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REVISED ENVIRONMENTAL IMPACT STATEMENT
SANPO LAND INDUSTRIAL (HAWAII) CO., LTD.
RETAIL COMPLEX IN WAIKIKI

DECEMBER 1976

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SANPO LAND INDUSTRIAL (HAWAII) COMPANY, LTD. RETAIL COMPLEX IN WAIKIKI

A. SUMMARY

The proposed action of this environmental impact statement is a nine story commercial complex at the intersection of Kalakaua and Beachwalk Avenues in Waikiki, City & County of Honolulu, Oahu, Hawaii, by the Sanpo Land Industrial (Hawaii) Company. The objective of the applicant in proposing this action is to attract a share of the growing retail sales activity being experienced by other major shopping areas on Oahu. The primary target group for merchandising in the commercial complex is visitors to Waikiki.

The project is designed to provide retail sales space suitable for a department store, boutique and specialty type shops and restaurants. Approximately 164,820 square feet of floor area will be constructed. The applicant intends to apply for a 50 percent reduction in the Waikiki Special Design District Ordinance parking requirements. If this application is approved, two levels of underground parking (206 spaces) will be provided.

The project site is presently occupied by several older buildings with appurtenant paved and planted areas. Portions of the site are being utilized for parking. Numerous underground utility lines traverse the site. The site's topography is relatively flat.

Implementation of the proposed action will have a variety of impacts on the environment. The most significant impact is likely to be a substantial increase in retail sales activity in Waikiki.

The proposed action is also likely to have broad socio-economic impacts and some impacts on traffic. The most important of the regional impacts will be the support and stimulus that the retail activity will have on the State's tourist industry. Short term construction activities to implement the proposed action will have various temporary impacts on the environment which are local in nature.

Implementation of the proposed action will require the increased provision of public services and utilities. The provision of these services will not, however, significantly strain existing resources. Existing drainage in the area of the site is inadequate; but to alleviate flooding and ponding, a box and pipe drain system is planned in the vicinity of the proposed action by the City & County of Honolulu. Plans for this project would coincide with implementation of the proposed action.

TABLE OF CONTENTS

	<u>PAGE</u>
A. SUMMARY	ii
B. IDENTIFICATION OF APPLICANT	1
C. IDENTIFICATION OF APPROVING AGENCY	1
D. DESCRIPTION OF THE PROPOSED ACTION'S TECHNICAL, ECONOMIC, SOCIAL AND ENVIRONMENTAL CHARACTERISTICS	1
E. DESCRIPTION OF THE ENVIRONMENTAL SETTING	10
F. THE RELATIONSHIP OF THE PROPOSED ACTION TO LAND USE PLANS, POLICIES AND CONTROLS FOR THE AFFECTED AREA	21
G. THE PROBABLE IMPACT OF THE PROPOSED ACTION ON THE ENVIRONMENT	23
H. ANY PROBABLE ADVERSE ENVIRONMENTAL EFFECTS WHICH CANNOT BE AVOIDED	43
I. ALTERNATIVES CONSIDERED	45
J. THE RELATIONSHIP BETWEEN LOCAL SHORT TERM USES OF MAN'S ENVIRONMENT AND THE MAINTENANCE AND ENHANCEMENT OF LONG TERM PRODUCTIVITY	46
K. MITIGATION MEASURES PROPOSED TO REDUCE AND AVOID ADVERSE ENVIRONMENTAL IMPACTS	47
L. IRREVERSIBLE AND IRRETRIEVABLE COMMITMENTS OF RESOURCES	51
M. AN INDICATION OF WHAT OTHER INTERESTS AND CONSIDERATIONS OF GOVERNMENTAL POLICIES MAY OFFSET THE ADVERSE ENVIRONMENTAL EFFECTS OF THE PROPOSED ACTION	52
N. NECESSARY APPROVALS	53
O. ORGANIZATION AND PERSONS CONSULTED	54
P. COMMENTS RECEIVED DURING THE CONSULTATION PERIOD AND RESPONSES	56
Q. COMMENTS RECEIVED DURING REVIEW OF THE ENVIRONMENTAL IMPACT STATEMENT AND RESPONSES	83

0
1
2
3
4
5
6
7
8
9
A
B
C
D
E
F
G
H
I
J
K
L
M
N
O
P
Q
R
S
T
U
V
W
X
Y
Z

LIST OF FIGURES
(See Appendix A)

<u>FIGURE</u>		<u>PAGE</u>
1	Site Location Map, Island of Oahu	A-1
2	Site Location Map, City of Honolulu	A-2
3	Site Location Map, Waikiki Special Design District	A-3
4	Existing Conditions	A-4
5	Street Circulation Map	A-7
6	Perspective of Sanpo Waikiki	A-8
7	Landscaping Plan	A-9
8	Ground Floor Plan	A-10
9	Building Cross Section	A-11

- B. IDENTIFICATION OF APPLICANT - The Sanpo Land Industrial (Hawaii) Company, Ltd.
- C. IDENTIFICATION OF APPROVING AGENCY - The City & County of Honolulu, Department of Land Utilization
- D. DESCRIPTION OF THE PROPOSED ACTION'S TECHNICAL, ECONOMIC, SOCIAL AND ENVIRONMENTAL CHARACTERISTICS

Project Location

The Sanpo Land Industrial (Hawaii) Company, Ltd. is proposing to construct a nine story commercial complex at the intersection of Kalakaua and Beachwalk Avenues in Waikiki, City & County of Honolulu, Island of Oahu, State of Hawaii. The site of the project is identified by Tax Map Key No. 2-6-03, parcels 17, 18 and 20 (See Appendix A, Figures 1-3).

Statement of Objectives

The proposed action is oriented to capturing retail sales activity that would otherwise occur in the Ala Moana Shopping Center and in Downtown Honolulu. It is anticipated that provision of such a facility will enhance visitor satisfaction in Waikiki. Other purposes of the proposed action are to provide retail space suitable for sales of high quality and import merchandise, which is presently unavailable in local boutiques and shops, and space for restaurant services.

The primary target group for merchandising in the proposed project is visitors to Waikiki. The secondary target group is local residents who wish to shop at a sophisticated establishment specializing in imported merchandise.

An economic feasibility study* prepared by Robert Cutshaw and Associates in March 1976, indicated that based on present and projected trends in buying habits, disposable income and visitor counts, a quality retail establishment in Waikiki is a viable proposal.

Project Description

The proposed action is a nine story commercial complex on a 0.92 acre site, located on the makai side of Kalakaua Avenue at the intersection of Beachwalk and Kalakaua Avenues.

The project is designed to provide retail sales space suitable for a department store, boutique and specialty type shops and restaurants. Approximately 164,820 square feet of floor space will be constructed. Net retail floor area is calculated at 65% to 88% of the gross floor area. Restaurants will comprise a maximum of 15% of the total square footage. Two levels of basement parking will also be provided in an attached garage (See Appendix A, Figure 9).

* Robert Cutshaw and Associates, Inc., March 29, 1976, "Proposed Kalakaua and Beachwalk Retail Complex".

Setbacks and Open Space

The average building setback along the Kalakaua Avenue frontage of the project is 30 feet, with a minimum setback of 20 feet. The building setback along the Beachwalk frontage is 20 feet. Open space on the site will be landscaped and furnished with benches, tables, walkways and other low profile landscaping elements. Approximately one quarter of the required open space will be planted and three quarters will be paved surface. (See Appendix A, Figure 7). Some paved portions of the open space will be utilized for truck loading and maneuvering and driveways.

Parking and Loading Areas

The applicant intends to apply for a 50% reduction in parking requirements under the Waikiki Special Design District Ordinance. If the application is approved, the proposed action will provide 206 parking spaces in two underground parking levels. Parking facilities will be designed both to serve building tenants and patrons, and will be administered as paid and validated facilities. Access to and egress from the parking facilities will be located on Beachwalk Avenue. Three loading spaces will be provided along the makai edge of the site.

Vehicular Access

Vehicular access to the proposed project will be located on the makai edge of the property, off Beachwalk Avenue.

Employment

Although the number and type of commercial establishments in the proposed complex has not yet been determined, it is planned that a variety of visitor-oriented establishments will be included. It is anticipated this mix of commercial uses will generate more jobs than now exist at the site.

Land Clearance

Land clearance activities for construction will include demolition and removal of existing buildings, debris, and vegetation as necessary to construct the project. A crane will be used for the demolition of existing structures. The demolition contractor will cut and cap all utility lines leading into the project and mark their origins. The contractor will set up safety barricades along the perimeter of the project, and also, employ policemen to insure a safe traffic flow in the vicinity while demolition is in progress.

Site work will include minor grading activities, the removal and stockpiling of topsoil for reuse and the importing of new topsoil.

Utilities

- Storm Drainage System - Six four inch drains will be installed to serve the approximately 20,000 square feet of proposed horizontal roof area. Three drains will be installed on Beachwalk Avenue and three on Kalakaua Avenue. Each four inch drain will be sufficient to serve 4,600 square feet of roof area.

- Sanitary Sewer System - A new six inch sanitary sewer line will be extended to an existing six inch sewer main located in an easement between the Holiday Isle Hotel and the project site, and extending along Kalakaua Avenue. The connection will be made at the mauka-Diamond Head edge of the project site. The sewer connection will be made prior to 1 July 1977 in accordance with the City & County's deadline requirement for the National Pollutant Discharge Elimination System (NPDES).

- Water System - One connection will be made to the existing eight inch water main which is located under Kalakaua Avenue. Two meters, one for fire protection and one for domestic water service, will be installed adjacent to the existing sidewalk on Kalakaua Avenue. Two separate lines will be provided, one six inch line for fire protection and one four inch line for domestic water. Plans for domestic and fire protection water will be coordinated with the City & County Board of Water Supply, to insure adequate domestic service and fire protection.

- Electric - The Hawaiian Electric Company will provide a transformer on the Diamond Head side of the proposed site. Secondary electric lines will be extended into the first floor of the building and will serve metered tenants by means of a riser duct extending through the structure. An emergency generator of 120 kilowatts will be located on the upper parking deck.

- Telephone - Telephone lines will be derived from existing Hawaiian Telephone Company lines on Kalakaua Avenue. Telephone switching rooms will be provided on each floor of the proposed structure.
- Gas - Any gas utilities necessary for the proposed action will be connected to the gas main on Kalakaua Avenue.
- Solid waste - A trash compactor will be located on the ground level of the structure. To accommodate the commercial and service uses in the project, a private refuse collection and disposal firm will be utilized.

Construction

It is estimated the proposed action will be constructed over a period of approximately 15 months. The total estimated construction cost is \$9.9 million. It is not anticipated that pre-drilling will be required for construction. The building will be constructed on a mat foundation.

Sheet piling will be installed to brace the walls of the excavation. The fabrication of formwork will be completed off site until a space on the site can be provided.

Entry to and delivery of equipment and materials to the site during the construction period will be primarily from its Beachwalk Avenue frontage.

Intermittent obstructions and partial closings of Beachwalk and Kalakaua Avenues and their sidewalks will be required for deliveries, the construction of utility connections, and the repair of sidewalks, curbs and gutters during the construction period.

It is anticipated that 250 to 300 workers will be employed during the construction period. Salaries for direct labor during construction are estimated to be \$3.5 million.

No public funds will be involved in the proposed action.

Project Background

The chronology of the project since October 1974 is as follows:

- Option signed for sale of project site by Lyman J. Blank, Gordon H. Damon and Sanpo Land Industrial (Hawaii) Company, Ltd., February 25, 1975.
- Application for General Plan Amendment for Sanpo, Waikiki, April 25, 1975.

- Ordinance #4573, Bill 144, Draft #5, Waikiki Special Design District effective, April 1, 1976.
- Various governmental and private agencies contacted for comments during preparation of environmental impact assessment, May-June, 1976.
- Submission of Environmental Assessment Statement to Department of Land Utilization, June 8, 1976.
- Environmental Assessment Determination that Impact Statement is required, July 6, 1976.
- Environmental Impact Statement Preparation Notice September 23, 1976. Comment period deadline: October 23, 1976.
- Environmental Impact Statement filed for circulation with the State of Hawaii Environmental Quality Commission, November 5, 1976. Comment period deadline December 8, 1976.

E. DESCRIPTION OF THE ENVIRONMENTAL SETTING

Existing Environmental Characteristics - Proposed Site

- Adjacent Uses

The proposed action is located in the Waikiki District, on a site on the makai side of Kalakaua Avenue. The site is bounded by Kalakaua and Beachwalk Avenues and is adjacent to the Beachwalk Triangle Park. On its Diamond Head side, the site is bounded by the thirteen story Holiday Isle Hotel. Across Beachwalk Avenue and opposite the site are the Tops Restaurant, the New Tokyo Restaurant and the Hula Hut Restaurant; the latter; being located in one and two story low rise structures. Makai of the proposed site is the nine story Waikiki Royal Hotel. Across and opposite the site, on Kalakaua Avenue, are one and two story commercial structures.

- Landscape Features

A most dominant existing landscape feature is a row of seven palm trees planted along the Kalakaua Avenue sidewalk, adjacent to the site, which are maintained by the City and County. The trees are planted approximately 20 feet apart and

are between 40 and 60 feet in height. The City also maintains the Beachwalk Triangle Park on Kalakaua Avenue, just Ewa of the site.

- Soils

The soils study report prepared for the proposed project, entitled "Interim Report of Foundation Investigation-Proposed Sanpo Waikiki Kalakaua Avenue and Beachwalk, Honolulu, Hawaii for Sanpo Land Industrial Company, Ltd.",* states that:

"Existing fill soils, two to seven feet in thickness, were encountered in the exploration borings. The fill consists of various mixtures of sand, silty sand, silt and clay, and contains some debris. The fill is non-uniform and varies from moderately firm to firm.

"The natural soils beneath the site consist of sands, silty sands, silts and clays with varying amounts of coral fragments. The soils to depths of 50 to 60 feet are soft to only moderately firm. The deeper soils are moderately firm to firm with varying amounts of cementation.

"Water was measured in the borings at depths ranging from about 4-1/2 to 5-1/2 feet below the existing ground surface. The corresponding elevations of the water surface varied from about -0.4 to +0.2 feet.

* LeRoy Crandall and Associates, "Interim Report of Foundation Investigation, Proposed Sanpo Waikiki Kalakaua Avenue and Beachwalk, Honolulu, Hawaii for Sanpo Land Industrial Company, Ltd.", August 9, 1976.

"The major factor affecting subterranean construction will be the shallow groundwater condition. It appears that the most feasible construction method will be to dewater the site prior to excavating below the water table. This will involve the pumping and disposal of a significant quantity of water throughout the majority of the construction period. The necessary lowering of the water table will cause some settlement of the surrounding area. Pumping tests have been performed and the results will be presented in the final report. The estimated pumping requirements and the expected magnitude of the settlement will be evaluated as the design features are finalized."

Construction of the proposed underground parking facilities is considered to be feasible by the construction contractor of the Sanpo project.

- Site Conditions (See Appendix A, Figure 4)

The proposed site is presently occupied by several buildings with appurtenant paved and planted areas. Portions of the site are paved and are being utilized as parking areas. Numerous underground utility lines traverse the site. The ground surface is relatively level and flat.

Buildings on the site are presently occupied by approximately 15 commercial tenants. The number and type of tenants tend to fluctuate as all the commercial leases are short term. Existing commercial uses include offices, a motel, shops,

services, souvenir stands and a lunch counter. Existing uses appear to be primarily low capital investment establishments. All tenants have been notified of the proposed action. The following is a description of existing uses (April 1975) by Tax Map Key.

(TMK: 2-6-03: 18) One two-story and one three-story commercial building fronting Kalakaua Avenue. The buildings are of concrete and glass. Presently let on short term leases to various commercial enterprises. Directly behind these buildings is a three-story, concrete hotel building of 17 rooms.

(TMK: 2-6-03: 17) One four-story and one ten-story concrete hotel building. Besides the 63 hotel rooms, the parcel includes a lobby, office, swimming pool, garden area, and parking.

(TMK: 2-6-03: 20) A two-story commercial building of concrete and glass with 4,000 square feet of rentable space per floor.

All buildings included above will be demolished to implement the proposed project.

- Transportation and Parking

The small and contained Waikiki area encourages walking and discourages the use of private automobiles. An environmental impact statement prepared for a commercial complex proposed by the Helumoa Land Company on the makai side of Kalakaua Avenue between Lewers Street and the Outrigger Hotel concluded that over 80 percent of the store patrons in that area are visitors who walk, ride buses or take taxis to the shopping area.* The Sanpo site is similar in commercial character and accessibility as the Helumoa site.

The commercial establishments which presently occupy the proposed site are also oriented to the pedestrian trade generated by hotels and residences in the area. Parking for shoppers who choose to drive is available in nearby commercial facilities. There are twelve existing parking spaces on the site.

The proposed site is served by the #8, #2 and #5 lines of the City & County of Honolulu bus system.

* Environmental Communications, Inc., "Environmental Impact Statement for the Proposed Kalakaua Commercial Complex", July 1976.

- Flora and Fauna

Based on site observations and a review of other studies conducted for the proposed Kalakaua Commercial Complex at Kalakaua Avenue and Lewers Street, (one-half block Diamond Head), it was determined that the proposed site is not a habitat for any rare or endangered species of flora or fauna. Common species of birdlife such as the mynah, cardinal, and sparrow are found in the area.

Environmental Characteristics - Waikiki

- Land Use

The environmental setting of the proposed action is famous for its beaches, hotels, shops, and entertainment facilities, and is the center of the tourism industry in Hawaii. Provision of an attractive and lively urban environment in Waikiki is of great significance to the economic future of the State. However, the rapid development of Waikiki which has occurred throughout the past

* Environmental Communications, Inc., and Helumoa Land Company, Inc., "Environmental Assessment for the Proposed Kalakaua Commercial Complex", April 1976.

several decades has resulted in a variety of urban problems including traffic congestion, lack of open space, excessive densities, and in some areas, inadequate municipal facilities. Many studies of the area have been conducted and a Waikiki Special Design District have been implemented to protect and preserve the area from disorderly development.

- Socio-Economic Characteristics

The feasibility study prepared for the proposed action* estimated that Waikiki's share of Hawaii's retail and service trade was approximately \$291 million in 1975. It was also estimated that an additional \$28 million in potential sales would be lost to other areas because of a lack of commercial floor space in Waikiki. Unsatisfied potential in floor area was estimated to be 304,000 square feet (See Exhibit 1 on the following page).

Based on dollar volume, the retail centers for Hawaii may be ranked as follows:

	<u>Dollar Volume</u>
Waikiki	\$291 million
Ala Moana Shopping Center	\$250 million
Pearlridge Shopping Center	\$ 96 million

* op cit, Cutshaw, March 29, 1976.

EXHIBIT 1

	POTENTIAL DEMAND AND UNSATISFIED POTENTIAL DEMAND IN SQUARE FEET IN WAIKIKI		UNSATISFIED POTENTIAL IN WAIKIKI (SF)	KNOWN ADD'L PLANNED FLOOR AREA (SF)	BALANCE OF FLOOR AREA DEMAND (SF)
	WAIKIKI'S SHARE HAWAII'S RETAIL & SERVICES (000)	UNSATISFIED POTENTIAL IN WAIKIKI (000)			
1975	\$291,000	\$ 28,000	304,000		304,000
1976	307,000	44,000	473,000	96,000*	377,000
1977	323,000	60,000	645,000	292,000**	353,000
1978	339,000	76,000	817,000	292,000	525,000
1979	355,000	93,000	1,000,000	292,000	708,000
1980	371,000	109,000	1,172,000	292,000	880,000

* Hemmeter Center 96,000 SF (not including banquet halls, hotel rooms, other hotel central facilities)

** Kalakaua Commercial Complex 196,000 SF (not including offices and museum)
 Sanpo Waikiki Complex 160,000 SF approx. (not considered in projection)

SOURCE: Department of General Planning, June 26, 1974 report.

According to the 1970 Census, Waikiki had a total resident population of 13,124. Over four fifths (82.8%) of the community's population was classified as Caucasian. Other ethnic groups included Chinese (2.9%), Filipino (2.4%), Hawaiian (4.5%) and Japanese (4.2%). Median age in Waikiki was 33 years. The median income of the community's approximately 3,000 families was \$9,965. In terms of personal income, 65% of Waikiki's population of 14 years and over earned below \$6,000 annually and 16% earned \$10,000 or more.

The unemployment rate in Waikiki has remained substantially higher than that experienced by all of Oahu. The 1970 Census placed the area's jobless rate at 4.5%, representing 331 unemployed persons. The Islands' jobless rate for the same period was estimated at 3.0%. For April 1973, the Hawaii State Department of Labor and Industrial Relations estimated that the unemployment rate in Waikiki was 7.4%, representing over 700 jobless persons. In contrast, Oahu's unemployment rate for the same month was estimated at 4.7%.

The 1970 Census indicated that more than 85% of the Waikiki work force was employed by the private sector of the economy, and only 15% were employed by the government sector. Employment patterns by broad occupational groups indicated that 20% of the area's work force were employed in clerical occupations, and 19.6% were professional and technical workers. In addition, 19% were employed in service occupations, 13% were non-farm managers and administrators, and 10% were sales workers. Employment patterns by industry revealed that 13% of the Waikiki work force were employed in other personal services, and 11% were engaged in retail trade. In addition, 7% were employed by the construction industry, and a total of 7% were employed in insurance, real estate, or finance.

- Visual Quality

A crowded and lively man made environment are the significant aesthetic and scenic features of Waikiki. Streets are dominated by hotels, tourist-oriented shops, restaurants, and condominium apartment buildings. In many places

Waikiki also includes many older single family residences which are often frame or stucco, with peaked roofs, and which are expressive of the traditional Island life style. Heavy landscaping with ferns, palms and other indigeneous subtropical vegetation characterizes the area.

Waikiki is noted for its sunny, warm weather, infrequent rain and soft tradewinds.

- Related Actions

The proposed action is similar to a proposal for a multi-level shopping complex being made by the Helumoa Land Company, Inc., on a site one block away on the makai side of Kalakaua Avenue, bounded by Lewers Street and the Outrigger Hotel. That proposal provides for approximately 275,000 square feet of gross leasable area to be provided in three low rise buildings.

F. THE RELATIONSHIP OF THE PROPOSED ACTION TO LAND USE
PLANS, POLICIES AND CONTROLS FOR THE AFFECTED AREA

Waikiki Special Design District (Ordinance No. 4573)

The proposed action's objective to provide space for retail facilities in an attractive and sophisticated commercial center conforms with the objectives of the Waikiki Special Design District. In particular, implementation of the proposed action will contribute to "... a desirable level of urban design compatible with the climate and character of Hawaii within the district ...," will "... encourage the development of a variety of land uses which are compatible with and enhance the unique character of the district ...," and will "... alleviate traffic ... problems ...".

The Demand for Commercial Uses in Waikiki

The economic feasibility study which is described in Section E of this Statement indicated that there is a demand for additional commercial uses in Waikiki.

* Section 1, Legislative Intent, Ordinance No. 4573, Bill No. 144, Draft No. 5 "A Bill for an Ordinance to Establish the Waikiki Special Design District (WSDD)".

The report also stated that: "The most desirable commercial locations border Kalakaua Avenue and enjoy the highest pedestrian traffic. Within this small strip, except for small pockets of under-developed real estate, there is no developable property."*

It can therefore be concluded that the proposed action is in conformity with the demand for commercial uses in Waikiki, and its implementation is not likely to adversely affect the socio-economic character of the existing commercial area along Kalakaua Avenue.

* Robert Cutshaw & Associates, Inc, "Proposed Kalakaua and Beachwalk Retail Complex", March 29, 1976.

G. THE PROBABLE IMPACT OF THE PROPOSED ACTION ON THE ENVIRONMENT

Implementation of the proposed action will have a variety of impacts on the environment. The most significant long term impact of the proposed action is likely to be the substantial increase in retail sales in Waikiki.

The proposed action is also likely to have socio-economic impacts of regional significance and some impacts on traffic. The most important of regional impacts will be the support and stimulus that the proposed retail facility will have on tourism in the State. Short term construction activities to implement the proposed action will have temporary impacts on the environment. These impacts will be local in nature.

This section identifies and evaluates the significance of the anticipated environmental impacts of the proposed Sanpo Complex in Waikiki.

Parking

The applicant for the proposed action intends to request a 50% reduction of the Comprehensive Zoning Code parking requirement. Based upon 164,820 square feet of leasable floor area to be constructed, the project normally requires 412 parking spaces. If the reduction is approved, 206 parking spaces will be provided. The project would then result in a net increase of 194 parking spaces on the site.

According to a study prepared by the Real Estate Research Corporation for the proposed Kalakaua Commercial Complex, 93% of the people who come to Waikiki for shopping, browsing, entertainment or dining do not park in the area. Of the remaining 7%, 3% are workers who park in the area and the remainder are either residents or visitors staying outside Waikiki. If these characteristics apply to the proposed project, less than 10% of the project's patrons will arrive by automobile and park in the vicinity.

Since the majority of people in Waikiki are pedestrians and this characteristic is expected to continue, the applicant has proposed that the full CZC parking requirement is not necessary for the proposed action. The Waikiki Special Design District (WSDD) permits a 50% reduction of CZC parking requirements under certain circumstances. Since the demand for parking will vary inversely with the proportion of pedestrians and public transit users and the primary clientele of the complex is expected to be visitors without private cars, reduction of the parking requirement is felt to be justified.

The 50% reduction also conforms with the intent of the WSDD to alleviate traffic congestion in Waikiki. It is likely, that in the short term, curbside and off-street parking demand may increase, however in the long term, patrons who must travel to the Sanpo complex will either tend to park in outlying areas or use public transportation and walk.

Circulation - Vehicular

The net increase of 194 parking spaces on the site will result in additional vehicular traffic on surrounding streets, but the capacity of the streets will be adequate to accommodate the additional traffic.

A brief analysis was conducted to determine the probable traffic impacts of the Sanpo commercial complex, following its opening in 1978. Traffic generated by the proposed project was estimated, and compared with existing traffic on the surrounding street system and estimated street capacities. Daily and hourly traffic data for the surrounding streets was derived from recent traffic counts of the City & County of Honolulu, Department of Transportation Services. The counts used in the analysis were taken on weekdays during 1975 and 1976, and their locations are identified on Figure 5-Street Circulation (Appendix A).

Information on the characteristics of traffic likely to be generated by the project was mostly derived from a recent traffic study* prepared for the adjacent Kalakaua Commercial Complex. The analysis also incorporated various assumptions, as follows:

- An assumed continuation of the existing traffic distribution and approximate volumes on the surrounding streets;
- An assumption that future traffic increases will be generated only by the presence of the proposed commercial complex;
- The establishment of a vehicular turnover rate to account for the limited amounts of parking space at the Sanpo complex and the high proportion of planned, walk-in trade;
- The assumption that vehicular turnover in the 206-space parking structure will be once every two hours (for a 15 hour day, parking turnover in the lot would occur 7-1/2 times);

* Au, Henry Tuck, Traffic Impact Statement, Kalakaua Commercial Complex, Kalakaua Avenue, Waikiki. (1976)

- An assumption that all the traffic attracted to the complex would be new traffic on Beachwalk Avenue, although it can be reasonably expected that one-half of the vehicles entering the parking structure each hour would be vehicles already in Waikiki. The proportion of these vehicles on Beachwalk Avenue, which is the location of the parking structure entry and exit, would probably be quite low;
- The allocation of one-third of the parking structure for employee and tenant parking for which vehicles were assumed to enter and exit the structure once each day (however, to be conservative, all these spaces were included in the estimates of vehicular traffic);
- The assumption that all traffic on Beachwalk Avenue would distribute equally in both directions at the intersection of Kalia and Saratoga Roads;
- Finally, the assumption that the vehicular capacity of the surrounding streets should be based on a level of service "C" capacity rating.

The traffic impacts resulting from the Sanpo complex were estimated for the normal P.M. peak hour of existing traffic in Waikiki (between 4 and 5 P.M.) and for the 15 hour daily period when the project is expected to be open (between 9 A.M. and 12 P.M.). The turnover rate for the parking structure was multiplied by the number of parking spaces to calculate arriving and departing vehicle trips for the peak and 15 hour periods. These trips were compared with the traffic data derived from the City & County counts and the estimated street capacities. This provided an indication of the probable vehicular circulation impacts of the proposed action.

It was calculated that, following completion of the complex during an average day, a total of 103 vehicles would enter and exit the parking structure each hour. This would total 1,545 vehicles during the 15 hour period when the complex is open (between 9 A.M. and 12 P.M.). This additional traffic was added directly to existing traffic on Beachwalk Avenue and on Kalia Road between Beachwalk and Saratoga Road. At the intersection of Kalia and Saratoga Roads, it was estimated that one half of this traffic would proceed down Kalia Road in the ewa direction, and one half would proceed in the mauka direction on Saratoga Road.

Exhibit 2 on the following page compares this information on traffic generation with the recent count data of the Department of Transportation Services. It can be seen that traffic on Beachwalk Avenue is estimated to increase by nearly 50% during the peak hour, while traffic on Kalia Road between Beachwalk Avenue and Saratoga Road is estimated to increase approximately 15%. The increase in traffic on Saratoga Road in the mauka direction and on Kalia Road ewa of the Saratoga Road intersection is estimated to be much less and relatively insignificant.

During an average 15 hour period when the complex is open, traffic on Beachwalk Avenue is estimated to increase by approximately 60%. The increases in traffic on Kalia Road and Saratoga Road are estimated to be much less significant than this, during the 15 hour period.

Although the surrounding streets will experience increased traffic to varying degrees as illustrated by this data, the significance of this increase is related to the ability of the streets to accommodate the additional traffic. At level of service "C", the capacity of the one-lane Beachwalk Avenue is estimated

COMPARISON OF TRAFFIC WITHOUT AND WITH THE PROPOSED ACTION

Location of Counts ¹	Peak Hour Vehicles (4 - 5 P.M.)		15 Hour Vehicles (9 A.M. - 12 P.M.)	
	Without the Proposed Action	With the Proposed Action	Without the Proposed Action	With the Proposed Action
Beachwalk Avenue	214 ²	317	2,571 ³	4,116
Kalia Road	711 ³	814	8,308 ³	9,853
Saratoga Road	930 ⁴	982	9,505 ⁴	10,278

- 1 Exact Locations are identified in Figure 4-Street Circulation Map
- 2 Based on traffic count data collected on 2/25/76 (Wednesday)
- 3 Based on traffic count data collected on 9/13/76 (Monday)
- 4 Based on traffic count data collected on 2/25/76 (Wednesday)

to be approximately 600 vehicles per hour. The peak hour traffic levels, both with and without the proposed action, would be well below this capacity. The peak hour volume/capacity ratio for Beachwalk Avenue with the proposed action would be slightly over 0.5, and this ratio for the entire 15 hour period would be less than 0.5.

The two-lane one way Kalia Road at this level of service is estimated to have a capacity of 1,080 vehicles per hour. The volume/capacity ratio at the peak hour for this road would be about 0.75 with the proposed action. During the 15 hour period, this ratio would be about 0.6 for Kalia Road. The traffic and volume/capacity increases for Saratoga Road in the mauka direction and Kalia Road ewa of its intersection with Saratoga are expected to be much less significant.

Overall it can be seen that while the net increase of 194 parking spaces on the site (assuming approval of the request for a 50% parking space reduction) may contribute somewhat to vehicular congestion, the capacity of the surrounding streets will be adequate to accommodate the increased traffic.

The availability of a high quality shopping facility in Waikiki may also have a secondary impact on travel for shopping to other parts of Honolulu, specifically to Ala Moana Center and Downtown Honolulu. The significance of this impact would be the extent to which tourists are discouraged from vehicular travel outside of Waikiki for shopping purposes.

Circulation - Pedestrian

The appeal of display windows of the retail complex and the provision of pedestrian amenities in the landscaped plaza area are likely to generate increased numbers of pedestrians shopping and strolling in the area of the proposed action. Encouragement of the development of a pedestrian-oriented environment on Kalakaua Avenue is in general conformance with the objectives of the Waikiki Special Design District and of preceding studies such as the Waikiki Transportation Plan (1972).*

Some short term impacts on pedestrian circulation are anticipated to occur during construction of the proposed action.

* Department of Land Utilization, City & County of Honolulu, "Waikiki Special Design District", November 1975.

Social Impacts

Rapid growth in Waikiki has brought many changes which may be summarized as changes in the quality of life. Whether these changes are for the better or worse depends primarily on one's subjective opinion. The proposed action is part of a continuum of actions which have resulted in an increasingly tourist oriented and urbanized Waikiki. While these trends can be documented in terms of decline and loss, at the same time they have provided people with the basis for more social and economic opportunities.

Because of the predominantly developed nature of Kalakaua Avenue, approval and implementation of the proposed action will be in conformance with the existing social character of Kalakaua Avenue.

Implementation of the proposed action is likely to cause dislocation for approximately 75 workers employed by establishments now located on the proposed site. Although detailed data on tenants of the Sanpo complex is not yet available, it is anticipated that a project of its size will generate more jobs than those that are temporarily displaced.

Economic Impacts

The probable long term economic impact of implementation of the proposed action would be to support growth of the retail and service sectors in Waikiki. Existence of the proposed action will serve both to encourage tourists to shop in Waikiki and to stimulate competition in price, quantity and merchandising techniques among retailers.

The economic feasibility study prepared for the proposed action indicated that the implementation of the proposed action would serve to fulfill an unsatisfied potential in retail floor space in Waikiki. As the visitor count increases over the years and retail commercial activities fail to develop proportionally, the unsatisfied potential sales of Waikiki will continue to be diverted to other areas on Oahu. The proposed action is designed to fulfill this unmet demand for retail sales space. No adverse economic consequences on existing development in Waikiki are anticipated.

* op cit, Ctushaw, March 29, 1976.

The proposed action is being considered simultaneously with several other proposed commercial developments in Waikiki. One of the other major commercial developments currently being planned in Waikiki is the Kalakaua Commercial Complex proposed to be constructed at the corner of Lewers Street and Kalakaua Avenue. The environmental assessment study prepared for the project,* and the socio-economic study**, indicate that "... there would be no significant negative economic effects on owners of existing or planned commercial floor space in the Waikiki District if all four projects are ready for occupancy by 1980."

Implementation of the proposed action will result in the displacement of 80 hotel rooms and the commitment of space which could be used for new hotel room construction. Important contributors to the popularity of Waikiki as a visitor destination, however, are shops, restaurants and other tourist-oriented commercial facilities. While increases in hotel rooms are important to the overall economy of the State, also important

* op cit, "Environmental Communications Inc."

**Evaluation Research Consultants "Socio-Economic Impact of the Proposed Kalakaua Commercial Complex", March 1976.

is the expansion of related commercial facilities. In 1960 there were 7,151 hotel rooms in Waikiki and Ala Moana; in 1972 there were about 22,000 existing and planned rooms in these areas. During this period visitor growth was 367% and the total acreage devoted to commercial uses remained about the same.* It is planned that the proposed action will support and stimulate further new growth in the hotel industry.

Approval of the proposed action is also likely to cause increases in property values and may cause additional commitments for new development in the vicinity.

Impacts on Governmental Services and Utilities

- Fire and Police Protection - Difficulties in providing fire and police protection to the proposed action are not anticipated. As the Waikiki Fire Station is less than one half mile from the proposed action, response to any emergency would be adequate. Fire alarms, sprinkler system, hydrants and fire fighting devices would be installed as part of the proposed action in accordance with existing

* "Application for an Amendment to the General Plan of the City & County of Honolulu", May 16, 1973, Applicant: The Trustees, Estate of Bernice Pauahi Bishop.

regulations and procedures. The Honolulu Police Department provides regular service in Waikiki, which may be supplemented by private security services retained by the proposed complex.

- Solid Waste - No impacts on public services are anticipated as the commercial complex will retain a private refuse firm.

- Drainage - Existing drainage in the area of the proposed site is inadequate but to alleviate flooding and ponding, a new box and pipe drain system is planned in the vicinity of the proposed action. This project is identified in the Six Year Capital Improvements Program and Budget Fiscal Years 1976-1981 of the City & County of Honolulu, as Project No. 737043 Priority 083. Staff of the Drainage Division of the Department of Public Works, City & County of Honolulu stated that specifications are being prepared and this project is likely to go to bid by January 1977.

The storm runoff from the proposed facility is projected to be equal to or slightly less than the existing conditions.

- Electric, Gas and Telephone Service - No difficulties in providing electricity, gas or telephone service to the proposed action are anticipated.
- Water Quality - No adverse impacts to existing water quality are anticipated to occur through implementation of the proposed action.
- Sewers - The existing sewer system is considered adequate to accommodate the proposed action. Environmental laws currently require hook-up prior to July 1977.

Visual Impacts

The proposed action will be similar in character to existing and proposed developments on Kalakaua Avenue. Consequently, there will be no significant change in the visual quality on an area wide scale resulting from the proposed action. The existing appearance of the proposed site will be changed significantly, but is likely to be enhanced by the proposed development. Design will be conceived in accordance with the urban design guidelines of the Waikiki Special Design District.

There will be no adverse impacts on existing view planes caused by the proposed action. Potential views to the Ocean and Diamond Head are already blocked by existing commercial and hotel structures.

Noise Impacts

No significant long term adverse noise impacts are anticipated to result from implementation of the proposed action.

Air Quality Impacts

Deterioration in air quality may result in the long term from increased traffic generated by the proposed action. Since the increased traffic is not expected to result in significant congestion on surrounding streets, including Beachwalk Avenue, Kalia and Saratoga Roads, this deterioration is not anticipated to be significant, though this conclusion is not based on a quantitative analysis. (See preceding section on Circulation-Vehicular for a discussion on expected traffic impacts).

An additional factor leading to this conclusion is the relatively high volume of traffic on Kalakaua Avenue, adjacent to the site (some 10 times the traffic counted on Beachwalk Avenue during a weekday P.M. peak period, without the proposed action). It may be expected that ambient air quality in the vicinity

of the proposed action would be much more affected by normal future increases in this traffic, than the additional traffic attracted to Waikiki by the proposed action.

To verify this assessment, a detailed air quality study is being prepared for the project. That study will document expected air quality impacts and will be available for review through the City Department of Land Utilization. When it is completed (anticipated completion date is January 1977); a quantification of air quality impacts will be available for the final EIS review.

Soils

No significant adverse settlement or damages to adjacent public and private properties are anticipated to result from the proposed action. If underpinning is constructed beneath the adjacent bank building foundation as suggested by the structural engineer for the proposed project, no settlement of the bank building should occur. Final settlement of the roadway adjacent to the proposed action is not anticipated to exceed one inch. Final settlement of the project itself may be two or three inches. This is not anticipated to have any effect on adjacent properties.

Historic Sites

No historic sites within or immediately adjacent to the proposed site have been identified.

Parks

The proposed project is not likely to have any impact on public park facilities in the area. The landscaping plans, as proposed, will complement the use of the adjacent Beachwalk Triangle Park as open space and for passive recreation purposes.

Construction Impacts

Construction activities to implement the proposed action will have short term impacts primarily on noise, air quality, drainage and traffic. The extent and significance of these impacts will depend upon the nature of the construction activities, scheduling, equipment utilized, and the extent that any adverse impacts can be minimized. It is anticipated that these impacts will be insignificant as any undesirable impacts will be minimized through the enforcement of existing pollution control measures such as the Public Health Regulations Chapter 44B, "Community Noise Control for Oahu" and other standards provided in the construction specifications.

If the proposed new storm drain in Beachwalk Avenue is not completed prior to completion of the Sanpo complex, storm drainage conditions will continue to be unsatisfactory. However, these adverse conditions are not anticipated to be worse than existing conditions.

The proposed action will result in some additional traffic on Beachwalk Avenue and other local streets. It may also result in some deterioration of existing ambient air quality.

I. ALTERNATIVES CONSIDERED

The principal alternatives to the proposed action are:

- No action, which would be a hold action for development at a future date.
- The development of a resort hotel.

The former action is not considered economically feasible, and the latter is not considered desirable by the applicant because a strong existing demand for retail space has been identified. In addition, permitted densities for hotel uses in the Waikiki Special Design District are considered too low for a hotel to be economically viable on this site.

J. THE RELATIONSHIP BETWEEN LOCAL SHORT TERM USES OF MAN'S ENVIRONMENT AND THE MAINTENANCE AND ENHANCEMENT OF LONG-TERM PRODUCTIVITY

The proposed commercial complex is being developed to provide space for retail and for restaurant uses. From the perspective of the present generation it can be considered to be a long term use of the site.

An alternative relationship might be to allow the site to remain in its existing condition. From an economic standpoint that alternative would not reflect the enhancement of the long term productivity of the site to the degree that the proposed action would. The long term productivity of the proposed action includes the creation of new jobs and increased income in Waikiki.

Implementation of the proposed action would foreclose other future options for the proposed site. However, it seems clear that the use of the proposed site for commercial activities conforms with the land use policies of the City and County of Honolulu, and is likely to generate complementary uses in the vicinity of the action.

K. MITIGATION MEASURES PROPOSED TO REDUCE OR AVOID ADVERSE ENVIRONMENTAL IMPACTS

Measures During Construction

Most of the impacts of the proposed action which are adverse will occur during construction. Impacts are likely to include some disruption of traffic circulation, noise, and dust in the vicinity of the proposed action. To avoid these adverse impacts, construction activities will be scheduled between the hours of 7:30 A.M. and 3:30 P.M. Appropriate permits will be obtained for the temporary disruption of existing activity in the vicinity of the proposed action.

The building design which is proposed incorporates metal lath and plaster exterior walls rather than poured-in-place or precast concrete. This design will reduce construction noise associated with conventional poured-in-place and precast construction techniques.

A combination of diesel driver and vibratory or sonic hammer will be used to drive sheet piling, to minimize noise impacts during construction. Use of this equipment is anticipated for ten to twelve days. Muffler devices will be used to minimize exhaust noise.

Short term adverse impacts on air quality will be minimized by dust control measures, by the covering of trucks which transport construction materials, and by careful scheduling of the use of construction equipment. Construction contractors will meet applicable Public Health Regulations regarding noise control.

Dewatering for the excavation will use the most economical technique, which suits soil conditions, and which protects adjacent public and private property. Although specific methods will not be selected until further information on soil conditions is obtained, dewatering of the proposed site will probably be accomplished through the use of five wells and five pumps.

The Contractor will obtain a permit from the City and County of Honolulu, Department of Public Works, Division of Engineering to dispose of waste water into the storm drain on Lewers Street, which empties into the Ala Wai Canal. Filters will be provided to maintain existing water quality standards in accordance with State of Hawaii Water Pollution Control measures. Crushed rock filters around the wells will be utilized.

No disruption of the Beachwalk Triangle Park or the bus stop on Kalakaua Avenue is expected to occur from construction of the proposed project. During construction a fence will protect the park. Access to shops or disruption to existing activities on Beachwalk Avenue is not likely to occur, although some intermittent closings of the sidewalk on Beachwalk Avenue may be necessary to complete the proposed project.

Other Short Term Measures

The primary short term socio-economic impacts associated with the proposed action will be the temporary displacement of jobs.

A formal relocation program for displaced tenants is not planned, as all existing tenants have been advised of the project for at least a year. Existing tenants are currently under short term and month-to-month leases.

Long Term Measures

Discussions with various public agencies have revealed that anticipated adverse impact of the proposed action may be congestion resulting from inadequate

access and egress from the parking garage on Beachwalk Avenue. Staff members from the City & County Department of Transportation Services have suggested two methods to alleviate this impact. The first would be to widen the driveway to the proposed parking facilities, and the second would be to place tollgate facilities sufficiently off the street and well within the proposed parking structure to avoid cars lining up on Beachwalk Avenue to enter the garage. As a result of these discussions, new plans were developed to conform with the recommendations.

L. IRREVERSIBLE AND IRRETRIEVABLE COMMITMENTS OF RESOURCES

The labor required for the project and the construction materials which cannot be economically re-used will be irretrievable. Labor and materials expended during maintenance and operation of the complex will also be irretrievable.

M. AN INDICATION OF WHAT OTHER INTERESTS AND CONSIDERATIONS OF GOVERNMENTAL POLICIES MAY OFFSET THE ADVERSE ENVIRONMENTAL EFFECTS OF THE PROPOSED ACTION

The most significant concern in this regard is the City and County of Honolulu, Waikiki Special Design District. The proposed project has been developed in concept and in form to conform to the objectives and regulations of the Waikiki Special Design District.

N. NECESSARY APPROVALS

Approvals from governmental agencies necessary for implementation of the proposed action are the granting of a Development Conformance Certificate for the Waikiki Special Design District, by the City and County Department of Land Utilization and City Council, a grading permit by the Department of Public Works, and a building permit by the Building Department.

O. ORGANIZATIONS AND PERSONS CONSULTED

Federal Government

Environmental Protection Agency
U. S. Army Corps of Engineers
U. S. Fish & Wildlife Service
Soil Conservation Service
Air Force - 15th Air Base Wing
Army-Commanding General/Environmental Section
Navy
Army - Directorate of Facilities Engineering

State of Hawaii

Office of Environmental Quality Control
Department of Agriculture
Department of Land & Natural Resources
Department of Health
Department of Planning & Economic Development
Department of Defense
Department of Accounting & General Services
Department of Social Services & Housing
Department of Transportation
Department of Education

City & County of Honolulu

Department of General Planning

Department of Transportation Services

Department of Parks & Recreation

Department of Public Works

Board of Water Supply

Department of Housing & Community Development

Mass Transit Division

Building Department

University of Hawaii

Environmental Center

Water Resources Research Program

Private

American Lung Association

Waikiki Improvement Association

Waikiki Residents Association

P. COMMENTS RECEIVED DURING THE CONSULTATION PERIOD AND RESPONSES

Urban 9

Urban Planning - Urban Design
Environmental Engineering
Landscape Architecture

926 Bethel Street
Honolulu Hawaii 96813
Telephone (808) 533-1725

GEORGE R. ARAYOSH
GOVERNOR



ANDREW I. T. CHANG
DIRECTOR OF SOCIAL SERVICES & HOUSING

STATE OF HAWAII
DEPARTMENT OF SOCIAL SERVICES AND HOUSING
P.O. Box 339
Honolulu, Hawaii 96809

September 10, 1976

RECEIVED
SEP 17 1976

GROUP ARCHITECTS
COLLABORATIVE, INC.

Environmental Quality Commission
550 Halekuanila Street, Room 301
Honolulu, Hawaii 96813

Dear Sirs:

Re: Sampo Land Industrial (Hawaii) Co.,
Ltd., Retail Complex in Waikiki

We have no comment on the project/EIS as it relates to our programs.

We are returning the EIS for your future usage. Thank you for the opportunity to review the project/EIS.

Sincerely,

Andrew I. T. Chang
Andrew I. T. Chang
Director

Attachment

cc: Dept. of Land Utilization
(Ms. Mary Ellen Ross, URBAN 9

October 11, 1976

Mr. Andrew I. T. Chang, Director
State of Hawaii
Department of Social Services & Housing
P. O. Box 339
Honolulu, Hawaii 96809

Dear Mr. Chang:

RE: Letter September 10, 1976
commenting on Sampo Land Industrial
(Hawaii) Co. Ltd., Retail Complex
in Waikiki

Thank you for your letter. The document you reviewed was a part of the EIS Preparation Notice pursuant to the Environmental Quality Commission's EIS Regulations. An EIS for the project is being prepared and will be available shortly for your further review.

Yours very truly,

URBAN 9

Mary Ellen Ross

Mary Ellen Ross

MER:lf

cc: Department of Land Utilization
Environmental Quality Commission



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Division of Ecological Services
821 Mililani Street
Honolulu, Hawaii 96813

Reference: ES

September 8, 1976

Interim Director
Environmental Quality Commission
550 Halekauwila Street, Rm. 301
Honolulu, Hawaii 96813

Dear Sir:

We have reviewed the environmental impact statement for Sanpo Land Industrial (Hawaii) Company, Ltd., Retail Complex in Waikiki, island of Oahu, Hawaii, and have no additional comments to offer. We are returning the EIS as requested.

Thank you for the opportunity to comment.

Sincerely yours,
Maurice H. Taylor
Maurice H. Taylor
Field Supervisor

Encl.

cc: Ms. Mary F. Ross
ARD, AE



Urban 9

Urban Planning - Urban Design
Environmental Engineering
Landscape Architecture
926 Bethel Street
Honolulu Hawaii 96813
Telephone (808) 533-1725

October 11, 1976

Mr. Maurice H. Taylor
Field Supervisor
U. S. Dept. of the Interior
Fish and Wildlife Services
821 Mililani Street
Honolulu, Hawaii 96813

Dear Mr. Taylor:

RE: Letter of September 8, 1976
commenting on Sanpo Land Industrial
(Hawaii) Co. Ltd., Retail Complex
in Waikiki

Thank you for your letter. The document you reviewed was a part of the EIS Preparation Notice pursuant to the Environmental Quality Commission's EIS Regulations. An EIS for the project is being prepared and will be available shortly for your further review.

Yours very truly,

URBAN 9

Mary Ellen Ross
Mary Ellen Ross

MER:lf

cc: Department of Land Utilization
Environmental Quality Commission

Urban 9

Urban Planning, Urban Design
Environmental Engineering
Landscape Architecture
926 Bethel Street
Honolulu Hawaii 96813
Telephone (808) 533-1725

Dept. of Housing & Community Development
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

October 11, 1976

September 13, 1976

Mr. William Blackfield, Director
Dept. of Housing & Community Development
City & County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Environmental Quality Commission
550 Halekiauila Street, Rm. 301
Honolulu, Hawaii 96813

Dear Mr. Blackfield:

Gentlemen:

RE: Letter of September 13, 1976
commenting on Sanpo Land Industrial
(Hawaii) Co. Ltd., Retail Complex
in Waikiki

Subject: Environmental Impact Statement
Sanpo Land Industrial (Hawaii)
Co., Ltd.
Retail Complex in Waikiki

The Department of Housing & Community Development
has reviewed the "EIS for Sanpo Land Industrial (Hawaii) Co.,
Ltd., Retail Complex in Waikiki." We have no comments to
make relating to this department's program or workload.

Thank you for your letter. The document you reviewed was
a part of the EIS Preparation Notice pursuant to the
Environmental Quality Commission's EIS Regulations. An
EIS for the project is being prepared and will be available
shortly for your further review.

Yours very truly,

URBAN 9

Mary Ellen Ross

Mary Ellen Ross

MER:lf

cc: Department of Land Utilization
Environmental Quality Commission

We are returning the copy of the EIS for your further
use.

Sincerely,

WILLIAM BLACKFIELD
WILLIAM BLACKFIELD
Director

Enc.
cc: Department of Land Utilization
City and County of Honolulu
Ms. Mary Ellen Ross

DEPARTMENT OF PUBLIC WORKS
CITY AND COUNTY OF HONOLULU
650 SOUTH KING STREET
HONOLULU, HAWAII 96813



FRANK P. FABI
MAYOR

KAZU HAYASHIDA
DIRECTOR AND CHIEF ENGINEER

DEP 76-355

September 13, 1976

RECEIVED
SEP 17 1976

GROUP ARCHITECT.
COMPARATIVE, INC.

MEMORANDUM

TO : MR. GEORGE S. MORIGUCHI, DIRECTOR
DEPARTMENT OF LAND UTILIZATION

FROM : KAZU HAYASHIDA, DIRECTOR AND CHIEF ENGINEER

SUBJECT: ENVIRONMENTAL IMPACT STATEMENT (EIS) FOR THE
SANPO LAND INDUSTRIAL (HAWAII) CO., LTD.,
RETAIL COMPLEX IN WAIKIKI

Mr. George Moriguchi

- 2 -

henceforth that applicant consult with our department formally as required by Environmental Quality Commission's EIS Regulations.

4. Sewers (Page 31). Under one of the requirements of the National Pollutant Discharge Elimination System (NPDES) permit, the City is required to provide secondary treatment for the Honolulu sewer system by July 1, 1977. The City will not be able to meet this requirement. Consequently, we may not be allowed to permit any new connections after July 1, 1977 even though sewers are considered adequate for the proposed project.
5. Construction Impacts and Mitigation Measures (Pages 33 & 38). Dewatering methods and operation for the disposal of groundwater should be elaborated. The City will not permit the discharge of groundwater into the storm drainage system unless water quality standards are met. Application for a permit to connect to the municipal drainage system is processed by the Division of Engineering. City's streets will not be used for ponding operation.
6. Probable Adverse Effects (Page 34). Any settlement or damages to City properties will have to be corrected by the applicant.

We have reviewed the subject EIS and have the following comments:

1. Project Description (Page 3). According to prior information provided to the Sewers Division, approximately 168,604 square feet of floor space will be constructed, of which restaurants will comprise about 8 percent (13,740 square feet) of the total floor area. The 8 percent figure does not agree with the 30 percent stated in the EIS. Wastewater flows from restaurants are higher than commercial (stores and shops) establishments, hence this discrepancy should be explained, inasmuch as the availability of adequate sewers may be affected.
2. Sanitary Sewer System (Page 6). The existing sewer in the easement described in the EIS has a diameter of 6 inches and not 8 inches. If an 8-inch or larger size lateral is found to be necessary, connection must be made to the 10-inch sewer lateral on Kalakaua Avenue.
3. Project Background (Page 9). Our office was not formally consulted during the consultation period following publication of the EIS Preparation Notice. We request

cc: Urban 9
Div. of Engineering
Div. of Sewers

KAZU HAYASHIDA
Director and Chief Engineer

Urban 9

Urban Planning • Urban Design
Environmental Engineering
Landscape Architecture
Research & Development

928 Bethel Street
Honolulu Hawaii 96813
Telephone (808) 533-1725

September 23, 1976

Mr. Kazu Hayashida
Director & Chief Engineer
Department of Public Works
City & County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Hayashida:

Thank you for your letter of September 13, 1976 regarding the proposed Sanpo Commercial Complex in Waikiki. We are reviewing your comments and recommendations. These will be carefully considered in the preparation of the Environmental Impact Statement.

Yours very truly,

URBAN 9

Mary Ellen Ross

Mary Ellen Ross

MER:jf

200476-283

Urban 9

Urban Planning • Urban Design
Environmental Engineering
Landscape Architecture
926 Bethel Street
Honolulu, Hawaii 96813
Telephone (808) 533-1725

University of Hawaii at Manoa Water Resources Research Center

MEMORANDUM

September 14, 1976

MEMO TO: Department of Land Utilization /
City and County of Honolulu
Ms. Mary Ellen Ross
Urban 9

FROM: Reginald H. F. Young ^{LMC}
Asst. Director, WRRC

SUBJECT: EIS for Sampo Retail Complex in Waikiki

We have reviewed the subject EIS and have no critical comment. We appreciate the opportunity to review the EIS.

RHFY:jmm

cc: Env. Quality Comm.

October 11, 1976

Mr. Reginald H. F. Young
Asst. Director, Water Resources
Research Center
University of Hawaii
Honolulu, Hawaii 96822

Dear Mr. Young:

RE: Letter of September 14, 1976
Commenting on Sampo Land Industrial
(Hawaii) Co. Ltd., Retail Complex
in Waikiki

Thank you for your letter. The document you reviewed was a part of the EIS Preparation Notice pursuant to the Environmental Quality Commission's EIS Regulations. An EIS for the project is being prepared and will be available shortly for your further review.

Yours very truly,

URBAN 9



Mary Ellen Ross

MER:lif

cc: Department of Land Utilization
Environmental Quality Commission

Urban 9

Urban Planning • Urban Design
Environmental Engineering
Landscape Architecture

926 Bethel Street
Honolulu, Hawaii 96813
Telephone (808) 533-1725

DIRECTORATE OF FACILITIES ENGINEERING

AFZV-FE-EE

14 SEP 1976

RECEIVED

SEP 17 1976
GROUP ARCHITECTS
CONSULTANTS, INC.

Department of Land Utilization
City and County of Honolulu
Honolulu, Hawaii 96813

Gentlemen:

Reference is made to the Environmental Impact Statement (EIS) for Sanpo Land Industrial (Hawaii) Co., Ltd, Rental Complex in Waikiki, dated September 1976.

We have reviewed the EIS document and have no comments to offer.

Thank you for the opportunity to review this document.

Sincerely yours,

CARL P. RODOLPH
Colonel, CE
Director of Facilities Engineering

CF:
Ms. Mary Ellen Ross
Urban 9
926 Bethel Street
Honolulu, Hawaii 96813

October 11, 1976

Colonel Carl P. Rodolph, CE
Director of Facilities Engineering
Department of the Army
Honolulu, Hawaii

Dear Col. Rodolph:

RE: Letter of September 14, 1976
commenting on Sanpo Land Industrial
(Hawaii) Co. Ltd., Retail Complex
in Waikiki

Thank you for your letter. The document you reviewed was a part of the EIS Preparation Notice pursuant to the Environmental Quality Commission's EIS Regulations. An EIS for the project is being prepared and will be available shortly for your further review.

Yours very truly,

URBAN 9

Mary Ellen Ross
Mary Ellen Ross

MER:lf

cc: Department of Land Utilization
Environmental Quality Commission

AMERICAN LUNG ASSOCIATION of Hawaii

September 16, 1976

RECEIVED

SEP 17 1976
ORCUP ARCHITECTS
COLLABORATIVE, INC.

Ms. Mary Ellen Ross
Urban 9
926 Bethel Street
Honolulu, Hawaii 96813

Dear Ms. Ross:

Thank you for your recent letter accompanied by a copy of the EIS for the proposed Sampo Commercial Complex in Waikiki. While we found it unusual to be receiving a copy of an EIS in such final form without having been previously consulted, we have since been informed by the Office of Environmental Quality Control that the EIS is actually intended to be an EIS Preparation Notice. That being the case, we shall comment in the same manner that we normally do on Preparation Notices.

Since, obviously, the principal impact of the proposed commercial complex on air quality will be due to increased motor vehicle traffic, we recommend that a screening analysis be conducted in order to quantify that impact. The methodology described in the following EPA publication is relatively simple and expedient and will give a good indication of whether or not state or federal ambient air quality standards will be approached or violated.

Guidelines for Air Quality Maintenance Planning and Analysis, Volume 9: Evaluating Indirect Sources.
U.S. Environmental Protection Agency, 1975.
EPA-450-4-75-001

We also trust that the final EIS will include or have appended technical reports supporting contentions expressed in the EIS concerning traffic and air quality impact. If we can be of any assistance in the assessment of air quality impact, please do not hesitate to call us. Thank you for giving us the opportunity to review your Preparation Notice.

Sincerely yours,

James W. Morrow
James W. Morrow, Director
Environmental Health

JMM:ct

cc: Dr. Richard E. Marland

Christmas Seals Fight TB, Asthma, Emphysema, Air Pollution

September 23, 1976

Mr. James W. Morrow
Director, Environmental Health
American Lung Association of Hawaii
245 North Kukui Street
Honolulu, Hawaii 96817

Dear Mr. Morrow:

Thank you for your letter of September 16, 1976 regarding the proposed Sampo Commercial Complex in Waikiki. We are reviewing your recommendation for a screening analysis to evaluate air quality impacts of increased motor vehicle traffic and requests for additional information regarding traffic impacts. These will be carefully considered in the preparation of the Environmental Impact Statement.

Again thank you for your interest and attention to this project.

Yours very truly,

URBAN 9

Mary Ellen Ross

MER:lif

Urban 9

Urban Planning • Urban Design
Environmental Engineering
Landscape Architecture
Research & Development

926 Bethel Street
Honolulu Hawaii 96813
Telephone (808) 533-1725

BOARD OF WATER SUPPLY
CITY AND COUNTY OF HONOLULU
630 SOUTH BERETANIA
HONOLULU, HAWAII 96813

FRANK E. FASI, Mayor
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EDWARD F. C. LAU
TERESITA R. JUBINSKY
E. ALVEY WRIGHT

EDWARD Y. HIRATA
Manager and Chief Engineer

September 20, 1976

Mr. George Moriguchi, Director
Department of Land Utilization
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Moriguchi:

SUBJECT: Environmental Impact Statement
Sanpo Land Industrial (Hawaii) Co., Ltd.
Retail Complex in Waikiki

We have reviewed the submitted environmental impact statement on the proposed project, have no objections to the project and offer the following comments:

1. We do not anticipate any adverse effects to potable groundwater resources in the area.
2. Construction plans must be coordinated with us to insure adequate domestic service and fire protection.
3. We recommend the installation of two meters, one for fire protection and the other for domestic service.

Please call Mr. Lawrence Whang at 548-5221 if further information is needed.

Very truly yours,

EDWARD Y. HIRATA
Manager and Chief Engineer

cc: Ms. Mary Ellen Ross
URBAN 9
926 Bethel Street
Honolulu, Hawaii 96813

September 23, 1976

Mr. Edward Y. Hirata
Manager and Chief Engineer
Board of Water Supply
City & County of Honolulu
630 South Beretania Street
Honolulu, Hawaii 96813

Dear Mr. Hirata:

Subject: Sanpo Retail Complex - Waikiki

Thank you for your letter of September 20, 1976 regarding the Sanpo Retail Complex in Waikiki. The comments you have made relative to construction and water supply are most helpful and will be incorporated into the Environmental Impact Statement.

Thank you again for your interest in this project.

Yours very truly,

URBAN 9

Mary Ellen Ross

MER:lf

RECEIVED
SEP 23 1976
GROUP ARCHITECTS
COLLABORATIVE, INC.

Urban 9

Urban Planning - Urban Design
Environmental Engineering
Landscape Architecture
925 Bethel Street
Honolulu Hawaii 96813
Telephone (808) 533-1725

October 11, 1976

RECEIVED
SEP 27 1976

GROUP ARCHITECTS
CONSULTANTS, INC.

September 29, 1976

I. George S. Horiguchi, Director
Department of Land Utilization
City and County of Honolulu
650 South King Street
Honolulu, Hawaii

Dear Mr. Horiguchi:

Subject: Sanpo Land Industrial (Hawaii) Co.,
Ltd., Retail Complex in Waikiki

We have reviewed the Environmental Impact Statement covering the
subject project and have no comments to make.

Sincerely,

E. ALVEY WRIGHT
Director

ALK:JK

cc: DEQC
Ms. Ross (Urban 9)

E. Alvey Wright, Director
Department of Transportation
State of Hawaii
809 Punchbowl Street
Honolulu, Hawaii 96813

Dear Admiral Wright:

RE: Letter of September 20, 1976
commenting on Sanpo Land Industrial
(Hawaii) Co. Ltd., Retail Complex
in Waikiki

Thank you for your letter. The document you reviewed was
a part of the EIS Preparation Notice pursuant to the
Environmental Quality Commission's EIS Regulations. An
EIS for the project is being prepared and will be available
shortly for your further review.

Yours very truly,

URBAN 9

Mary Ellen Ross

Mary Ellen Ross

MER:lf

cc: Department of Land Utilization
Environmental Quality Commission

Urban Planning - Urban Design
Environmental Engineering
Landscape Architecture
926 Bethel Street
Honolulu Hawaii 96813
Telephone (808) 533-1725

STATE OF HAWAII
Department of Land and Natural Resources

MEMORANDUM

TO: Environmental Quality Commission DATE: September 20, 1976
FROM: Gordon Soh, Program Planning Coordinator
SUBJECT: SANPO LAND INDUSTRIAL (HAWAII) CO., LTD. RETAIL COMPLEX

We have no comments to offer on this project.

TO: URBAN 9

October 11, 1976

Mr. Gordon Soh
Program Planning Coordinator
State of Hawaii
Department of Land & Natural Resources
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Soh:

RE: Letter of September 20, 1976
commenting on Sanpo Land Industrial
(Hawaii) Co. Ltd., Retail Complex
in Waikiki

Thank you for your letter. The document you reviewed was
a part of the EIS Preparation Notice pursuant to the
Environmental Quality Commission's EIS Regulations. An
EIS for the project is being prepared and will be available
shortly for your further review.

Yours very truly,

URBAN 9

Mary Ellen Ross
Mary Ellen Ross

MER:lf

cc: Department of Land Utilization
Environmental Quality Commission

Gordon Soh
GORDON SOH
Program Planning Coordinator

Urban 9

Urban Planning - Urban Design
Environmental Engineering
Landscape Architecture
926 Bethel Street
Honolulu Hawaii 96813
Telephone (808) 533-1725

October 13, 1976

Mr. John Farias, Jr.
Chairman, Board of Agriculture
State of Hawaii
Department of Agriculture
1428 South King Street
Honolulu, Hawaii 96814

Dear Mr. Farias:

RE: Letter of September 28, 1976
commenting on Sanpo Land Industrial
(Hawaii) Co. Ltd., Retail Complex
in Waikiki

Thank you for your letter. The document you reviewed was a part of the EIS Preparation Notice pursuant to the Environmental Quality Commission's EIS Regulations. An EIS for the project is being prepared and will be available shortly for your further review.

Yours very truly,

URBAN 9



Mary Ellen Ross

MER:lf

cc: Department of Land Utilization
Environmental Quality Commission

JOHN FARIAS, JR.
CHAIRMAN, BOARD OF AGRICULTURE
KUNIO KITAGAWA
DEPUTY TO THE CHAIRMAN



GEORGE S. ARYDOON
GOVERNOR

MEMORANDUM

STATE OF HAWAII
DEPARTMENT OF AGRICULTURE
1428 SO. KING STREET
HONOLULU, HAWAII 96814
September 28, 1976

MEMORANDUM

To: Environmental Quality Commission

Subject: Sanpo Land Industrial (Hawaii) Co., Ltd. Retail Complex
in Waikiki - Intersection of Kalekale & Beachwalk
TRK: 2-6-03: 17, 18 & 20

The Department of Agriculture has reviewed the subject document and foresees no adverse environmental impact on the proposed action.

Thank you for the opportunity to comment.


John Farias, Jr.
Chairman, Board of Agriculture

JF:d

GEORGE R. ARIYOSHI
GOVERNOR



STATE OF HAWAII
OFFICE OF ENVIRONMENTAL QUALITY CONTROL
OFFICE OF THE GOVERNOR

350 HALEKUA WALK 57
ROOM 301
HONOLULU, HAWAII 96813

October 1, 1976

Ms. Mary Ellen Ross
Urban 9
926 Bethel Street
Honolulu, Hawaii 96813

SUBJECT: Environmental Impact Statement Preparation Notice
for the Proposed Sampo Land Industrial (Hawaii) Co.,
Ltd. Retail Complex in Waikiki.

Dear Ms. Ross:

This Office has reviewed the subject document which we understand is being considered an Environmental Impact Statement Preparation Notice. We wish to offer the following comments for your consideration:

- 1) The dewatering of the construction site is discussed on page 12 of the Notice. Where will this significant quantity of water be discharged? What receiving water body will be affected by this discharge? Will there be a change in the quality of the receiving waters?
- 2) Which buildings, as listed on page 13, will be demolished due to the implementation of this project? Will this include the 10-story hotel? How will these structures be demolished? What will the environmental impacts be?
- 3) What will be the net change in the number of parking spaces that the project will provide?
- 4) Documentation of the statement that substantially more jobs will be generated by the project appears necessary.
- 5) What portion of the open space requirement will be planted, and/or paved?

Please find attached those comments received by this Office on the subject EIS Preparation Notice.

Page 2

RICHARD E. MARLAND, PH.D.
DIRECTOR

TELEPHONE NO.
548-8915

We trust that these comments will be helpful to your in the preparation of the EIS. Thank you for the opportunity to comment on this EIS Preparation Notice. We look forward to receiving the EIS on this project.

RECEIVED

OCT 4 1976

GROUP ARCHITECTS
CORPORATION, INC.

Sincerely,

Richard E. Marland
Director

cc: George Moriguchi, DLU
w/out attachment

1 COPY TO MARY ELLEN

Urban 9

Urban Planning • Urban Design
Environmental Engineering
Landscape Architecture
Research & Development

926 Belhel Street
Honolulu Hawaii 96813
Telephone (808) 533-1725

October 4, 1976

Dr. Richard E. Marland, Director
State of Hawaii
Office of Environmental Quality Control
Office of the Governor
550 Halekauwila Street, Room 301
Honolulu, Hawaii 96813

Dear Dr. Marland:

Subject: Environmental Impact Statement
Preparation Notice for the
Proposed Sango Land Industrial
(Hawaii) Company, Ltd.
Retail Complex in Waikiki

Thank you for your letter of October 1, 1976 regarding the proposed Sango Commercial Complex in Waikiki. We are reviewing your comments and recommendations. These will be carefully considered in the preparation of the Environmental Impact Statement.

Yours very truly,

URBAN 9

Mary Ellen Ross
Mary Ellen Ross

MER:lf

DEPARTMENT OF GENERAL PLANNING
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET
HONOLULU, HAWAII 96813



FRANK C. FASI
MAYOR

ROBERT R. WAY
CHIEF PLANNING OFFICER

DGP9/76-2167 (JB)

October 1, 1976

RECEIVED
OCT 5 1976

GROUP ARCHITECTS
COLLABORATIVE, INC.

Ms. Mary Ellen Ross
URBAN 9
926 Bethel Street
Honolulu, Hawaii 96813

Dear Ms. Ross:

Waikiki Retail Complex (Sanpo)
Draft Environmental Impact Statement

Thank you for extending us the opportunity to examine the above-captioned.

Some 63 hotel rooms, it is noted, will be displaced by construction of the proposed retail complex. An area of impact, therefore, that might be addressed is the effect on the hotel room inventory resulting from the loss of these units. In addition, the draft EIS might also describe the impact of removing lands earmarked to meet future needs for hotel rooms in Waikiki.

Has any effort been made or pursued by the developer toward relocating any of the displaces?

Sincerely,

ROBERT R. WAY
Chief Planning Officer

RRW:fmt

Urban 9

Urban Planning - Urban Design
Environmental Engineering
Landscape Architecture

926 Bethel Street
Honolulu, Hawaii 96813
Telephone (808) 533-1725

October 11, 1976

Mr. Robert R. Way
Chief Planning Officer
City & County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Way:

RE: Letter of October 1, 1976
commenting on Sanpo Land Industrial
(Hawaii) Co. Ltd., Retail Complex
in Waikiki

Thank you for your letter. The document you reviewed was a part of the EIS Preparation Notice pursuant to the Environmental Quality Commission's EIS Regulations. An EIS for the project is being prepared and will be available shortly for your further review. Your comments will be carefully considered in the preparation of the EIS.

Yours very truly,

URBAN 9

Mary Ellen Ross

MER:lf

cc: Department of Land Utilization
Environmental Quality Commission

Urban 9

Urban Planning • Urban Design
Environmental Engineering
Landscape Architecture
Research & Development

526 Bethel Street
Honolulu Hawaii 96813
Telephone (808) 533-1725

State of Hawaii
DEPARTMENT OF DEFENSE
OFFICE OF THE ADJUTANT GENERAL
330 Halekuanila Street
Honolulu, Hawaii 96813

HLERG

B 200-111

Dr. Albert Yoo, Chairman
Environmental Quality Commission
530 Halekuanila Street
Honolulu, Hawaii 96813

Dear Dr. Yoo:

Sanpo Land Industrial (Hawaii) Co., Ltd.
Retail Complex in Waikiki, Oahu, Hawaii

Thank you for sending us a copy of the Environmental Impact Statement for the proposed "Sanpo Land Industrial (Hawaii) Co., Ltd., Retail Complex in Waikiki." We have received the publication and have no comments to offer.

We are returning an Environmental Impact Statement for the proposed project per your request.

Yours truly,



WAYNE R. TOMOYASU
Captain, CE, HARRNG
Contr & Engr Officer

Enclosure

October 13, 1976

Captain Wayne R. Tomoyasu
Contr. & Engr. Officer
State of Hawaii
Department of Defense
Office of the Adjutant General
Fort Ruger, Honolulu, Hawaii 96816

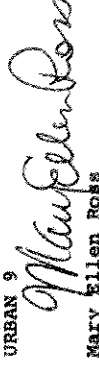
Dear Captain Tomoyasu:

RE: Letter of October 5, 1976
commenting on Sanpo Land Industrial
(Hawaii) Co. Ltd., Retail Complex
in Waikiki

Thank you for your letter. The document you reviewed was a part of the EIS Preparation Notice pursuant to the Environmental Quality Commission's EIS Regulations. An EIS for the project is being prepared and will be available shortly for your further review.

Yours very truly,

URBAN 9



Mary Ellen Foss

MER:lf

CC: Department of Land Utilization
Environmental Quality Commission

Urban 9

Urban Planning - Urban Design
Environmental Engineering
Landscape Architecture
925 Bethel Street
Honolulu Hawaii 96813
Telephone (808) 533-1725

October 13, 1976

Mr. Francis C. H. Lum
State Conservationist
United States
Department of Agriculture
Soil Conservation Service
440 Alexander Young Building
Honolulu, Hawaii 96813

Dear Mr. Lum:

RE: Letter of October 5, 1976
commenting on Sampo Land Industrial
(Hawaii) Co. Ltd., Retail Complex
in Waikiki

Thank you for your letter. The document you reviewed was a part of the EIS Preparation Notice pursuant to the Environmental Quality Commission's EIS Regulations. An EIS for the project is being prepared and will be available shortly for your further review.

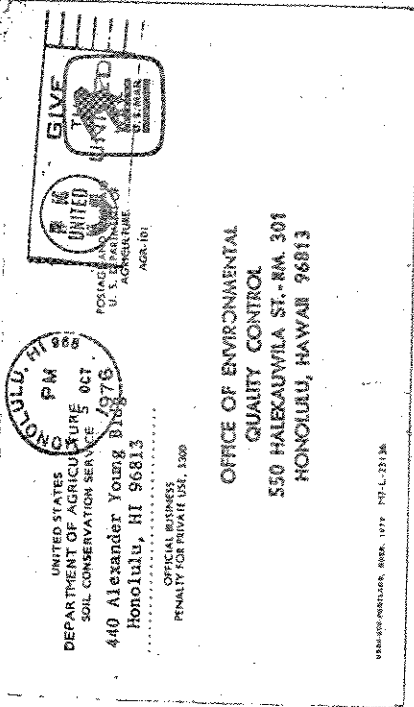
Yours very truly,

URBAN 9

Mary Ellen Ross
Mary Ellen Ross

MER:lif

cc: Department of Land Utilization
Environmental Quality Commission



TO: Richard E. Marland, Interim Director,
Office of Environmental Quality Control
Sampo Land Industrial (Hawaii) Co., Ltd. Retail
Complex in Waikiki

RE: NO COMMENTS.
 EIS returned: project does not pertain to SCS
activities and/or responsibilities.

EIS received: undergoing review.

Francis C. H. Lum
Francis C. H. Lum
State Conservationist

10/5/76
Date

Urban 9

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Research & Development

926 Bethel Street
Honolulu Hawaii 96813
Telephone (808) 533-1725

DEPARTMENT OF THE ARMY
HONOLULU DISTRICT, CORPS OF ENGINEERS
Bldg. 210, Ft. Shafter
APO SAN FRANCISCO 96388



FODED-F

6 October 1976

Mr. George S. Moriguchi, Director
Department of Land Utilization
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Moriguchi:

We have reviewed the Environmental Impact Statement for Sanpo Land Industrial (Hawaii) Co., Ltd. Retail Complex in Waikiki and offer the following comments for your consideration.

- a. The project area is not in a tsunami flood zone, but is included in an area subject to flooding from the 100-year flood of the Ala Wai Canal.
- b. The significance of the parking and congestion problem that may result with the proposed project does not appear to be fully addressed. A 50 percent reduction in the Waikiki Special Design District Ordinance parking requirements represents a substantial deviation from recommended provisions. Since parking and congestion are recognized as serious problems in the project area, additional documentation of the justification for such a significant deviation should be presented.

Thank you for the opportunity to review this statement.

Sincerely yours,

KISUK CHEUNG
Chief, Engineering Division

Cy Fura:
Office of Environmental Quality
Control, State of Hawaii
550 Halekuanila Street
Honolulu, Hawaii 96813

October 13, 1976

Mr. Kisuk Cheung
Chief, Engineering Division
Department of the Army
Honolulu District
Corps of Engineers
Bldg. 230
Fort Shafter
APO San Francisco 96558

Dear Mr. Cheung:

RE: Letter of October 6, 1976
commenting on Sanpo Land Industrial
(Hawaii) Co. Ltd., Retail Complex
in Waikiki

Thank you for your letter. The document you reviewed was a part of the EIS Preparation Notice pursuant to the Environmental Quality Commission's EIS Regulations. An EIS for the project is being prepared and will be available shortly for your further review.

We are reviewing your suggestions for additional documentation and justification. These will be carefully considered in the preparation of the EIS.

Yours very truly,

URBAN 9

Mary Ellen Ross

MER:lf

cc: Department of Land Utilization
Environmental Quality Commission

Donald R. Hanson
1800 Ala Moana Blvd.
Apartment 902
Honolulu, HI 96815

COMMENTS AND RECOMMENDATIONS
WAIKIKI RESIDENTS ASSOCIATION
RE: SANO LAND INDUSTRIAL (HAWAII) CO., LTD.
RETAIL COMPLEX E.I.S.

RECEIVED
OCT 7 1976

The Waikiki Residents Association opposes construction of this building for several environmental and planning reasons. ^{COMPARATIVE} ~~THE~~ ¹⁹⁷⁵ ~~1976~~ find the statement prepared by the Applicant to be substantially lacking in technical statistics as well as in appreciation of the Residents of Waikiki and the Culture of Hawaii. Our opposition on environmental grounds is:

1. Damage to Surrounding Private Properties:
The soils study by LeRoy Crendall and Associates shows that subterranean construction will cause land settlement of the area surrounding the site, (see page 12) resulting in loss of economic value to property.

2. Damage to Public Property:
The displacement of ground water by the completed building, which includes 2 levels of basement parking, will cause the resultant water table to rise in an area which already is heavily flooded during rainstorms. The resultant potential damage could be excessive to all the City's public property, especially the cracking and settlement of the pavement and underground utilities on Kalanikaʻe and Beachwalk. (See page 55).

3. Project Noise, Fumes, Litter, & Over-Population:
According to the document's own statement on page 25, both vehicular and pedestrian traffic are to be "increased" and "generated" because of the "special attraction" of this department store. (See pages 11 and 2). Since traffic is already overloaded in this area due to the nearby hotels, restaurants, clubs and parking lots, the development will cause even more intolerable environmental impacts of noise, fumes, litter, and crowds of people. Further, the store is asking for a 50% reduction in parking requirements, thereby causing more traffic confusion around the other commercial areas from over-parking by workers and shoppers looking for parking spaces.

4. Construction Noise:

Pre-drilling is not envisaged for driving piles (see page 7); however, pre-drilling will reduce noise pollution.

5. Air-conditioning Noise:

The design requires air-conditioning which will add to noise pollution of the area.

Our opposition on planning grounds is:

1. The project will not create new sales jobs, as claimed, since the store is designed (according to the Report) to attract retail sales away from Ala Moana and Downtown Honolulu (page 2), and therefore will merely attract jobs away from other areas.

2. The project will specialize in imported merchandise, thereby taking away local production jobs of local products, so badly needed in Hawaii.

3. Since the products are to be largely imported, "work visa" (foreign) personnel (management and sales persons) are probably envisaged, as in other stores of this type in Hawaii. This means few, if any, jobs will be available for the unemployed of Waikiki which, as the Report states on page 8, is the highest in Oahu.

4. The project "overloads" this section of Waikiki with retail stores since two additional, high-rise commercial projects are to be built in the near vicinity (Halepuu).

5. Because of the Beachwalk Triangle Park and the low-rise building across Beachwalk (Tops, New Tokyo, Hula Hut), a better blending of uses would be a low-rise commercial area.

6. There are no proposals as to how existing workers in the area will be absorbed into the workforce, nor how displaced stores will be relocated. (See page 39)

7. In view of recent DPED planning studies which show that Waikiki can only absorb 8,000 new hotel rooms, the supporting documents such as the Cutshaw Report (page 22) will have to be rewritten as will the Environmental Communication Inc. and Evaluation Research Consultants reports (page 29).

8. Statistics on which all planning proposals such as this should be based are sadly lacking in the Report - even those for the more

obvious subjects: drainage, waste, energy, sewers, as well as for decibel, air quality, and traffic levels (See page 34).

9. No attempt is made at energy-saving alternatives, such as solar energy systems, despite the heavy use of air-conditioning that will be required for this store, adding to our energy crises.

10. The proposal stresses design similarities of buildings with those on Kalaniana'ole Avenue, but fails to mention the adjacent Beachwalk buildings across the street - all of which are 1 or 2-story buildings.

11. The proposed design completely violates the urban design guideline, number 5, as well as Legislative Intent, B and L, of the Waikiki Special Design District Ordinance.

12. All views of the ocean over Fort DeBussy will be blocked by this project for residents in apartments below 9 stories in 9 apartment buildings on the site, and which are between Lewers and Seaside, including the Lutheran Church's retirement home.

13. In view of the new Park Dedication Bill, no provision is made for providing Park area on this development site.

14. Since the Report claims that a great deal more retail space is needed in Waikiki (with which we disagree for the foregoing reasons), it is contradictory for them to then say that 30% of the area will be for restaurants (see page 3).

15. The so-called amendments made to the plans, after discussion with D.L.U. (see page 40) are not solutions to the larger contextual problem which the Report raises itself. (See page 25)

16. The project fails to conform to any of the 12 applicable objectives, i.e. ("intent" and "purpose") of the Waikiki Special Design District.

17. Finally, the design, in no possible way, is Hawaiian in character. In fact, the design is one that can usually be found in temperate climates such as in Tokyo or San Francisco; it should not be used in Waikiki, one of the most distinctive Polynesian and tropical beach areas in the World. The proposed building could be considered an architectural insult to Hawaii.

In summary, we oppose the Applicant's Project because the proposed building and its use will:

1. Cause physical environmental damage to the surrounding properties, both private and public.
2. Increase air, noise and litter environmental pollution during and after the construction period.
3. Deteriorate the aesthetic environment of Waikiki by its untropical design, which will further change the Hawaiian character of Waikiki, and which is not compatible with the Ewa side architecture of Beachwalk properties.

Furthermore, the Applicant's Report contradicts itself several times, and has a paucity of statistics to substantiate its economic and environmental claims.

Finally, the Project proposal violates six of the twelve objectives listed under the Legislative Intent of the Waikiki Special Design District (A, D, E, H, K, & L); two of the objectives (B & C) are not referred to in the Environmental Impact Statement at all, nor are there any statistical facts in the Report that would satisfy these criteria; two objectives are not applicable to this proposal; and the final two (F & G) are not fully defined nor fully supported with adequate statistical data to support the claims made for compliance.

As a recommendation, we suggest that Ms. Mary Ellen Ross reconsult her developers and architects to propose a one or two-story retail complex similar in conception to the International Market and/or the Hilton Hawaiian Village. This design would be more consistent with the Hawaiian character and climate, as called for in the Special Design District Ordinance. Furthermore, air-conditioning would be eliminated; parking could still be built underground (with the necessary utility questions solved); tourists would prefer it; small shops could be developed; vistas for waikiki residents would be preserved, and the skyline would be more open; more landscaping could be provided in the interior sections of the complex; and the retail square footage would not be overbuilt in terms of new demand figures based on the State's Department of Planning and Economic Development estimates for tourism in Waikiki. In other words, the environment would be preserved, the architecture would be compatible, and concepts retail profit improved since there would be less overhead in the new design. Then Ms. Mary Ellen Ross could feel proud of this development - her contribution to Waikiki. The Residents would then support this project to the fullest, and be forever grateful for her foresight and good taste.

Urban 9

Urban Planning • Urban Design
Environmental Engineering
Landscape Architecture

926 Bethel Street
Honolulu, Hawaii 96813
Telephone (808) 533-1725

October 11, 1976

Mr. Donald R. Hanson
Waikiki Residents Assoc.
1860 Ala Moana Boulevard
Apt. 903
Honolulu, Hawaii 96813

Dear Mr. Hanson:

RE: Statement received on October 7, 1976
Sanpo Land Industrial (Hawaii) Co. Ltd.,
Retail Complex in Waikiki

Thank you for your statement. The document you reviewed was a part of the EIS Preparation Notice pursuant to the Environmental Quality Commission's EIS Regulations. An EIS for the project is being prepared and will be available shortly for your further review. Your comments will be carefully considered in the preparation of the EIS.

Yours very truly,

URBAN 9



Mary Ellen Ross

MER:lif

cc: Department of Land Utilization
Environmental Quality Commission

Urban 9

Urban Planning • Urban Design
Environmental Engineering
Landscape Architecture
Research & Development

926 Bethel Street
Honolulu Hawaii 96813
Telephone (808) 533-1725

November 1, 1976

Mr. Donald R. Hanson
Waikiki Residents Association
1860 Ala Moana Boulevard, Apt. 903
Honolulu, Hawaii 96813

Dear Mr. Hanson:

RE: Statement received on October 7, 1976
regarding the Sanpo Land Industrial
(Hawaii) Co. Ltd., Retail Complex in
Waikiki

Thank you again for your interest in the proposed Sanpo Land Industrial Complex in Waikiki. As noted in my previous letter of October 11, 1976, your comments are being considered in the preparation of the EIS.

According to the statement you sent, the Waikiki Residents Association opposes the project for several environmental and Planning reasons. These include impacts identified in the EIS Preparation Notice (further elaborated on by the WRA) and various statements concerning the overall desirability of the project to the WRA. Other than the proposed construction of this project, it appears the WRA is most concerned about the thoroughness of the discussion of impacts in the Preparation Notice.

As you are aware, an EIS is an informational document designed to reveal the environmental impacts of a proposed action, rather than a formal planning proposal or justification for the action. The Sanpo EIS is being prepared on this basis.

The proposed retail complex will require, in addition to an approved EIS, a Waikiki Special Design District (WSDD) Conformance Certificate prior to final project approval. The application for this certificate is reviewed for conformance with the WSDD objectives and guidelines including those related to urban design and land use planning. The WSDD review includes a public hearing at which alternative planning viewpoints may be expressed.

Mr. Donald R. Hanson
Re: Sanpo Waikiki
November 1, 1976

Page 2

Regarding the discussion of environmental impacts, we expect that the EIS will adequately address those that are pertinent. In addition to addressing the probability of these impacts, details of measures which will be taken to minimize those that are adverse will be included in the EIS. Additional concerns over impacts may be expressed, after the EIS is filed with the State Environmental Quality Control Commission.

Thank you again for your interest.

Yours very truly,

URBAN 9


MARY ELLET ROSS

MER:lf

cc: DLJ
EQC

Urban 9

Urban Planning • Urban Design
Environmental Engineering
Landscape Architecture
926 Bethel Street
Honolulu Hawaii 96813
Telephone (808) 533-1725

GEORGE A. LYVEN
DIRECTOR OF HEALTH
Audrey W. Metz, M.D., M.P.H.
Deputy Director of Health
Henry N. Thompson, M.A.
Deputy Director of Health
James S. Kumagai, Ph.D., P.E.
Deputy Director of Health



STATE OF HAWAII
DEPARTMENT OF HEALTH
P.O. Box 3378
HONOLULU, HAWAII 96801

October 7, 1976

In reply, please refer to:
File: EPMS - 58

MEMORANDUM

To: Dr. Richard E. Marland, Director
Office of Environmental Quality Control

From: Deputy Director for Environmental Health

Subject: Environmental Impact Statement (EIS) for Sanpo Land Industrial
(Hawaii) Co., Ltd. Retail Complex

Thank you for allowing us to review and comment on the subject EIS. Please be informed that we have reservations on this EIS.

Staff comments are as follows:

1. The air quality analysis of the subject EIS is not adequate to reach any conclusion on the air quality effects of the project. Conclusions are misleading since they appear to be speculative rather than being based on quantitative analyses.
2. State of Hawaii Water Pollution Control measures are not specified in the discussion of pollution abatement measures during construction. However, dewatering wells as used in the present construction industry usually incorporate the use of crushed rock fillers around wells to minimize deposits of silt and muddy water into receiving drain systems.
3. Building construction design and alternatives to be utilized in reducing the noise impact of construction and pile driving should be stated.

We realize that the statements are general in nature due to preliminary plans being the sole source of discussion. We, therefore, reserve the right to impose future environmental restrictions on the project at the time final plans are submitted to this office for review.

cc: Dept. of Land Utilization, C&C of Honolulu
Ms. Mary Ellen Ross

JAMES S. KUMAGAI, Ph.D.

October 11, 1976

Dr. James S. Kumagai, Ph. D.
Deputy Director for Environmental Health
State of Hawaii
Department of Health
P. O. Box 3378
Honolulu, Hawaii 96801

Dear Mr. Kumagai:

RE: Letter of October 7, 1976
commenting on Sanpo Land Industrial
(Hawaii) Co. Ltd., Retail Complex
in Waikiki

Thank you for your letter. The document you reviewed was a part of the EIS Preparation Notice pursuant to the Environmental Quality Commission's EIS Regulations. An EIS for the project is being prepared and will be available shortly for your further review. Your comments will be carefully considered in the preparation of the EIS.

Yours very truly,

URBAN 9

Mary Ellen Ross

MER:lf

cc: Department of Land Utilization
Environmental Quality Commission

Urban 9

Urban Planning * Urban Design
Environmental Engineering
Landscape Architecture
Research & Development

926 Behbel Street
Honolulu Hawaii 96813
Telephone (808) 533-1725

October 19, 1976

Dr. James S. Kumagai, Ph. D.
Deputy Director for Environmental Health
State of Hawaii
Department of Health
P.O. Box 3378
Honolulu, Hawaii 96801

Dear Dr. Kumagai,

RE: Sanpo Land Industrial (Hawaii) Co., Ltd.
Retail Complex in Waikiki, E.I.S.
Preparation Notice

Thank you for your comments on the subject E.I.S. Preparation Notice. Since we are concerned that the E.I.S. documents these impacts, we would like to expand the discussion in response to your comments. In order to do so, we would like to coordinate with you further.

Preliminary discussions with members of your staff have indicated that the methodology described in EPA Guidelines for Air Quality Maintenance Planning and Analysis, Volume 9: Evaluating Indirect Sources will be required. Completion of such a study would involve substantial additional effort, which we feel is not justifiable for a project this size. The lack of baseline air quality data for Waikiki would make such a study even more difficult to evaluate definitively.

Since we are concerned that the impacts on air quality of increased motor vehicle traffic be adequately reviewed, we desire to clarify the documentation desired by your department. We would like to meet with you at your convenience, to discuss this further, or

Dr. James S. Kumagai, Ph. D.
Deputy Director for Environmental Health
Department of Health
Subject: Sanpo Industrial (Hawaii) Co., Ltd.
E.I.S. Preparation Notice
October 19, 1976

Page 2

alternatively, would you send us a statement of information clarifying your requirements.

We are planning to file the E.I.S. with a discussion of air quality impacts. We will incorporate or append the necessary documentation or response to comments on air quality impacts at that time.

Yours very truly,

URBAN 9



Mary Ellen Ross

MER:cs

cc: Robert Cutshaw and Associates
Department of Land Utilization
Environmental Quality Commission

Urban 9

Urban Planning - Urban Design
Environmental Engineering
Landscape Architecture
926 Bethel Street
Honolulu Hawaii 96813
Telephone (808) 533-1725

DEPARTMENT OF TRANSPORTATION SERVICES
CITY AND COUNTY OF HONOLULU
HONOLULU MUNICIPAL BUILDING
650 SOUTH KING STREET
HONOLULU, HAWAII 96813

FRANK P. FASI
MAYOR



RECEIVED
OCT 11 1976

GROUP ARCHITECTS
COLLABORATIVE, INC.

Environmental Quality Commission
550 Halekauwila St., Rm. 301
Honolulu, Hawaii 96813

GEORGE C. VILLEGAS
DIRECTOR

October 11, 1976

TES/76-1848

Mr. George C. Villegas
Director
Dept. of Transportation Services
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Villegas:

RE: Letter October 8, 1976
commenting on Sanpo Land Industrial
(Hawaii) Co. Ltd., Retail Complex
in Waikiki

Thank you for your letter. The document you reviewed was a part of the EIS Preparation Notice pursuant to the Environmental Quality Commission's EIS Regulations. An EIS for the project is being prepared and will be available shortly for your further review. Your comments will be carefully considered in the preparation of the EIS.

Yours very truly,

URBAN 9

Mary Ellen Ross
Mary Ellen Ross

MER:lf

cc: Department of Land Utilization
Environmental Quality Commission

Gentlemen:

Subject: Environmental Impact Statement
Sanpo Land Industrial (Hawaii) Co., Ltd.
Retail Complex in Waikiki

We have reviewed the Environmental Impact Statement for the Sanpo Land Industrial (Hawaii) Retail Complex in Waikiki and offer the following comments:

1. The developer's proposal to provide only 210 parking stalls to primarily serve the building's tenants will have some impact on the surrounding streets and nearby off-street parking facilities.
2. Curbside parking demand is currently high on streets located near the proposed project and this development may cause further burden on these streets.

Very truly yours,

George C. Villegas
GEORGE C. VILLEGAS
Director

cc: Dept. of Land Utilization
Ms. Mary Ellen Ross

Q. COMMENTS RECEIVED DURING REVIEW OF THE ENVIRONMENTAL
IMPACT STATEMENT AND RESPONSES

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GEORGE ARIYOSHI
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF HEALTH
P.O. Box 3374
HONOLULU, HAWAII 96811

November 4, 1976

Ms. Mary Ellen Ross
Urban 9
926 Bethel Street
Honolulu, HI 96813

Dear Ms. Ross:

Subject: Environmental Impact Statement (EIS) -
Sanpo Land Industrial (Hawaii) Co., Ltd.
Waikiki Retail Complex

Further to your discussion with Mr. Harold Youngquist of the Department of Health's position on the air quality analysis in the subject document, the following comments are offered for your consideration:

1. The evaluation area should be defined and traffic data, signalization information and other data pertinent to CO emissions collected.
2. CO concentrations for specific receptor points in the immediate vicinity due to existing conditions and conditions expected following project completion should be computed.
3. Acceptable methods for estimating CO concentrations with and without the project are described in the following reference:

U.S. Environmental Protection Agency, "Guidelines for Air Quality Maintenance Planning and Analysis, Volume 9: Evaluating Indirect Sources," January 1975"

Since our suggestions do not encompass complete details regarding analytical procedures and potential problem areas, we recommend that you review the noted reference and, if you desire, discuss any problems with our staff.

Sincerely,

James S. Kumagai
JAMES S. KUMAGAI, Ph.D.
Deputy Director for
Environmental Health

HJY/jcn
cc: Dept. of Land Utilization
Environmental Quality Commission

This is Recycled Paper

GEORGE A. L. YUEN
DIRECTOR OF HEALTH
Audrey W. Mertz, M.D., M.P.H.
Deputy Director of Health
James S. Kumagai, Ph.D., P.E.
Deputy Director of Health
Henry N. Thompson, M.A.
Deputy Director of Health

In reply, please refer to:
File # PTK

November 29, 1976

PTK

Mr. George Moriguchi, Director
Department of Land Utilization
City and County of Honolulu
650 South King Street
Honolulu, HI 96813

Dear Mr. Moriguchi:

Subject: Environmental Impact Statement (EIS)
Sanpo Land Industrial (Hawaii) Company, Ltd.
Retail Complex in Waikiki

A meeting was held between representatives of the Department of Health and Urban 9 (for Sanpo Land Company) concerning the air quality analysis portion of the subject EIS. It was agreed that the present form of the EIS did not address the question of carbon monoxide (CO) concentrations attributable to the project in a manner considered adequate by the Department of Health.

The Department of Health requires that a supplemental analysis of present and probable CO concentrations be conducted by the developer or his designated representative. The analysis will follow the methodology described in EPA Guidelines for Air Quality Maintenance Planning and Analysis, Volume 9: Evaluating Indirect Sources. Existing analyses for similar projects in the same area may be utilized where applicable, provided that a rational justification for their use is included. This justification must be based on the technical aspects of the analysis and due care must be taken to insure that all extrapolation of results is supported by the data.

Sincerely,

Shinji Soneda

SHINJI SONEDA, Chief
Environmental Protection and
Health Services Division

HJY/jcn
cc: Urban 9

Urban 9

Urban Planning • Urban Design
Environmental Engineering
Landscape Architecture
Research & Development

926 Bethel Street
Honolulu, Hawaii 96813
Telephone (808) 533-1725

December 16, 1976

James S. Kumagai, Ph. D.
Deputy Director for Environmental Health
State of Hawaii
Department of Health
P. O. Box 3378
Honolulu, Hawaii 96801

Dear Dr. Kumagai:

RE: Letter of November 4, 1976
Commenting on the Sampo Land Industrial
(Hawaii) Co., Ltd. Retail Complex in
Waikiki Environmental Impact Statement

Thank you for your comments on the air quality analysis for
the subject project and the subsequent assistance provided
by your staff.

A more extensive air quality study is being prepared according
to your guidelines by the firm of Sunn, Low, Tom & Hara, Inc.
We anticipate that this study will take approximately one
month to complete and when completed will be available for
your review. As agreed with your staff and DLU, final
approval of the EIS will be conditional on the air quality
analysis. Until the study is completed an accurate quantifi-
cation of air quality impacts cannot be included in the EIS.

Thank you again for your comments.

Yours very truly,

URDAN 9


Mary Ellen Ross

MER:lf

cc: Department of Land Utilization
Environmental Quality Commission



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Division of Ecological Services

821 Milliani Street

Honolulu, Hawaii 96813

Reference: ES

November 8, 1976

Interim Director
Environmental Quality Commission
550 Halekauwila Street, Room 301
Honolulu, Hawaii 96813

Dear Sir:

We have reviewed the environmental impact statement, Sampo Land Industrial (Hawaii) Co., Ltd., Retail Complex in Waikiki, Oahu, Hawaii, with reference to our area of jurisdiction and have no additional comments to offer.

Thank you for the opportunity to review.

We are returning the environmental impact statement as requested.

Sincerely yours,

Maurice H. Taylor
Maurice H. Taylor
Field Supervisor

cc: Ms. Mary Ellen Ross
AND, AE

Urban 9

Urban Planning • Urban Design
Environmental Engineering
Landscape Architecture
Research & Development

926 Bethel Street
Honolulu Hawaii 96813
Telephone (808) 533-1725

November 18, 1976

Mr. Maurice H. Taylor
Field Supervisor
United States Department of the Interior
Fish and Wildlife Service
Division of Ecological Services
821 Milliani Street
Honolulu, Hawaii 96813

Dear Mr. Taylor:

RE: Letter of November 8, 1976
Commenting on Sampo Land Industrial
(Hawaii) Co., Ltd. Retail Complex in Waikiki
Environmental Impact Statement

Thank you for your review of the Statement.

Very truly yours,

URBAN 9

Mary Ellen Ross

Mary Ellen Ross

MER:cs

cc: Department of Land Utilization
Office of Environmental Quality Control





DEPARTMENT OF THE ARMY
HEADQUARTERS UNITED STATES ARMY SUPPORT COMMAND, HAWAII
APO SAN FRANCISCO 96558

AFZY-SG-EC

8 November 1976

Richard E. Marland, PhD
Office of Environmental Quality Control
State of Hawaii
Room 301, 550 Halekaunila Street
Honolulu, Hawaii 96813

Dear Dr. Marland:

The following Environmental Impact Statements were reviewed by our office:

- Gentry-Waipio, Waipio, Oahu
- ✓ Sanpo Land Industrial (Hawaii Co., Ltd., Retail Complex in Waikiki
- 1.5 Million Gallon Heeiea-Kai Reservoir at Heeiea, Koolauapoko, Oahu

We have no comments to offer at this time.

Thank you for the opportunity to review these statements.

Sincerely,

Lee C. Herwig, Jr.

LEE C. HERWIG, JR.
Colonel, MSC
Environmental Consultant to Commander,
U.S. Army Support Command, Hawaii



Urban 9

Urban Planning • Urban Design
Environmental Engineering
Landscapes Architecture
Research & Development

826 Bethel Street
Honolulu, Hawaii 96813
Telephone (808) 533-1725

December 3, 1976

Mr. Lee C. Herwig, Jr.
Colonel, M.S.C.
Environmental Consultant to Commander
U.S. Army Support Command Hawaii
APO San Francisco 96558

Dear Colonel Herwig:

RE: Letter of 8 November 1976
Commenting on Sanpo Land Industrial (Hawaii) Co., Ltd.
Environmental Impact Statement

Thank you for your review of the statement.

Yours very truly,

URBAN 9

Mary Ellen Ross

Mary Ellen Ross

MER:cs

GEORGE R. ARYOSH
GOVERNOR



JOHN FARIAS, JR.
CHAIRMAN, BOARD OF AGRICULTURE
YUKIO KITAGAWA
DEPUTY TO THE CHAIRMAN

STATE OF HAWAII
DEPARTMENT OF AGRICULTURE
1428 SO. KING STREET
HONOLULU, HAWAII 96814

November 9, 1976

MEMORANDUM

To: Environmental Quality Commission
Subject: Sanpo Land Industrial (Hawaii) Co., Ltd.
Retail Complex in Waikiki
TMK: 2-6-03:18, 17 & 20

The Department of Agriculture has no comments regarding the above applicant.

Enclosed herewith please find the EIS for the subject project.

Thank you for the opportunity to comment.

John Farias, Jr.
Chairman, Board of Agriculture

Enc.

Urban 9

Urban Planning • Urban Design
Environmental Engineering
Landscape Architecture
Research & Development
926 Bethel Street
Honolulu Hawaii 96813
Telephone (808) 533-1725

December 9, 1976

Mr. John Farias, Jr.
Chairman, Board of Agriculture
State of Hawaii
Department of Agriculture
1428 South King Street
Honolulu, Hawaii 96814

Dear Mr. Farias:

RE: Letter of 9 November 1976
Commenting on Sanpo Land Industrial (Hawaii) Co., Ltd.
Environmental Impact Statement

Thank you for your review of the statement.

Yours very truly,

URBAN 9

Mary Ellen Ross

MER:cs



ANDREW I. T. CHANG
DIRECTOR OF SOCIAL SERVICES & HOUSING

STATE OF HAWAII
DEPARTMENT OF SOCIAL SERVICES AND HOUSING
P. O. Box 339
Honolulu, Hawaii 96809

November 10, 1976

Environmental Quality Commission
550 Halekaunaha Street, Rm. 301
Honolulu, HI 96813

Gentlemen:

Re: Environmental Impact Statement Sanpo Land Industrial
(Hawaii) Co., Ltd. Retail Complex in Waikiki

We have reviewed the subject Environmental Impact Statement and have no comment to offer relating to our program areas.

We are returning the EIS for your usage. Thank you for the opportunity to review and comment.

Sincerely,

Andrew I. T. Chang
Andrew I. T. Chang
Director

Att.

Urban 9

Urban Planning • Urban Design
Environmental Engineering
Landscape Architecture
Research & Development

926 Bethel Street
Honolulu Hawaii 96813
Telephone (808) 533-1725

December 3, 1976

Mr. Andrew I. T. Chang, Director
Department of Social Services and Housing
P. O. Box 339
Honolulu, Hawaii 96809

Dear Mr. Chang:

RE: Letter of November 10, 1976
Commenting on Sanpo Land Industrial (Hawaii) Co., Ltd.
Environmental Impact Statement

Thank you for your review of the statement.

Yours very truly,

URBAN 9

Mary Ellen Ross

Mary Ellen Ross

MER:cs

Urban 9

Urban Planning • Urban Design
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Landscape Architecture
Research & Development

926 Bethel Street
Honolulu Hawaii 96813
Telephone (808) 533-1725

December 16, 1976

Mr. Kazu Hayasida
Director & Chief Engineer
Department of Public Works
City & County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Hayasida:

RE: Letter of November 12, 1976
Commenting on the Sanpo Land Industrial
(Hawaii) Co., Ltd. Retail Complex in
Waikiki Environmental Impact Statement

Thank you for your review of the Statement. Responses to
your comments are as follows:

1. We appreciate the information you provided on the gas
main on Kalakaua Avenue. The text of the Revised EIS
has been amended.
2. As you recommended in your letter special measures
will be taken to prevent differential settlement of
the existing 6-inch sewer line. The sewer line will
be relocated temporarily at the surface, using flexible
connections. In this way, the Contractor can monitor
changing conditions and resolve them. At the end of
the contract, the sewer line will be replaced in an
appropriate position.

Thank you again for your comments.

Yours very truly,

URBAN 9

Mary Ellen Ross
Mary Ellen Ross

MER:lf

cc: Department of Land Utilization
Environmental Quality Commission

DEPARTMENT OF PUBLIC WORKS
CITY AND COUNTY OF HONOLULU
650 SOUTH KING STREET
HONOLULU, HAWAII 96813



RECEIVED
NOV 19 1976

FRANK F. FASI
MAYOR

GROUP ARCHITECTS
COLLAPORTIVE, INC.

KAZU HAYASHIDA
DIRECTOR AND CHIEF ENGINEER

ENV 76-414

November 12, 1976

MEMORANDUM

TO : MR. GEORGE MORIGUCHI, DIRECTOR
DEPARTMENT OF LAND UTILIZATION

FROM : KAZU HAYASHIDA, DIRECTOR AND CHIEF ENGINEER
DEPARTMENT OF PUBLIC WORKS

SUBJECT: ENVIRONMENTAL IMPACT STATEMENT FOR THE SANPO
LAND INDUSTRIAL (HAWAII) CO., LTD., RETAIL
COMPLEX IN WAIKIKI (NOVEMBER 1976)

We have reviewed the subject statement and have the following
comments:

1. Gas main (page 7) - The gas main on Kalakaua
Avenue probably belongs to the Honolulu Gas
Company. The City has no gas utility system.
2. Settlement (page 40) - Since the existing
6-inch line in the easement described in the
EIS is close to the proposed building foundation,
measures should be taken to prevent differential
settlement of the line during construction.
Differential settlement, however slight, can reduce
the capacity of the sewer, and create perpetual
maintenance problems, and increase maintenance
cost to the City. Any settlement or damages to
City properties will have to be corrected by the
applicant.

Kazu Hayasida
KAZU HAYASHIDA
Director and Chief Engineer

cc: Urban 9
1 Division of Sewers

Urban 9

Urban Planning • Urban Design
Environmental Engineering
Landscape Architecture
Research & Development

926 Bethel Street
Honolulu Hawaii 96813
Telephone (808) 533-1725

VALENTINE A. SIEGEMANN
MAJOR GENERAL
ADJUTANT GENERAL



STATE OF HAWAII
DEPARTMENT OF DEFENSE
OFFICE OF THE ADJUTANT GENERAL
FORT RUGER, HONOLULU, HAWAII 96816

HIENG

15 NOV 1976

December 3, 1976

Dr. Albert Tom, Chairman
Environmental Quality Commission
550 Halekawaile Street
Honolulu, Hawaii 96813

Dear Dr. Tom:

Sanpo Land Industrial (Hawaii) Co., Ltd.
Retail Complex in Waikiki, Oahu, Hawaii

Thank you for sending us a copy of the Environmental Impact Statement for the proposed "Sanpo Land Industrial (Hawaii) Co., Ltd., Retail Complex in Waikiki." We have received the publication and have no comments to offer.

We are returning the Environmental Impact Statement for the proposed project per your request.

Yours truly,

WAYNE R. TOMOYASU
Captain, CE, HARRNG
Contr & Engr Officer

Enclosure

Captain Wayne R. Tomoyasu
Contracting and Engineering Officer
State of Hawaii
Department of Defense
Office of the Adjutant General
Fort Ruger
Honolulu, Hawaii 96816

Dear Captain Tomoyasu:

RE: Letter of 15 November 1976
Commenting on Sanpo Land Industrial (Hawaii) Co., Ltd.
Environmental Impact Statement

Thank you for your review of the statement.

Yours very truly,

URBAN 9

Mary Ellen Ross

MER:cs

Urban 9

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926 Bethel Street
Honolulu Hawaii 96813
Telephone (808) 533-1725

FRANK P. FASE
MAYOR

DEPARTMENT OF GENERAL PLANNING
CITY AND COUNTY OF HONOLULU
850 SOUTH KING STREET
HONOLULU, HAWAII 96813



ROBERT R. WAY
CHIEF PLANNING OFFICER

DGPL11/76-2650 (JB)

November 16, 1976

RECEIVED
NOV 17 1976
CITY AND COUNTY OF HONOLULU
DEPARTMENT OF GENERAL PLANNING

GRACE ASSOCIATES
COLLABORATIVE, INC.

Ms. Mary Ellen Ross
URBAN 9
926 Bethel Street
Honolulu, Hawaii 96813

Dear Ms. Ross:

Waikiki Retail Complex (Sanpo)
Environmental Impact Statement

We have examined the above material and have found no mention or discussion as to whether or not the potential developer has attempted to relocate or offered any assistance to this effect to the displacees. With some 15 commercial tenants being faced with the possibility of financial losses because of the displacement, significant adverse impact might result from implementation of this proposal. Unless existing business tenants are relocated, the loss of employment and income-producing opportunities especially by those affected becomes a major concern.

Thank you for the opportunity to comment on this proposal.

Sincerely,

ROBERT R. WAY
Chief Planning Officer

RRW:fmt

December 16, 1976

Mr. Robert R. Way
Chief Planning Officer
Department of General Planning
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Way:

RE: Letter of November 16, 1976
Commenting on the Sanpo Land Industrial
(Hawaii) Co., Ltd. Retail Complex in
Waikiki Environmental Impact Statement

Thank you for your review of the Statement. Your comments regarding relocation of business tenants are appreciated.

As you will note on page 49 of the EIS, no formal relocation program is planned. Existing commercial tenants may be adversely affected by the proposed project as you suggest, however it is our understanding that the applicant has fulfilled his responsibility to those displaced by informing them at least a year in advance of the project. In addition, existing tenants were contacted by the leasing agent of the proposed retail complex and offered space in the new building.

Thank you again for your interest in the proposed project.

Yours very truly,

URBAN 9

Mary Ellen Ross

MER:lf

cc: Department of Land Utilization
Environmental Quality Commission

Urban Planning • Urban Design
Environmental Engineering
Landscape Architecture
Research & Development

AMERICAN LUNG ASSOCIATION of Hawaii

Department of Land Utilization
City & County of Honolulu
Honolulu, Hawaii 96813

November 22, 1976

Gentlemen:

Subject: Environmental Impact Statement for the Proposed
Sanpo Land Industrial (Hawaii) Co., Ltd.
Retail Complex in Waikiki

We have reviewed the subject EIS with particular attention to those sections pertaining to traffic and air quality impact and have the following comments.

We found the traffic analysis acceptable, but the section on air quality was not adequate since no attempt was made to quantify either present or projected air quality in the vicinity of the proposed retail complex. This is unfortunate since the data generated for the traffic analysis could have been easily applied in the air quality impact method we recommended in our letter of September 16, 1976 (Section P of the EIS) or some other similar method.

In its present form the air quality section is simply a restatement of the traffic impact section and lacks specific consideration of pollutant emissions or ambient concentrations. Without such consideration it is practically impossible to draw any valid conclusions about the project's impact on air quality.

We cannot consider the EIS complete until the air quality impact has been adequately addressed.

Sincerely yours,

James W. Morrow
James W. Morrow, Director
Environmental Health

JWM:lp

cc: Ms. Mary Ellen Ross, URBAN 9
Dr. Richard E. Marland

Christmas Seals Fight TB, Asthma, Emphysema, Air Pollution

December 16, 1976

Mr. James W. Morrow
Director Environmental Health
American Lung Association of Hawaii
245 North Kukui Street
Honolulu, Hawaii 96817

Dear Mr. Morrow:

RE: Letter of November 22, 1976
Commenting on Sanpo Land Industrial
(Hawaii) Co., Ltd. Retail Complex in
Waikiki Environmental Impact Statement

Thank you for your review of the statement and your comments. A more extensive air quality study is being prepared by the firm of Sunn, Low, Tom & Hara. We anticipate that this study will take approximately one month to complete and will be available for review when completed. The study will be available through the City and County Department of Land Utilization. Until it is completed an accurate quantification of air quality impacts cannot be included in the EIS.

Thank you again for your comments.

Yours very truly,

URBAN 9

Mary Ellen Ross
Mary Ellen Ross

MER:lf

cc: Department of Land Utilization
Environmental Quality Commission

BOARD OF WATER SUPPLY
CITY AND COUNTY OF HONOLULU
630 SOUTH BERETANIA
HONOLULU, HAWAII 96813

FRANK F. FASI, Mayor
YOSHIE H. FUJINAKA, Chairman
STANLEY S. YAKAHASHI, Vice Chairman
KAZUHIKAYASHIDA
EDWARD F. C. LAU
TERESITA R. LUBINSKY
E. ALVEY WRIGHT

November 29, 1976

Mr. George Moriguchi, Director
Department of Land Utilization
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Moriguchi:

SUBJECT: Environmental Impact Statement
SANPO Land Industrial (Hawaii)
Co., Ltd. Retail Complex in Waikiki

We have no objections to the subject project. Comments in our letter appended under Section P have been incorporated into the environmental impact statement.

Please contact Mr. Lawrence Whang at 548-5221 if further information is needed.

Very truly yours,

A.B. Pasteris
EDWARD Y. HIRATA
Manager and Chief Engineer

cc: Ms. Mary Ellen Ross
Urban 9
926 Bethel Street
Honolulu, Hawaii 96813

Urban 9

Urban Planning • Urban Design
Environmental Engineering
Landscape Architecture
Research & Development
926 Bethel Street
Honolulu Hawaii 96813
Telephone (808) 533-1725

December 3, 1976

Edward Hirata, Manager and Chief Engineer
Board of Water Supply
City and County of Honolulu
630 South Beretania Street
Honolulu, Hawaii 96813

Dear Mr. Hirata:

RE: Letter of November 29, 1976
Commenting on Sanpo Land Industrial (Hawaii) Co., Ltd.
Environmental Impact Statement

Thank you for your review of the statement.
Yours very truly,

URBAN 9
Mary Ellen Ross
Mary Ellen Ross

MER:cs

RICHARD E. MARLAND, PH.D.
DIRECTOR
TELEPHONE NO.
548-8815



STATE OF HAWAII
OFFICE OF ENVIRONMENTAL QUALITY CONTROL
OFFICE OF THE GOVERNOR
HONOLULU, HAWAII, HI.

RECEIVED
NOV 29 1976
GROUP ARCHITECTS
COLLABORATIVE, INC.

NOVEMBER 29, 1976

George Moriguchi, Director
Department of Land Utilization
City and County of Honolulu

SUBJECT: Environmental Impact Statement for the proposed
Sanpo Land Industrial (Hawaii) Co., Ltd. Retail
Complex in Waikiki

Dear Mr. Moriguchi,

We have reviewed the subject EIS and offer the following comments:

- 1) Will 63 or 80 hotel rooms be demolished due to this project? The list on page 13 of the EIS implies the removal of 80 rooms. Were the removal of these hotel rooms considered in the analysis of the economic impacts of the project?
 - 2) Will the project's air conditioners be placed on the roof near the neighboring hotel? Would noise be an impact on this hotel?
 - 3) In order to evaluate the economic impact of creating more jobs rough estimates of the present and potential employment on the site should be provided.
 - 4) Are all existing view planes presently blocked, as stated on page 38? The view plane from the mauka-diamond head side of Kalaheua Ave. to the Fort DeKussey beach area might be blocked by the proposed building. We suggest clarification on this matter.
 - 5) The air quality analysis should address whether or not the change in traffic will create increased emissions and if these changes might exceed the State/federal standards for such emissions. The State Department of Health should be of help in this matter.
- Consideration should be given to the full parking requirement as well as the proposed 50% reduction. The air quality impact of both should be evaluated. With this information, the statement on page 39, "...the application for a 50% reduction in the Waikiki Special Design District parking requirement would minimize the likelihood of any adverse impacts" might be substantiated.

6) What mitigation measures are proposed for implementation during the demolition of the existing structures? The statement, "these impacts will be minimized by the...enforcement of existing pollution control measures" should be more specific.

7) We wish to commend the applicant on the reduction of the bulk of the EIS by reducing the size of the correspondence during the consultation period.

We have attached comments received by this Office and the Environmental Quality Commission on the subject EIS.

We trust that these comments will be helpful in revising this EIS. We recommend that those persons and agencies that provide substantive comments on the EIS be provided with a copy of the Revised EIS.

Thank you for the opportunity to review this EIS.

Sincerely,
/s/ Richard E. Marland

Richard E. Marland
Director

attachment

cc: Mary Ellen Ross
Urban 9
925 Methel St.
Hon., HI. 96813

Urban 9

Urban Planning • Urban Design
Environmental Engineering
Landscape Architecture
Research & Development

925 Bethel Street
Honolulu, Hawaii 96813
Telephone (808) 533-1725

December 16, 1976

Richard E. Marland, Ph.D.
Director
State of Hawaii
Office of Environmental Quality Control
550 Halekauwila Street, Room 301
Honolulu, Hawaii 96813

Dear Dr. Marland:

RE: Letter of November 29, 1976
Commenting on the Sanpo Land Industrial
(Hawaii) Co., Ltd. Retail Complex in
Waikiki Environmental Impact Statement

Thank you for your review of the Statement. Responses to each of your comments are as follows:

1. Eighty hotel rooms will be demolished to implement the proposed project and removal of these rooms has been considered in the analysis of economic impacts (See page 35 of the EIS paragraph 2 and following). The number originally stated on page 35 was in error.
2. All air conditioning equipment will be contained inside the building. The only equipment not inside will be the air conditioning cooling tower, which will be located on the Diamond Head side of the property at the ground level and some exhaust fans. Adverse noise impacts on the neighboring hotel are not anticipated.
3. An estimate of the new employment is not available at the present time, as the developer has no firm commitments from potential tenants. However, the developer anticipates that at least 300 jobs will be created at the new complex. Present employment on the site is estimated at 75 persons.

Richard E. Marland, Ph.D.
Re: Sanpo Waikiki
December 16, 1976

Page 2

4. View planes in all directions are presently blocked from the street level by existing buildings, as stated in the EIS, including from the mauka-Diamond Head side of Kalakaua Avenue.
5. A more extensive air quality study is being prepared for the revised EIS. This study will address increased emissions relative to the State and Federal standards and will consider the proposed 50% parking reduction. The study will be available for review through the City and County of Honolulu, Department of Land Utilization. Until it is completed, an accurate quantification of air quality impacts cannot be included in the EIS.
6. In addition to the measures already stated on page 42, mitigation of adverse impacts during demolition will include the continuous use of fog sprays for dust control and the use of mufflers on vehicles used in demolition. Demolition work will be limited to the hours between 7 A.M. and 4 P.M.

Thank you again for your comments.

Yours very truly,

URBAN 9

Mary Ellen Ross

MER:lf

cc: Department of Land Utilization
Environmental Quality Commission

December 6, 1976

-2-

Environmental Quality Commission
550 Halekauwila Street, Room 301
Honolulu, Hawaii 96813

Re: SAMPO Land Industrial Co., Ltd.: Beachwalk-Kalaheua Retail
Complex, Waikiki.

Dear Sirs:

The Waikiki Residents Association has received the November, 1976 Environmental Impact Statement for the above-named Project. We note that this version is practically the same as the September, 1976 document which we also received. Therefore, our comments sent to you in October (see the E.I.S. Section F, page 56) remain virtually unchanged.

Some changes in the applicant's E.I.S. merely eliminated stating the adverse effects of the Project which had pointed out; however, by not stating them does not eliminate the problems! The major change in the new E.I.S. is merely the addition of traffic counts on the surrounding streets, especially Beachwalk.

Our Association therefore continues to oppose construction of this particular building for several environmental reasons:

1. The construction of two sub-levels of basement parking will raise the water table of the area which is already subject to flooding. Damage to public streets, drinking water lines, sewers, etc. can therefore arise much more easily, and seriously affect residents and visitors alike in the area.
2. Traffic on Beachwalk is estimated to increase by 60%. What ends up on the extremely narrow Beachwalk must come initially from Kalaheua due to its one-way street nature. Also Kalaheua is already seriously crowded during peak hours.
2. Beachwalk is, as the name implies, a major walkway to Waikiki Beach. A 60% increase will really make it "Carbon Monoxide Walk" for pedestrians.
4. The Beachwalk side of the proposed Project now has 2-3-story buildings, making a 9-story building environmentally and substantially different in character. Note: It would be more sensible, planning-wise, to have parking and service entrances on Kalaheua, but it is already too crowded.
5. While design per se is not being considered here, it should be pointed out that the present design requires air-conditioning which will add considerable noise pollution to the hotels on Lewers and Beachwalk.

In conclusion, we oppose the proposed project for the above reasons plus for 17 other planning reasons, as previously submitted by us. Our overall major concern is that Waikiki will be left with an impractical 9-story project which the residents will be stuck with.

Continued

The economic-market study of the applicant is shaky, being based on old outdated studies and not on the new General Plan Objectives and Policies. This new Plan foresees less growth in hotels and tourism for Waikiki. The physical and social studies are too general, and the environmental-impact implications are too detrimental to Waikiki.

For all these reasons, we oppose this particular proposal, although we would be favorable to a Project of the type described in our previous letter of 7 October, 1976.

Sincerely,



Donald R. Henson, President
Waikiki Residents Association

DRH:jl

Urban 9

Urban Planning • Urban Design
Environmental Engineering
Landscaps Architecture
Research & Development

926 Bethel Street
Honolulu Hawaii 96813
Telephone (808) 533-1725

December 16, 1976

Mr. Donald R. Hanson, President
Waikiki Residents Association
1860 Ala Moana Boulevard, Apt. 903
Honolulu, Hawaii 96813

Dear Mr. Hanson:

Re: Letter of 6 December 1976
Commenting on the Sanpo Land Industrial
(Hawaii) Company, Ltd. Retail Complex
in Waikiki Environmental Impact Statement

Thank you for your review of the Statement. Responses to
your comments are as follows:

- (1) The proposed project and the Environmental Impact Statement have been reviewed by the City and County of Honolulu Department of Public Works and the Board of Water Supply. No adverse impacts related to the construction of basement parking have been identified by these or any other agencies consulted. However, the issue you raise about possible flooding is important, and will be given special consideration during final design and construction of the project.
- (2) These adverse traffic impacts anticipated from the proposed project are noted in Section G of the Revised EIS.
- (3) A detailed air quality study is being prepared for the Revised EIS. That study will document impacts and will be available for review through the City and County, Department of Land Utilization. Until it is completed, an accurate quantification of air quality impacts cannot be included in the EIS.
- (4) While the proposed site is presently occupied by two and three story buildings, existing adjacent buildings are a 13 story hotel and a 9 story hotel. The proposed 9 story commercial building should be similar in character to these existing buildings.

Mr. Donald R. Hanson
Re: Sanpo Waikiki
December 16, 1976

Page 2

Planning for access to the proposed site included the evaluation of alternatives and incorporated suggestions from the City and County of Honolulu Department of Transportation Services. The proposed access on Beachwalk Avenue was considered the most desirable by all parties concerned.

- (5) All air conditioning equipment will be contained inside the proposed building. The only air conditioning equipment not inside will be a cooling tower, which will be located on the Diamond Head side of the property at the ground level, and some exhaust fans. Adverse noise impacts on the neighboring hotels are not anticipated.

As the Sanpo project is proposed by a private developer, its implementation involves the expenditure of no public funds. The project is expected to be economically feasible by the developer and in no way a burden on local residents. Rather, it is hoped that the project will contribute to the viability of Waikiki in terms of visitor satisfaction, quality shopping, and increased employment opportunities.

The primary land use control mechanism in Waikiki is the Waikiki Special Design District. As mentioned in our November 1, 1976 letter to you, conformity with the objectives of the WSDDD will be considered in the WSDDD Development Conformance Certificate Application.

Thank you again for your comments.

Yours very truly,

URBAN 9.



Mary Ellen Ross

MER:mm

cc: Department of Land Utilization
Office of Environmental Quality Control

Urban 9

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DEPARTMENT OF TRANSPORTATION SERVICES CITY AND COUNTY OF HONOLULU

HONOLULU MUNICIPAL BUILDING
650 SOUTH KING STREET
HONOLULU, HAWAII



FRANK P. FASI
MAYOR

December 16, 1976

TELEPHONE 76-2304

Mr. George Villegas, Director
Department of Transportation Services
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96814

Dear Mr. Villegas:

RE: Letter of December 1, 1976
Commenting on the Sanpo Land Industrial
(Hawaii) Co., Ltd. Retail Complex in
Waikiki Environmental Impact Statement

Thank you for your review of the statement.
Yours very truly,

URBAN 9

Mary Ellen Ross
Mary Ellen Ross

MER:cs
cc: Department of Land Utilization
Environmental Quality Commission

Environmental Quality Commission
550 Halekaawila St., Rm. 301
Honolulu, Hawaii 96813

Gentlemen:

Subject: Environmental Impact Statement for
Sanpo Land Industrial (Hawaii) Co., Ltd.
Retail Complex in Waikiki

We have reviewed the subject Environmental Impact
Statement for the proposed nine-story commercial complex
in Hawaii and have no further comments to offer.

Very truly yours,

George C. Villegas
GEORGE C. VILLEGAS
Director

cc: DLU
Ms. Mary Ellen Ross, URBAN 9
926 Bethel St.
Hon. Hawaii 96813



DEPARTMENT OF THE ARMY
HONOLULU DISTRICT, CORPS OF ENGINEERS
BLDG. 336, FT. SHAFTER
APO SAN FRANCISCO 96338

FOKD-P

2 December 1976

Mr. George S. Moriguchi, Director
Department of Land Utilization
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Moriguchi:

We have reviewed the Environmental Impact Statement for the Sanpo Land Industrial Retail Complex in Waikiki. The Corps commented on the EIS Preparation Notice in a letter to you, dated 6 October 1976, and has no further comments to make at this time.

Thank you for the opportunity for additional input.

Sincerely yours,

KIUK CHEUNG
Chief, Engineering Division

Cy-kara:
-Ms. Mary Ellen Ross, Urban 9
926 Bethel Street, Honolulu,
Hawaii 96813

Urban 9

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Honolulu Hawaii 96813
Telephone (808) 533-1725

December 16, 1976

Mr. Kisuk Cheung
Chief, Engineering Division
Department of the Army
Honolulu District
Corps of Engineers
Building 230, Fort Shafter
APO San Francisco 96558

Dear Mr. Cheung:

RE: Letter of 2 December 1976
Commenting on Sanpo Land Industrial
(Hawaii) Co., Ltd., Retail Complex in Waikiki, EIS

Thank you for your review of the statement.

Yours very truly,

URBAN 9

Mary Ellen Ross
Mary Ellen Ross

MER:cs

cc: Department of Land Utilization
Environmental Quality Commission

University of Hawaii at Manoa

Water Resources Research Center

December 1, 1976

MEMORANDUM

TO: Ms. Mary Ellen Ross
URBAN 9

FROM: Reginald H. F. Young^{PHD}
Asst. Director, WREC

SUBJECT: EIS for Sanpo Land Industrial (Hawaii) Co., Ltd. Retail
Complex in Maikiki

We have reviewed the subject EIS and consider that the impact of site dewatering has not been adequately evaluated. The use of crushed rock filters around the wells should minimize the turbidity of the discharge into the storm drain. Complete removal of the turbidity, however, as well as removal of the dissolved nutrients cannot be effected by these filters. The net impact of this residual contamination on the Ala Wai Canal should be considered.

The EIS should also specify the water quality standards to be met in discharging into the Ala Wai Canal.

RFY:jm

cc: H. Gee
E. Murabayashi
Env. Center

Urban 9

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Environmental Engineering
Landscape Architecture
Research & Development

926 Bethel Street
Honolulu, Hawaii 96813
Telephone (808) 533-1725

December 16, 1976

Mr. Reginald H. F. Young
Asst. Director WRRC
University of Hawaii at Manoa
Water Resources Research Center
Honolulu, Hawaii 96822

Dear Mr. Young:

RE: Letter of December 1, 1976
Commenting on Sanpo Land Industrial
(Hawaii) Co., Ltd. Retail Complex in
Waikiki Environmental Impact Statement

Thank you for your review of the Statement. Your comments regarding the impact of site dewatering are appreciated.

As stated on page 48 of the EIS, the Contractor will obtain a permit to discharge wastewater into the storm drain on Lewers Street. The net impact of residual contamination on the Ala Wai Canal will be considered when further information on soil conditions is obtained, in the application for a permit from the City and County of Honolulu.

The water quality standards to be met in discharging into the Ala Wai Canal are described in the State of Hawaii, Department of Health, Public Health Regulations, Chapter 37, "Water Quality Standards". Section 6 on page 8 states: "All water shall also be free from soil particles resulting from erosion on land involved in earthwork, such as the construction of public works; highways; subdivisions, recreational,

Mr. Reginald H. F. Young
RE: Sanpo Waikiki
December 16, 1976

Page 2

commercial, or industrial developments: . . . This standard shall be deemed met if it can be shown that . . . the discharge has received the best degree of treatment or control practicable under existing technology. The determination of compliance with the standard shall be made by the Director, consistent with the Hawaii Administrative Procedure Act and the Rules of Practice and Procedure of the Department of Health."

Thank you again for your comments.

Yours very truly,

URBAN 9

Mary Ellen Ross
Mary Ellen Ross

MER:lf

cc: Department of Land Utilization
Environmental Quality Commission



University of Hawaii at Manoa

Environmental Center
Crawford 317 • 2650 Campus Road
Honolulu, Hawaii 96822
Telephone (808) 948-7361

RECEIVED

DEC 10 1976

GROUP ARCHITECTS
COLLABORATIVE, INC.

Office of the Director

RE: 0215

December 8, 1976

MEMORANDUM

TO: Department of Land Utilization
FROM: Doak C. Cox

RE: Review of Environmental Impact Statement for the proposed Sanpo Land Industrial (Hawaii) Co., Ltd. Retail Complex in Waikiki

The Environmental Center Review of the above cited EIS has been prepared with the assistance of Duane Preble (Art), James Pearson (Architecture) and Mae Kato Pattison (Environmental Center). The following comments are submitted for your consideration:

The setback of the proposed project from Kalakaua and Beachwalk is a positive feature worth noting since the existing character of the corner is one of open relief from the wall of highrises behind (p. A-5, fig. 1). The massiveness of the structure is softened somewhat by the curving wall of the corner adjacent to the park, however, the bulk of the structure only adds to an already overcrowded area. The height is within reasonable limits, allowing for light and movement of air.

The perspective drawing (fig. 6) is inaccurate and highly misleading in its representation of the building and its relationship to the surroundings. In drawing the palm trees overly tall the developer has made the proposed building seem shorter than its nine stories. The drawing also suggests that nearby buildings are smaller than they actually are, creating the false impression that there is more open space than is present. Figure 6 does not include an accurate indication of the proposed landscaping shown in figure 7, and figure 7 does not coincide with the description of existing landscape features on page 11. Without a better verbal description and an elevation drawing which includes accurate relative heights of trees, planters and shrubs, the evaluation of the visual impact of the proposed development is most difficult.

We disagree with the statement on visual quality (p. 19) that "a crowded and lively man made environment are the significant aesthetic and scenic

AN EQUAL OPPORTUNITY EMPLOYER

features of Waikiki". It seems more likely that the ocean with its excellent surfing conditions, the long curving beach, Kapiolani Park and Diamond Head are the significant aesthetic and scenic features of Waikiki. These are the features which attracted the visitors and developers who created the crowded conditions. In this light the proposed building can only add to the concrete jungle which has proliferated and threatens the features which attract visitors to Waikiki.

The tile-roofed lowrise on Kalakaua (p. A-5, fig. 3) that would be demolished has a character akin to the Alexander & Baldwin building on the classic Gump building further down the street. These kinds of structures (or even the neo-grass shacks (p. A-6, fig. 7)) are worth retaining in an area fast losing its special regional character. Waikiki's Special Design District encourages "... a desirable level of urban design compatible with the climate and character of Hawaii ...". However, the proposed nine stories of air-conditioned concrete and glass offers no clue to a respect for this objective or a respect for the special views from the site that are famous throughout the world.

The long term productivity of the proposed building (p. 46) can be interpreted as a long range financial gain to the owners. However, what are the long term benefits to the visitors and residents of Waikiki and Hawaii?

Thank you for the opportunity to review this EIS. We will appreciate your consideration of our comments.

Doak C. Cox, Director

cc: Mary Ellen Ross, Urban 9
DEOC
Contributors

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Urban 9

Urban Planning • Urban Design
Environmental Engineering
Landscape Architecture
Research & Development

926 Bethel Street
Honolulu Hawaii 96813
Telephone (808) 533-1725

December 16, 1976

Mr. Doak C. Cox, Director
University of Hawaii
Environmental Center
Crawford 317
2550 Campus Road
Honolulu, Hawaii 96822

Dear Mr. Cox:

Re: Letter of 8 December 1976
Commenting on Sanpo Land Industrial
(Hawaii) Company, Ltd. Retail Complex
in Waikiki Environmental Impact Statement

Thank you for your review of the Statement. Responses to each of your comments are as follows:

Before the proposed retail complex can be built, a Waikiki Special Design District (WSPD) Conformance Certificate will be required, in addition to an approved EIS. The application for this certificate is reviewed for conformance with the WSPD objectives and guidelines, including those related to urban design. The project has been designed in anticipation that this application constitutes the appropriate design review.

The perspective drawing (Figure 5) is a view from a height of approximately 50 feet above ground level. It shows the relationship of the proposed building to its surroundings from that vantage point and was intended to illustrate the general appearance of the building itself, not the building's surroundings. Figure 9, which is a representation of the building's size from ground level, shows the size of palm trees in a better relationship.

Photographs included in Figure 4 show that the palm trees along Kalakaua Avenue are at least 40 feet high, with several at least as high as 60 feet. The text on page 11 of the Revised EIS has been amended to account for this additional palm tree height.

Mr. Doak C. Cox
Re: Sanpo Waikiki
December 16, 1976

Page 2


Figure 7 in the EIS is a conceptual sketch of the proposed landscape plan. The Revised EIS will include an actual landscape plan for the project.

According to your memorandum, the section of the EIS on visual quality should state that the significant aesthetic and scenic features of Waikiki are the ocean, surf, the beach, Kapiolani Park and Diamond Head. It is likely that visitors are attracted to Waikiki by these features as well as by the built environment.

As noted on page 35 and 36 of the EIS, the long-term importance of the proposed project is the expansion of commercial facilities which enable the maintenance of a viable tourist industry and provide jobs to local residents.

Thank you again for your comments.

Yours very truly,


Mary Ellen Rog's

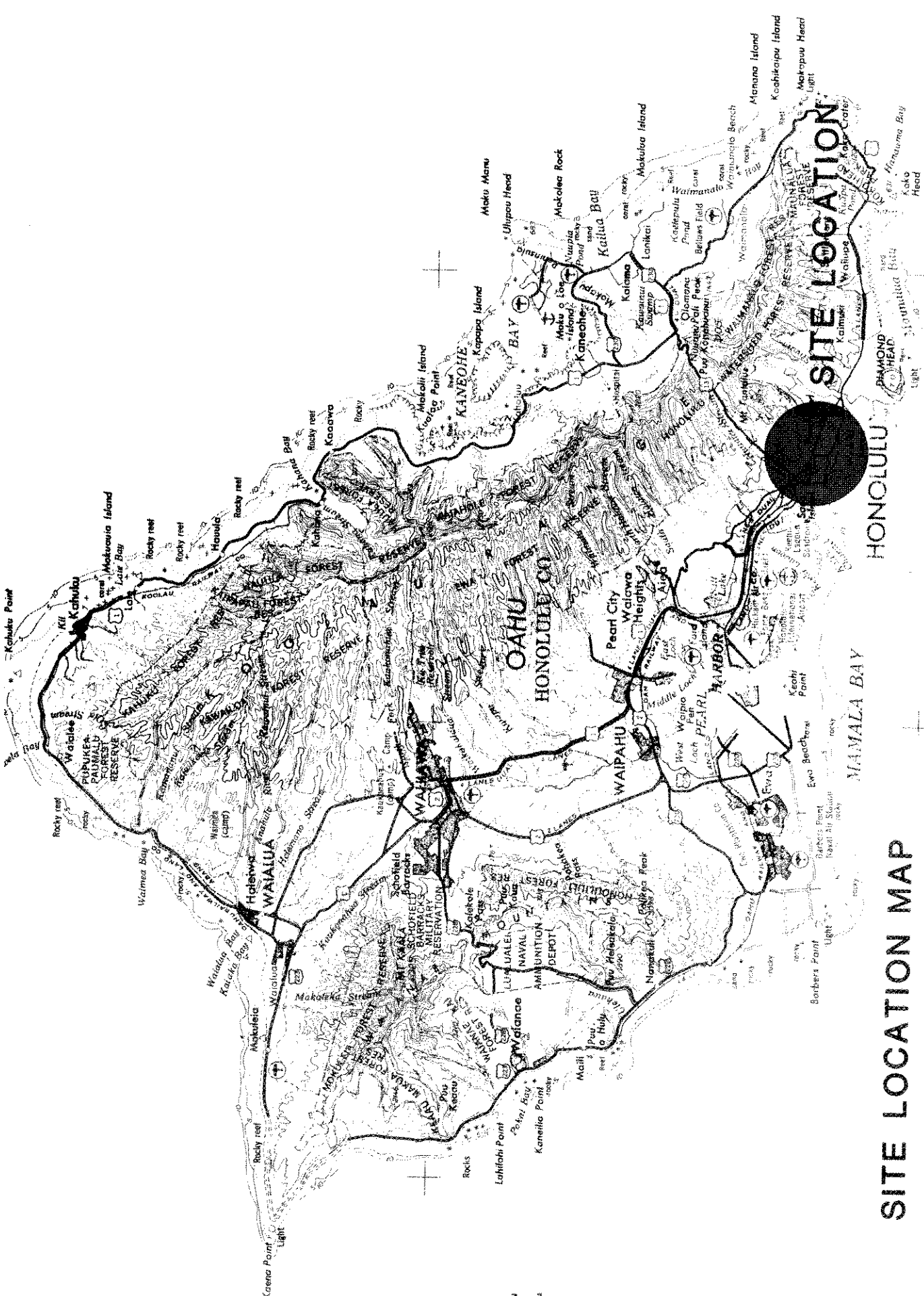
MER:mm

cc: Department of Land Utilization
Office of Environmental Quality Control



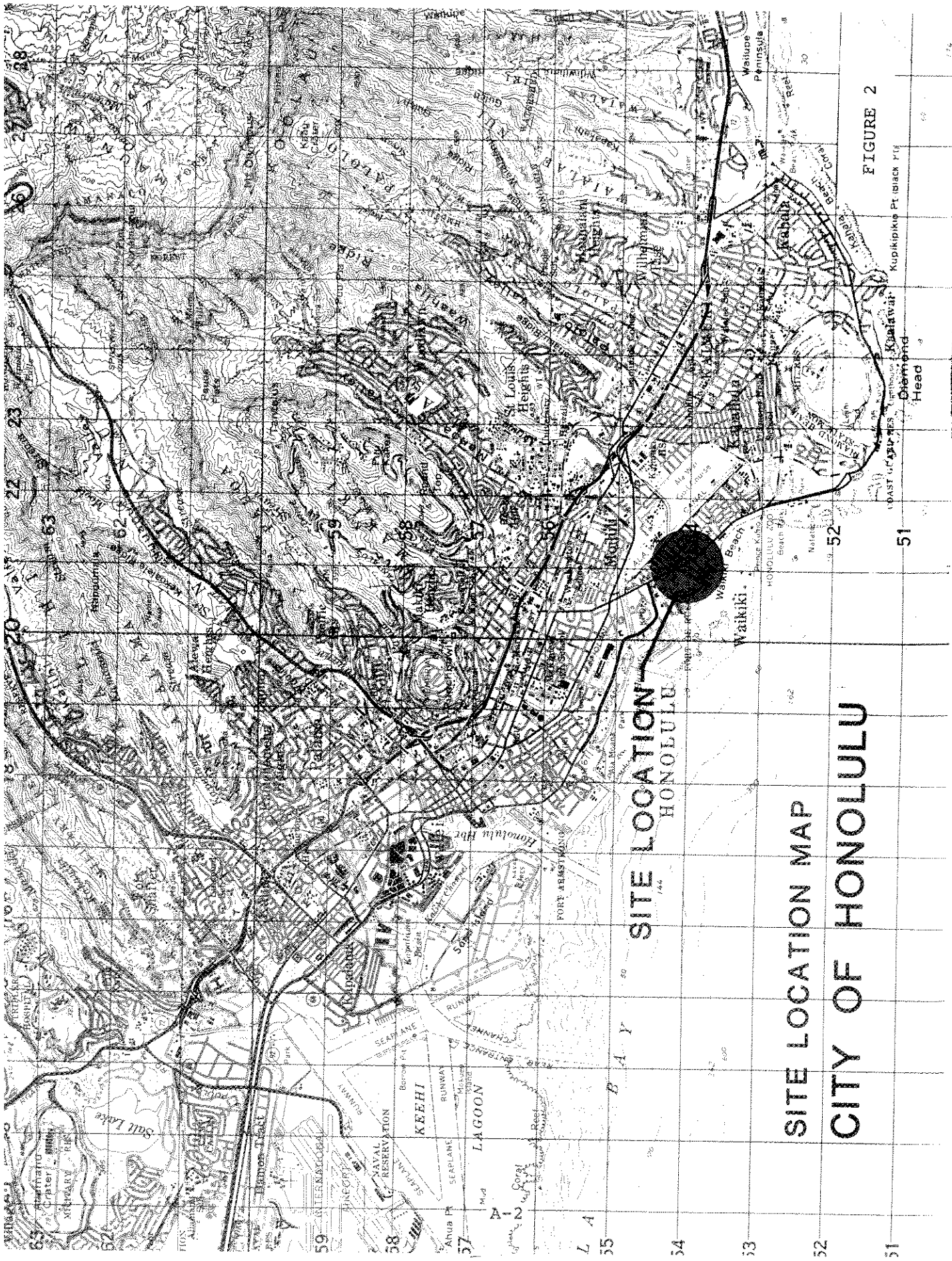
APPENDIX A - FIGURES

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**SITE LOCATION MAP
ISLAND OF OAHU**

FIGURE 1

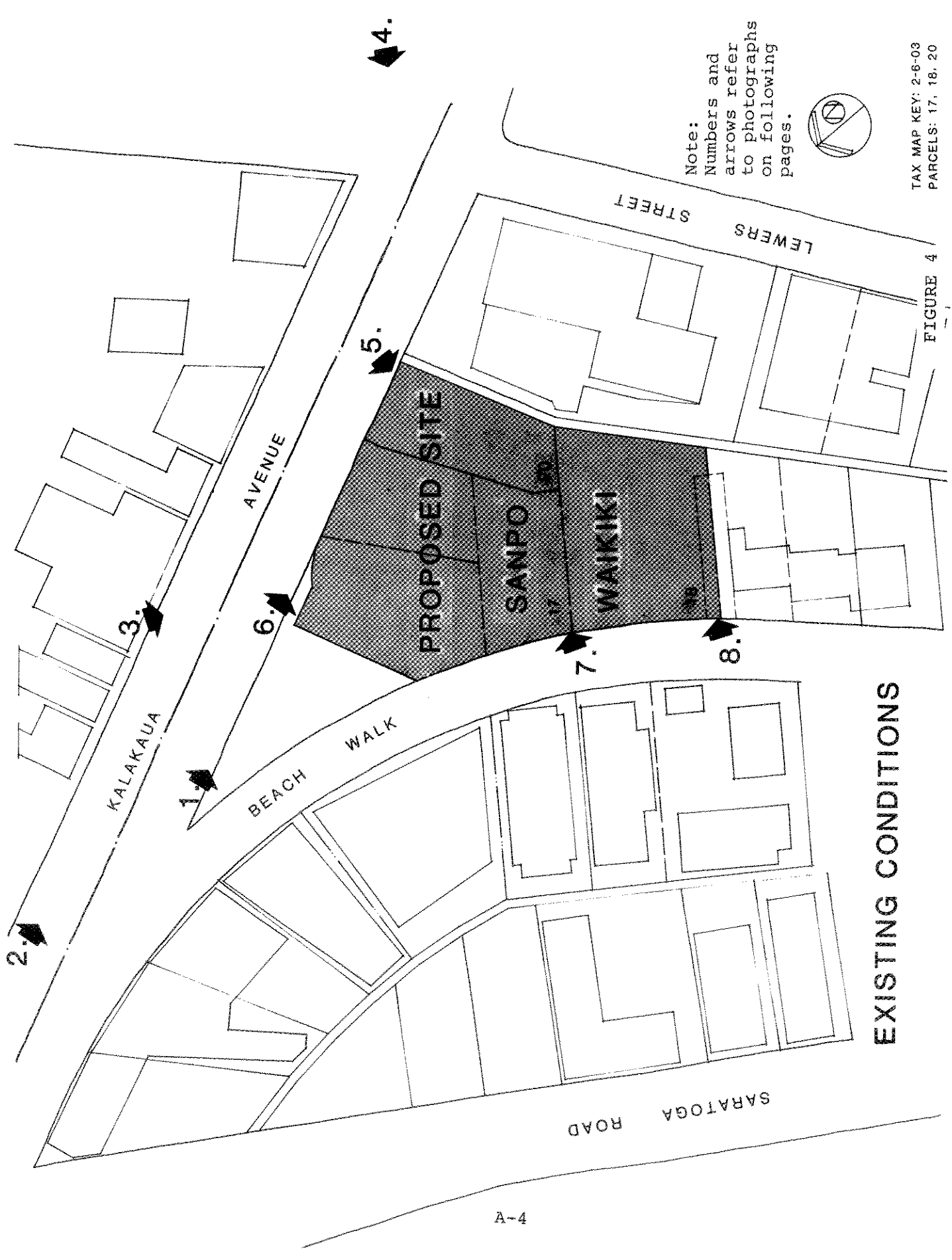


SITE LOCATION
HONOLULU

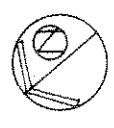
**SITE LOCATION MAP
CITY OF HONOLULU**

FIGURE 2

Kupukipuko Pt (black Pt)
Cherryland Head



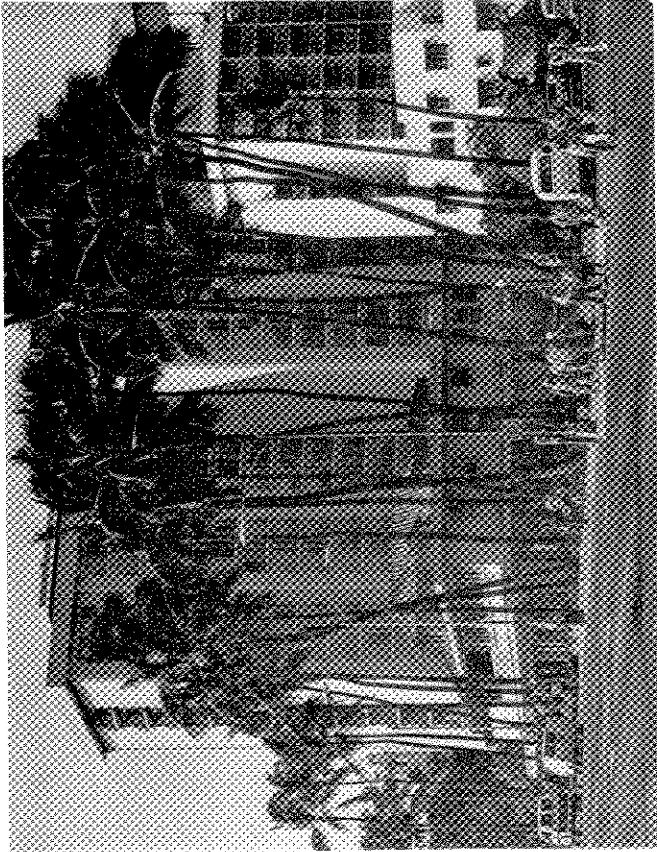
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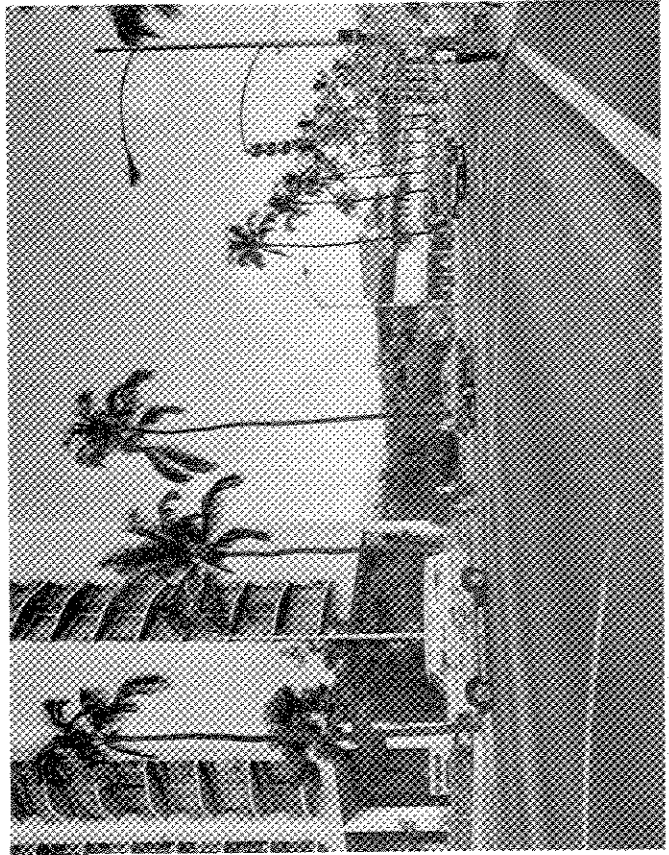
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FIGURE 4

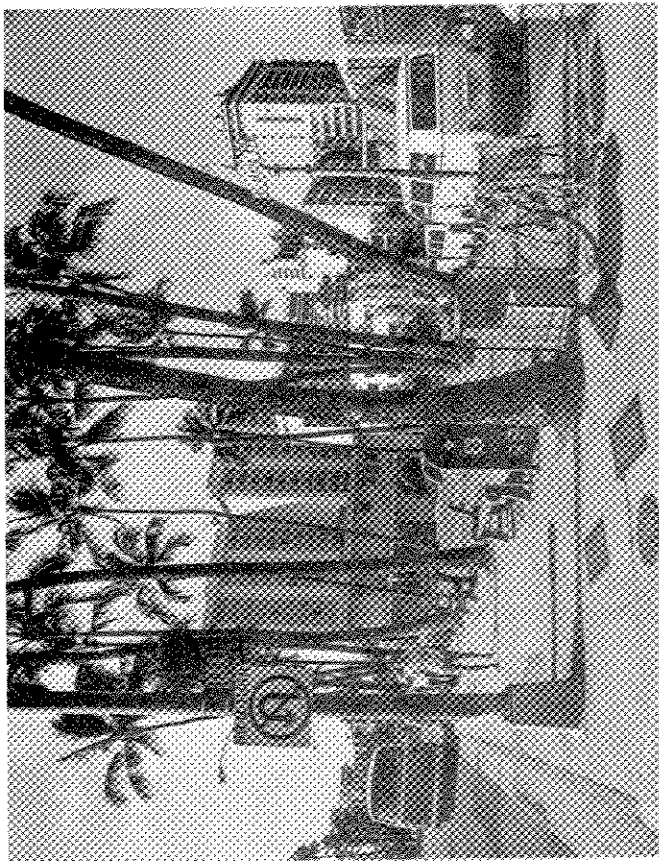
EXISTING CONDITIONS



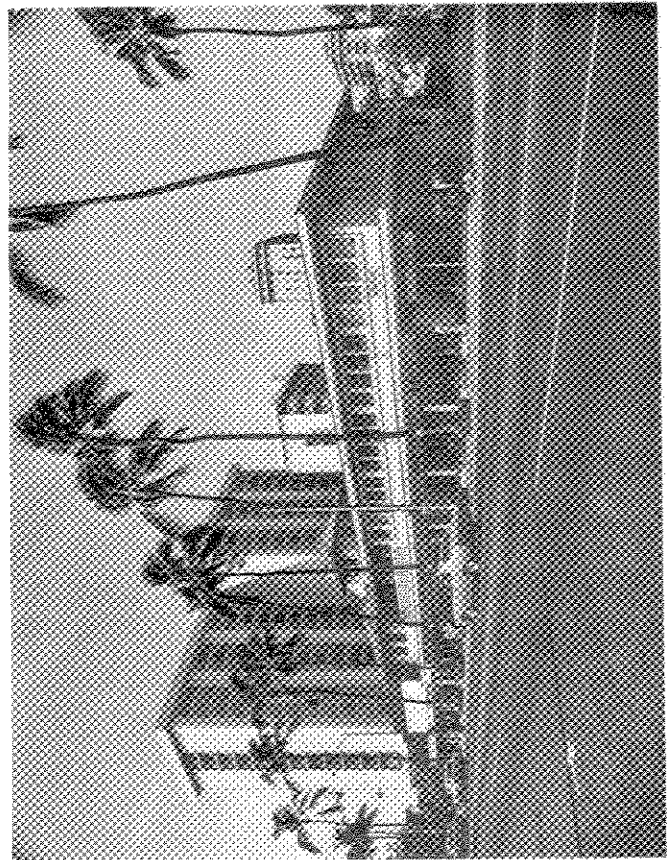
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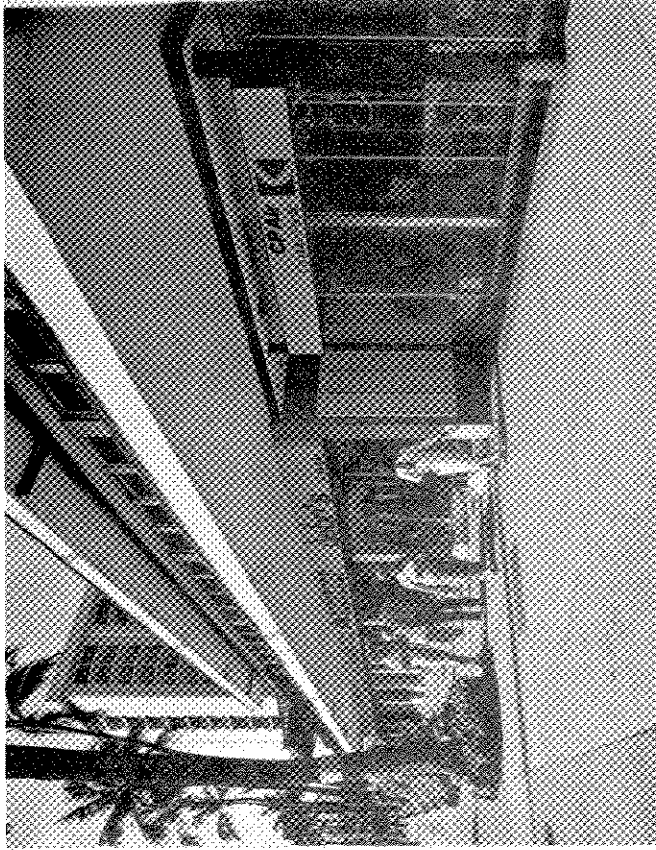
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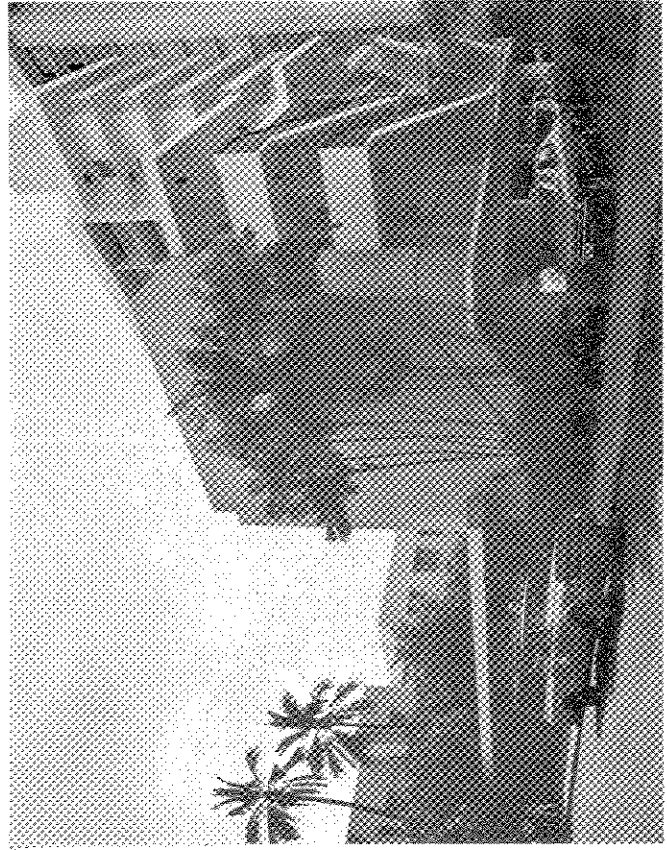
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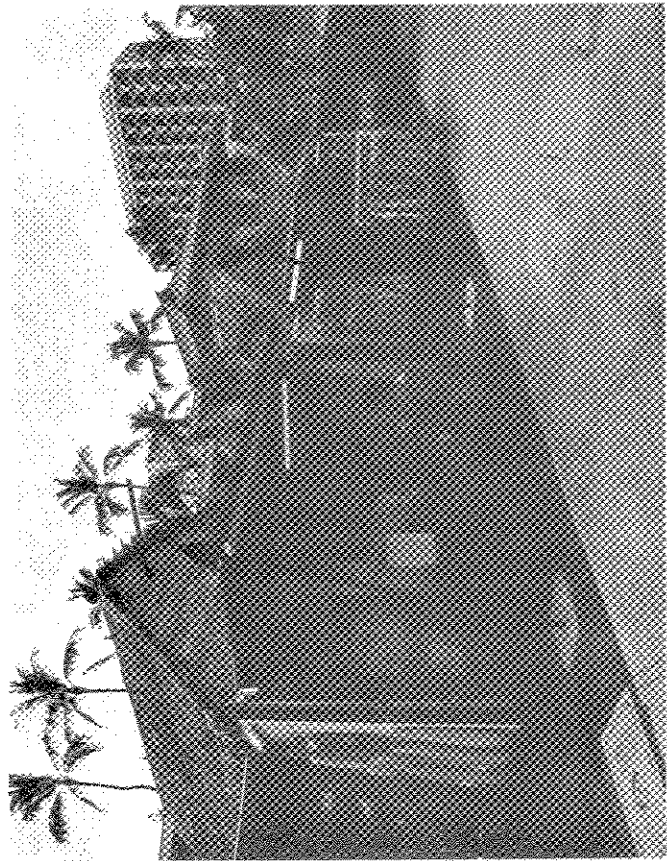
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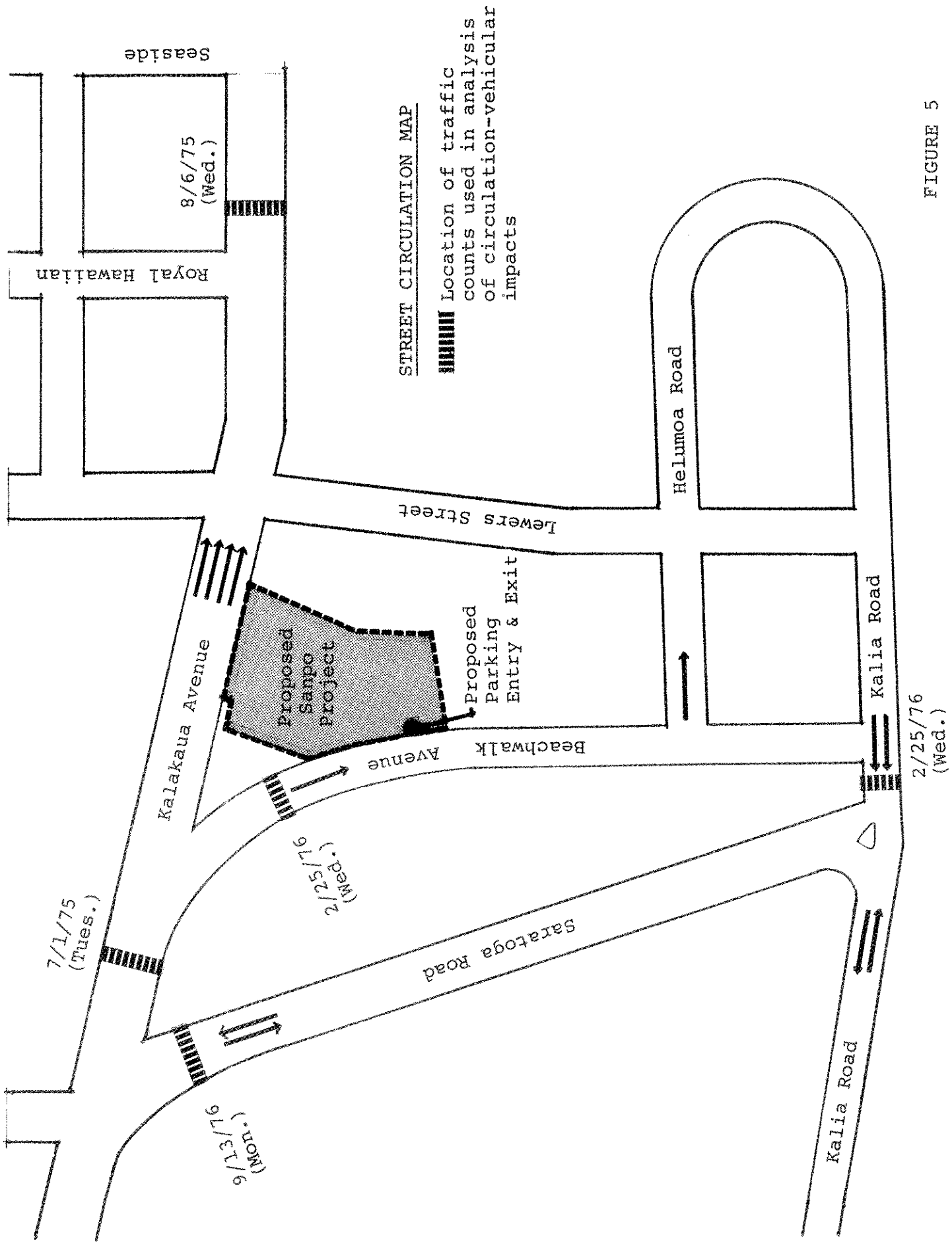
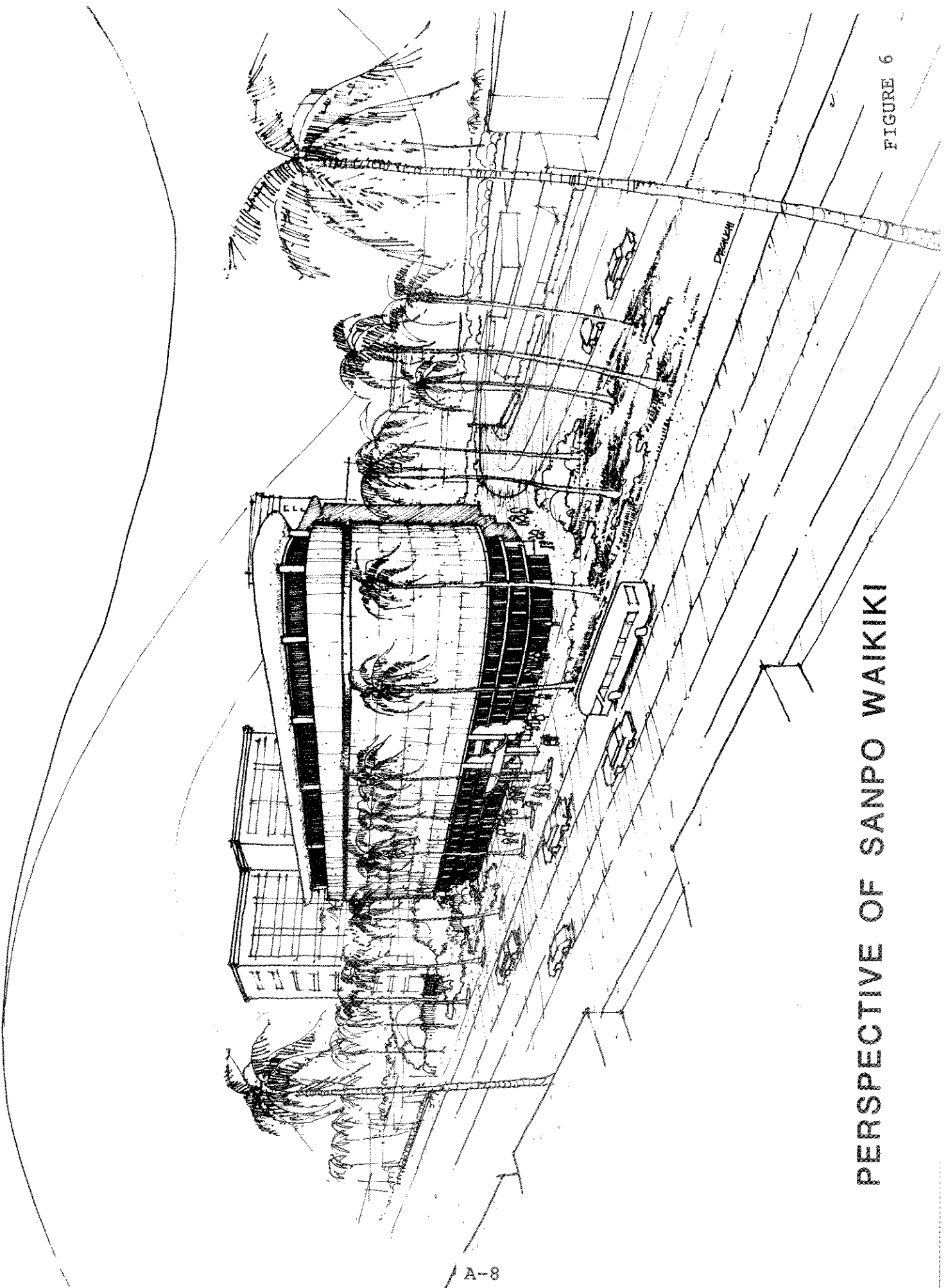
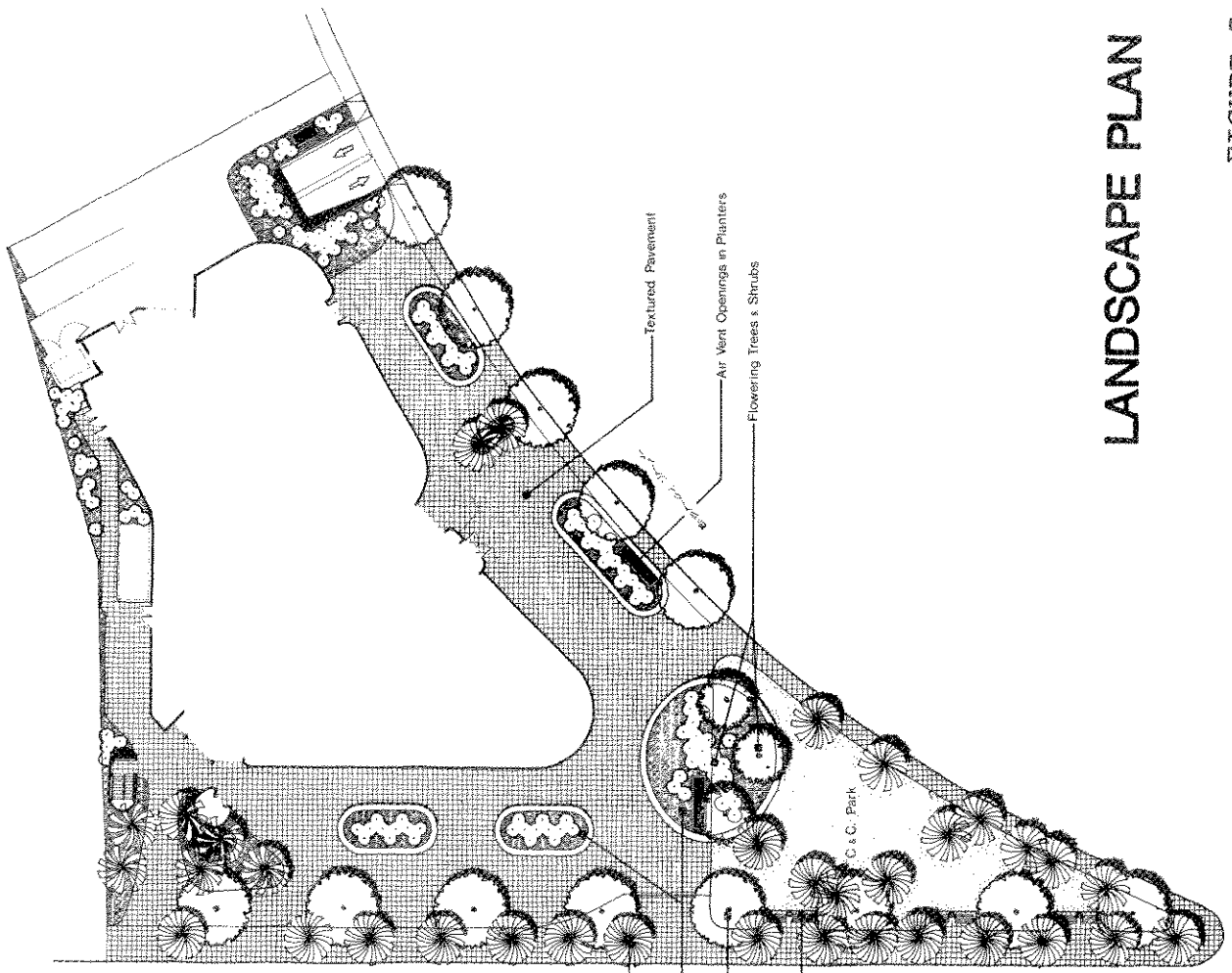


FIGURE 5



PERSPECTIVE OF SANPO WAIKIKI

FIGURE 6



Existing Coconut Palms

Raised Planters with Seat Wall

Medium-size Shade Trees

Benches & Trash Receptacles

Textured Pavement

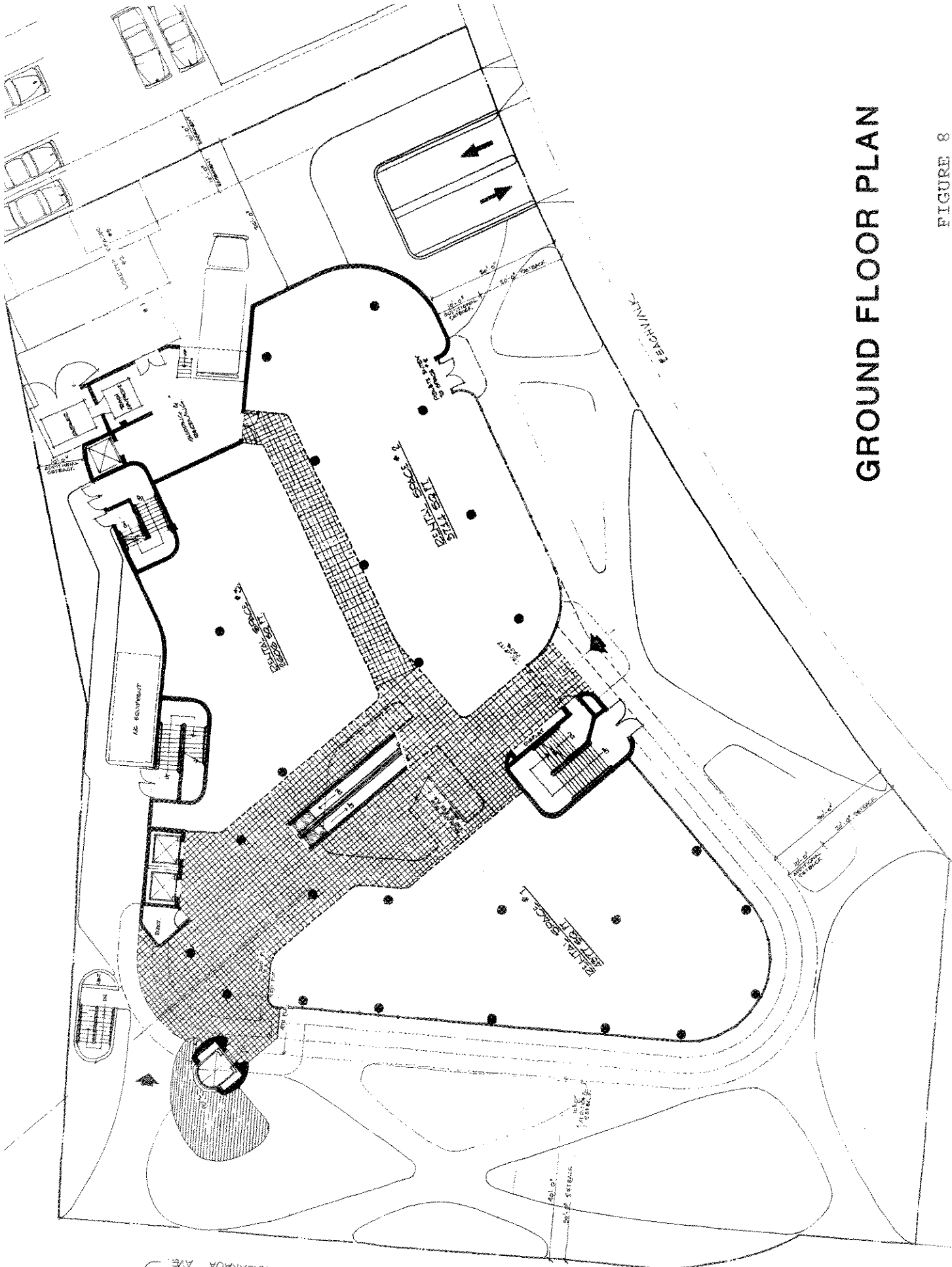
Air Vent Openings in Planters

Flowering Trees & Shrubs

C & C Park

LANDSCAPE PLAN

FIGURE 7

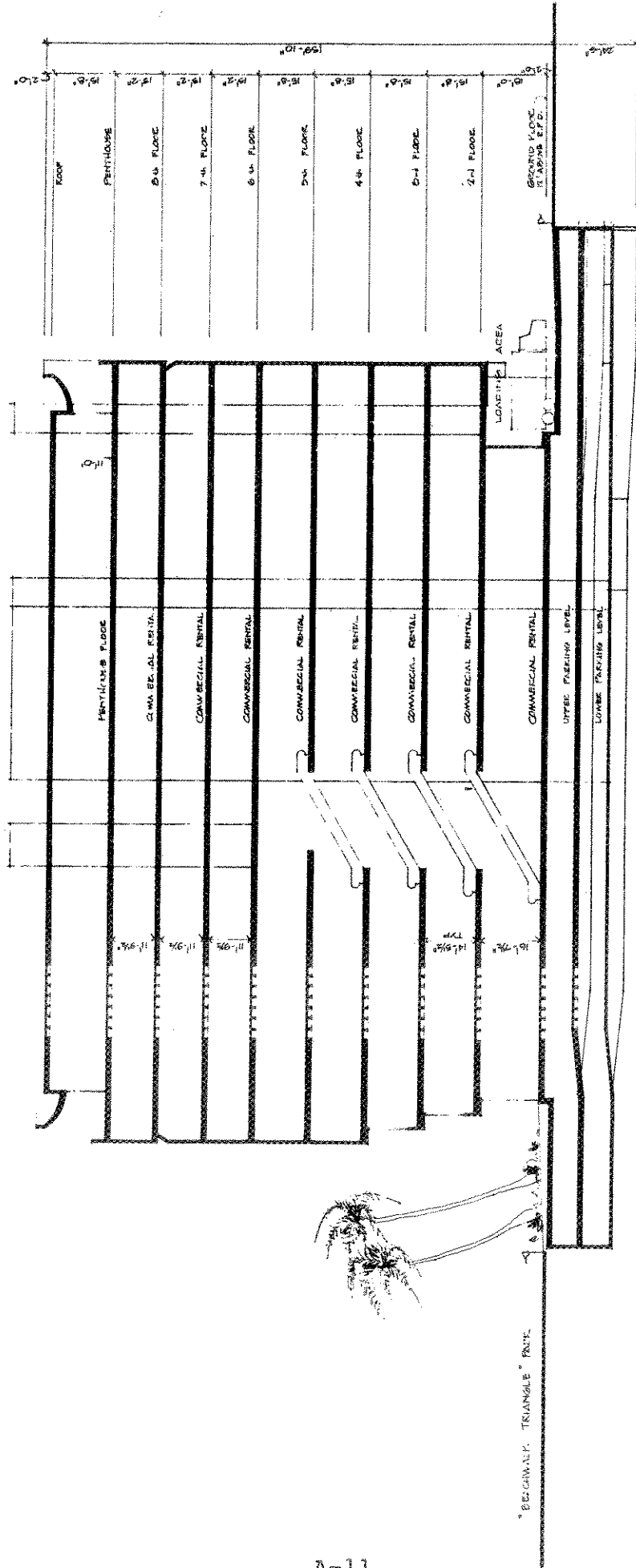


GROUND FLOOR PLAN

FIGURE 8

KALAKADA AVE

WANTU SLAB THROUGHOUT BUILDING



BUILDING CROSS SECTION

FIGURE 9