is acknowledged that the Programmatic Draft EIS did not evaluate, *“the environmental impacts of least 200 towers including 100,000 units of housing on the Aloha Stadium site,”* as such a program would not meet the goals and objectives of the Proposed Action as described in Section 2.2 of the Programmatic Draft EIS. Nonetheless, the Proposed Action is envisioned to directly serve regional and State housing demands through the creation of a diverse range of residential options, accounting for upwards of 1,800 new housing units as discussed in Section 2.1 of the Programmatic Draft EIS. However, it should be noted that the extent of residential programming will ultimately be determined by the Stadium Authority and the selected Real Estate Developer(s) which will comply with applicable affordable housing requirements.

Please note that due to broad comments raised in response to the Programmatic Draft EIS, Section 3.4 has been added to the Programmatic Final EIS which on a conceptual basis, evaluated a conceptual affordable housing project site design alternative program scenario with 20,000 to 100,000 units within the confines of the Project Site. It is readily apparent that this type of programming would not be compatible with the general purpose and need, as well as goals and objectives of the Proposed Action. Moreover, such a program and its anticipated impacts would require the preparation of a separate, comprehensive EIS documentation and evaluation.

With regards to your comment the use of State lands near rail stations, please note that the State of Hawai‘i is the land owner of the Project Site, and in partnership with the selected Stadium Developer and Real Estate Developer(s), may pursue different land-use configurations and strategies than what is presented in the Programmatic EIS to maximize the value of the Proposed Action and address a number of Statewide needs. The State of Hawai‘i, as the land owner, has the ultimate say in how they use their lands to fit their

needs. Furthermore, it has not yet been determined how Act 146 will be administered, specifically, how it relates to implementing a “stadium development district.” However, it is expected that the State of Hawai‘i, in partnership with the selected Stadium Developer and Real Estate Developer(s), will coordinate and work closely with the CCH to implement the Proposed Action, and to minimize any potential impacts on land uses at the Project Site and the Project Region.

Comment 2: *Many comparable facilities around the world today are surrounded by high density development, such as Wankhede Stadium in Mumbai, Madison Square Garden in New York, and Happy Valley Racecourse in Hong Kong. Because a stadium itself would be small--Soldier Field, the home of the Chicago Bears, is only seven acres--over 90 percent of the Aloha Stadium site, as many as 91 acres, can be used for high density housing.*

Response 2: Your comments are acknowledged. As noted in Response #1 above, the State of Hawai‘i, as the land owner, has the ultimate say in how they use their lands to fit their needs. However, it is expected that the State of Hawai‘i, in partnership with the selected Stadium Developer and Real Estate Developer(s), will coordinate and work closely with the CCH to implement the Proposed Action and to minimize any potential impacts on land uses at the Project Site and the Project Region. It is anticipated that the Proposed Action will result in the New Aloha Stadium, approximately 730,000 gross square feet (GSF) of residential space, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF of hotel space, which can be considered high density development across the Project Site.

Comment 3: *The rise of online shopping and the coronavirus pandemic have greatly reduced demand for brick and mortar retail and office space, both worldwide and in Hawaii. A recent study estimated that retail vacancies on Oahu will grow by 270,000 square feet this year alone. A strip mall or office building is unlikely to generate revenue to pay for the new stadium. By contrast, the new residents of 100,000 housing units will generate enormous amounts of economic activity and dramatically expand the tax base, thereby supporting the new stadium and other operations of the State.*

Response 3: Your comments are acknowledged. However, based on the economic and market analysis conducted by Victus Advisors in 2019, the Proposed Action which is anticipated to encompass approximately 730,000 gross square feet (GSF) of residential space, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF of hotel space will create a vibrant district that could, in summary, generate a Net Present Value (NPV) of over \$1.8 billion in total economic output, over \$700 million in personal earnings, and over \$198 million in State and County tax revenues, assuming an 8.0 percent discount over a 25-year period. After the Full Build-Out, up to 1,190 net new annual jobs are anticipated to be supported by operations of the Proposed Action. Hence, it is anticipated that the Proposed Action will also generate enormous amounts of economic activity while also achieving the goals and objectives of the Proposed Action, as well as the

Hālawā Area TOD Plan whereas constructing 100,000 housing units at the Project Site would not as discussed in Response #1 above.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects



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10422-01

Nancy Metcalf
NancyM@cbpacific.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear Nancy Metcalf:

Thank you for your comments dated February 8, 2021, regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *I believe that the only focus at this time should be a new Stadium with approx.. 35,000 seats. We need to give the UH a place to play and it could also be a venue for concerts. Getting into designing an entire new area for entertainment, retail, etc., will just prolong the loss of a stadium. PLEASE FOCUS ON THE STADIUM ONLY!!*

Response 1: As revised within the forthcoming Programmatic Final EIS, development and construction of the Proposed Action will occur as two development actions within the greater Proposed Action consisting of the “Stadium Development” and the “Real Estate Development”. The structure and relationship of these two components encompass and articulate various impacts and requirements for potential development milestones. In practice, Proposed Action development may occur in a more linear (or other) manner at the direction of the selected Stadium Developer and Real Estate Developer(s). It is anticipated that the Stadium Development and Initial Real Estate Development (a portion of the overall Real estate Development) will be completed within five years after all necessary approvals. No specific timeline has been provided for ‘full build-out’ since future development will be determined by what the market allows.

We acknowledge your comments regarding the stadium capacity. The Programmatic Final EIS includes a market feasibility & economic review and analysis prepared by Victus Advisors conducted in conjunction with master planning and preliminary design efforts for the Proposed Action. This documentation clearly underscores that the existing Aloha Stadium’s capacity of 50,000, by far, and in large exceeds current and anticipated future

market needs. In observance of the analysis and guidance set forth by Victus Advisors as well as market sounding and user analysis by Stadium and Industry consultants, the unified recommendation is that the construction of a 27,500 - 35,000 seat capacity stadium would best serve current and anticipated future market demand.

Furthermore, before the 2018 fiscal year, Aloha Stadium was not widely considered as a major venue for concert activities. As the Aloha Stadium began to be marketed more heavily as a concert venue over the course of 2019, it was revealed through consultation with entertainment industry professionals that the Aloha Stadium's current capacity of 50,000 seats was a significant deterrent to the candidacy of the existing Aloha Stadium as a venue for major artists. Promoters and performers alike voiced that the ideal range for seating at a stadium-set concert lies between 25,000 and 30,000 seats.

Since the fiscal year of 2018, Aloha Stadium has hosted eight concerts, with seven held within the fiscal year of 2019. Six concerts have been booked/promoted by Live Nation with an average of 30,743 attendees, right in line with feedback provided by industry professionals. Nonetheless, as currently proposed, in addition to a raw 35,000 fixed seat capacity, concert events could potentially utilize field space for additional viewership that could accommodate upwards of 10,000 additional attendees.

With regard to sporting events held at Aloha Stadium, Division 1 Football Bowl Subdivision (D1-FBS) football factors in as the central activity featured. Specifically, Aloha Stadium was the home to the University of Hawai'i Rainbow Warriors Football Program (UH Football) when it was in operation. The University of Hawai'i is a member of the Mountain West Conference, which is considered to be a Mid-Major or Group of Five (G5) conference, and has ranked 81st in attendance among all D1-FBS institutions in the most recent season of play with no attendance restrictions (2019), bordering just under 25,000 attendees for home game attendance. Overall, attendance trends nation-wide are in sharp decline. The 2019 D1-FBS season resulted in the lowest overall attendance in the past 24 years (41,477 per game), with the Mountain West posting its lowest average per game attendance ever (23,232 per game). It is further notable that over the past five years, running from the 2014 season to 2019 season, average UH Football attendance has also trended down, reflecting a decline in average attendance. Moreover, UH Football has not drawn a sell-out crowd since 2007. By contrast, the highest attended game within the past five years attracted approximately 36,411 attendees (2014 season opener), under the context of the capacity of the existing Aloha Stadium (50,000 seats), the highest attended UH Football event held at the Stadium over the course of the last five years would have a little more than a 25% of the seats vacant. By contrast, under the Proposed Action the current capacity of 50,000 seats (35,000 seat stadium), with a similar level of attendance, the Stadium would be 100% filled to capacity. There is a quality all unto-itself to having a sold-out-stadium that cannot be tangibly quantified.

Overall, the proposed New Aloha Stadium (35,000 seat capacity) would create the opportunity to serve as a viable venue for a greater range of events. Possible events include

rugby, motor sports, soccer and mixed martial arts. These events typically will not pursue stadiums larger than 35,000, as the demand of their audience typically would not justify the use of a larger venue, particularly under the context of the market that would be locally served here on O'ahu.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Nanea Kaawaloa](#)
To: [Public Comment](#)
Subject: Aloha Stadium Entertainment District
Date: Wednesday, December 23, 2020 8:40:42 PM

We didn't even finish the rail yet and you guys want to build a massive stadium/tourist trap. All of that money could easily be spent on helping the Kanaka of this land, helping us stay sustainable. Same as that stupid casino, WE DONT NEED IT!!!

Sent from my iPhone



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10422-01

Nanea Kaawaloa
nkaawaloa@icloud.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear Nanea Kaawaloa:

Thank you for your comments dated December 23, 2020, regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *We didn’t even finish the rail yet and you guys want to build a massive stadium/tourist trap. All of that money could easily be spent on helping the Kanaka of this land, helping us stay sustainable. Same as that stupid casino, WE DONT NEED IT!!!*

Response 1: Your comments are acknowledged and we understand that you are in opposition of the Proposed Action. As it relates to the economic generation of the Proposed Action, please note that the Proposed Action is anticipated to have a direct economic impact on the Project Region, as well as the State. In summary, as discussed in Section 4.13.3 of the Programmatic EIS, the Proposed Action (at Full Build-Out) is anticipated to generate a Net Present Value (NPV) of over \$1.8 billion in total economic output, over \$700 million in personal earnings, and over \$198 million in State and County tax revenues, assuming an 8.0 percent discount over a 25-year period. After the Full Build-Out, up to 1,190 net new annual jobs are anticipated to be supported by operations of the Proposed Action. Hence, analysis shows that the Proposed Action could provide numerous benefits of the No Action alternative whereby the existing Aloha Stadium would continue to deteriorate as discussed in Section 3.5 of the Programmatic Final EIS.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Public Comment](#)
To: [Andrew Blasko](#)
Subject: Fw: \$\$\$\$\$\$\$\$
Date: Thursday, February 11, 2021 1:15:54 PM

From: hnymama.dj <hnymama.dj@gmail.com>
Sent: Tuesday, February 9, 2021 2:26 PM
To: Public Comment <publiccomment@wilsonokamoto.com>
Subject: \$\$\$\$\$\$\$\$

? STADIUM
Want or Need!
What will it cost?
How long will it take?
Is it a repeat of the rail?
Destroying the land only to make next generation move away.
GREED = FAT POCKETS
People need \$\$\$\$\$\$
Prevent Homelessness.

Sent from my Verizon, Samsung Galaxy smartphone



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10422-01

Sir / Madam
hnymama.dj@gmail.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASD)
Hālawā, O‘ahu, Hawai‘i

Dear Sir / Madam:

Thank you for your comments dated February 9, 2021 regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: ? *STADIUM Want or Need!*

Response 1: Your comments are unclear. However, please note as discussed in Section 2.1 of the Programmatic EIS, the existing Aloha Stadium has stood for over 45 years and is deteriorating structurally, with numerous deferred maintenance issues. It has fallen out of compliance with current accessibility and building codes and lacks the amenities of other modern stadiums. While it was once hailed as a first-class, state-of-the-art facility, the existing Aloha Stadium has effectively served its mission as a gathering place well beyond its practical life-span as a multi-purpose venue. Its numerous unaddressed deferred maintenance items are contributing to its obsolescence, and substantial ongoing investment is required to keep it functioning, accessible, and safe for public use.

In 2018, DAGS commissioned a planning study that was prepared by Wiss, Janney Elstner Associates, Inc. (WJE). This planning study identified several deficiencies (of varying degrees of severity), as well as several items that required attention to protect public safety. Noted deficiencies of the existing Aloha Stadium included, but were not limited to deteriorated areas and corrosion, structural issues, necessary replacement of seats and other Stadium equipment, non-compliant code conditions, and the considerable nature of maintenance costs that would be required to abate the ongoing corrosion of the structure. This study highlighted the urgency of systemic problems that were continuing to grow as a

result of deferred maintenance and chronic corrosive conditions and provided prioritized recommended repairs.

Although a range of structural upgrades have been made to mitigate the corrosion of the existing Aloha Stadium since its construction, approximately \$423 million in deferred maintenance has accumulated to date, including \$121 million that is needed in Americans with Disabilities Act (ADA)-related improvements and code compliance. The scope of these repairs is discussed in further detail within the appended NASED Programmatic Master Plan (PMP) and WJE Report included herein as Appendix A-1: NASED Programmatic Master Plan and A-4: WJE Report, respectively. The cost of such repairs were estimated to grow at a rate of approximately 5% per year, meaning that funding such repairs requires over \$30 million of annual contributions over the next 25 years. Failure to fund the necessary health and safety repairs will eventually lead to closing down portions of the Stadium (Foley, 2017). Since 2008, the State has spent approximately \$117 million towards maintaining the existing Aloha Stadium, a figure that includes on-going maintenance efforts. Nonetheless, this capital expenditure has not adequately addressed all of the existing Aloha Stadium's deficiencies.

By contrast, construction of a New Aloha Stadium facility is estimated to cost approximately \$324.5 million (2017 dollars), including \$260 million for building hard costs (including a 10% contingency), in addition to costs associated with: furniture, fixtures and equipment (FF&E), demolition, minor excavation, utility relocation, and abandonment), \$15 million for site preparation, and \$49.5 million in soft costs. This new multipurpose Stadium would provide a comprehensive array of fan amenities and support spaces to market new events, including more seating options, increased concessions, and improved facility circulation. Moreover, this new facility would be fully ADA compliant and would decrease overall operational expenses through more efficient building systems. Infrastructure improvement costs are, however, not factored into these cost projections.

Comment 2: *What will it cost?*

Response 2: Please note that final cost determination will be based on the final design of the Stadium Development component of the Proposed Action as determined by the Stadium Authority and the selected Stadium Developer and Real Estate Developer(s). Please note as discussed in Section 2.5 of the Programmatic Final EIS, as of July 8, 2019, by signing into law HB1586 HD1 SD2 CD1 (as Act 268 SLH 2019), the Hawai'i State Legislature and Governor had appropriated \$350,000,000 to improve the Project Site for public use and to assist with the construction of the 'Stadium Development District'. However, with the passage of HB1348 (2021) by the senate and signing into law as Act 146 by Governor Ige, the Stadium Development appropriation has been lowered to \$170,000,000.

The Proposing Agency intends to use this appropriation to leverage private sector investment in the District and deliver the New Aloha Stadium, along with other elements of the Proposed Action, through public-private-partnership arrangements. Stadium Developer and Real Estate Developer(s) from the private sector will be responsible for

accomplishing the goals and achieving the key objectives of the New Aloha Stadium Entertainment District through public-private-partnership arrangements.

Comment 3: *How long will it take?*

Response 3: Please note that it is anticipated that the Stadium Development and Initial Real Estate Development (a portion of the overall Real estate Development) will be completed within five years after all necessary approvals. No specific timeline has been provided for ‘full build-out’ since future development will be determined by what the market allows.

Comment 4: *Is it a repeat of the rail?*

Response 4: Your comments regarding the Proposed Action being a “repeat of the rail” is unclear. Hence, we cannot provide you with a clear response.

Comment 5: *Destroying the land only to make next generation move away. GREED = FAT POCKETS*

Response 5: Your comment is acknowledged, However, as the Project Site and Project Region is within a heavily altered urban environment. As such, it is not anticipated that the construction or operation of the Proposed Action will pose significant impacts to the land that would result in its destruction or make the next generation move away.

Comment 6: *People need \$\$\$\$\$*

Response 6: The Proposed New Aloha Stadium Entertainment District will support the State of Hawai‘i’s efforts to promote its economic, environmental and socio-cultural goals. The Proposed Action will accomplish this by providing direct employment opportunities to present and future residents of O‘ahu, generating state and federal tax revenues, and enhancing the quality of life for visitors and residents alike by transforming the Project Site into a thriving and vibrant community entertainment district through the new Real Estate Development component of the Proposed Action.

In summary, the development of the Proposed Action (Full Built-Out) is anticipated to generate Net Present Value (NPV) of over \$1.8 billion in total economic output, over \$700 million in personal earnings, and over \$198 million in State and County tax revenues, assuming an 8.0 percent discount over a 25-year period. After the Full Build-Out, up to 1,190 net new annual jobs are anticipated to be supported by operations of the Proposed Action.

Comment 7: *Prevent Homelessness.*

Response 7: The Proposed Action is anticipated to directly serve housing demand, as it aligns with the development of a mixed-use entertainment district, through the creation of a diverse range of residential options, accounting for upwards of 1,800 new housing units. It should be noted that the extent of residential programming will ultimately be determined by DAGS and the selected Real Estate Developer(s) which will comply with any and all applicable affordable housing requirements.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Public Comment](#)
To: [Andrew Blasko](#)
Subject: Fw: Aloha Stadium site
Date: Tuesday, February 9, 2021 1:50:06 PM

From: Diane Martinson <pastordianem@gmail.com>
Sent: Wednesday, February 3, 2021 10:39 PM
To: Public Comment <publiccomment@wilsonokamoto.com>
Subject: Aloha Stadium site

Aloha,

I am writing in support of higher density residential housing development on the Aloha Stadium site than is currently being discussed. Providing more affordable workforce and lower income housing is of critical importance to the wellbeing of this state. The Aloha Stadium site with its available space for development and close proximity to a rail station is an ideal site on which to maximize workforce and lower income housing. Additional higher density housing than is currently being planned appears to be very doable and would be a boon for rail as well as for Aloha Stadium. This is an opportunity that should not be lost.

Pastor Diane Martinson



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10422-01

Pastor Diane Martinson
pastordianem@gmail.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear Pastor Diane Martinson:

Thank you for your comments dated February 3, 2021 regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment #1: *Providing more affordable workforce and lower income housing is of critical importance to the wellbeing of this state. The Aloha Stadium site with its available space for development and close proximity to a rail station is an ideal site on which to maximize workforce and lower income housing.*

Response #1: Your comments are acknowledged. Please note that the Proposed Action, which is premised upon the Programmatic Master Plan appended to the Programmatic EIS as Appendix A, reflects the aggregated collection of extensive and exhaustive input from area residents, members of the public, existing Aloha Stadium stakeholders and public agencies as discussed in Section 2.3 of the Programmatic EIS. Additionally, the Project Team conducted a substantial number of public outreach meetings and has considered public input throughout the EIS process. Hence, the Proposed Action represents the vision of the overall community for the Project Site. Based on community input and various technical studies, the Proposed Action is envisioned to encompass the New Aloha Stadium, approximately 730,000 gross square feet (GSF) of residential space, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF of hotel space.

The general intent of the NASED project is to replace the existing, obsolete Aloha Stadium, and create a supporting mixed-use entertainment district. Consequently, the subject Programmatic Draft EIS is intended to disclose the impacts of construction and operation

of the Proposed Action, which includes the Stadium Development and Initial Real Estate Development. It is acknowledged that the Programmatic Draft EIS does not explore an affordable housing program that maximizes workforce and lower income housing, as such a program would run contrary to the scope and intent of the Proposed Action. Nonetheless, as envisioned, the Proposed Action will directly serve housing demand, as it aligns with the development of a mixed-use entertainment district, through the creation of a diverse range of residential options, accounting for upwards of 1,800 new housing units. It should be noted that the extent of residential programming will ultimately be determined by DAGS and the selected Real Estate Developer(s) which will comply with any and all applicable affordable housing requirements.

Comment 2: *Additional higher density housing than is currently being planned appears to be very doable and would be a boon for rail as well as for Aloha Stadium. This is an opportunity that should not be lost.*

Response 2: Your comments are acknowledged. Please note that due to broad comments raised in response to the Programmatic Draft EIS, Section 3.4 has been added to the Programmatic Final EIS which on a conceptual basis, evaluated a conceptual affordable housing project site design alternative program scenario with 20,000 to 100,000 units within the confines of the Project Site. It is readily apparent that this type of programming would not be compatible with the general purpose and need, as well as goals and objectives of the Proposed Action. Moreover, such a program and its anticipated impacts would require the preparation of a separate, comprehensive EIS documentation and evaluation.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in cursive script that reads "Keola Cheng". The ink is dark and the signature is fluid.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Public Comment](#)
To: [Andrew Blasko](#)
Subject: Fw: New Aloha Stadium Comments
Date: Tuesday, February 9, 2021 1:52:52 PM

From: Patrick J Canonigo <patrickjcanonigo@gmail.com>
Sent: Monday, February 8, 2021 7:23 AM
To: Public Comment <publiccomment@wilsonokamoto.com>
Subject: New Aloha Stadium Comments

Aloha,

I'm writing to provide some personal opinions and suggestions to the new Aloha Stadium project. I'm a local-born-and-raised part-Hawaiian male, and have many fond memories playing high school football games in Aloha Stadium. I understand the value in having these types of memories, and wish to provide some ideas to allow future generations of families to benefit from creating new memories in a well-thought-out facility at the new Aloha Stadium project. Also, with future and potential businesses in mind, having a multi-dimensional facility will set the stage to attract new revenue into the state of Hawaii (thus creating all kinds of new opportunities).

I. Safety & Security

Having a property that will be tightly monitored by security cameras and have controlled accessways will set the tone for a family-friendly atmosphere for visitors to have a good experience while on the property, and build a reputation for being a facility that families and businesses will want to return to in the future.

II. Sports Medicine/Health Center

To allow revenue to continually stream into the facility, having a facility for Emergency Technicians to rest/re-stock supplies at, and having local and professional athletes to train/rehab injuries at will be a positive for the athletic and health care businesses in Hawaii. This purpose could also serve as an educational vehicle, and attract athletes, doctors and students who wish to pursue this path as a career.

III. Multi-Uses

Below are a few suggestions of revenue-generating events which can help Hawaii's economy right away by attracting international, nation-wide, as well as state-wide organizations to use the facility:

- A. American Football
- B. Track and Field
- C. Soccer
- D. Rugby
- E. Musical Concert Events
- F. Corporate/business-type events

Thank you for allowing me to share these suggestions, and I hope that this facility can become

an attractive facility for future generations of Hawaii residents to be proud of!

Respectfully,
Patrick J Canonigo



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10422-01

Patrick J Canonigo
patrickjcanonigo@gmail.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear Patrick J Canonigo:

Thank you for your comments dated February 8, 2021 regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *I. Safety & Security*

Having a property that will be tightly monitored by security cameras and have controlled accessways will set the tone for a family-friendly atmosphere for visitors to have a good experience while on the property, and build a reputation for being a facility that families and businesses will want to return to in the future.

Response 1: In regards to safety and security, the Project Site is expected to include features that promote public safety such as adequate lighting and design to minimize “blind” spots, emergency help-points (i.e. Blue Boxes) and security cameras to ensure the safety of the public. This will create a safe and friendly atmosphere for visitors to the Project Site.

Comment 2: *II. Sports Medicine/Health Center*

To allow revenue to continually stream into the facility, having a facility for Emergency Technicians to rest/re-stock supplies at, and having local and professional athletes to train/rehab injuries at will be a positive for the athletic and health care businesses in Hawaii. This purpose could also serve as an educational vehicle, and attract athletes, doctors and students who wish to pursue this path as a career.

Response 2: It is noted in Chapter 5 of the Programmatic Draft EIS that the increased use of the Project Site will create a greater demand on health services. Specifically, due to the nature of contact sporting events that will be held at the New Aloha Stadium, it is in the

best interest to ensure health and safety personnel and equipment be readily available. The Proposed Action's conceptual design will include a significant addition of commercial office space that could potentially be occupied and rented to local medical physicians and medical services such as but not limited to doctors' offices, urgent care clinics, Physical rehabilitation centers and dentistry to serve the community and the surrounding areas. Additionally, the market study prepared for Crawford Architects highlights the potential for residential living, when combined with medical services, restaurants, commercial retail and recreational open space could create synergy that promotes the attractiveness and desirability of the Proposed Action.

Comment 3: *III. Multi-Uses*

Below are a few suggestions of revenue-generating events which can help Hawaii's economy

right away by attracting international, nation-wide, as well as state-wide organizations to use

the facility:

A. American Football

B. Track and Field

C. Soccer

D. Rugby

E. Musical Concert Events

F. Corporate/business-type events

Response 3: Your comments are acknowledged. Please note that the Stadium Development component of the Proposed Action is anticipated to create the opportunity to serve as a viable venue for a greater range of events. Possible events include rugby, motor sports, soccer and mixed martial arts. These events typically will not pursue stadiums larger than 35,000, as the demand of their audience typically would not justify the use of a larger venue, particularly under the context of the market that would be locally served here on O'ahu.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Public Comment](#)
To: [Andrew Blasko](#)
Subject: Fw: Aloha Stadium Entertainment Center
Date: Tuesday, February 9, 2021 1:51:22 PM

From: Pikake Ho <pikakelives@yahoo.com>
Sent: Sunday, February 7, 2021 8:29 PM
To: Public Comment <publiccomment@wilsonokamoto.com>
Subject: Aloha Stadium Entertainment Center

Are the taxpayers (including the neighboring islands) paying for this? If so, what benefit is this to the citizens of the State of Hawaii? How often will the stadium be utilized?

Pikake D Ho
pikakelives@yahoo.com

Sent from my iPhone



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10422-01

Pikake D Ho
pikakelives@yahoo.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, Oʻahu, Hawaiʻi

Dear Pikake D Ho:

Thank you for your comments dated February 7, 2021 regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawaiʻi Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *Are the taxpayers (including the neighboring islands) paying for this?*

Response 1: Please note as discussed in Section 2.5 of the Programmatic Final EIS, As of July 8, 2019, by signing into law HB1586 HD1 SD2 CD1 (as Act 268 SLH 2019), the Hawaiʻi State Legislature and Governor had appropriated \$350,000,000 to improve the Project Site for public use and to assist with the construction of the ‘Stadium Development District’. However, with the passage of HB 1348 (2021) by the senate and signing into law as Act 146 by Governor Ige, the Stadium Development appropriation has been lowered to \$170,000,000. The source of this appropriation does come from State revenue sources that include taxation. However, through a private sector investment in the form of Public-Private-Partnerships, a much greater investment into the Project Site will be made by the private sector.

Comment 2: *what benefit is this to the citizens of the State of Hawaii?*

Response 2: The Proposed New Aloha Stadium Entertainment District will support the State of Hawaiʻi’s efforts to promote its economic, environmental and socio-cultural goals. The Proposed Action will accomplish this by providing direct employment opportunities to present and future residents of Oʻahu, generating state and federal tax revenues, and enhancing the quality of life for visitors and residents alike by transforming the Project Site

into a thriving and vibrant community entertainment district through the new Real Estate Development component of the Proposed Action.

In summary, the development of the Proposed Action (Full Built-Out) is anticipated to generate Net Present Value (NPV) of over \$1.8 billion in total economic output, over \$700 million in personal earnings, and over \$198 million in State and County tax revenues, assuming an 8.0 percent discount over a 25-year period. After the Full Build-Out, up to 1,190 net new annual jobs are anticipated to be supported by operations of the Proposed Action.

Comment 3: *“How often will the stadium be utilized?”*

Response 3: This is still not determined. However, the Programmatic Final EIS includes a market feasibility & economic review and analysis prepared by Victus Advisors conducted in conjunction with master planning and preliminary design efforts for the Proposed Action. This documentation clearly underscores that the existing Aloha Stadium’s capacity of 50,000, by far, and in large exceeds current and anticipated future market needs. In observance of the analysis and guidance set forth by Victus Advisors as well as market sounding and user analysis by Stadium and Industry consultants, the unified recommendation is that the construction of a 27,500 - 35,000 seat capacity stadium would best serve current and anticipated future market demand.

Furthermore, before the 2018 fiscal year, Aloha Stadium was not widely considered as a major venue for concert activities. As the Aloha Stadium began to be marketed more heavily as a concert venue over the course of 2019, it was revealed through consultation with entertainment industry professionals that the Aloha Stadium’s current capacity of 50,000 seats was a significant deterrent to the candidacy of the existing Aloha Stadium as a venue for major artists. Promoters and performers alike voiced that the ideal range for seating at a stadium-set concert lies between 25,000 and 30,000 seats.

Since the fiscal year of 2018, Aloha Stadium has hosted eight concerts, with seven held within the fiscal year of 2019. Six concerts have been booked/promoted by Live Nation with an average of 30,743 attendees, right in line with feedback provided by industry professionals. Nonetheless, as currently proposed, in addition to a raw 35,000 fixed seat capacity, concert events could potentially utilize field space for additional viewership that could accommodate upwards of 10,000 additional attendees.

With regard to sporting events held at Aloha Stadium, Division 1 Football Bowl Subdivision (D1-FBS) football factors in as the central activity featured. Specifically, Aloha Stadium was the home to the University of Hawai‘i Rainbow Warriors Football Program (UH Football) when it was in operation. The University of Hawai‘i is a member of the Mountain West Conference, which is considered to be a Mid-Major or Group of Five (G5) conference, and has ranked 81st in attendance among all D1-FBS institutions in the most recent season of play with no attendance restrictions (2019), bordering just under 25,000 attendees for

home game attendance. Overall, attendance trends nation-wide are in sharp decline. The 2019 D1-FBS season resulted in the lowest overall attendance in the past 24 years (41,477 per game), with the Mountain West posting its lowest average per game attendance ever (23,232 per game). It is further notable that over the past five years, running from the 2014 season to 2019 season, average UH Football attendance has also trended down, reflecting a decline in average attendance. Moreover, UH Football has not drawn a sell-out crowd since 2007. By contrast, the highest attended game within the past five years attracted approximately 36,411 attendees (2014 season opener), under the context of the capacity of the existing Aloha Stadium (50,000 seats), the highest attended UH Football event held at the stadium over the course of the last five years would have a little more than a 25% of the seats vacant. By contrast, under the Proposed Action the current capacity of 50,000 seats (35,000 seat stadium), with a similar level of attendance, the stadium would be 100% filled to capacity. There is a quality all unto-itself to having a sold-out-stadium that cannot be tangibly quantified.

Overall, the proposed New Aloha Stadium (35,000 seat capacity) would create the opportunity to serve as a viable venue for a greater range of events. Possible events include rugby, motor sports, soccer and mixed martial arts. These events typically will not pursue stadiums larger than 35,000, as the demand of their audience typically would not justify the use of a larger venue, particularly under the context of the market that would be locally served here on O'ahu.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Public Comment](#)
To: [Andrew Blasko](#)
Subject: Fw: Public comment
Date: Tuesday, February 9, 2021 1:53:11 PM

From: Pinky Bright <pncbright@gmail.com>
Sent: Monday, February 8, 2021 10:23 AM
To: Public Comment <publiccomment@wilsonokamoto.com>
Subject: Public comment

Aloha,

To whom this may concern, please consider building affordable housing in your building plans for the Aloha Stadium. It is an absolute necessity for our island.

Thank you,
Bright Ohana



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10422-01

Pinky Bright
pncbright@gmail.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear Pinky Bright:

Thank you for your comments dated February 8, 2021, regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *To whom this may concern, please consider building affordable housing in your building plans for the Aloha Stadium. It is an absolute necessity for our island.*

Response 1: Your comments are acknowledged. Please note that the Proposed Action, which is premised upon the Programmatic Master Plan appended to the Programmatic EIS as Appendix A, reflects the aggregated collection of extensive and exhaustive input from area residents, members of the public, existing Aloha Stadium stakeholders and public agencies as discussed in Section 2.3 of the Programmatic EIS. Additionally, the Project Team conducted a substantial number of public outreach meetings and has considered public input throughout the EIS process. Hence, the Proposed Action represents the vision of the overall community for the Project Site. Based on community input and various technical studies, the Proposed Action is envisioned to encompass the New Aloha Stadium, approximately 730,000 gross square feet (GSF) of residential space, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF of hotel space. However, as noted throughout the Programmatic EIS, that final design of the Project Site and use and space allocation will be determined by the Stadium Authority, the selected Stadium Developer and Real Estate Developer(s). It should be noted that the extent of residential programming will ultimately be determined by the Stadium Authority and the selected Real Estate Developer(s) will comply with applicable affordable housing requirements.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [RANDALL ALCESTO](#)
To: [Public Comment](#)
Date: Thursday, December 24, 2020 11:06:29 AM

The stadium should have some kind roof covering
where the stadium can be used year round..all different
functions and events not just
football...the PEOPLE that is
building the stadium doesn't
know our weather situations.
We don't need hotels in area.
there's alot in Waikiki and ala moana..where most the rooms sit empty!!

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10422-01

Randall Alcesto
lladnar1961@hotmail.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear Randall Alcesto:

Thank you for your comments dated December 24, 2020, regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *The stadium should have some kind roof covering where the stadium can be used year round..*

Response 1: Your comments are acknowledged. Please note that the design of the Stadium Development component of the Proposed Action is still yet to be determined. The Stadium Authority and the selected Stadium Developer will consider all feasible design options regarding the New Aloha Stadium while weighing construction cost factors, the spectator experience, and future maintenance costs factors.

Comment 2: *all different functions and events not just football...*

Response 2: Overall, the proposed New Aloha Stadium (35,000 seat capacity) would create the opportunity to serve as a viable venue for a greater range of events. Possible events include rugby, motor sports, soccer and mixed martial arts. These events typically will not pursue stadiums larger than 35,000, as the demand of their audience typically would not justify the use of a larger venue, particularly under the context of the market that would be locally served here on O‘ahu.

Comment 3: *the PEOPLE that is building the stadium doesn't know our weather situations.*

Response 3: We respectfully disagree with your comment relating to qualifications of the selected Stadium Developer and Real Estate Developer(s). At the time of the writing of the Programmatic Final EIS, three finalists were selected from the request for qualifications process that drew six respondents in May. Three developer-led teams, all of which list some Hawaii-based elements, are finalists to present proposals for the building of the NASED. The three priority-listed teams include Aloha Stadium District Partners, Aloha Stadium Hui Hilina'i and Waiola Development Partners. Moreover, Section 4.1 of the Programmatic EIS evaluates the climate and potential climate change impacts as it relates to the Proposed Action and the Project Region.

Comment 4: *We don't need hotels in area. there's alot in Waikiki and ala moana..where most the rooms sit empty!!*

Response 4: We acknowledge your comments. Please note that based on community input and various technical studies, the Proposed Action is envisioned to encompass the New Aloha Stadium, approximately 730,000 gross square feet (GSF) of residential space, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF of hotel space. However, as noted throughout the Programmatic EIS, that final design of the Project Site and use and space allocation will be determined by the Stadium Authority, the selected Stadium Developer and Real Estate Developer(s). The Proposed Action, as described in the EIS and the Programmatic Master Plan, has the potential to significantly increase the Project Region's desirability from a hospitality perspective contributing to the vibrancy of the Proposed Action. It is anticipated that a hotel at the Project Site could serve potentially over 1.5 million annual visitors to the New Aloha Stadium; furthermore, the Proposed Action could potentially serve as a catalyst for growth in visitation, attracting tourists and visitors to the Project Site retail and mixed-use environment that would have otherwise not considered coming to the submarket.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in cursive script, reading "Keola Cheng". The ink is dark blue or black, and the signature is fluid and connected.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Public Comment](#)
To: [Andrew Blasko](#)
Subject: Fw: New aloha stadium,I object
Date: Tuesday, February 9, 2021 1:53:53 PM

From: Rawstina Leleo <rawstinalei@gmail.com>
Sent: Monday, February 8, 2021 7:00 PM
To: Public Comment <publiccomment@wilsonokamoto.com>
Subject: New aloha stadium,I object

Aloha,

My name is Rawstina Leleo from Kapolei O'ahu. I'm emailing you in regards to the plans to build the new stadium. I am completely against it and the whole idea of turning it into another tourist attraction. I don't see the need to continue to build places that cater to people who do not even live here just to make a quick buck. I'm sick and tired of the RESIDENTS needs being pushed to the back burner while this state CONTINUES to only waste money on UNNECESSARY attractions to please tourist. I feel the money could be used to fix residential issues first before being used on irrelevant things. We do NOT need more malls and hotels. For what? To cater to people who don't live here? We can't even help our own people but yet we still direct all of our money towards them so law makers and high up officials make money. How much to residents get? How so you guys help out our communities? How are you guys fixing our homeless issue or people staying on the streets? You guys don't. You continue to turn your head and worry about YOU and how to make a profit. The more you build the less land there is to build homes to people ESPECIALLY Native Hawaiians of this 'Aina. When will enough building be enough? When the last tree is cut is that when you'll realize? We need to STOP depending on our state people to make and income and focus on fixing up our own issues. This plan to expand the stadium is out right ridiculous. As a NATIVE & KANAKA of this Mokopuni I am hurt and saddened by this. When will locals come first? You guys continue to pimp out our resources and 'Aina to foreigners while they get to come to "paradise" as locals suffer on a DAILY. I'm asking you to ask yourself, is this stadium that important? Is it gonna fix our problems locals face when it comes to homelessness? Enough is enough and I hope you realize this is not a smart decision and is only going to benefit the rich and make them richer while the poor continue to stay poor. Think about it please. Thank you for your time.

Mahalo Nui,
Rawstina Leleo



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10422-01

Rawstina Leleo
rawstinalei@gmail.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear Rawstina Leleo:

Thank you for your comments dated February 8, 2021 regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *My name is Rawstina Leleo from Kapolei O‘ahu. I‘m emailing you in regards to the plans to build the new stadium. I am completely against it and the whole idea of turning it into another tourist attraction. I don‘t see the need to continue to build places that cater to people who do not even live here just to make a quick buck . I‘m sick and tired of the RESIDENTS needs being pushed to the back burner while this state CONTINUES to only waste money on UNNECESSARY attractions to please tourist .*

Response 1: We acknowledge your comment that you are completely against the Proposed Action. Please note that the Proposed Action, which is premised upon the Programmatic Master Plan appended to the Programmatic EIS as Appendix A, reflects the aggregated collection of extensive and exhaustive input from area residents, members of the public, existing Aloha Stadium stakeholders and public agencies as discussed in Section 2.3 of the Programmatic EIS. Additionally, the Project Team conducted a substantial number of public outreach meetings and has considered public input throughout the EIS process. Hence, the Proposed Action represents the vision of the overall community for the Project Site. Based on community input and various technical studies, the Proposed Action is envisioned to encompass the New Aloha Stadium, approximately 730,000 gross square feet (GSF) of residential space, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF of hotel space. However, as noted throughout the Programmatic EIS, that final design of the Project Site and use and space allocation will be

determined by the Stadium Authority, the selected Stadium Developer and Real Estate Developer(s).

Moreover, the Proposed New Aloha Stadium Entertainment District will support the State of Hawai'i's efforts to promote its economic, environmental and socio-cultural goals. The Proposed Action will accomplish this by providing direct employment opportunities to present and future residents of O'ahu, generating state and federal tax revenues, and enhancing the quality of life for visitors and residents alike by transforming the Project Site into a thriving and vibrant community entertainment district through the new Real Estate Development component of the Proposed Action.

In summary, the development of the Proposed Action (Full Built-Out) is anticipated to generate Net Present Value (NPV) of over \$1.8 billion in total economic output, over \$700 million in personal earnings, and over \$198 million in State and County tax revenues, assuming an 8.0 percent discount over a 25-year period. After the Full Build-Out, up to 1,190 net new annual jobs are anticipated to be supported by operations of the Proposed Action.

Comment 2: *I feel the money could be used to fix residential issues first before being used on irrelevant thing. We do NOT need more malls and hotels .For what? To cater to people who don't live here? We can't even help our own people but yet we stil direct all of our money towards them so law makers and high up officials make money. How much to residents get? How so you guys help out our communities? How are you guys fixing our homeless issue or people staving on the streets? You guys don't . You continue to turn your head and worry about YOU and how to make a profit .*

Response 2: Your comments are acknowledged. As noted in Response #1 above, the Proposed New Aloha Stadium Entertainment District will support the State of Hawai'i's efforts to promote its economic, environmental and socio-cultural goals. The Proposed Action will accomplish this by providing direct employment opportunities to present and future residents of O'ahu, generating state and federal tax revenues, and enhancing the quality of life for visitors and residents alike by transforming the Project Site into a thriving and vibrant community entertainment district through the new Real Estate Development component of the Proposed Action.

In summary, the development of the Proposed Action (Full Built-Out) is anticipated to generate Net Present Value (NPV) of over \$1.8 billion in total economic output, over \$700 million in personal earnings, and over \$198 million in State and County tax revenues, assuming an 8.0 percent discount over a 25-year period. After the Full Build-Out, up to 1,190 net new annual jobs are anticipated to be supported by operations of the Proposed Action.

As it relates to your comments about homelessness issues, please note it is not within the scope of the Programmatic EIS to evaluate. Please note as discussed at the EIS Scoping

Meeting and described in the EIS Preparation Notice published on September 8, 2019, as well as reiterated in Section 1.1 of the Programmatic Draft EIS, “*The Proposed Action encompasses the construction of a new, modern stadium facility that will be supported by complimentary mixed-use development.*” Therefore, the subject Programmatic Draft EIS is intended to assess the potential effects associated with the Proposed Action on various environmental resource categories as prescribed by Section 11-200.1-24.

Comment 3: *The more you build the less land there is to build homes to people ESPECIALLY Native Hawaiians of this ‘Āina. When will enough building be enough? When the last tree is cut is that when you’ll realize?*

Response 3: The Project Site for the Proposed Action is situated in an urbanized area that has been successively altered over many years. As such the Proposed Action is not reducing the total square footage of open land on the island of O‘ahu for new development.

Comment 4: *We need to STOP depending on our our state people to make and income and focus on fixing up our own issues. This plan to expand the stadium is out right ridiculous. As a NATIVE & KANAKA of this Mokopuni I am hurt and sadden by this. When will locals come first?*

Response 4: This comment is not directed at one issue and is unclear to which issues you are referring to, hence, we cannot provide you a direct response.

Comment 5: *You guys continue to pimp out our resources and ‘Āina to foreigners while they get to come to “paradise” as locals suffer on a DAILY. I’m asking you to ask yourself, is this stadium that important? Is it gonna fix our problems locals face when it comes to homelessness? Enough is enough and I hope you realize this is not a smart decision and is only going to benefit the rich and make them richer while the poor continue to stay poor. Think about it please.*

Response 5: Your comments are acknowledged. As noted in Response #1 above, the Proposed New Aloha Stadium Entertainment District will support the State of Hawai‘i’s efforts to promote its economic, environmental and socio-cultural goals. The Proposed Action will accomplish this by providing direct employment opportunities to present and future residents of O‘ahu, generating state and federal tax revenues, and enhancing the quality of life for visitors and residents alike by transforming the Project Site into a thriving and vibrant community entertainment district through the new Real Estate Development component of the Proposed Action.

In summary, the development of the Proposed Action (Full Built-Out) is anticipated to generate Net Present Value (NPV) of over \$1.8 billion in total economic output, over \$700 million in personal earnings, and over \$198 million in State and County tax revenues, assuming an 8.0 percent discount over a 25-year period. After the Full Build-Out, up to 1,190 net new annual jobs are anticipated to be supported by operations of the Proposed

Action. Hence, the Proposed Action is anticipated to provide numerous benefits to the residents of the City and County as well as the State.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Public Comment](#)
To: [Andrew Blasko](#)
Subject: Fw: Aloha Stadium Redevelopment
Date: Tuesday, February 9, 2021 1:52:26 PM

From: Rebecca Soon <rebecca.ji.soon@gmail.com>
Sent: Sunday, February 7, 2021 11:09 PM
To: Public Comment <publiccomment@wilsonokamoto.com>
Subject: Aloha Stadium Redevelopment

Aloha Kakou,

Mahalo for the opportunity to provide mana‘o on the redevelopment plans of the Aloha Stadium. Clearly much work and thought has been put into the vision and much work is ahead. We have seen the importance of sports to the development of our youth and our community, especially in how it has been impacted this past year.

My input is primarily to encourage that any plans that move forward look at much more housing inclusion. If done correctly, we can both have a world-class stadium and an integrated housing community. Given the footprint and proximity to the rail line, it may even be possible to host tens of thousands of units. The residents can support a robust stadium district and vice versa. Cities around the world are looking for ways to address their massive housing crises - even Brazil has looked to how it might convert aged futbol stadiums into housing for local residents.

Mahalo for the opportunity to share input and a vision for how this important project can benefit from being a partner creating the housing opportunities that O‘ahu needs. Aloha, Rebecca

--

Rebecca JI Soon



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10422-01

Rebecca JI Soon
rebecca.ji.soon@gmail.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear Rebecca JI Soon:

Thank you for your comments dated February 7, 2021 regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *Mahalo for the opportunity to provide mana ‘o on the redevelopment plans of the Aloha*

Stadium. Clearly much work and thought has been put into the vision and much work is ahead. We have seen the importance of sports to the development of our youth and our community, especially in how it has been impacted this past year.

Response 1: We acknowledge your comments regarding the importance of sports to the development of the youth in Hawai‘i and the community.

Comment 2: *My input is primarily to encourage that any plans that move forward look at much more housing inclusion. If done correctly, we can both have a world-class stadium and an integrated housing community. Given the footprint and proximity to the rail line, it may even be possible to host tens of thousands of units. The residents can support a robust stadium district and vice versa. Cities around the world are looking for ways to address their massive housing crises - even Brazil has looked to how it might convert aged futbol stadiums into housing for local residents.*

Response 2: Please note that the Proposed Action, which is premised upon the Programmatic Master Plan appended to the Programmatic EIS as Appendix A, reflects the aggregated collection of extensive and exhaustive input from area residents, members of the public, existing Aloha Stadium stakeholders and public agencies as discussed in Section

2.3 of the Programmatic EIS. Additionally, the Project Team conducted a substantial number of public outreach meetings and has considered public input throughout the EIS process. Hence, the Proposed Action represents the vision of the overall community for the Project Site. Based on community input and various technical studies, the Proposed Action is envisioned to encompass the New Aloha Stadium, approximately 730,000 gross square feet (GSF) of residential space, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF of hotel space. However, as noted throughout the Programmatic EIS, that final design of the Project Site and use and space allocation will be determined by the Stadium Authority, the selected Stadium Developer and Real Estate Developer(s). It should be noted that the extent of residential programming will ultimately be determined by the Stadium Authority and the selected Real Estate Developer(s) which will comply with applicable affordable housing requirements.

With regards to your comment the use of State lands near rail stations, please note that the State of Hawai'i is the land owner of the Project Site, and in partnership with the selected Stadium Developer and Real Estate Developer(s), may pursue different land-use configurations and strategies than what is presented in the Programmatic EIS to maximize the value of the Proposed Action and address a number of Statewide needs. The State of Hawai'i, as the land owner, has the ultimate say in how they use their lands to fit their needs. Furthermore, it has not yet been determined how Act 146 will be administered, specifically, how it relates to implementing a "stadium development district." However, it is expected that the State of Hawai'i, in partnership with the selected Stadium Developer and Real Estate Developer(s), will coordinate and work closely with the CCH to implement the Proposed Action, and to minimize any potential impacts on land uses at the Project Site and the Project Region.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Richard Kawatani](#)
To: [Public Comment](#)
Subject: Aloha Stadium
Date: Saturday, December 26, 2020 2:25:29 PM

Has the option been selected yet? The picture shown on the document I believe is for option B. Was there something published that shows the pro's & con's of each? I saw the renderings and this option appears to have limited seating in the middle and didn't have a roof to cover all the seats. Just based upon those issues I like Option A the best.

Let me know.

Thanks!

Richard Kawatani

Sent from [Mail](#) for Windows 10



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10422-01

Richard Kawatani
outlook_B2479B66B2E317FC@outlook.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear Richard Kawatani:

Thank you for your comments dated December 26, 2020, regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *Has the option been selected yet? The picture shown on the document I believe is for option B.*

Response 1: A specific site option has not been selected. However, initial master planning efforts for the Proposed Action, identified three possible stadium locations within the Project Site and postulated resultant alternative development concepts which were identified as Options A, B, and C. These development configurations were represented in the Proposed Action’s EISPN published on September 8, 2019. The previously discussed Option B was selected to serve as the basis for the PMP for several critical reasons. First, the main project constraint for the design and construction of the New Aloha Stadium is that the existing Aloha Stadium be allowed to operate and continue to host critical revenue-producing events. Option B allows a new Stadium to be built alongside the existing Aloha Stadium, thus allowing Stadium operations to continue while construction of the New Aloha Stadium takes place. This will allow large events to continue to take place, with no major disruption.

Comment 2: *Was there something published that shows the pro’s & con’s of each?*

Response 2: For the purposes of this Programmatic Draft EIS process, as outlined in the PMP, Crawford conducted further architectural and design studies of both of these alternative development configurations. This due diligence process weighed feedback and

input received through community engagement efforts conducted in conjunction with both the master planning effort for the Proposed Action as well as the scoping process tied to the Developer Procurement documentation for the Proposed Action.

Comment 3: *I saw the renderings and this option appears to have limited seating in the middle and didn't have a roof to cover all the seats. Just based upon those issues I like Option A the best.*

Response 3: The final design of the Stadium has not been determined and the renderings within EIS are conceptual in nature. The final design of the Stadium will be determined by the Stadium Developer and Real Estate Developer(s) and it is anticipated that Stadium will incorporate design elements that protect the spectators for the elements.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Public Comment](#)
To: [Andrew Blasko](#)
Subject: Fw: New Stadium
Date: Tuesday, February 9, 2021 1:51:43 PM

From: Ross Masuhara <rmasu808@gmail.com>
Sent: Sunday, February 7, 2021 10:36 PM
To: Public Comment <publiccomment@wilsonokamoto.com>
Subject: New Stadium

Why do we keep building a stadium with open air? Let's build with a retractable roof or closed roof.. it will bring lot more revenue from different attractions ie. concerts, football, soccer, wrestling, mma, etc..

Especially if the event calls for a controlled environment.

Parking: a parking structure would help but enough parking stalls.

Something as big as this. Would provide the island with more jobs.

Just use solar to power the entire stadium. It's environmentally friendly.

Ross Masuhara

Sent from my iPhone

*Note: This message, including any attachments, contains confidential information intended for a specific individual and purpose, and is protected by law. If you are not the intended recipient, you should destroy this message, including any attachments. Any disclosure, copying or distribution of this message, or the taking of any action based on it, is strictly prohibited.



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10422-01

Ross Masuhara
rmasu808@gmail.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear Ross Masuhara:

Thank you for your comments dated February 7, 2021 regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *Why do we keep building a stadium with open air? Let’s build with a retractable roof or closed roof.. it will bring lot more revenue from different attractions ie. concerts, football, soccer, wrestling, mma, etc.. Especially if the event calls for a controlled environment.*

Response 1: The design of the Stadium is not final and will be decided by the selected Stadium Developer and Real Estate Developer(s). However, it is anticipated that the final design of the Stadium would both promote natural beauty of O‘ahu, while protecting the spectators from the natural elements and allow for year round use. The final design is also anticipated to maximize revenue by allowing the field to configure for multiple uses.

Comment 2: *Parking: a parking structure would help but enough parking stalls.*

Response 2: Your comments are acknowledged. Please note that it is anticipated that a parking study will be conducted by the selected Stadium Developer and Real Estate Developer(s) as they finalize the design and programming of the Proposed Action. This parking study is anticipated to look at off-street parking and site generated parking demand, while considering TOD principals.

Comment 3: *Something as big as this. Would provide the island with more jobs.*

Response 3: Please note that the Proposed Action is anticipated to have a direct economic impact on the Project Region, as well as the State. In summary, as discussed in Section 4.13.3 of the Programmatic EIS, the Proposed Action (at Full Build-Out) is anticipated to generate a Net Present Value (NPV) of over \$1.8 billion in total economic output, over \$700 million in personal earnings, and over \$198 million in State and County tax revenues, assuming an 8.0 percent discount over a 25-year period. After the Full Build-Out, up to 1,190 net new annual jobs are anticipated to be supported by operations of the Proposed Action

Comment 4: *Just use solar to power the entire stadium. It's environmentally friendly.*

Response 4: Electrical Power for the island of O'ahu is provided by the Hawaiian Electrical Company (HECO). HECO continues to increase its use of renewable energy sources to provide electricity to O'ahu. In their most recent sustainability report for 2020-2021, they determined that 35% of their sales are coming from renewable energy.

The Proposed Action will implement energy efficient design and energy conservation measures across the Project Site under Developer Procurement. As stated in Chapter 5 of the Draft EIS, it is anticipated that the selected Stadium Developer and Real Estate Developer(s) shall use one of the following building life cycle assessment (LCA) tools, or their equivalent, to provide total GHG emission as well as document other environmental impacts of the building materials and their construction. Specifically, the selected Stadium Developer and Real Estate Developer(s) shall prepare and submit annual LCA reports, outlining the total carbon emissions generated by the construction work, determined in accordance with a defined methodology consistent with BMPs. It is also anticipated that the selected Stadium Developer and Real Estate Developer(s) will, at a minimum, obtain United States Green Building Council's (USGBC) Leadership in Energy and Environmental Design (LEED) Building Design and Construction (BD+C) Green Building Rating System (the "LEED Rating System") Silver certification ("LEED Silver Certification") for each building.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Public Comment](#)
To: [Andrew Blasko](#)
Subject: Fw: Comments on DEIS for the Proposed Aloha Stadium Entertainment District
Date: Tuesday, February 9, 2021 1:50:02 PM

From: Samuel L Domingo <revsamdom@gmail.com>
Sent: Tuesday, February 2, 2021 11:54 AM
To: Public Comment <publiccomment@wilsonokamoto.com>; david.c.deponte@hawaii.gov
<david.c.deponte@hawaii.gov>
Subject: Comments on DEIS for the Proposed Aloha Stadium Entertainment District

Thank you for the opportunity to comment on the draft EIS for the proposed Aloha Stadium Entertainment District.

I have the following comments:

1. re page 2-7. *"The comprehensive Proposed Action total build out is projected to encompass approximately 1,813 residential units, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 621 hotel keys."*

There were public comments submitted at the scoping meeting and community workshop asking for a higher number of residential units to be studied, some as high as 20,000. Why was this not taken into consideration? 1813 residential units are insufficient!!!

2. re page 5-17. *"Not Applicable: Stimulate and promote feasible approaches that increase affordable rental and for sale housing choices for extremely low-, very low-, lower-, moderate-, and above-moderate-income households."*

–Hawai'i State Plan, §226-19 Objectives and policies for socio-cultural advancement – housing."
Why is this objective of the State Plan "not applicable" for the proposed action as presented on page 5-17?

- There is plenty of land that can be redeveloped to prioritize the housing needs of extremely low-, very low-, lower-, moderate-, and above-moderate-income households.
- The 1,800-unit assumption in the draft EIS should be analyzed at a higher target that allows the proposed action to satisfy the State Plan objective to increase housing choices.
- The 2019 HHFDCHousingPlanningStudy indicates a need for 22,168 units by 2025 on O'ahu. Why is the impact of a higher number of units not studied to help address the critical need and State Plan?

3. re page 5-28 (1/2). Page 5-28 (1/2)

"Not Applicable: Create incentives for development which would increase home ownership and rental opportunities for Hawai'i's low and moderate-income households, gap-group households, and residents with special needs."

–Hawai'i State Plan, §226-106 Affordable housing."

- Why is this objective of the State Plan "not applicable" for the proposed action as presented

on page 5-28?

- The redevelopment is an opportunity to increase housing opportunities, including incentivized housing for low- and moderate-income households. The proposed action should be modified so this objective will be satisfied.
- The 1,800-unit assumption should be studied at a higher maximum to address the HHFDC-published needs for housing.

4. re page 5-28 (2/2). *“Not Applicable: Encourage improved coordination between various agencies and levels of government to deal with housing policies and regulations. –Hawai‘i State Plan, §226-106 Affordable housing.”*

- Why is this objective of the State Plan “not applicable” for the proposed action as presented on page 5-28?
- This is a possible opportunity to collaborate with the Department of Hawaiian Home Lands to develop transit-oriented housing for their beneficiaries, a positive socio-economic impact of the proposed action. Was that considered and ruled out?

5. re page 5-58. *“Not Applicable: Encourage the production and maintenance of affordable rental housing. Encourage the provision of affordable housing design for the elderly and the handicapped. –City and County of Honolulu, General Plan – Objectives and Policies.”*

- Why are these objectives of the General Plan “not applicable” for the proposed action as presented on page 5-58?
- Affordable rental housing should be a priority of the proposed action. The housing quantity in the plan should be increased so that it will satisfy this objective of the General Plan.
- The mixed-use, transit-oriented, pedestrian-oriented redevelopment would be an ideal place for housing designed to people with limited mobility, including the elderly and handicapped. Walkability would make it easier to take short trips on foot.

6. re page 5-76. *“Satisfies: Density. Areas close to transit lines and the major east-west arterials should be zoned for medium-density residential, which may range from 13 to 90 units per acre, or high-density residential mixed use, which may range up to 140 units per acre.”*

- The draft EIS states the site is “high density,” but the study only includes 1,800 housing units, which equates to 18 units per acre. How does this proposal satisfy the high-density standard set in the Primary Urban Center Development Plan as indicated on page 5-76?

7. re page 5-79 (1/2). *“Not Applicable: Provide incentives and cost savings for affordable housing. Provide exemptions from zoning and building codes for housing projects that meet established standards of affordability, on a case-by-case basis. –Primary Urban Center Development Plan”*

- Why is the objective incentivizing affordable housing and providing exemptions from zoning and building codes as stated in the Primary Urban Center Development Plan “not applicable” for the proposed action as presented on page 5-79?

8. re page 5-79 (2/2). *“Satisfies: Provide for high-density housing options in mixed-use development around transit stations. This type of “transit-oriented development” facilitates transit use and allows for increased densities without generating increased vehicular congestion. –Primary Urban Center Development Plan”*

- The draft EIS states the site is “high density,” but the study only includes 1,800 housing units, which equates to 18 units per acre. How does this proposal satisfy the high-density standard

set in the Primary Urban Center Development Plan as indicated on page 5-79?

- Why does the study not include figures that demonstrate how much more affordable housing can be included based on assumptions about transit usage? What about assumptions that prioritize already transit-dependent households?
- A public commenter asked at the scoping meeting to do a sensitivity analysis on the traffic impacts if we were to assume housing prioritization at the site for low-income car-free and car-light households. Why was this valid question not addressed?

As you can see my comments are focused on housing. When the need for affordable housing is now in a crisis situation, here is a rare opportunity to produce affordable residential units way beyond the 1813 units proposed.

--

Rev. Samuel L Domingo
204 Kuuhoa Place
Kailua, Hawaii 96734
Cell Phone: 808-384-8701
Email: revsamdom@gmail.com



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10422-01

Reverend, Samuel L. Domingo
204 Kuuhoa Pl.
Kailua, Hawaii 96734
revsamdom@gmail.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, Oʻahu, Hawaiʻi

Dear Reverend Domingo:

Thank you for your comments dated February 2, 2021, regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawaiʻi Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *re page 2-7. “The comprehensive Proposed Action total build out is projected to encompass approximately 1,813 residential units, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 621 hotel keys.”*

There were public comments submitted at the scoping meeting and community workshop asking for a higher number of residential units to be studied, some as high as 20,000. Why was this not taken into consideration? 1813 residential units are insufficient!!!

Response 1: Please note that we acknowledge there were comments provided at the EIS Scoping Meeting regarding affordable housing and were considered when preparing the Programmatic Draft EIS with regard to meeting content requirements prescribed in Hawaiʻi Administrative Rules, Title 11, Chapter 200.1.

Please note as discussed at the EIS Scoping Meeting and described in the EIS Preparation Notice published on September 8, 2019, as well as reiterated in Section 1.1 of the Programmatic Draft EIS, “*The Proposed Action encompasses the construction of a new, modern stadium facility that will be supported by complimentary mixed-use development.*” Therefore, the subject Programmatic Draft EIS is intended to assess the potential effects

associated with the Proposed Action on various environmental resource categories as prescribed by Section 11-200.1-24.

It is acknowledged that the Programmatic Draft EIS did not evaluate, “20,000 affordable housing units,” as such a program would not meet the goals and objectives of the Proposed Action as described in Section 2.2 of the Programmatic Draft EIS. Nonetheless, the Proposed Action is envisioned to directly serve regional and State housing demands through the creation of a diverse range of residential options, accounting for upwards of 1,800 new housing units as discussed in Section 2.1 of the Programmatic Draft EIS. However, it should be noted that the extent of residential programming will ultimately be determined by the Stadium Authority and the selected Real Estate Developer(s) will comply with applicable affordable housing requirements.

Please note that due to broad comments raised in response to the Programmatic Draft EIS, Section 3.4 has been added to the Programmatic Final EIS which, on a conceptual basis, evaluated a conceptual affordable housing project site design alternative program scenario with 20,000 to 100,000 units within the confines of the Project Site. It is readily apparent that this type of programming would not be compatible with the general purpose and need, as well as goals and objectives of the Proposed Action. Moreover, such a program and its anticipated impacts would require the preparation of a separate, comprehensive EIS documentation and evaluation.

Comment 2: *re page 5-17. “Not Applicable: Stimulate and promote feasible approaches that increase affordable rental and for sale housing choices for extremely low-, very low-, lower-, moderate-, and above-moderate-income households.*

–Hawai‘i State Plan, §226-19 Objectives and policies for socio-cultural advancement – housing.”

Why is this objective of the State Plan “not applicable” for the proposed action as presented on page 5-17?

- *There is plenty of land that can be redeveloped to prioritize the housing needs of extremely low-, very low-, lower-, moderate-, and above-moderate-income households.*
- *The 1,800-unit assumption in the draft EIS should be analyzed at a higher target that allows the proposed action to satisfy the State Plan objective to increase housing choices.*
- *The 2019 HHFDCHousingPlanningStudy indicates a need for 22,168 units by 2025 on O‘ahu.*

Why is the impact of a higher number of units not studied to help address the critical need and State Plan?

Response 2: The intention of the Proposed Action is the replacement of the existing Aloha Stadium and support the new stadium with mixed-use development through the Real Estate

Development surrounding it. However, as noted above in Response #1, the extent of residential programming will ultimately be determined by the Stadium Authority and the selected Real Estate Developer(s) will comply with applicable affordable housing requirements.

As it relates to the specific objectives and policies you quote above, please note that it is not within the purpose and need of the Proposed Action to develop a program that will “Stimulate and promote feasible approaches that increase affordable rental and for sale housing choices for extremely low-, very low-, lower-, moderate-, and above moderate-income households.” The intention of the Proposed Action as noted in Response #1 encompasses the construction of a new, modern stadium facility that will be supported by complimentary mixed-use development. Hence, the Proposed Action is not applicable to this specific policy. However, we do note that the Proposed Action is applicable to several other objectives and policies related to §226-19.

Comment 3: *re page 5-28 (1/2). Page 5-28 (1/2)*

“Not Applicable: Create incentives for development which would increase home ownership and rental opportunities for Hawai‘i’s low and moderate-income households, gap-group households, and residents with special needs.—Hawai‘i State Plan, §226-106 Affordable housing.”

- *Why is this objective of the State Plan “not applicable” for the proposed action as presented on page 5-28?*
- *The redevelopment is an opportunity to increase housing opportunities, including incentivized housing for low- and moderate-income households. The proposed action should be modified so this objective will be satisfied.*
- *The 1,800-unit assumption should be studied at a higher maximum to address the HHFDC-published needs for housing.*

Response 3: Similarly as acknowledged in Response #2 above, as it relates to the specific objectives and policies you quote above, please note that it is not within the purpose and need of the Proposed Action to develop a program that will “Create incentives for development which would increase home ownership and rental opportunities for Hawai‘i’s low and moderate-income households, gap-group households, and residents with special needs.” The intention of the Proposed Action as noted in Response #1 encompasses the construction of a new, modern stadium facility that will be supported by complimentary mixed-use development. Hence, the Proposed Action is not applicable to this specific policy. However, we do note that the Proposed Action is applicable to several other objectives and policies related to §226-106.

Comment 4: *re page 5-28 (2/2). “Not Applicable: Encourage improved coordination between various agencies and levels of government to deal with housing policies and regulations. —Hawai‘i State Plan, §226-106 Affordable housing.”*

- *Why is this objective of the State Plan “not applicable” for the proposed action as presented on page 5-28?*

- *This is a possible opportunity to collaborate with the Department of Hawaiian Home Lands to develop transit-oriented housing for their beneficiaries, a positive socio-economic impact of the proposed action. Was that considered and ruled out?*

Response 4: Similarly as acknowledged in Response #2 above, as it relates to the specific objectives and policies you quote above, please note that it is not within the purpose and need of the Proposed Action to develop a program that will “Encourage improved coordination between various agencies and levels of government to deal with housing policies and regulations.” The intention of the Proposed Action as noted in Response #1 encompasses the construction of a new, modern stadium facility that will be supported by complimentary mixed-use development. Hence, the Proposed Action is not applicable to this specific policy. However, we do note that the Proposed Action is applicable to several other objectives and policies related to §226-106.

Comment 5: *Not Applicable: Encourage the production and maintenance of affordable rental housing. Encourage the provision of affordable housing design for the elderly and the handicapped. –City and County of Honolulu, General Plan – Objectives and Policies.”*

- *Why are these objectives of the General Plan “not applicable” for the proposed action as presented on page 5-58?*
- *Affordable rental housing should be a priority of the proposed action. The housing quantity in the plan should be increased so that it will satisfy this objective of the General Plan.*
- *The mixed-use, transit-oriented, pedestrian-oriented redevelopment would be an ideal place for housing designed to people with limited mobility, including the elderly and handicapped. Walkability would make it easier to take short trips on foot.*

Response 5: Similarly as acknowledged in Response #2 above, as it relates to the specific objectives and policies you quote above, please note that it is not within the purpose and need of the Proposed Action to develop a program that will “Encourage the production and maintenance of affordable rental housing. Encourage the provision of affordable housing design for the elderly and the handicapped.” The intention of the Proposed Action as noted in Response #1 encompasses the construction of a new, modern stadium facility that will be supported by complimentary mixed-use development. Hence, the Proposed Action is not applicable to this specific policy. However, we do note that the Proposed Action is applicable to several other objectives and policies related to CCH General Plan.

However, as mentioned early, the selected Real Estate Developer(s)’ final master plan and design scheme will comply with any and all applicable affordable housing requirements. In broad stroke terms, the Project Region’s local housing submarket is supply-constrained and has not experienced any substantive additional surge in supply of housing in decades. Given the Proposed Action’s high-density, mixed-use potential, there is a strong opportunity for the Proposed Action to effectively tap into the pent-up submarket demand, as well as the general State-wide demand.

Comment 6: *re page 5-76. “Satisfies: Density. Areas close to transit lines and the major east-west arterials should be zoned for medium-density residential, which may range from 13 to 90 units per acre, or high-density residential mixed use, which may range up to 140 units per acre.*

- *The draft EIS states the site is “high density,” but the study only includes 1,800 housing units, which equates to 18 units per acre. How does this proposal satisfy the high-density standard set in the Primary Urban Center Development Plan as indicated on page 5-76?*

Response 6: We respectfully disagree with your comments regarding the Proposed Action fulfillment of the Primary Urban Center Development Plan (PUCD Plan). We assume your comment is relating to PUCD Plan Policy 3.2.2.3 In-Town Residential Neighborhoods on Page 5-76 which reads:

Density. Areas close to transit lines and the major east-west arterials should be zoned for medium-density residential, which may range from 13 to 90 units per acre, or high-density residential mixed use, which may range up to 140 units per acre. Neighborhoods in these zones would also include reinforcing uses which support resident lifestyle and livelihood choices, such as convenience or neighborhood stores, dining establishments, professional and/or business services, or other similar activities.

As you stated the current unit count per acre at the proposed 1,800 housing units is roughly 18 units per acre. This is within the 13 to 90 unit per acre requirement to be considered medium density and thus supports the PUCD Plan which is why the Proposed Action is supportive of this policy.

Comment 7: *re page 5-79 (1/2). “Not Applicable: Provide incentives and cost savings for affordable housing. Provide exemptions from zoning and building codes for housing projects that meet established standards of affordability, on a case-by-case basis. –Primary Urban Center Development Plan”*

- *Why is the objective incentivizing affordable housing and providing exemptions from zoning and building codes as stated in the Primary Urban Center Development Plan “not applicable” for the proposed action as presented on page 5-79?*

Response 7: Similarly as acknowledged in Response #2 above, as it relates to the specific objectives and policies you quote above, please note that it is not within the purpose and need of the Proposed Action to develop a program that will “Provide incentives and cost savings for affordable housing. Provide exemptions from zoning and building codes for housing projects that meet established standards of affordability, on a case-by-case basis.” The intention of the Proposed Action as noted in Response #1 encompasses the construction of a new, modern stadium facility that will be supported by complimentary mixed-use development. Hence, the Proposed Action is not applicable to this specific policy. However,

we do note that the Proposed Action is applicable to several other objectives and policies related to CCH General Plan.

However, as mentioned early, the selected Real Estate Developer(s)' final master plan and design scheme will comply with any and all applicable affordable housing requirements. In broad stroke terms, the Project Region's local housing submarket is supply-constrained and has not experienced any substantive additional surge in supply of housing in decades. Given the Proposed Action's high-density, mixed-use potential, there is a strong opportunity for the Proposed Action to effectively tap into the pent-up submarket demand, as well as the general State-wide demand.

Comment 8: *re page 5-79 (2/2). "Satisfies: Provide for high-density housing options in mixed-use development around transit stations. This type of "transit-oriented development" facilitates transit use and allows for increased densities without generating increased vehicular congestion.*

–Primary Urban Center Development Plan"

- *The draft EIS states the site is "high density," but the study only includes 1,800 housing units, which equates to 18 units per acre. How does this proposal satisfy the high-density standard set in the Primary Urban Center Development Plan as indicated on page 5-79?*
- *Why does the study not include figures that demonstrate how much more affordable housing can be included based on assumptions about transit usage? What about assumptions that prioritize already transit-dependent households?*
- *A public commenter asked at the scoping meeting to do a sensitivity analysis on the traffic impacts if we were to assume housing prioritization at the site for low-income car-free and car-light households. Why was this valid question not addressed?*

Response 8: Your comment is unclear as you do not indicate which policy / objective you are referring to. However, we assume that you are referring to the set of 3.3.2 policies. Specifically, the Primary Urban Center Development Plan objective in question reads:

Provide for high-density housing options in mixed-use development s around transit stations. This type of "transit-oriented development" facilitates transit use and allows for increased densities without generating increased vehicular congestion.

Similarly, to our response to your Comment #6, your calculated number of units per acre is made on the assumption that the residential units would be evenly spread through the development of the Project Site. With this in mind, at a minimum the residential units provided within the Real Estate Development component of the Proposed Action would be considered to be medium density. However, the majority of residential units outlined in all three conceptual designs are placed along the Hālawā / Aloha Stadium Hart Transit Station and line. Thus, the residential housing density surrounding a transit stadium, or in this case the Hālawā / Aloha Stadium Hart Transit Station would be anticipated to be within the high-

density criteria of 90 to 140 units per acre. As a result, the Proposed Action would support this objective.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Sandi Yorong](#)
To: [Public Comment](#)
Subject: New Aloha Stadium Project
Date: Wednesday, December 23, 2020 11:29:36 PM

As a New England Patriots fan, I had the experience of enjoying the entertainment district connected to Gillette stadium. A shopping mall, hotels, various restaurants and bars turned football games into a greater experience. I think the concept for the Aloha stadium entertainment district is a great idea and expands the opportunities for venues beyond football.

However, I feel the seating capacity should be between 45,000-50,000 seats. Perhaps UH football will not be able to fill all those seats but it will make it more appealing (profitable) for other entertainment to come to Hawaii. Bruno Mars was a great example of multiple sold out concerts attracting tourists and neighbor island spectators as well.

A larger seating capacity can attract top tier entertainers, motivational speakers, religious events, semi-finals and championship tournaments for various sports, and international events that attract tourist from Asia, New Zealand and Australia. With a population of 1.4 million people, a 50,000 seat stadium represents only 3.5% of the population before factoring in tourist. If the seating capacity is only 35,000, it shrinks seating even greater for concerts because of staging requirements and entertainers may decide it's not worth it. A larger seating capacity to go with an entertainment district may also attract the Pro bowl to return, too.

Please consider expanding the seating capacity of the stadium. Based on my experience at Gillette stadium, I feel the Aloha Stadium entertainment district has the potential to be great but we need the seating capacity to support that potential.

--

Aloha,
Sandi



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10422-01

Sandi Yorong
sandiyorong@gmail.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASD)
Hālawā, O‘ahu, Hawai‘i

Dear Sandi Yorong:

Thank you for your comments dated December 23, 2020, regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *As a New England Patriots fan, I had the experience of enjoying the entertainment district connected to Gillette stadium. A shopping mall, hotels, various restaurants and bars turned football games into a greater experience. I think the concept for the Aloha stadium entertainment district is a great idea and expands the opportunities for venues beyond football.*

However, I feel the seating capacity should be between 45,000-50,000 seats. Perhaps UH football will not be able to fill all those seats but it will make it more appealing (profitable) for other entertainment to come to Hawaii. Bruno Mars was a great example of multiple sold out concerts attracting tourists and neighbor island spectators as well.

Response 1: We acknowledge your comments. The Programmatic Final EIS includes a market feasibility & economic review and analysis prepared by Victus Advisors conducted in conjunction with master planning and preliminary design efforts for the Proposed Action. This documentation clearly underscores that the existing Aloha Stadium’s capacity of 50,000, by far, and in large exceeds current and anticipated future market needs. In observance of the analysis and guidance set forth by Victus Advisors as well as market sounding and user analysis by Stadium and Industry consultants, the unified recommendation is that the construction of a 27,500 - 35,000 seat capacity stadium would best serve current and anticipated future market demand.

Furthermore, before the 2018 fiscal year, Aloha Stadium was not widely considered as a major venue for concert activities. As the Aloha Stadium began to be marketed more heavily as a concert venue over the course of 2019, it was revealed through consultation with entertainment industry professionals that the Aloha Stadium's current capacity of 50,000 seats was a significant deterrent to the candidacy of the existing Aloha Stadium as a venue for major artists. Promoters and performers alike voiced that the ideal range for seating at a stadium-set concert lies between 25,000 and 30,000 seats.

Since the fiscal year of 2018, Aloha Stadium has hosted eight concerts, with seven held within the fiscal year of 2019. Six concerts have been booked/promoted by Live Nation with an average of 30,743 attendees, right in line with feedback provided by industry professionals. Nonetheless, as currently proposed, in addition to a raw 35,000 fixed seat capacity, concert events could potentially utilize field space for additional viewership that could accommodate upwards of 10,000 additional attendees.

With regard to sporting events held at Aloha Stadium, Division 1 Football Bowl Subdivision (D1-FBS) football factors in as the central activity featured. Specifically, Aloha Stadium was the home to the University of Hawai'i Rainbow Warriors Football Program (UH Football) when it was in operation. The University of Hawai'i is a member of the Mountain West Conference, which is considered to be a Mid-Major or Group of Five (G5) conference, and has ranked 81st in attendance among all D1-FBS institutions in the most recent season of play with no attendance restrictions (2019), bordering just under 25,000 attendees for home game attendance. Overall, attendance trends nation-wide are in sharp decline. The 2019 D1-FBS season resulted in the lowest overall attendance in the past 24 years (41,477 per game), with the Mountain West posting its lowest average per game attendance ever (23,232 per game). It is further notable that over the past five years, running from the 2014 season to 2019 season, average UH Football attendance has also trended down, reflecting a decline in average attendance. Moreover, UH Football has not drawn a sell-out crowd since 2007. By contrast, the highest attended game within the past five years attracted approximately 36,411 attendees (2014 season opener), under the context of the capacity of the existing Aloha Stadium (50,000 seats), the highest attended UH Football event held at the stadium over the course of the last five years would have a little more than a 25% of the seats vacant. By contrast, under the Proposed Action the current capacity of 50,000 seats (35,000 seat stadium), with a similar level of attendance, the Stadium would be 100% filled to capacity. There is a quality all unto-itself to having a sold-out-stadium that cannot be tangibly quantified.

Overall, the proposed New Aloha Stadium (35,000 seat capacity) would create the opportunity to serve as a viable venue for a greater range of events. Possible events include rugby, motor sports, soccer and mixed martial arts. These events typically will not pursue stadiums larger than 35,000, as the demand of their audience typically would not justify the use of a larger venue, particularly under the context of the market that would be locally served here on O'ahu.

Comment 2: *A larger seating capacity can attract top tier entertainers, motivational speakers, religious events, semi-finals and championship tournaments for various sports, and international events that attract tourist from Asia, New Zealand and Australia. With a population of 1.4 million people, a 50,000 seat stadium represents only 3.5% of the population before factoring in tourist. If the seating capacity is only 35,000, it shrinks seating even greater for concerts because of staging requirements and entertainers may decide it's not worth it. A larger seating capacity to go with an entertainment district may also attract the Pro bowl to return, too.*

Please consider expanding the seating capacity of the stadium. Based on my experience at Gillette stadium, I feel the Aloha Stadium entertainment district has the potential to be great but we need the seating capacity to support that potential.

Response 2: Your comments are acknowledged. As noted in Response #1 above, the reduction of the stadium capacity is justified by the *Market Feasibility Studies & Economic Impact Analysis for a New Aloha Stadium & Ancillary Development District* Prepared by Victus Advisors and RCLCO Real Estate Advisors as detailed above.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Environmental and Quality Control.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Shar Chun-Lum](#)
To: [Public Comment](#)
Subject: How do you join the community meetings scheduled for Jan. 26 or 28
Date: Tuesday, January 26, 2021 9:52:31 AM

ALoha,

Could you please provide the link to the virtual meetings you are having? There are people who would like to join live.

Please respond to this email before this evening's meeting.

Mahalo,

Shar Chun-Lum
Save Ala Moana Beach Park Hui

*'A'ohē hana nui ke alu 'ia.
No task is too big when done together by all.*



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10422-01

Shar Chun-Lum
Save Ala Moana Beach Park Hui
sharstocks@yahoo.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear Shar Chun-Lum:

Thank you for your comments dated December 26, 2020, regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *Could you please provide the link to the virtual meetings you are having? There are people who would like to join live.*

Response 1: We apologize for the timing of this response. The January 26 and 28, 2021 meetings have passed. However, we would like to note the public comment email provided was intended for comments on the Programmatic Draft EIS. For future reference and information relating to upcoming public engagement meetings, please visit the New Aloha Stadium Entertainment District Website at <https://alohastadium.hawaii.gov/new-aloha-stadium-entertainment-district/>.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in cursive script, reading "Keola Cheng". The ink is dark blue or black, and the signature is fluid and connected.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Bill Nelson](#)
To: [Public Comment](#)
Subject: new stadium feedback
Date: Thursday, December 24, 2020 3:17:11 PM

Although Aloha Stadium needs to be replaced, we don't need to be saddled with an "entertainment district", just a stadium with adequate parking will do. Find a way to accommodate the existing flea market in those plans.

And more importantly, we don't need an Entertainment District Authority to oversee development in the area. HCDA has done a terrible job for the residents of Hawaii while benefiting only developers. We don't need to repeat that gross mistake.

And please don't use the term "world class" to describe this project.

Stanley Nelson
Haleiwa



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10422-01

Stanley Nelson
stnelso@gmail.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear Stanley Nelson:

Thank you for your comments dated December 24, 2020, regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *Although Aloha Stadium needs to be replaced, we don't need to be saddled with an "entertainment district", just a stadium with adequate parking will do. Find a way to accommodate the existing flea market in those plans.*

Response 1: We acknowledge your comments. Please note that the Proposed Action, which is premised upon the Programmatic Master Plan appended to the Programmatic EIS as Appendix A, reflects the aggregated collection of extensive and exhaustive input from area residents, members of the public, existing Aloha Stadium stakeholders and public agencies as discussed in Section 2.3 of the Programmatic EIS. Additionally, the Project Team conducted a substantial number of public outreach meetings and has considered public input throughout the EIS process. Hence, the Proposed Action represents the vision of the overall community for the Project Site. Based on community input and various technical studies, the Proposed Action is envisioned to encompass the New Aloha Stadium, approximately 730,000 gross square feet (GSF) of residential space, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF of hotel space. However, as noted throughout the Programmatic EIS, that final design of the Project Site and use and space allocation will be determined by the Stadium Authority, the selected Stadium Developer and Real Estate Developer(s). Moreover, the Real Estate Development component of the Proposed Action is anticipated to allow the Project Site to be utilized 24/7 and generate economic benefits. Please note that the Proposed Action is anticipated to have a direct economic impact on the Project Region, as well as the State. In summary, as

discussed in Section 4.13.3 of the Programmatic EIS, the Proposed Action (at Full Build-Out) is anticipated to generate a Net Present Value (NPV) of over \$1.8 billion in total economic output, over \$700 million in personal earnings, and over \$198 million in State and County tax revenues, assuming an 8.0 percent discount over a 25-year period. After the Full Build-Out, up to 1,190 net new annual jobs are anticipated to be supported by operations of the Proposed Action.

With regards to your comment about accommodating the existing flea market, we assume that you are referring to the Swap Meet. Please note that the Swap Meet will have a proper space to continue its operations throughout the construction and the operation of the Proposed Action.

Comment 2: *And more importantly, we don't need an Entertainment District Authority to oversee development in the area. HCDA has done a terrible job for the residents of Hawaii while benefiting only developers. We don't need to repeat that gross mistake.*

Response 2: Your comment is acknowledged. However, please note that it is not within the scope of the Programmatic EIS to evaluate the management structures of the Proposed Action. Please note as discussed at the EIS Scoping Meeting and described in the EIS Preparation Notice published on September 8, 2019, as well as reiterated in Section 1.1 of the Programmatic Draft EIS, *“The Proposed Action encompasses the construction of a new, modern stadium facility that will be supported by complimentary mixed-use development.”* Therefore, the subject Programmatic Draft EIS is intended to assess the potential effects associated with the Proposed Action on various environmental resource categories as prescribed by Section 11-200.1-24.

Comment 3: *And please don't use the term "world class" to describe this project.*

Response 3: Within this EIS, “world class,” is used to describe the standard for which the Proposed Action strives for, as the existing Aloha Stadium was once a world-class facility but is no longer as it is deteriorating and is functionally obsolete now as described throughout the Programmatic EIS. Furthermore, the Oxford Languages Dictionary defines “world-class” as (of a person, thing, or activity) of or among the best in the world. Hence, the Stadium Development component of the Proposed Action is envisioned to deliver a facility that can be considered of the highest standard, or “world class.”

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Public Comment](#)
To: [Andrew Blasko](#)
Subject: Fw: NASED Comments
Date: Tuesday, February 9, 2021 1:53:32 PM

From: Stephen Murai <smura5012@gmail.com>
Sent: Monday, February 8, 2021 2:21 PM
To: Public Comment <publiccomment@wilsonokamoto.com>; Stephen Murai <smura5012@gmail.com>
Subject: NASED Comments

To Whom It May Concern;

Subject: NASED COMMENTS

I recommend not constructing a replacement stadium in the Aloha Stadium campus. The stadium would be used primarily for the UH football games and the swap meet. Rather than building a replacement stadium in the Aloha Stadium campus for these limited uses, have the University of Hawaii build their own permanent stadium at the Quarry or at the West Oahu campus. If at West Oahu, build a resort hotel to house both teams the week before the game.

Large attendance high school football games could be played at the UH stadium. UH could rent their stadium for large attendance concerts and other events. There would be no need for a replacement stadium in the Aloha Stadium campus.

There are more appropriate uses for the Aloha Stadium campus. These would be affordable and workforce housing, schools, commercial space and parks.

The affordable and workforce housing would include townhouses and high rises with units for rent and owner/occupant sales. Primary and middle schools would service the area. Commercial space would include retail, supermarket, swap meet, farmer's market, office, medical, light industrial and personal services. Parks would be integrated into a mauka to makai greenbelt.

Expand the Aloha Stadium campus by buying the two existing shopping centers adjacent to the campus, incorporating the rail station/parking lot parcel and including the Makalapa Manor campus. The campus would be continuous at grade with separating streets underground or above grade.

Thank you for your consideration.

Stephen H. Murai



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10422-01

Stephen H. Murai
smura5012@gmail.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, Oʻahu, Hawaiʻi

Dear Stephen Murai:

Thank you for your comments dated February 8, 2021, regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawaiʻi Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *I recommend not constructing a replacement stadium in the Aloha Stadium campus. The stadium would be used primarily for the UH football games and the swap meet. Rather than building a replacement stadium in the Aloha Stadium campus for these limited uses, have the University of Hawaii build their own permanent stadium at the Quarry or at the West Oahu campus. If at West Oahu, build a resort hotel to house both teams the week before the game.*

Response 1: Your comments are acknowledged. As discussed in Section 3.1 of the Programmatic Final EIS, a site study, entitled “Aloha Stadium: Planning for New Stadium & Site Redevelopment” was conducted in February 2019 by Crawford Architects, Callison and RTKL Associates, AHL, and WT Partnership to analyze and assess the relative merits and drawbacks of the Project Site in Hālawā against a range of alternative location options across the island of Oʻahu. Comparison metrics for the various sites included site access, transit connections, regional demographic and development opportunities, and incentives.

Of the sites that were assessed, which included the UH Mānoa campus the UH West Oʻahu campus, the Ala Wai Golf Course, Kapiʻolani Regional Park, and the Kalaeloa Airport, the current Project Site in Hālawā rated the highest in all categories. Hālawā is the most equipped for development potential to meet the goals and objectives of the Proposed Action given the availability of open space on site, direct access to major roadways, and its centralized location within an already established urban environment. Consequently, all

other sites outside of the Project Site in Hālawā were eliminated from further consideration in master planning efforts for the Proposed Action. The direction set forth for the scope of assessment of the Proposed Action encompassed within this Programmatic EIS document is therefore limited solely to the Project Site.

Moreover, the unexpected impacts of COVID-19 and the mounting maintenance cost issues led to closure of the existing Aloha Stadium to spectator events, and the UH is now temporarily hosting UH football games at its Clarence T.C. Ching Athletics Complex, located on its Lower Campus in Mānoa, until the New Aloha Stadium is constructed. Hence, UH has confirmed that they plan to return to the New Aloha Stadium once constructed and ready to operate in the future.

However, please note that should UH pursue their own permanent stadium, that is outside the scope of evaluation for this Programmatic EIS. Please note as discussed at the EIS Scoping Meeting and described in the EIS Preparation Notice published on September 8, 2019, as well as reiterated in Section 1.1 of the Programmatic Draft EIS, *“The Proposed Action encompasses the construction of a new, modern stadium facility that will be supported by complimentary mixed-use development.”* Therefore, the subject Programmatic Draft EIS is intended to assess the potential effects associated with the Proposed Action on various environmental resource categories as prescribed by Section 11-200.1-24.

Comment 2: *Large attendance high school football games could be played at the UH stadium. UH could rent their stadium for large attendance concerts and other events. There would be no need for a replacement stadium in the Aloha Stadium campus.*

Response 2: Your comments are acknowledged. However, as noted in Response #1 above, should UH pursue their own permanent stadium, that is outside the scope of evaluation for this Programmatic EIS. Moreover, UH has confirmed that they plan to return to the New Aloha Stadium once constructed and ready to operate in the future.

Comment 3: *There are more appropriate uses for the Aloha Stadium campus. These would be affordable and workforce housing, schools, commercial space and parks.*

Response 3: Your comments are acknowledged. Based on community input and various technical studies, the Proposed Action is envisioned to encompass the New Aloha Stadium, approximately 730,000 gross square feet (GSF) residential space, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF of hotel space. Moreover, the Proposed Action is envisioned to directly serve regional and State housing demands through the creation of a diverse range of residential options, accounting for upwards of 1,800 new housing units as discussed in Section 2.1 of the Programmatic Draft EIS. However, it should be noted that the extent of residential programming will ultimately be determined by the Stadium Authority and the selected Real Estate Developer(s) which will comply with applicable affordable housing requirements.

Comment 4: *The affordable and workforce housing would include townhouses and high rises with units for rent and owner/occupant sales. Primary and middle schools would service the area. Commercial space would include retail, supermarket, swap meet, farmer's market, office, medical, light industrial and personal services. Parks would be integrated into a mauka to makai greenbelt.*

Response 4: We acknowledged your comments. As noted in Response #3 above, the Proposed Action is envisioned to encompass the New Aloha Stadium, approximately 730,000 gross square feet (GSF) of residential space, 680,500 GSF of retail and entertainment space, 216,000 GSF of office space, and 160,000 GSF of hotel space. Moreover, the Proposed Action is envisioned to directly serve regional and State housing demands through the creation of a diverse range of residential options, accounting for upwards of 1,800 new housing units as discussed in Section 2.1 of the Programmatic Draft EIS. However, it should be noted that the extent of residential programming will ultimately be determined by the Stadium Authority and the selected Real Estate Developer(s) which will comply with applicable affordable housing requirements.

Comment 5: *Expand the Aloha Stadium campus by buying the two existing shopping centers adjacent to the campus, incorporating the rail station/parking lot parcel and including the Makalapa Manor campus. The campus would be continuous at grade with separating streets underground or above grade.*

Response 5: Purchasing additional lands is outside the scope of evaluation of Programmatic EIS. Moreover, it is not a part of the Proposed Action.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Suzen Murakoshi](#)
To: [Public Comment](#)
Subject: Aloha Stadium Redux
Date: Friday, December 25, 2020 10:25:43 AM

Aloha,

As a Halawa Heights resident, we live next to the Stadium through seeing the lights, hearing the sounds, and experiencing the traffic.

Sports is a commercially viable endeavor during non-covid times. However, the plan must now include other pandemic-ready strategies. Having more viable telecommunication possibilities built into the plans, social distancing and other non-crowded uses for the stadium should be included. One area may be to feature ART through the stadium, in addition to sports. ART is a major salve for tough times (and times of plenty) for all humans, young and old. The unifying humanity of ART brings the community together.

Featuring spaces for arts education to happen, art galleries as well as performance art spaces and performance art training areas would be a valuable asset for the community. Building this into the plan through small group access for usable space should be relatively easy and cost-effective. Partnerships with current organizations such as Ballet Hawai'i, the Pa'u Foundation, Honolulu Museum of Art, various halaus, etc. could foster the artistic creativity of the youth, adults and kupuna of the Islands.

Please consider this idea.

--

Mahalo nui. Aloha aku,
Suzen Kukana Murakoshi
Artistic Director
Hawai'i Public Theatre

Check out:
www.hawaiipublictheatre.com



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10422-01

Suzen Murakoshi
suzenmura@gmail.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear Suzen Murakoshi:

Thank you for your comments dated December 25, 2020, regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *As a Halawa Heights resident, we live next to the Stadium through seeing the lights, hearing the sounds, and experiencing the traffic.*

Response 1: Your comments relating to lighting, noise and traffic have been acknowledged.

As it relates to noise, please note that Section 4.9 and Appendix F of the Programmatic EIS assess noise level increases and impacts associated with the Proposed Action based on historical events that occurred at the Project Site, including concerts, football games, and monster truck shows. Under the Proposed Action, it is anticipated that special events will exceed normal background noise levels at the closest residential communities. The louder emissions may be associated with amplified voice and music, crowd noise, motor vehicle and motorcycle engine and exhaust noise, fireworks, fighter aircraft flyovers, etc. The sound levels associated with these special events will vary depending upon the siting of the New Aloha Stadium within the Project Site.

As it relates to traffic, please note that the Programmatic EIS includes a detailed description of the existing traffic conditions and potential traffic impacts associated with the Proposed Action in Section 4.11. Additionally, a Traffic Impact Report (TIR) was prepared by Wilson Okamoto Corporation in May 2020 which was updated in December 2021, and is appended to the Programmatic Final EIS as Appendix H.

The intent of TIR was to assess anticipated impacts on regional vehicular traffic conditions and infrastructure as well as multimodal transit facilities within the vicinity of the Project Site that could result from the implementation and operation of the Proposed Action. In summary, the Proposed Action is anticipated to be built out over 10+ years. By the year 2026, traffic conditions in the Project Region are anticipated to remain the same. Although the Stadium Development, accompanied by the Initial Real Estate Development, is expected to generate additional trips to the Project Site, it should be noted that the Project Site is also situated in the vicinity of regional roadways with higher capacities to accommodate additional traffic. In addition, the Project Site is located in an area that is accessible via multiple connections to and from regional roadways, with designated ramps to and from the freeways. As such, site-generated trips are dispersed along the different routes to and from the Project Site, thereby diluting the increases along the individual roadways. However, it is recommended that the preparation of a Transportation Management Plan which includes traffic circulation, parking, loading, and traffic demand management strategies, as well as a clear public information plan to relay changes to the traffic circulation in the vicinity of the Project Site is recommended to minimize the impact of the special events and other off-peak activities associated with the Proposed Action on the surrounding roadways. Moreover, with the completion of the Hālawa / Aloha Stadium HART Transit Station, and proposed multi-modal facilities under the Proposed Action, alternative transportation methods will be encouraged to further reduce traffic impacts related to single occupancy vehicles.

Due to the design and programming of the Proposed Action not being finalized, there is insufficient data to evaluate lighting impacts on the Project Region. However, the Programmatic Final EIS recommends that a lighting study be conducted when the design and programming are being finalized.

Comment 2: *Sports is a commercially viable endeavor during non-covid times. However, the plan must now include other pandemic-ready strategies*

Response 2: Your comments are acknowledged. As noted throughout the Programmatic EIS, the final design of the Stadium Development component of the Proposed Action will be determined by the Stadium Authority, the selected Stadium Developer. However, it is anticipated that the new Aloha Stadium will feature more club and premium seating as compared to the existing Aloha Stadium.

As it relates to COVID-19 impacts, please note that the impacts of the COVID-19 pandemic have been documented throughout this Programmatic EIS process. Specifically, COVID-19 impacts are discussed in the Executive Summary, Section 1.5, Section 4.18, and more importantly, in Chapter 9 as an unresolved issue, and have been updated to capture changes in conditions since the publication of the Programmatic Draft EIS.

Please note that at the time of the writing for the Programmatic Final EIS, the general consensus is that as more vaccinations are administered, COVID-19 will become more contained. As we can see in the State, as well as around the country, activities are returning to normal, to pre-COVID-19 conditions when impacts of the Proposed Action were projected out. Hence, the Proposed Action is still very feasible, and in fact, may provide even more beneficial impacts as the State economy begins to recover.

Please note however, future stadium events will follow all CDC and State Department of Health guidelines to ensure the safety of event patrons, staff and performers.

Comment 3: *One area may be to feature ART through the stadium, in addition to sports. ART is a major salve for tough times (and times of plenty) for all humans, young and old. The unifying humanity of ART brings the community together. Featuring spaces for arts education to happen, art galleries as well as performance art spaces and performance art training areas would be a valuable asset for the community. Building this into the plan through small group access for usable space should be relatively easy and cost-effective.*

Response 3: Your comments are acknowledged. Please note that the design and programming of the Proposed Action are yet to be finalized. This letter and its recommendations will be appended to the Programmatic Final EIS and will be provided to the Stadium Authority, the selected Stadium Developer and Real Estate Developer(s) for consideration.

Comment 4: *Partnerships with current organizations such as Ballet Hawai'i, the Pa'u Foundation, Honolulu Museum of Art, various halaus, etc. could foster the artistic creativity of the youth, adults and kupuna of the Islands.*

Response 4: Your comment is acknowledged. As noted in Response #3 above, this letter and its recommendations will be appended to the Programmatic Final EIS and will be provided to the Stadium Authority, the selected Stadium Developer and Real Estate Developer(s) for consideration.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services.

Mr. Stacey Jones, Crawford Architects

From: [Public Comment](#)
To: [Andrew Blasko](#)
Subject: Fw: Aloha Stadium
Date: Tuesday, February 9, 2021 1:51:31 PM

From: Ty Ga <0001saturday@gmail.com>
Sent: Sunday, February 7, 2021 10:31 PM
To: Public Comment <publiccomment@wilsonokamoto.com>
Subject: Aloha Stadium

To Whom It May Concern,

I think this is an Awesome layout for these a New Stadium, Events, Hotels, and retail.
Make sure there is ample parking and free flow of traffic in that area.
The swap meet too is an important retail outlet we need to keep for local people.

When is this all taking place? The sooner the better, with few tax dollars to build would be nice.

Regards,
Tax payer



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INNOVATORS • PLANNERS • ENGINEERS

10422-01

Ty Ga
0001saturday@gmail.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear Ty Ga:

Thank you for your comments dated February 7, 2021 regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *Make sure there is ample parking and free flow of traffic in that area.*

Response 1: Your comments are acknowledged. Please note that it is anticipated that a parking study will be conducted by the selected Stadium Developer and Real Estate Developer(s) as they finalize the design and programming of the Proposed Action. This parking study is anticipated to look at off-street parking and site generated parking demand, while considering TOD principals.

Comment 2: *The swap meet too is an important retail outlet we need to keep for local people.*

Response 2: It is acknowledged that the Aloha Stadium Swap Meet is a vital part of the community. The Stadium Authority has had a long and healthy relationship with the Swap Meet vendors and intends to provide space for the Swap Meet through the construction and operation of the Proposed Action.

Comment 3: *When is this all taking place? The sooner the better, with few tax dollars to build would be nice.*

Response 3: Your comment about when this will take place is unclear. We assume that you are referring to the construction of the Proposed Action. Please note that it is anticipated

that the Stadium Development and Initial Real Estate Development (a portion of the overall Real estate Development) will be completed within five years after all necessary approvals. No specific timeline has been provided for ‘full build-out’ since future development will be determined by what the market allows.

As it relates to your comments about tax payer dollars, please note as discussed in Section 2.5 of the Programmatic Final EIS, as of July 8, 2019, by signing into law HB1586 HD1 SD2 CD1 (as Act 268 SLH 2019), the Hawai‘i State Legislature and Governor had appropriated \$350,000,000 to improve the Project Site for public use and to assist with the construction of the ‘Stadium Development District’. However, with the passage of HB1348 (2021) by the senate and signing into law as Act 146 by Governor Ige, the Stadium Development appropriation has been lowered to \$170,000,000. A portion of this comes from State revenue sources of taxation.

However, the Proposing Agency intends to use this appropriation to leverage private sector investment in the District and deliver the New Aloha Stadium, along with other elements of the Proposed Action, through public-private-partnership arrangements. Stadium Developer and Real Estate Developer(s) from the private sector will be responsible for accomplishing the goals and achieving the key objectives of the New Aloha Stadium Entertainment District through public-private-partnership arrangements.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

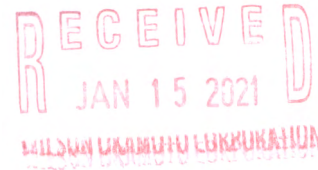
Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

Valarie M Igawa
99-266 Ohenana Lp
Aiea HI 96701

January 11, 2021

New Aloha Stadium Entertainment District (NASED)
Draft Environmental Impact Statement (DEIS)
Comments
1907 South Beretania Street #400
Honolulu, HI 96826



I have lived in Halawa Valley Estates when it was built in 1965 before the stadium was built in 1975. When I was 8 years old my parents became proud owners of a new home instead of renting although they struggled with my two other siblings. We managed as a poor happy family. My parents tried their best to feed us and keep us safe. The idea of a new stadium being built by our home was exciting yet with reservations. I had just graduated from high school and not into sports so I was not totally involved in the issues that would come up. Looking back the Stadium planning was done poorly. In January 2007 it was permanently locked for football and yes that is all I remember football games. Dealing with football games and traffic was tolerable then. When the rust issue became a major problem and Nate Barzilay won the bid to sandblast it became a noise issue for us. He did the sandblasting all times of the morning and night that I had to call the DOH Noise Complaint. Sound decibels should be only 50 it was beyond that. What is the noise curfew time? Not 11:00 p.m.? It's a valley where sound travels. The back of my parents home was where the CDL office was until it got robbed and shut down. Then Kiewit for the rail occupied it and they would come and go all hours of the day making noise and headlights shining into my patio where I sleep. They also did not take care of the grass where they occupied. Since they left no one takes care of the lot. Many times I tried calling Scott Chan the Stadium Manager but he was never in to take a call. Such unbusiness like. I want the Stadium to go away. We were a happy family until that Stadium caused my family pain and problems. My mother had Alzheimer's/Dementia and could not sleep with the noise that she no longer could live in her own home and had to go live with my sister where it was quiet. I too now have cancer. You all have parents how would you feel but one major factor is you don't live in Halawa Valley Estates. Like Glenn Wakai Senator for Economic Development to create a robust economy but not playing around with people's livelihood. The sick and elderly should be respected properly. In 2018 when Bruno Mars came and had a 3-day concert even though I work in Pearl City and takes only about 10 minutes to reach home with concerts going on I had the hardest time reaching home. I had to follow the concert goers. I even took off just to avoid traffic. Why should this be? Guns and Rose's was another loud concert with lots of traffic. I cannot even go out of my subdivision to go to the store. Snoop Dog and Cardi B same thing. That is what the Blaisdell Concert Hall was made for. Otherwise you need to build a Stadium that will capture the sound. Make like a Mercedes Benz Stadium! Get Private/Public Partnerships to build one good Stadium. Think first! Kapolei would be a good site. You need wide open space.

I saw in the news going forward the UH Football games will be at the University so now Dylan Armstrong Manoa Neighborhood Board Chair is speaking out complaining about noise and traffic. How do you think I felt!



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10422-01

Ms. Valarie M. Igawa
99-266 Ohenana Loop
Aiea HI 96701

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear Valarie M. Igawa:

Thank you for your comments dated January 11, 2021 regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *Looking back the Stadium planning was done poorly. In January 2007 it was permanently locked for football and yes that is all I remember football games. Dealing with football games and traffic was tolerable then.*

Response 1: Your comments are acknowledged. The Project Team understands that success of this Proposed Action is premised upon the planning process that occurs during the early stages of a project. Public input is an essential component of the planning process and with this in mind the Project Team has made a deliberate effort to involve the public in the planning process. This is evidenced by the various public outreach meetings held and comment periods that are summarized in Chapter 10 of the Programmatic EIS.

Please note that the Programmatic EIS also includes a detailed description of the existing traffic conditions and potential traffic impacts associated with the Proposed Action in Section 4.11. Additionally, a Traffic Impact Report (TIR) was prepared by Wilson Okamoto Corporation in May 2020 and is appended to the Programmatic Final EIS as Appendix H.

The intent of TIR was to assess anticipated impacts on regional vehicular traffic conditions and infrastructure as well as multimodal transit facilities within the vicinity of the Project Site that could result from the implementation and operation of the Proposed Action. In summary, the Proposed Action is anticipated to be built out over 10+ years. By the year

2026, traffic conditions in the Project Region are anticipated to remain the same. Although the Stadium Development, accompanied by the Initial Real Estate Development, is expected to generate additional trips to the Project Site, it should be noted that the Project Site is also situated in the vicinity of regional roadways with higher capacities to accommodate additional traffic. In addition, the Project Site is located in an area that is accessible via multiple connections to and from regional roadways, with designated ramps to and from the freeways. As such, site-generated trips are dispersed along the different routes to and from the Project Site, thereby diluting the increases along the individual roadways. However, it is recommended that the preparation of a Transportation Management Plan which includes traffic circulation, parking, loading, and traffic demand management strategies, as well as a clear public information plan to relay changes to the traffic circulation in the vicinity of the Project Site is recommended to minimize the impact of the special events and other off-peak activities associated with the Proposed Action on the surrounding roadways. Moreover, with the completion of the Hālawā / Aloha Stadium HART Transit Station, and proposed multi-modal facilities under the Proposed Action, alternative transportation methods will be encouraged to further reduce traffic impacts related to single occupancy vehicles.

Comment 2: *When the rust issue became a major problem and Nate Barzilay won the bid to sandblast it became a noise issue for us. He did the sandblasting all times of the morning and night that I had to call the DOH Noise Complaint. Sound decibels should be only 50 it was beyond that. What is the noise curfew time? Not 11:00 p.m.? It's a valley where sound travels. The back of my parents home was where the CDL office was until it got robbed and shut down. Then Kiewit for the rail occupied it and they would come and go all hours of the day making noise and headlights shining into my patio where I sleep. They also did not take care of the grass where they occupied. Since they left no one takes care of the lot.*

Response 2: Your comments regarding your concerns of noise generated from construction have been acknowledged. It is anticipated that adverse noise impacts are anticipated and unavoidable but temporary during the construction of the Proposed Action as discussed in Section 4.9 of the Programmatic EIS. Construction noise impacts can be mitigated by compliance with provisions of the State DOH Administrative Rules, Title 11, Chapter 46, and “Community Noise Control” regulations. These rules require a noise permit if the noise levels from construction activities are expected to exceed the allowable levels stated in the DOH Administrative Rules. Under these regulations, Aloha Stadium is situated within a Class A district. Therefore, the maximum permissible sound levels for construction activities is 60 dBA during daytime (7:00 a.m. to 10:00 p.m.) hours and 50 dBA during nighttime hours (10:00 p.m. to 7:00 a.m.). These levels may not be exceeded at or beyond the property line for more than 10 percent of any continuous 20-minute period. It shall be the contractor’s responsibility to minimize noise by properly maintaining noise mufflers and other noise-attenuating equipment, and to maintain noise levels within regulatory limits. Also, the guidelines for heavy equipment operation and noise curfew times, as set forth by the DOH noise control rules, will be adhered to; or, if necessary, a noise permit shall be obtained.

Comment 3: *They also did not take care of the grass where they occupied. Since they left no one takes care of the lot. Many times I tried calling Scott Chan the Stadium Manager but he was never in to take a call. Such unbusiness like. I want the Stadium to go away.*

Response 3: Your comment about the “grass” is unclear. However, we acknowledge your frustration with the previous lack of transparency that may have occurred. In effort to allow for better communication between the public and the Project Team for this Proposed Action several public meetings were held to engage the community member through submissions of form comments, as well as public comment periods. For more information on public outreach, please refer to Chapter 10 Consultation of the Programmatic Final EIS.

Comment 4: *In 2018 when Bruno Mars came and had a 3-day concert even though I work in Pearl City and takes only about 10 minutes to reach home with concerts going on I had the hardest time reaching home. I had to follow the concert goers. I even took off just to avoid traffic. Why should this be? Guns and Rose's was another loud concert with lots of traffic. I cannot even go out of my subdivision to go to the store. Snoop Dog and Cardi B same thing.*

Response 4: In response to your comments regarding the increase in traffic, as discussed in Response #1 above, please note that the Programmatic EIS includes a detailed description of the existing traffic conditions and potential traffic impacts associated with the Proposed Action in Section 4.11. Additionally, a Traffic Impact Report (TIR) was prepared by Wilson Okamoto Corporation in May 2020 which was updated in December 2021, and is appended to the Programmatic Final EIS as Appendix H.

Comment 5: *Otherwise you need to build a Stadium that will capture the sound. Make like a Mercedes Benz Stadium! Get Private/Public Partnerships to build one good Stadium. Think first! Kapolei would be a good site. You need wide open space.*

Response 5: The design of the Stadium Development component of the Proposed Action is not yet final. The final design of the Stadium Development will be determined mutually between the Stadium Authority and the selected Stadium Developer.

As it relates to alternative locations, as discussed in Section 3.1 of the Programmatic Final EIS, a site study, entitled “Aloha Stadium: Planning for New Stadium & Site Redevelopment” was conducted in February 2019 by Crawford Architects, Callison and RTKL Associates, AHL, and WT Partnership to analyze and assess the relative merits and drawbacks of the Project Site in Hālawā against a range of alternative location options across the island of O‘ahu. Comparison metrics for the various sites included site access, transit connections, regional demographic and development opportunities, and incentives.

Of the sites that were assessed, which included the UH Mānoa campus the UH West O‘ahu campus, the Ala Wai Golf Course, Kapi‘olani Regional Park, and the Kalaeloa Airport, the

current Project Site in Hālawā rated the highest in all categories. Hālawā is the most equipped for development potential to meet the goals and objectives of the Proposed Action given the availability of open space on site, direct access to major roadways, and its centralized location within an already established urban environment. Consequently, all other sites outside of the Project Site in Hālawā were eliminated from further consideration in master planning efforts for the Proposed Action. The direction set forth for the scope of assessment of the Proposed Action encompassed within this Programmatic EIS document is therefore limited solely to the Project Site.

Comment 6: *I saw in the news going forward the UH Football games will be at the University so now Dylan Armstrong Manoa Neighborhood Board Chair is speaking out complaining about noise and traffic. How do you think I felt!*

Response 6: Your comments are acknowledged. However, please note that the University of Hawai'i (UH) had anticipated that the UH could continue to host home football games in the existing Aloha Stadium, as the New Aloha Stadium was to be constructed concurrently. However, the unexpected impacts of COVID-19 and the mounting maintenance cost issues led to closure of the existing Aloha Stadium to spectator events, and the UH is now temporarily hosting UH football games at its Clarence T.C. Ching Athletics Complex, located on its Lower Campus in Mānoa, until the New Aloha Stadium is constructed. Hence, UH has confirmed that they plan to return to the New Aloha Stadium once constructed and ready to operate in the future. As it relates to traffic and noise impacts generated from UH football games at UH, please note that this is not within the scope of evaluation of this Programmatic EIS.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Public Comment](#)
To: [Andrew Blasko](#)
Subject: Fw:
Date: Tuesday, February 9, 2021 1:54:47 PM

From: Warren Dela Cruz <boz.d.090659@gmail.com>
Sent: Tuesday, February 9, 2021 12:55 PM
To: Public Comment <publiccomment@wilsonokamoto.com>
Subject:

Wow amazing either the people in Hawaii are deaf, blind, or stupid, you guys can't even complete the rail system which is a couple billion dollars over the proposed budget, and now you want to propose another monstrous project that's proably going to raise our taxes again to foot your idiotic failing projects, wake up elected officials, and visitor industry bureau, get back to basics and develop what we the people of Hawaii can afford, not trying to impress the world when all along we have dire issues existing with education, delepatating public school structures and grounds. Come on elected officials wake up, lets see the real picture here, oh yeah I forgot every state will be receiving millions for cov19 losses, wow the picture now looks clearer ! Sorry Guys....



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10422-01

Mr. Warren Dela Cruz
boz.d.090659@gmail.com

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASD)
Hālawā, Oʻahu, Hawaiʻi

Dear Mr. Dela Cruz:

Thank you for your comments dated February 9, 2021 regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawaiʻi Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *Wow amazing either the people in Hawaii are deaf, blind, or stupid, you guys can't even complete the rail system which is a couple billion dollars over the proposed budget, and now you want t propose another monstrous project that's proably going to raise our taxes again to foot your idiotic failing projects, wake up elected officials, and visitor industry bureau, get back to basics and develop what we the people of Hawaii can afford, not trying to impress the world when all along we have dire issues existing with education, delepatating public school structures and grounds. Come on elected officials wake up, lets see the real picture here, oh yeah I forgot every state will be receiving millions for cov19 losses, wow the picture now looks clearer ! Sorry Guys....*

Response 1: Your comments regarding the rail system, education, and delipidating public school infrastructure are acknowledged, however, please note that these are not within scope of the EIS. The scope of assessment of the EIS, as defined in Section 1.1, is limited to the construction of the New Aloha Stadium, the Initial Real Estate Development, and the Subsequent Real Estate Development to the extent possible.

The Proposed New Aloha Stadium Entertainment District will support the State of Hawaiʻi's efforts to promote its economic, environmental and socio-cultural goals. The Proposed Action will accomplish this by providing direct employment opportunities to present and future residents of Oʻahu, generating state and federal tax revenues, and enhancing the quality of life for visitors and residents alike by transforming the Project Site

into a thriving and vibrant community entertainment district through the new Real Estate Development component of the Proposed Action.

In summary, the development of the Proposed Action (Full Built-Out) is anticipated to generate Net Present Value (NPV) of over \$1.8 billion in total economic output, over \$700 million in personal earnings, and over \$198 million in State and County tax revenues, assuming an 8.0 percent discount over a 25-year period. After the Full Build-Out, up to 1,190 net new annual jobs are anticipated to be supported by operations of the Proposed Action. Hence, the Proposed Action is anticipated to provide significant beneficial impacts to the community, City and County of Honolulu, and the State.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in dark ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Ms. Chris Kinimaka, Department of Accounting and General Services
Mr. Stacey Jones, Crawford Architects

From: [Liu, Rouen](#)
To: [Public Comment](#); david.c.deponte@hawaii.gov
Cc: [Kuwaye, Kristen](#)
Subject: Draft Programmatic EIS - New Aloha Stadium Entertainment District
Date: Monday, February 1, 2021 9:33:15 AM

Dear Ms. Cheng

Thank you for the opportunity to comment on the subject project. Hawaiian Electric Company has no objection to the project. Should Hawaiian Electric have existing easements and facilities on the subject property, we will need continued access for maintenance of our facilities. We appreciate your efforts to keep us apprised of the subject project in the planning process. As the proposed New Aloha Stadium Entertainment District project comes to fruition, please continue to keep us informed.

Should there be any questions, welcome to contact me at 543-7245

Rouen Liu
Permit Engineer
Hawaiian Electric Company

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10422-01

Rouen Liu
Permit Engineer
Hawaiian Electric Company
Honolulu, HI 96813

Subject: Programmatic Draft Environmental Impact Statement
New Aloha Stadium Entertainment District (NASED)
Hālawā, O‘ahu, Hawai‘i

Dear Rouen Liu:

Thank you for your comments dated February 1, 2021 regarding the subject Programmatic Draft Environmental Impact Statement (EIS). We acknowledge your comments and concerns which have been considered in the preparation of the Programmatic Final EIS with regard to meeting content requirements prescribed in Hawai‘i Administrative Rules, Title 11, Chapter 200.1. A record of your comments has been appended to the Programmatic Final EIS in Appendix M.

We offer the following in response to your comments relating to the Draft EIS:

Comment 1: *Thank you for the opportunity to comment on the subject project. Hawaiian Electric Company has no objection to the project. Should Hawaiian Electric have existing easements and facilities on the subject property, we will need continued access for maintenance of our facilities. We appreciate your efforts to keep us apprised of the subject project in the planning process. As the proposed New Aloha Stadium Entertainment District project comes to fruition, please continue to keep us informed.*

Response 1: We acknowledge your comments and understand that the Hawaiian Electric Company (HECO) has no objections to the Proposed Action. As noted in Section 4.15.4 and Appendix K of the Programmatic Draft EIS, it is our understanding that the Project Site is currently served by a medium voltage 115-kilo-volt (kV) service line with a 125-amp fuse from HECO via a primary meter. The Proposing Agency and the selected Stadium Developer and Real Estate Developer(s) will continue to coordinate with HECO during finalization of the design for the Project Site to ensure that HECO has access to existing easements and potentially any future easements required for the Proposed Action.

Your written comments, along with this response, will be reproduced and included in the Programmatic Final EIS. The Programmatic Final EIS, including the various technical studies associated with it, will be available for review at the Office of Planning and

Sustainable Development – Environmental Review Program (formerly the Office of Environmental Quality Control) website.

We appreciate your interest and participation in this environmental review process.

Sincerely,

A handwritten signature in blue ink that reads "Keola Cheng". The signature is written in a cursive, flowing style.

Keola Cheng
Director of Planning

cc: Chris Kinimaka, Department of Accounting and General Services
Stacey Jones, Crawford Architects

An architectural rendering of the New Aloha Stadium Entertainment District. The image shows a large, modern stadium with a distinctive, angular roof structure. To the left of the stadium is a tall, multi-story building with a grid-like facade. In the foreground, there's a lower building with a flat roof that has some landscaping, including palm trees. The stadium's seating bowl is visible, and the field area has the word 'HAWAII' written on it. The entire scene is set against a dark, hazy background, suggesting an evening or night setting. The overall color palette is dominated by dark blues and greys, with some lighter areas on the buildings and the field.

NEW ALOHA STADIUM ENTERTAINMENT DISTRICT

PROGRAMMATIC FINAL ENVIRONMENTAL IMPACT STATEMENT

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