

**ALOHA TOWER PLAZA DEVELOPMENT PLAN**  
**Final Environmental Impact Statement**

Aloha Tower Development Corporation

**SUMMARY**

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FINAL  
ENVIRONMENTAL IMPACT STATEMENT

Aloha Tower Development Corporation  
Aloha Tower Plaza Development Plan  
Honolulu, Oahu, Hawaii



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Robert Holman  
Chief Executive Officer

Prepared  
by  
Group 70  
Honolulu, Hawaii

August 1983

FINAL  
ENVIRONMENTAL IMPACT STATEMENT  
AUGUST 1983

PROJECT: ALOHA TOWER PLAZA DEVELOPMENT PLAN

LOCATION: HONOLULU  
ISLAND OF OAHU  
STATE OF HAWAII

PROPOSING AGENCY: ALOHA TOWER DEVELOPMENT CORPORATION  
ALOHA TOWER, EIGHTH FLOOR  
HONOLULU, HAWAII 96813  
CONTACT: ROBERT HOLMAN  
TELEPHONE: (808) 548-5327

ACCEPTING AUTHORITY: GOVERNOR GEORGE ARIYOSHI  
STATE OF HAWAII

CONSULTANT: GROUP 70  
924 BETHEL STREET  
HONOLULU, HAWAII 96813  
CONTACT: MARILYNN METZ  
TELEPHONE: (808) 533-4445

## PREFACE

The Final Environmental Impact Statement (FEIS) for the Aloha Tower Plaza Development Plan was filed with the Environmental Quality Commission (EQC) on August 15, 1983. The complete bound version of this FEIS is available for review at the following public depositories:

Office of Environmental Quality Control (OEQC)  
Department of Planning and Economic Development (DPED) Library  
Legislative Reference Bureau  
State Archives  
U.H. Hamilton Library - Hawaiian Collection  
U.H./Environmental Center  
Municipal Reference and Records Center  
State Main Library  
Kaimuki Regional Library  
Kaneohe Regional Library  
Pearl City Regional Library  
Hilo Regional Library  
Wailuku Regional Library  
Lihue Regional Library  
Kalihi-Palama Branch Library  
Liliha Branch Library  
McCully-Moiliili Branch Library

The purpose of this Summary FEIS is to inform the reader of major changes and additions to the June 1983 draft EIS and to give interested agencies and individuals an opportunity to review the letters received during the 30-day public review period and the ATDC responses to these comments.

## SUMMARY

Although maritime activities are still an important use of the site, interest in the redevelopment of the Aloha Tower area has increased in recent years. Because the need to revitalize the area is evident, the State initiated investigations to determine the most feasible uses (in addition to maritime uses) and means of redeveloping the site.

Several studies were made to determine the optimum use of the Aloha Tower complex. The most recent, prior to this undertaking, was done by the American City Corporation (ACC) in 1981. The results of the ACC study were reviewed by the Legislature, and it was agreed that the basic utilization concepts for the site (including maintenance of maritime activities) would include an office building, a medium-sized executive-type hotel, retail and commercial areas, and a park area, with the attractiveness of Aloha Tower emphasized in the site plan.

Based on the information provided in the ACC study, the Legislature passed H.B. No. 1874, H.D. 2, S.D. 1, a measure to create the Aloha Tower Development Corporation (ATDC). The bill was signed into law as Act 236, Session Laws of Hawaii 1981, by Governor George R. Ariyoshi on June 23, 1981, and has been codified in the Hawaii Revised Statutes as Chapter 206J. Chapter 206J, HRS states in part that: "The purpose of this chapter is to establish a new public body corporate and politic and public instrumentality of the State for the purpose of undertaking the redevelopment of the Aloha Tower complex to strengthen the international economic base of the community in trade activities, to enhance the beautification of the waterfront, and in conjunction with the Department of Transportation to better serve modern maritime uses, and to provide for public access and use of the waterfront property. Properly developed, the Aloha Tower complex will further serve as a stimulant to the business community and help transform the waterfront into a 'people place'."

The Aloha Tower Development Corporation (ATDC) was attached to the State Department of Planning and Economic Development (DPED) for administration purposes.

The ATDC is charged with defining, protecting and maximizing the public interest during the redevelopment of the Aloha Tower site. Because the proposed redevelopment project is not slated for direct government funding for the physical improvements, the ATDC is also committed to the enhancement of the commercial feasibility and financial attractiveness of the proposed redevelopment in order to enlist the participation of private enterprise.

Because a readily developable site will allow the private investor-developer to concentrate on the design, market, and financial opportunities of the project, the ATDC will rezone the property from B2 to B4; identify specific development parcels; and, identify all governmental pre-conditions to development, prepare appropriate documentation, and undertake steps to obviate necessary hurdles to implementing the proposed project.

This Environmental Impact Statement (EIS), which is based on the urban design plan and implementation program that was adopted by the ATDC in May 1983, was prepared to satisfy one governmental pre-condition to development which is necessitated by the fact that the project will be located on State lands and will utilize, to some extent, State funds.

The Aloha Tower Plaza project will integrate cruise ship and inter-island vessel terminal facilities with hotel, office, retail and restaurant use. These proposed uses will define and reinforce a 1.6 acre open space (plaza) planned as the focus for the project. The continuation of an active working waterfront is expected to intensify the vitality of new development on the site.

The Aloha Tower will create a distinctive terminus for the Fort Street Mall, which will be extended into the project to connect downtown with the water's edge. Active ground level uses such as shops along the Fort Street Mall, and restaurants and cafes surrounding the plaza will encourage both day and nighttime use of the open space.

The parking level of the project will be below grade; approximately three to four feet below pier level. The flow of ground level activities from inside spaces to outside spaces will be an important element of the project. In addition, both the hotel and office buildings will present an elevation of terraces and lanais to the waterfront plaza; rooftop terraces, with recreational amenities, are to be carefully designed to be an attractive part of the complex. Landscaping and lighting will enhance the aesthetic qualities of the new development.

In order to provide public waterfront access, the hotel will provide generous public terraces above the maritime facilities along Piers 8 and 9 and the office will include a covered second-level walkway along its periphery. Irwin Memorial Park will be restored to open space. The vegetation in the park will be preserved and enhanced making it an attractive transition and forecourt between the hotel development and the busy Nimitz Highway.

The ATDC will demolish the pier sheds, the vehicular ramp leading to the podium level and the second level terminals. The site will be cleared and leveled to present pier grade and conveyed to the developer/lessee. The Pier 11 gallery, Hale Awa Ku Moku (the DOT Harbors Division office building), Irwin Memorial Park and the Aloha Tower will be maintained and protected during construction. In addition, the ATDC will provide construction fences, canopies and temporary ramps necessary for the continuation of cruise ship operations along Piers 10 and 11.

It should be emphasized that the project is conceptual; it has not yet been designed. The plan sets forth specific uses, a space program, design guidelines and building envelopes. The specific design of the private improvements will be the responsibility of the selected developer and his architect. The public improvements will be designed by firms selected by and under contract to the ATDC.

The construction of public and private improvements will be closely coordinated, both in terms of design and execution. Demolition and site preparation will be undertaken while private improvements are being designed. In addition, the ATDC has established a construction strategy that will permit continued maritime operations along Piers 10 and 11, and continued use of Aloha Tower, during construction.

Adverse environmental effects which have been identified include: construction noise, the relocation of some existing businesses, traffic, maritime activities during the construction period, and maritime activities during the operation of the project.

One tradeoff of Aloha Tower redevelopment involves the displacement of a few existing businesses in return for higher density commercial development. The proposed action is expected to enhance the long-term vitality of this presently under-utilized urban site by upgrading infrastructure necessary for redevelopment and by providing additional public improvements and amenities.

The construction and operation of the proposed project would involve the irretrievable commitment of certain natural and fiscal resources. Major resource commitments include land, money, construction materials, manpower and energy. The impacts of using these resources should, however, be weighed against the significant economic benefits to the residents of the State which will occur as a result of implementation of the project.

During the preparation of the development plan, a conscientious effort was made to identify and provide for the mitigation of adverse impacts that could result from the development of the proposed project. Two aspects of the proposed project, however, cannot be resolved at this time: the availability of water and the adequacy of the existing municipal sewage system to service the project.

STATE OF HAWAII

ENVIRONMENTAL QUALITY COMMISSION

550 HALEKAUWILA ST.  
ROOM 301  
HONOLULU, HAWAII 96813  
PHONE 548-6915

September 7, 1983

SUBJECT:      ADDENDUM TO THE ALOHA  
                  TOWER PLAZA DEVELOPMENT  
                  PLAN REVISED EIS

Attached for your information and files is an additional comment by the American Lung Association of Hawaii and a response by the Aloha Tower Development Corporation and Dames and Moore. Please attach these letters to your copy of the revised Aloha Tower EIS.

Thank you.





PVB  
CITY

# AMERICAN LUNG ASSOCIATION of Hawaii

HAWAII STATE  
245 N. Kukui St.  
Hono., Hawaii 96817  
Telephone 537-5988

HAWAII COUNTY  
Post Office Box 925  
Hilo, Hawaii 98720  
Telephone: 935-1206

KAUAI COUNTY  
3135 Akahi St.  
Lihue, Hawaii 96766  
Telephone 245-4142

MAUI COUNTY  
Cameron Center  
Wailuku, Hawaii 96793  
Telephone 244-5110

August 11, 1983

Mr. Robert W. Holman  
Aloha Tower Development Corporation  
Aloha Tower - Eighth Floor  
Honolulu, Hawaii 96813

Dear Mr. Holman:

Subject: Aloha Tower Plaza Development Plan EIS

Thank you for forwarding the response of your consultants Dames & Moore to our EIS review of July 8, 1983. I regret to inform you, however, that we find their response as inadequate as the original air quality impact analysis. In fact, as noted in both your letter and the Dames & Moore letter to Group 70, Inc. which was incorporated in the EIS, their work was not intended to be a thorough analysis but rather an "Air Quality Impact Opinion". I shall now address the specific responses provided by Dames & Moore.

1. Page A-8: The response did answer our question concerning the time period for the emissions estimates presented; however, since emission factors for motor vehicles are expressed as grams per vehicle mile travelled (g/mi), some explanation of what travel distance was assumed and the basis for that assumption should have been provided.

It also appears that the report and the subsequent letter incorrectly identified nitrogen oxides emissions as sulfur oxides.

2. Use of Outdated References: The response was inadequate. As shown in the attached Figure 1, emissions based on current emission factors and Oahu's vehicle registration data are significantly higher than those based on the outdated publications.
3. Lack of Ambient Impact Analysis: The response was inadequate. The fact remains that no attempt was made to determine existing or future ambient pollutant concentrations at the project site. An emissions analysis alone is of some interest but is of limited value. It must be accompanied by an ambient impact analysis since it is the ambient pollutant concentrations to which the public is exposed and on which decisions about acceptability and standards violations are based.

The fact that the emissions analysis showed an apparent decline in emissions over the time period studied is significant but only one part of a complete study. As shown in Figure 1, the presence of the project actually causes an increase in emissions over what would have occurred without the project. In other words, the theoretical improvement in air quality due to federal emission controls on new vehicles is set back by about 1 - 2 years because of the project.

Christmas Seals Fight TB, Asthma, Emphysema, Air Pollution

Mr. Robert W. Holman  
August 11, 1983

This is not unusual, but rather typical of traffic-generating projects. Unless they are extremely large, they do not completely offset the effects of the federal program but rather delay it. In the long run, it is the cumulative effect of many projects which may completely offset the emission reduction program. This is why it is extremely important for EIS's to accurately as possible identify the impact of each project. Reviewing agencies keeping track of the many relatively small projects can then begin to foresee the long term cumulative impact and at the appropriate time implement preventive measures.

Since there was no ambient air quality analysis included in the EIS, there appears to be little or no basis for the following assertion made in the Dames & Moore letter of 29 July 1983:

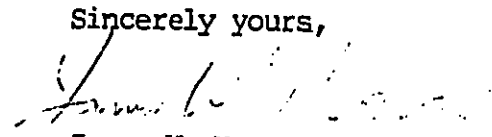
"The project should continue to enjoy high ambient air quality under normal tradewind conditions; and because of its leeward location, also should enjoy excellent ambient air quality under 'Kona' or on-shore wind conditions."

From our own measurements of carbon monoxide in the vicinity of heavily traveled streets in Honolulu, we have found 1-hour concentrations exceeding the State's standard at times when northeast tradewinds were blowing at 8 - 18 mph. Under stagnant Kona conditions, even higher concentrations can occur.

For this particular project, we did a screening analysis using the 1986 traffic projection (with project) and EPA's point, area, and line source model, PAL. Under low wind speed, stable air conditions, the 1-hour carbon monoxide concentration at 10 meters from the roadway was 25 mg/m<sup>3</sup>. This is substantially higher than the State standard of 10 mg/m<sup>3</sup>. Since the value was also based on a free-flow condition at 19.6 mph along Nimitz Highway fronting the project and did not account for acceleration/deceleration movements as well as queuing due to traffic signals, it is probably underestimated.

The proverbial bottom line in these comments is that the EIS was deficient in that it by no means provided full-disclosure of current or projected ambient air quality both with and without the project. As such it is of little use to the decision-maker in determining cumulative impact and ultimate air quality.

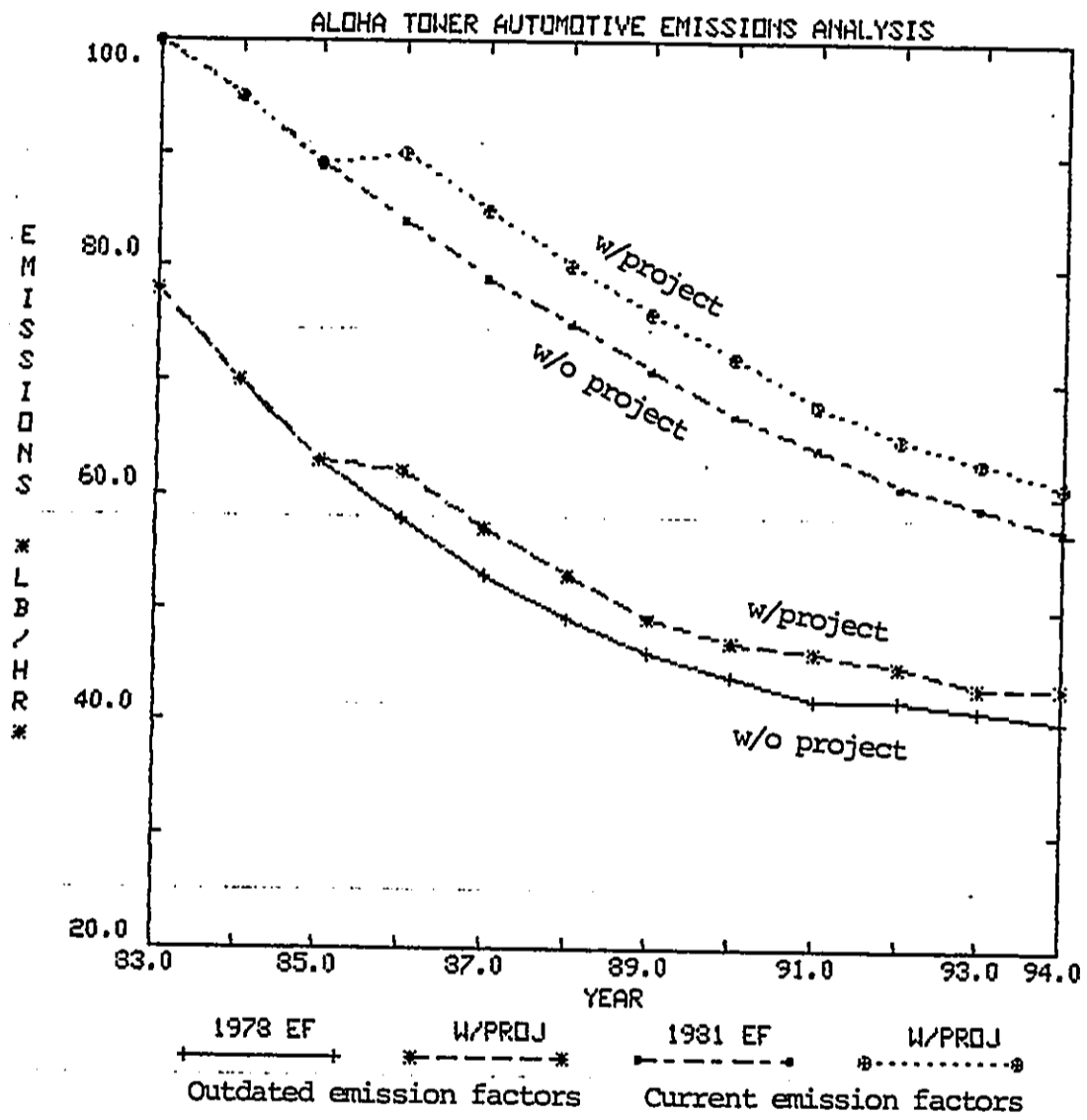
Sincerely yours,

  
James W. Morrow  
Director  
Environmental Health

JWM:ma

cc: OEQC, EQC  
Dames & Moore  
Group 70

FIGURE 1





# ALOHA TOWER DEVELOPMENT CORPORATION

Mr. Kent M. Keith, Chairman

Mayor Eileen Anderson Dr. Ryokichi Higashionna Mr. Susumu Ono Mr. Donald Kuyper Mr. Aaron Levine Mr. Thomas Trask  
Mr. Robert Holman, Executive Officer

August 26, 1983

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

RECEIVED  
AUG 29 1983

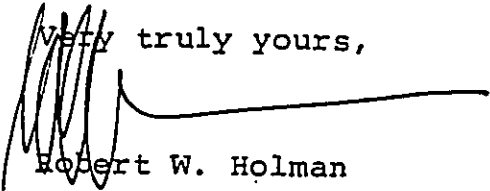
GROUP 70

Dear Mr. Morrow:

Subject: Aloha Tower Plaza Development Plan EIS

Your air quality concerns have been discussed with our consultants and they agreed to respond to your comments of August 11, 1983 in greater detail. Their letter to me on this subject is enclosed. Their explanations are the result of professional education, experience and evaluation, and, like your letters, represent informed opinions as to the significance of the air quality issue in respect of the Aloha Tower project. Please feel free to contact Group 70 or Dames & Moore directly for further professional comment.

Very truly yours,

  
Robert W. Holman

RWH:nrl  
Enclosure  
cc: Group 70  
Dames & Moore  
OEQC/EQC - with enclosure

# Dames & Moore



1144 10th Avenue, Suite 200  
Honolulu, Hawaii 96816  
(808) 735-3585  
Telex: 634100 Cable address: DAMEMORE

August 22, 1983

Aloha Tower Development Corporation  
Aloha Tower - Eighth Floor  
Honolulu, Hawaii 96813

Attention: Mr. Robert W. Holman

Gentlemen:

Response to Lung Association Comments  
Air Quality Impact Opinion  
Proposed Aloha Tower Plaza Development Plan  
Honolulu, Oahu, Hawaii

We have reviewed the American Lung Association of Hawaii letter of August 11, 1983 providing comments to our clarification of July 29, 1983. Based upon discussions with Group 70 Inc., we are providing this response directly to you. We would suggest the following points be included in your response to the American Lung Association.

## General Comments

The U.S. Council on Environmental Quality regulations regarding the content of Environmental Impact Statements, and those promulgated by the Hawaii Office of Environmental Quality Control direct that the EIS process examine "significant issues" relevant to proposed projects, and disclose adverse or beneficial consequences of the proposed action. This focused, rather than encyclopedic, approach has evolved to make the EIS process more relevant to decisionmakers. It is with this guidance, we approached the examination of potential air quality impacts of the proposed Aloha Tower Plaza Development Plan. Specifically, we examined potential changes in air emissions caused by the project and those planned to occur concomitant with the project during the 1983-1986 period. We identified emissions from the Hawaiian Electric Company generating station, those from ship traffic, and those from vehicles as being the more significant sources.

The planned emissions from the HECO facilities show a thirty-five percent reduction, due to the closure of one of the generating units. Ship traffic was anticipated to remain stable. The remaining vehicle emissions thus received the focus of our attention. In examining these emissions we made several assumptions. These assumptions included the use of standard U.S. emission rate information for a standard vehicle (automobile and truck)



Aloha Tower Development Corporation

August 22, 1983

Page 2

population, traveling at a constant speed, and over the distance identified in the provided traffic study as being the most affected area. (The "worst case" increase in traffic with the project.) We also assumed that the Federal vehicle air emission control program would continue to be implemented, and that this implementation will result in a decrease in emissions per vehicle through 1986. Given the small increase in traffic identified with the project, and the great reduction in emissions caused by the planned shutdown of a HECO generating unit, these assumptions appear warranted to examine an issue of this small magnitude.

The methodology used has been explained briefly in our May 18, 1983 letter, and subsequent clarification of July 29. The results of our analysis were that total vehicular emissions would be less in 1986 than they are in 1983. Given the cautions against using generalized air quality computer algorithms in areas where buildings and other structures form wind channels and distort the assumptions and algorithm validity, we believe the prudent approach to an issue of this small magnitude is to let the reductions in emissions stand on their own merit and not conduct a modeling scenario to confirm the anticipated results.

Specific Responses to American Lung Association Questions

1. The emission estimates presented in our air quality impact opinion are presented in grams per mile at 19.6 miles per hour for a 0.16 mile travel distance. This distance was selected as the "worst case" based upon a provided traffic study. The area includes the Nimitz highway - Bishop Street intersection.

2. In our opinion, the graphic information provided with our July 29 letter indicates that the differences in the 1978 and 1981 emissions estimates are insignificant. These values are emissions estimates for the United States vehicle population, in general. We have not subjected these emission rates to an inventory of Oahu's vehicle registrations.

3. We are pleased that the American Lung Association of Hawaii Point, Area, Line (PAL) emission algorithm indicates that vehicular emissions decrease during the life of the project. This provides additional confirmation of the opinion expressed on page A-8 of our letter of May 18, 1983.

4. The other comments and analysis provided by the American Lung Association are important input into the development impact review process, and as such provide a context in which decisionmakers review these types of projects. The assumptions and refinements to environmental issues can always receive additional input from many viewpoints. However, limited public and private resources are best expended in examining significant adverse impacts that can be mitigated through the development of mitigative measures, rather than through more detailed examination of issues that have been examined and identified as "non-problems".

## Dames & Moore



Aloha Tower Development Corporation  
August 22, 1983  
Page 3

If we may be of additional assistance in clarifying the basis of our opinion,  
please contact us.

Sincerely,

DAMES & MOORE

Donald F. Graf  
Senior Environmental Scientist

DFG:rcp(0145A/2136A)

ERRATA

The June 1983 draft Environmental Impact Statement (FEIS) for the Aloha Tower Plaza Development Plan was revised to reflect the concerns of various agencies, organizations and individuals who reviewed the document. The following substantive changes in the text were incorporated into the Final EIS:

(Note: Material in parentheses () has been deleted, underlined material has been added.)

- Page V, para. 2:            This Environmental Impact Statement, EIS, which is based on the urban design plan and implementation program that was adopted by the ATDC in May 1983, was prepared to satisfy one governmental pre-condition to development. . . This change was also made on page 3, D., paragraph 4.
- Page 3, E.:                Maritime operations will continue at Piers 10 and 11 during the construction period,...
- Page 5, para. 3:           This and all subsequent references to the "Matson Building" have been changed to either Hale Awa Ku Moku or DOT Harbors Office Building.
- Page 10, D.:               Through an inter-agency lease, DOT Harbors will transfer 10.2 acres of this area to the ATDC. As required by Chapter 206J, HRS, the ATDC will provide (in return for) replacement maritime facilities. . .
- Page 11, Figure 4:        Note: Trees on Nimitz Hwy Are Not Part of the Adopted Urban Design Plan has been added to the graphic. This statement also appears on Figures 7, 14 and 15.
- Page 13, para. 3:         The developer will be required to provide a continuous terrace along the length of Piers 8 and 9 at the main floor elevation of the hotel and above the inter-island and (back-up) Pier 9



terminals, in order to (provide) insure pedestrian access along the (pier aprons) periphery of the project without conflicting with maritime operations.

Page 13, para. 3:

The developer will be encouraged to provide a wide range of restaurant types to serve all segments of the population. ((This does not include fast-food chains which should be discouraged from locating in the project.)) This range could include a first-class dinner restaurant, cafes, a specialty restaurant, a coffee shop, and a take-out delicatessen which would encourage picnicking on the plaza and mall.

Page 21, para. 2:

The Aloha Tower Plaza development will continue to function as a working waterfront, presently serving (approximately 65) up to 120 cruise ship calls per year.

Page 21, para. 3:

The Aloha Tower enabling legislation (Chapter 206J HRS) requires that the Development Plan incorporate the needs of the Department of Transportation.

Page 21, para. 5:

Because of its prominent location along Nimitz Highway, and close proximity to the proposed project, improvements to this building have been (recommended) suggested to DOT Harbors. (These improvements are illustrated in Figure 13.)

Page 24, Figure 13:

Figure number is changed to 14 in FEIS. DOT Harbors Office Building: Street Elevation Treatment deleted. The revised graphic is included in this Summary.

Page 25, 2.4:

(Pier 9: Backup Terminal) Second Cruise Ship Terminal: Pier 9.

Page 26, Figure 14:

Figure number changed to Figure 13 in FEIS.

Page 27, para. 1:

A continuous rail along the perimeter of the terminal will provide separation from the pier apron. ((Figure 11)) (This facility was originally referred

to as a "back-up" terminal; Figures 8, 10, 11 and 12 reflect this earlier designation.)

Page 27, para. 4:

The following has been deleted: (Other uses for this terminal could include passenger operations for a third cruise ship and charter boat activities.)

Page 28, para. 6:

The northern edge of the park will be modified in order to accommodate the Fort Street Mall extension, (and) the proposed roadway realignment(.) and taxi staging area .

Page 30, Figure 15:

This figure has been revised to reflect new maritime circulation at the Pier 11 apron. The revised figure is included in this Summary FEIS.

Page 31, paragraph 3:

Because the problem of trucks affecting two lanes of Nimitz Highway has been resolved, this paragraph has been revised to read as follows:

"Truck access to and egress from the pier aprons will be gained by a right turn in and out at Pier 11 and Nimitz Highway. Service vehicles destined for the maritime operations area along Piers 10 and 11 will enter at Pier 11 and proceed through a control gate. Sufficient turning radii will permit service vehicles to return from the Pier 10 and 11 area, and from the corner of Piers 8 and 9. Continuous maritime service access will be available along Piers 9, 10 and 11, with Pier 8 reserved for inter-island operations. Emergency access will be permitted along all four piers."

Page 32, b. Off-Site Roadway Improvements:

Items 2 and 3 have been deleted.

Page 34, Figure 16:

This figure has been revised to show Hawaiian Electric fuel lines. The revised figure is included in this Summary FEIS.

Page 53, Figure 24:

Same changes as Figure 16.

Page 58, bottom:

Existing levels of service are shown in Table 2. Levels of service for additional intersections in the area ( Aloha / Nimitz ; Halekauwila / Nimitz ; and Nimitz/Richards ) are presented in Appendix D.

Page 61, C. Para. 1, last sentence:

The additional traffic generated lowers the level of service at these intersections. Mitigative alternatives, which could improve levels of service, are suggested in Appendix D for future consideration

Page 64, d.:

Traffic generated by the proposed project could affect conditions on other streets and at other intersections. (Although the traffic impact study did not include forecasts or intersection analyses beyond the immediate vicinity of the project, generalized impacts were addressed.) The Nimitz Highway intersections with Alakea, Richards, and Halekauwila Streets were also studied and are discussed in Appendix D.

Traffic impacts farther from the project were addressed in general terms. The reader is referred. . .

Page 65, 3.2 a.:

The project site currently has (674) approximately 463 stalls.

<u>Facilities</u>	<u>Number of Stalls</u>
1. State DOT employees	(194) <u>187</u>
2. Irwin Memorial Park, public	(114) <u>115</u>
3. Aloha Tower loading	46
4. Seaflite, open to public	(320) <u>115</u>

Page 66, para. 2:

State DOT employee parking will be moved to the Pier 5/6 area, a short distance from the Aloha Tower. (It is, therefore, expected that impacts on these users will be minimal if at

all.) This may be inconvenient for DOT employees who will have to walk farther to get to their offices.

Page 67, para 4:

Under this regulation, the Department of Health may grant permits to use or operate vehicles, construction equipment, power tools, etc. which emit noise levels in excess of the allowable limits. The conditional use of the permit must be complied with, as

specified in the regulations and conditions issued with the permit.

Page 67, para 4:

Add to end of paragraph: In addition, construction equipment and on-site vehicles or devices requiring an exhaust of gas or air must have mufflers.

Page 71, para. 3:

Outdoor noise levels experienced by HECO employees at (Hawaiian Electric) the Honolulu Power Plant . . . .

Page 74, para. 4:

As shown in the analysis of construction sounds, its distance from the project, combined with the presence of the Hawaiian Electric Honolulu Power Plant building, will attenuate sounds from the project and impacts will normally be insignificant.

Page 79, b.:

The total average daily water demand for the new development is estimated to be (279,000) 441,000 gallons per day.

Page 80, para. 1:

The estimated average daily water demand for the total development would then be (333, 920) 495,920 gallons per day.

Page 80, para. 2:

The maximum daily water demand of (500,880) 743,880 gallons . . . . The peak hourly flow will be . . . . approximately (1) 1.5 million gallons.

Page 80, para. 3:

Average daily water demand will experience on approximately (6) 8-fold increase.

- Page 80, para. 4: Construction plans will (also) be submitted to the BWS for review and approval (.), although no action can be taken until the project is approved by the City's Department of Land Utilization.
- Page 82, para. 1: The groundwater infiltration is (1,250) 2,750 gallons per acre per day for sewers above the groundwater table. The groundwater infiltration to be added to maximum daily flow to obtain peak sewage flow is (1,250) 35,750 gallons per day. Peak flow is thus estimated to be (939,250) 973,750 gallons per day.
- Page 83, 7.4 a.: Electricity for the site is (provided) served by (a 3-wire 11.5 KV system) by a three-wire, 4.16 KV system from Hawaiian Electric Company's (HECO) Halekauwila Substation.
- Page 83, 7.4 b.: The following sentence was added: HECO underground lines may also require relocation at ATDC or developer expense.
- Page 86, 8.3 a.: The Waterfront Fire Station is 1-1/2 to 2 minutes away from the project area. This station, however, houses only a fireboat that primarily provides fire protection for the Honolulu Harbor and wharf areas. Nearby stations that would (provide back-up service) serve the project are indicated in Figure 30.
- Page 86, 8.3 b.: The following sentence was added. In their review of the draft EIS, the fire department determined that adequate fire protection was available.
- Page 102, para. 2: Pier 8 is now primarily a parking shelter holding (185) 115 cars.
- Page 104, 11.4 a., para. 1: Almost all current DOT lessees on Piers 8 to 11 have leases which require 30-days notice by either party prior to termination.
- Page 104, 11.4 a., para. 2: It is estimated that 75 percent of the current DOT lessees will be in this category. These lessees are aware that

relocation is imminent. No subsidies will be offered to current lessees as the rent will be used to retire bonds. There is a sufficient supply of office space available in adjacent areas to minimize relocation impacts of those who choose to move off-site.

- Page 106, para. 3: Delete the following: (Party boats are also expected to be able to continue their operations at the Piers when space is not being used by cruise ships or inter-island vessels.)
- Page 106, para. 5: The average tonnage of cargo for this area was (over) 40,000 short tons per year in the (1st three) last few years; less than one percent of the 7.5 million short tons that passes through the Harbor each year.
- Page 107, para. 4: Efforts will be made to minimize this interruption of (regular) normal cruise ship operations, . . . .
- Page 108, para. 5: This terminal could be used for inter-island ferries, linking downtown Honolulu with other islands, (charter and dinner cruise lines,) or, if necessary, a third cruise ship.
- Page 115, b.: The financial plan for the ACC proposal is similar to the current plan with (three) two exceptions:
- Page 115, b: Delete: (o DOT reimbursement is as assumed in the ACC financial plan, since ACC called for 100% reimbursement of DOT cost beginning in year five, and partial reimbursement prior to full development.)
- Page 121, 2.0: The present plan was (approved) adopted after extensive negotiations between ATDC and DOT Harbors Division.
- Page 125, C., para. 1: The following is a listing of those objectives and policies of Chapter 205A-2 which are relevant to the proposed project(:) and are met by the proposed development plan:

Page 125, C., paras. 6 & 7: Deleted.

Page 132 & 133, PART VI: The revised section is incorporated into this Summary FEIS. Changes were made in items 2, 3 and 5.

Page 134, PART VII: The revised section is incorporated in this Summary FEIS. Changes were made in paragraphs 3, 4 and 5; paragraph 6 was deleted.

Page 138, para. 1: During the preparation of the (design prospectus for the project) development plan, . . . . . (However, it should be noted that) There are two aspects of the proposed project, however, which cannot be resolved at this time: . . . . .

Page 138, 1.0: After review of the plan, approval of new water hook-ups may or may not be (granted) recommended to DLU.

Appendix D: A revised "Traffic Impact Study" is incorporated into this summary FEIS.

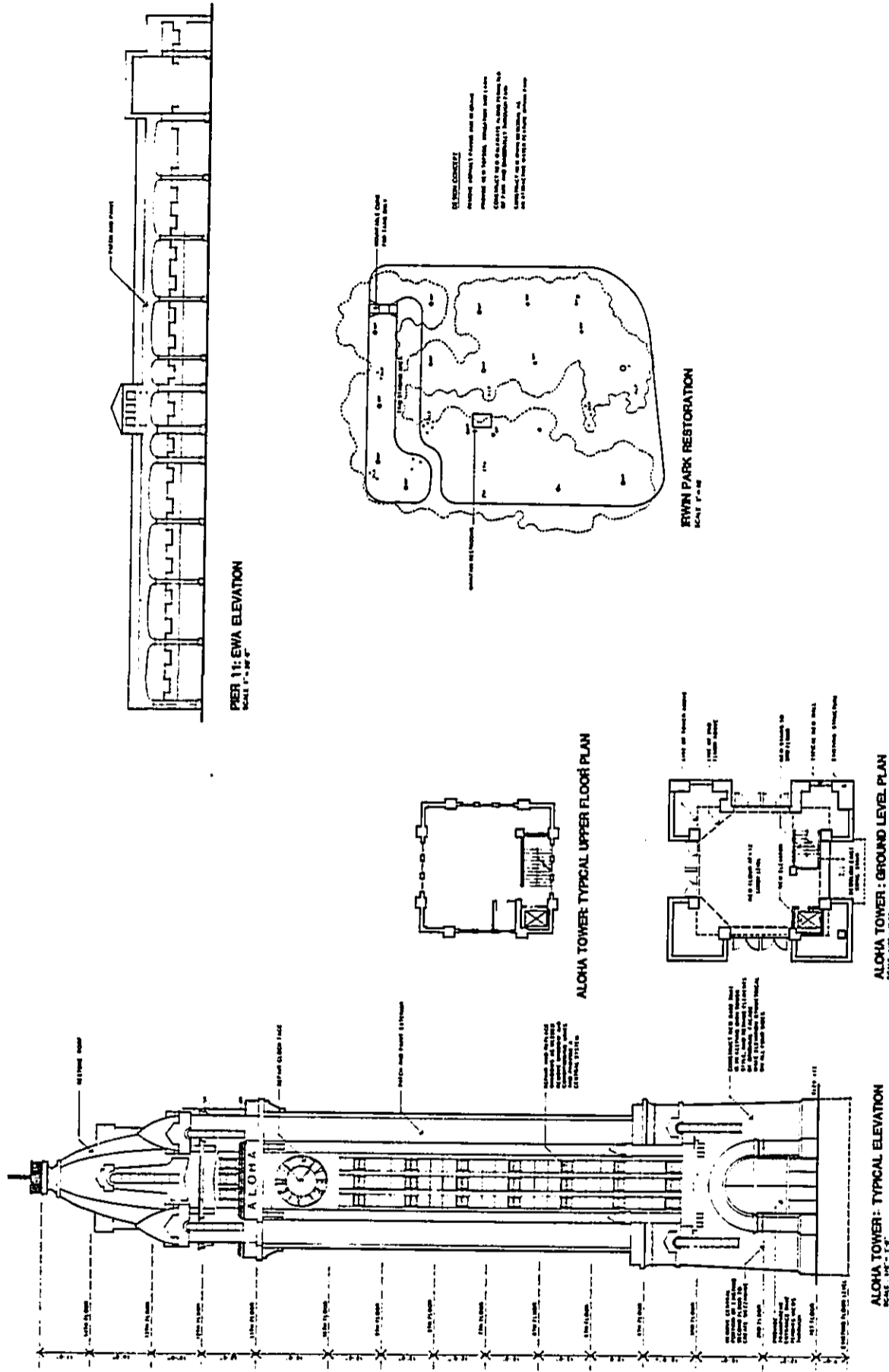


Figure 14 - Rehabilitation Strategy  
**ALOHA TOWER**

URBAN DESIGN PLAN AND  
 IMPLEMENTATION PROGRAM

Prepared for Aloha Tower Development Corporation, State of Hawaii by KIMBA Urban Design in association with Williams Architects & Associates, Engineers & Donald Wolford, Planning and Zoning



1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100

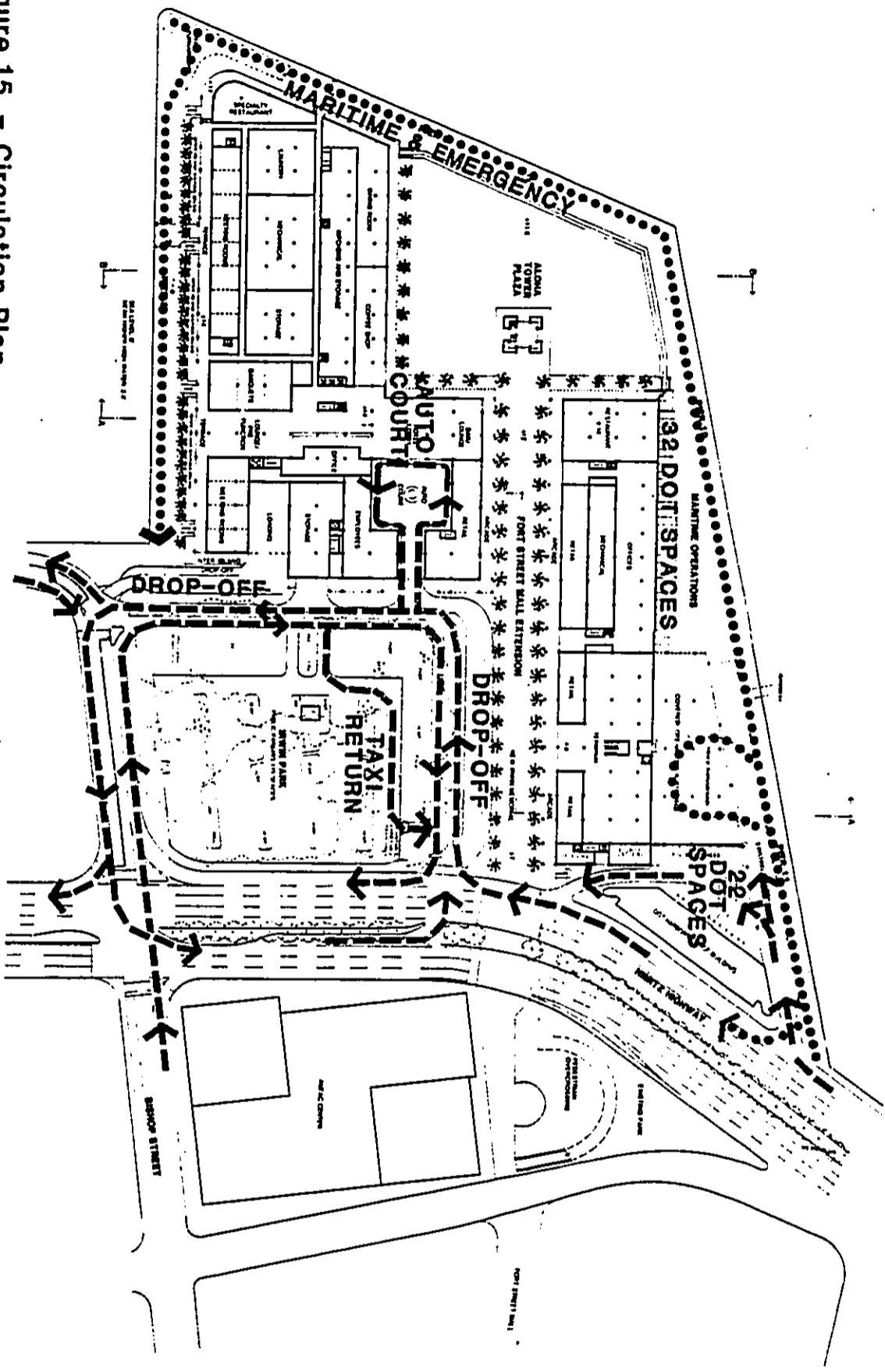
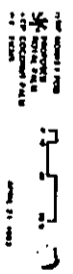


Figure 15 - Circulation Plan  
**ALOHA TOWER** URBAN DESIGN PLAN AND IMPLEMENTATION PROGRAM  
Prepared for Aloha Tower Development Corporation, City of Honolulu by RHM/Urban Design in cooperation with William Barthel & Associates, Inc., a Division of Skidmore, Peck, Kawneer & Merrill Lynch, Planning and Design  
**NOTE: TREES ON NIMITZ HWY ARE NOT PART OF THE ADOPTED URBAN DESIGN PLAN.**



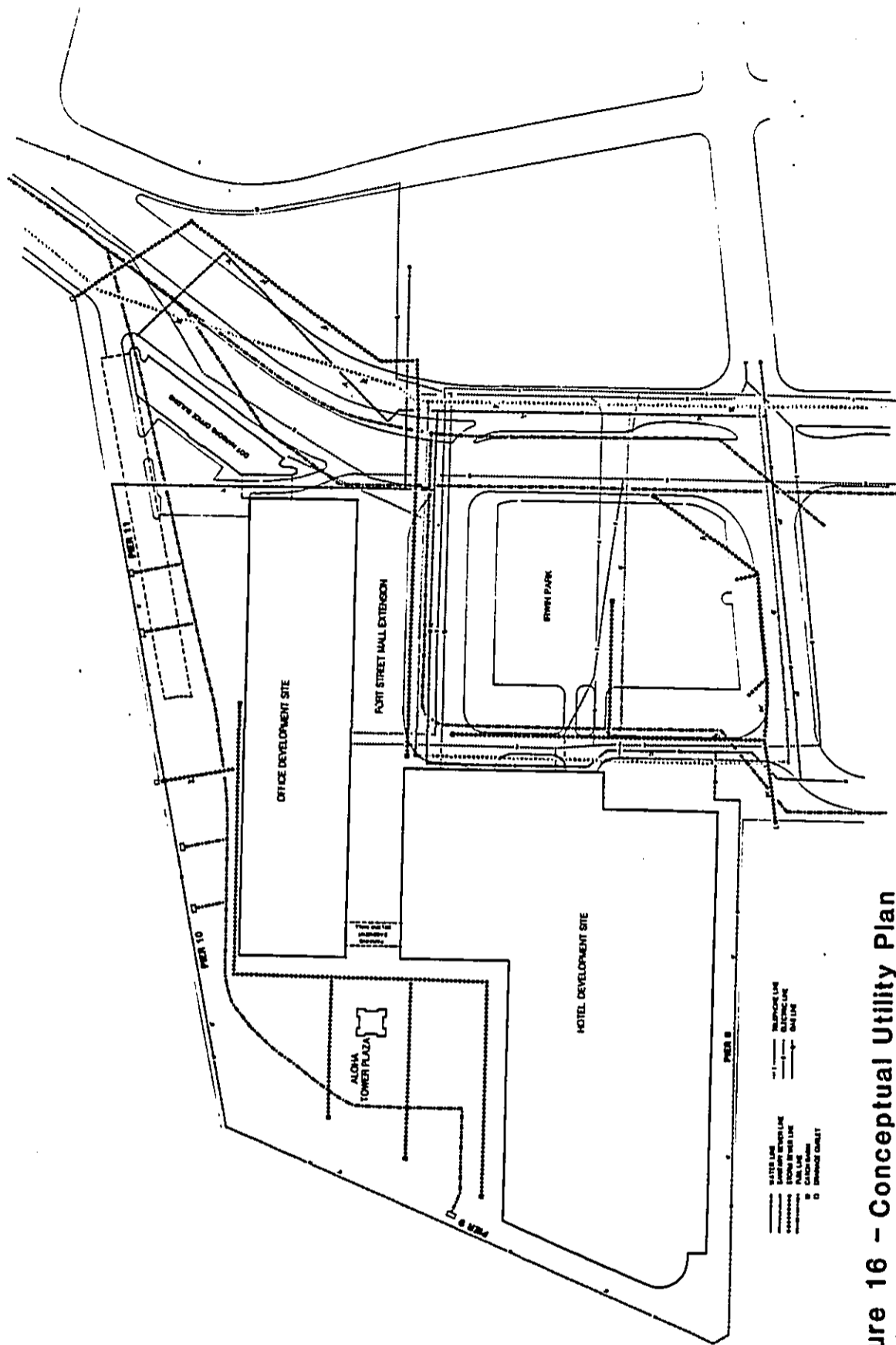


Figure 16 - Conceptual Utility Plan  
**ALOHA TOWER**  
 Prepared for Aloha Tower Development Corporation, State of Hawaii by ROMA Urban Design in association with William Kuehnel & Associates, Engineers & Donald W. Wilson, Planning and Zoning  
 URBAN DESIGN PLAN AND IMPLEMENTATION PROGRAM

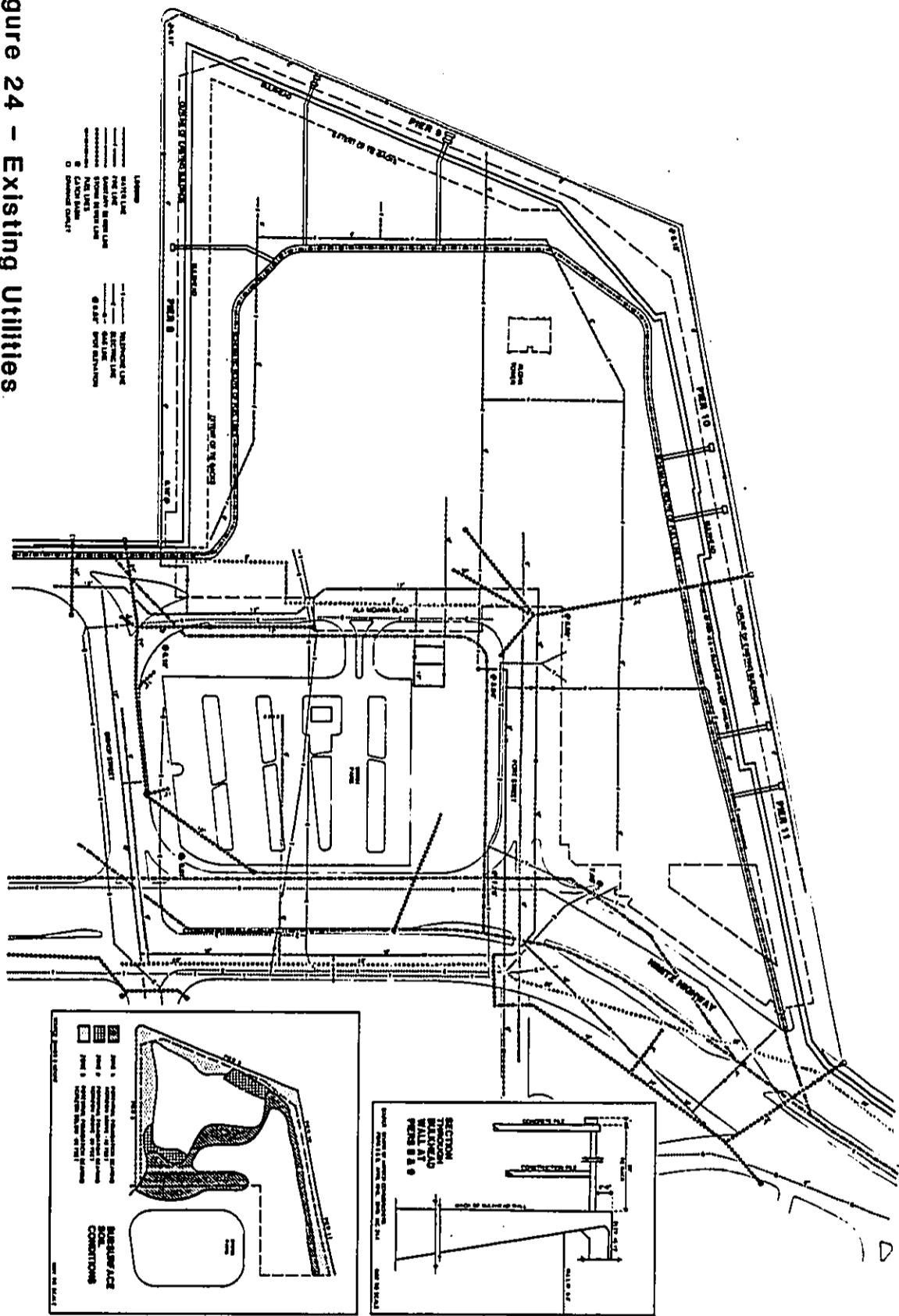
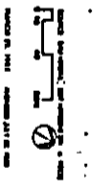


Figure 24 - Existing Utilities.

# ALOHA TOWER

## URBAN DESIGN PLAN AND IMPLEMENTATION PROGRAM

Prepared for Aloha Tower Development Corporation, State of Hawaii by ROMA Urban Design in association with Williams, Kunkin & Associates, Planners & David W. Mitchell, Planning and Zoning



PART VI: ANY PROBABLE ADVERSE ENVIRONMENTAL EFFECTS  
WHICH CANNOT BE AVOIDED  
AND MITIGATION MEASURES PROPOSED  
TO MINIMIZE IMPACT

There are several areas in which adverse environmental effects, both short-term and long-term, may occur. These include: (1) construction noise; (2) the impact of relocation; (3) traffic; (4) maritime activities during the construction period; (5) maritime activities during the operation of the project; and, (6) long-term parking. Each of these foreseeable adverse impacts are discussed below; proposed mitigation measures are also discussed under the same topic.

- (1) Construction Noise: Adverse noise impact on the surrounding areas will occur during the construction period. This will probably be evident primarily during site clearing, demolition, and pile driving activities. Several enforceable regulations and standards require the reduction of construction related noise and these include: the Comprehensive Zoning Code, OSHA standards (for occupational safety), and Public Health Regulations, 44-A and 44-B.
  
- (2) Impact of Relocation: All leases within the Pier 8 to Pier 11 structures will be terminated prior to the construction period. Non-maritime related businesses and certain maritime lessees must either negotiate with the developer for space in the new complex (at market determined rates) or move to other locations.  
  
The lessees involved are currently on 30-day revocable leases and are aware that relocation is imminent. There is a sufficient supply of office space available in adjacent areas to minimize relocation impacts.
  
- (3) Traffic: An adverse traffic impact that could result from implementing the proposed project is regional in nature and based on the assumption that all makai-bound traffic generated by the Aloha Tower project would use Bishop Street (Nuuanu Avenue, however, also serves makai-bound traffic through downtown Honolulu). In addition, the proposed circulation plan requires that traffic first use Nimitz Highway, then turn onto Smith, Bethel, or Alakea Streets when going mauka. Because traffic is expected to increase even without the project, increased capacities on these mauka-makai streets may be necessary to maintain existing levels of service through downtown Honolulu.
  
- (4) Maritime Activities During the Construction Period: During the construction phase, cargo operations will be displaced, and passenger handling operations (including customs and baggage handling) will be relocated to the Pier 11 Gallery. A temporary passenger terminal will be constructed on the

Pier 11 gallery, during demolition and construction. Construction fences will channel passengers to the existing loop road around Irwin Park, which will be maintained for vehicle drop-off and construction access.

To mitigate this interruption of normal cruise ship operations, the main terminal at Piers 10 and 11 will be scheduled for early completion. The estimated time for completion of this terminal is 21 months. On two cruise ship days during construction, the second ship will be accommodated at Pier 2, or elsewhere in Honolulu Harbor.

Existing offices in the Gallery will be vacated in order to make room for passenger handling activities. Pier side activities will continue in the same manner as they are currently being conducted.

- (5) Maritime Activities During the Operation of the Project:  
The only adverse impact to maritime activities after completion of the project is a slight loss in flexibility in handling cargo in Honolulu Harbor during peak periods, however, Pier 9's present cargo activities could be handled on other piers with minimal impacts.
- (6) Long-term Parking: 230 existing spaces, which are located at SeaFlite's Pier 8 terminal and in Irwin Park and are used primarily by downtown employees and visitors, will be lost if the proposed plan is implemented. Loss of this parking, which is primarily in long-term use, is not considered crucial since a surplus of long-term downtown parking has been projected.

Removing parking from Irwin Park will negatively impact those who use the metered stalls when they are stopping in the area for a short time on business or to visit Aloha Tower. These people will have to find alternative parking downtown or utilize the private subsurface parking garage for an hourly fee.

PART VII: RELATIONSHIP BETWEEN LOCAL SHORT-TERM USES  
OF MAN'S ENVIRONMENT  
AND THE MAINTENANCE AND ENHANCEMENT OF  
LONG-TERM PRODUCTIVITY

Inherent in any intensification of land use is the trade-off between long-term gains at the expense of short-term losses and vice-versa. The construction of this project is no exception.

The major tradeoff of Aloha Tower redevelopment involves the displacement of a few existing businesses in return for higher density commercial development. The proposed action is expected to enhance the long-term vitality of this presently under-utilized urban site by upgrading infrastructure necessary for redevelopment and by providing additional public improvements and amenities.

The development will result in a long-term (65 years) commitment of land for the uses described in the plan. Once in a higher density use, it is unlikely that the land will be reverted to a lower usage in the distant future. The project site is zoned for commercial use, however, and the proposed action will only further commit the site to its designated use.

The project will, in the long-term, result in the increased availability of hotel rooms in the CBD; greater public access to harbor; additional open space for the CBD; and additional office and commercial space for private businesses. The revenues generated by the property will increase and result in a higher revenues for the State.

It is anticipated that the construction of the proposed building will commit the necessary construction materials and human resources (in the form of planning, designing, engineering, construction labor, landscaping, and personnel for the sales, management, services, offices, and maintenance functions). Some of the construction material could be reused if and when the complex is demolished; however, the human resources expended for this project will not be retrievable. The primary human resource, labor, will be compensated during the various stages of the project by the ATDC, the developer, and on-site businesses.

APPENDIX D  
TRAFFIC IMPACT STUDY

BY

PARSONS BRINCKERHOFF QUADE & DOUGLAS, INC.

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TRAFFIC IMPACT STUDY

ALOHA TOWER PLAZA  
HONOLULU, HAWAII

ALOHA TOWER  
DEVELOPMENT CORPORATION

PREPARED FOR:  
ROMA ARCHITECTS

AUGUST 1983

SUBMITTED BY:  
PARSONS BRINCKERHOFF  
QUADE & DOUGLAS, INC.

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## TRAFFIC IMPACT REPORT

### ALOHA TOWER PLAZA

#### INTRODUCTION

The Aloha Tower Development Corporation (ATDC) proposes to redevelop a portion of the waterfront area in downtown Honolulu. A conceptual plan for the area, which includes the Aloha Tower landmark, Irwin Park, and Piers 8 through 11 of Honolulu Harbor, has been developed. Details of the parts of the project, however, will be determined by a private developer, yet to be selected by ATDC.

The development will be controlled by ATDC and guided by the conceptual plan. The plan calls for retaining the Aloha Tower and demolishing the existing pier sheds, second level passenger terminals, and the access ramp. New construction would include a 400- to 500-room hotel and between 100,000 and 150,000 square feet in commercial (retail) and office use. Minimum requirements include 15,000 square feet in retail use and 600 seats of restaurant service.

Maritime activities would be maintained at the pier aprons. New passenger terminals will be provided at piers 9 and 11; space will be allocated for possible future improvement of an interisland ferry terminal at Pier 8. The plan also calls for additional open space on the site, removal of the public parking in Irwin Park, and provision of replacement employee parking off-site, in the Piers 5-6 area.

This report will address the probable traffic impacts of the proposed project. The existing conditions and three possible future cases are identified. The analyses are based on traffic conditions during morning (AM) and afternoon (PM) peak hours of typical weekdays.

#### EXISTING CONDITIONS

The project site consists of approximately thirteen acres bounded by Nimitz Highway, Bishop Street, and Honolulu Harbor, as shown in Figure 1. Existing uses on the site include offices, employee and public parking, and maritime activity.

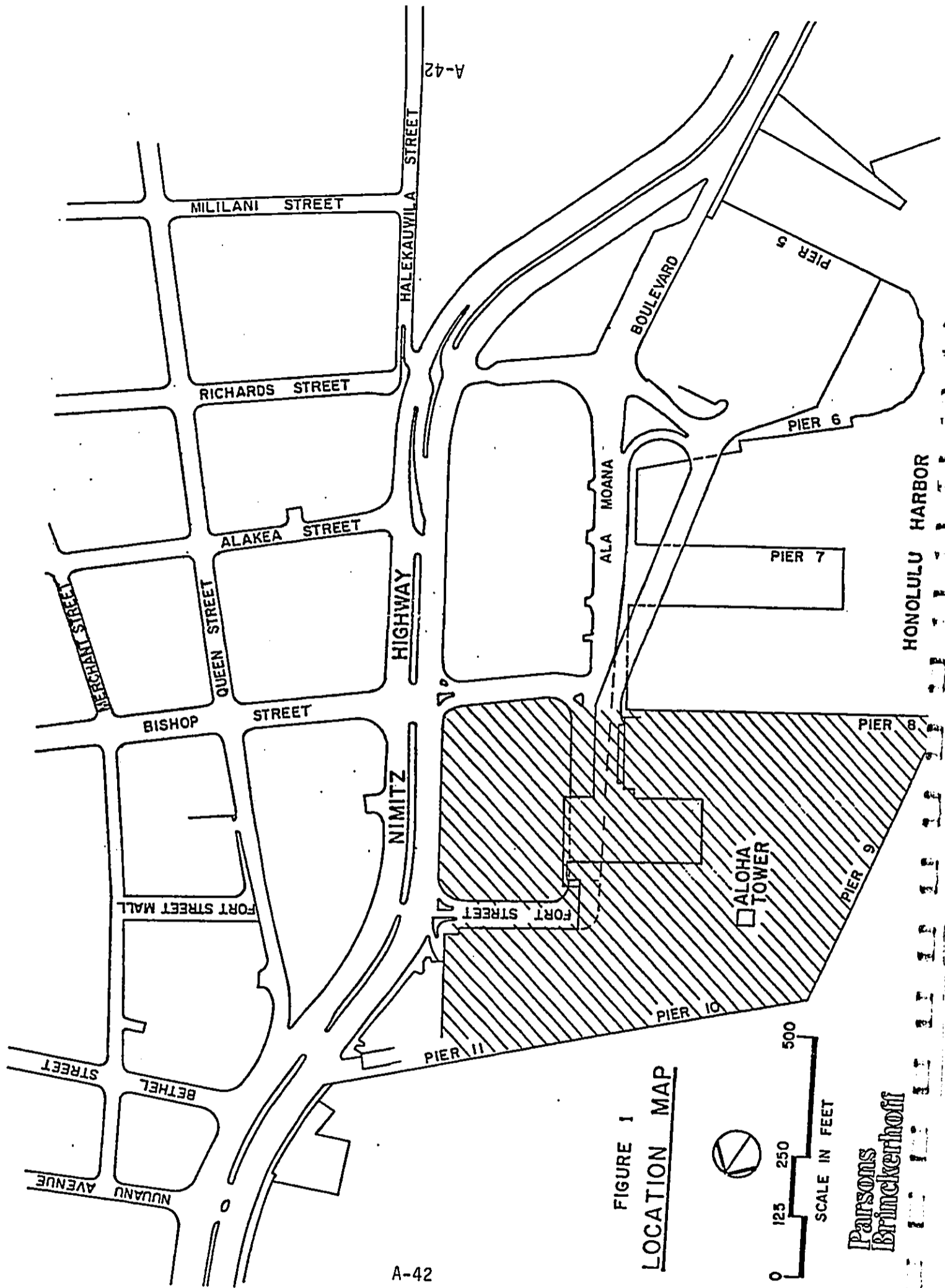


FIGURE 1  
LOCATION MAP

Parsons  
Brinckerhoff

HONOLULU HARBOR

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A-42

## Roadway System

State Route 92 (Nimitz Highway/Ala Moana Boulevard) is the primary highway link between Honolulu International Airport and Waikiki. This 6- to 8-lane facility serves a mix of traffic, including commuters, visitors, and commercial traffic. Traffic on the facility includes users originating from or destined to the downtown Honolulu/civic center area as well as through traffic between the Waikiki-Ala Moana-Kakaako areas and the Iwilei-Kalihi-Airport areas. Access into the project site from Nimitz Highway is provided at Richards Street (from Waikiki) and at Bishop Street (from Iwilei).

Ala Moana Boulevard originates at Fort Street and continues toward Waikiki. A three-block section of Ala Moana Boulevard provides local service and parking in the waterfront area. Between Fort and Bishop Streets, Ala Moana Boulevard provides access into the pier sheds and the Irwin Park parking area.

Fort Street serves mauka-bound traffic exiting the project site, and is one-way from Ala Moana Boulevard to Nimitz Highway. Parking is allowed on both sides of Fort Street. Mauka of Nimitz Highway, the Fort Street corridor is a pedestrian mall; mauka-bound traffic at Nimitz Highway must turn right or left.

Bishop Street is two-way, with two lanes each for mauka- and makai-bound traffic, between Ala Moana and Nimitz Highway. Existing mauka-bound traffic originates from the area diamondhead of the Aloha Tower site, and must turn right or left at Nimitz Highway. Bishop Street, mauka of Nimitz Highway, is one-way makai-bound.

Richards Street between Nimitz Highway and Ala Moana Boulevard is used for public metered parking and for makai-bound traffic from the highway. The ewa-bound left turn provided here is the only direct access into the site from the ewa-bound lanes of the highway.

Mauka of the highway, Nuuanu Avenue and Bethel, Bishop, Alakea, and Halekauwila Streets connect to Nimitz Highway near the project. Richards Street is physically separated. Nuuanu Avenue and Bishop Street are the main makai-bound streets through downtown Honolulu; Bethel and Alakea Streets serve mauka-bound traffic. These one-way streets carry traffic between Nimitz Highway (and the project site) and the other ewa-waikiki corridors as well as downtown Honolulu. Waikiki-bound traffic on Nimitz Highway can also turn left into Halekauwila Street toward the Kakaako area.

### Traffic Volumes

A traffic assignment describing the existing (1983) condition on roadways in the vicinity of the project is based on traffic counts from the State Highways Division<sup>1</sup> and the City and County of Honolulu.<sup>2</sup> These counts were adjusted to 1983 at an increasing annual rate of 1.3%, which was derived from historical data taken in April and July of 1983, included with the State counts.

Manual counts of peak hour activity at the site provided additional information. The existing traffic assignment is the starting point of the analysis of future conditions.

### Levels of Service

The existing levels of service were determined through field observations and compared to results from Highway Capacity Manual<sup>3</sup> analyses. The analytical results generally compare well with observed conditions, except as follows:

1. The number of vehicles turning right from Bishop Street (makai- or westbound) onto Nimitz Highway substantially exceeds the calculated capacity of the single turn lane. Field observations indicate that this occurs because of the large number of right turns on red, which effectively increases the "green time," and therefore the capacity, for right turn traffic.
2. Left turns from Nimitz Highway, southbound, into Alakea and Halekauwila Streets exceeds calculated capacities by 30 to 45 percent. The calculated capacities are based on a maximum service volume of 1200 vehicles per hour of green signal indication, or an average headway of 3 seconds per vehicle. Field observations at these and other similar locations in Honolulu indicate that average headways of 2 seconds per vehicle are experienced during peak traffic hours. Use of the shorter headway could increase calculated capacity by 50 percent.
3. Nimitz Highway southbound (toward Waikiki) levels of service do not reflect the poor observed peak hour conditions caused by queues of vehicles waiting to turn left onto Alakea or Halekauwila Streets and overflowing the storage space provided. The Halekauwila Street queue will, at times, affect through traffic and extend past Bishop Street. From Alakea Street, queues will often extend beyond Bishop Street to Fort Street.

4. Makaibound left turns from Bishop Street to Nimitz Highway are affected by the queueing on Nimitz Highway. The temporary blockage lowers the capacity of the Bishop Street approach and results in lower observed levels of service. The approach geometrics also constrain the distribution of turning vehicles between the two lanes available, which contributes toward the lower service level.

The existing levels of service are shown in Table 1. Analysis of the Bishop Street and Ala Moana Boulevard intersection confirms that the existing intersection configuration and yield controls are adequate.

#### Pedestrian Movement

Crosswalks are striped across Nimitz Highway at Fort, Bishop, and Richards Streets to serve pedestrian movements between downtown and the project site. The "walk" indications are pedestrian-actuated and occur simultaneously with minor movement green displays; total crossing time provided is approximately thirty seconds. The crossing time is adequate for normal walking speeds of four feet per second, but the long cycle length (120 seconds) and quick "don't walk" indication contribute to a perceived barrier to persons desiring to cross the highway.

Table 1  
EXISTING LEVELS OF SERVICE<sup>1</sup>

	<u>AM Peak Hour<sup>1</sup></u>	<u>PM Peak Hour<sup>2</sup></u>
Nimitz Highway, southbound (toward Waikiki)		
at Richards Street	A	A
at Bishop Street	A(C)	A(C)
at Fort Street	A(C)	A
Nimitz Highway northbound (toward Iwilei)		
at Halekauwila Street	D	D
at Alakea Street	D	D
at Bishop Street	A	A
at Fort Street	A	D
Nimitz Highway left turns		
northbound to Richards Street	C	C
southbound, to Halekauwila Street	F(E)	F(E)
southbound, to Alakea Street	F(E)	F(E)
Bishop Street, at Nimitz Highway		
West (makai) bound (left turn)	C(D)	C(D)
(through)	D	A
(right turn)	F(D)	D
East (mauka) bound (left turn)	A	A
(right turn)	C	C
Fort Street, eastbound (mauka-bound)	A	A

- Notes: 1) Levels of Service are defined in the Appendix.  
2) Computed levels are shown; observed levels, if different are indicated in parentheses.



### FUTURE CONDITIONS

Completion of the proposed project is scheduled for late 1986. This study assumed that full utilization of the facilities would occur in approximately 1½ years, and addresses possible future conditions for year 1988. Three cases were considered; 1) no build or future conditions without the proposed project, 2) future conditions with the project, which identified the project's likely impact, and 3) future conditions with maximum impact, which included the project and other potential uses on the site.

The future traffic projections do not specifically identify possible traffic increases due to a hotel and convention hall presently being considered by the City and County of Honolulu near Nimitz Highway and Bethel Street. A development of this type could generate traffic onto Nimitz Highway and some of the streets affected by the Aloha Tower Plaza.

#### Future Traffic Without the Project

Future traffic volumes were estimated using State and County traffic counts and the State's latest projection of future Nimitz Highway traffic<sup>4</sup> at a nearby project. An annual growth factor of 1.3 percent was used to project the future Nimitz Highway traffic. Traffic volumes on Bishop, Alakea and Halekauwila Streets at their Nimitz Highway intersections were assumed to increase at a similar rate. Within the project site, however, no increases are expected in this case. Major movements from the traffic assignment are shown in Figure 2.

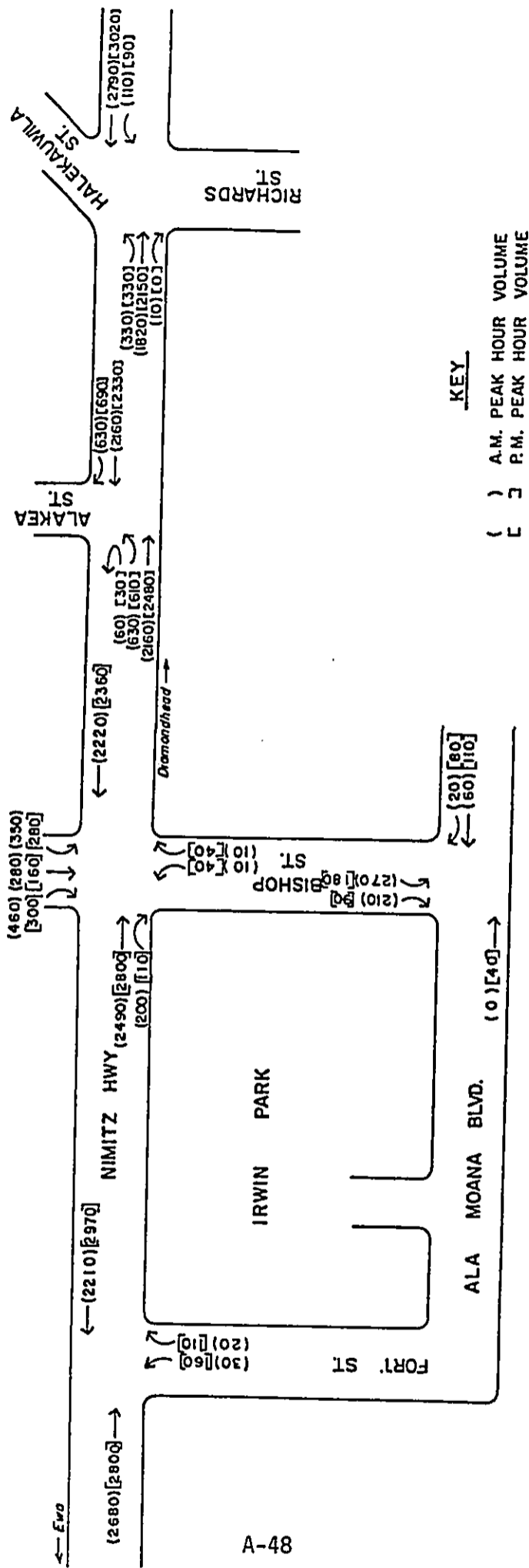
#### Levels of Service

Traffic analyses using Highway Capacity Manual procedures indicate that the existing intersections would generally remain adequate and continue to serve future traffic at today's service levels. The exceptions are the makai-bound right turn from Bishop Street to Nimitz Highway, and the left turns from Nimitz Highway to Alakea and Halekauwila Streets. The calculated over-capacity conditions were discussed in the section on existing conditions.

### PROJECT IMPACT

The traffic impact of the proposed project will be due to added vehicles on the roadway system. The greatest impact from the proposed uses would occur during the existing traffic peak hours.

The traffic impact of the proposed project is based on the following development:



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**KEY**  
 ( ) A.M. PEAK HOUR VOLUME  
 [ ] P.M. PEAK HOUR VOLUME

**FIGURE 2**  
**TRAFFIC ASSIGNMENT**  
**FUTURE CONDITION WITHOUT PROJECT**

- a) A new hotel, catering to downtown business clientele, with 500 rooms and typical in-house food service, meeting, and retail facilities,
- b) A new commercial building, totalling 150,000 square feet, with 10% of this in retail use, 85% in office use, and 5% in restaurant use.
- c) Replacement cruise ship passenger terminals with use patterns similar to existing.
- d) Access to maritime activities relocated to the Pier 11/Nimitz Highway area.
- e) Relocation of on-site employee parking to the Pier 5-6 area.
- f) Removal of the monthly and hourly parking at Pier 8 (Seaflite) and Irwin Park.

Additional analyses addressed the impact of the proposed project if:

- a) The interisland ferry system were to be fully operational using the terminal facilities at Pier 8.
- b) Irwin Park public parking were to be retained.

The new uses on the site would generate additional traffic, while removed or relocated uses would require adjustments in the base traffic assignment.

#### Traffic Generation - Proposed Project

Traffic generation estimates the number of vehicles added by the proposed project. Related trip distribution and traffic assignment analyses determine where these vehicles would be added onto the roadway system.

Various sources were consulted in this study. The Institute of Transportation Engineers' compilation of trip generation<sup>5</sup> rates includes hotels, commercial, and retail land uses, but cautions against using their average rates in central business district (CBD) locations. Traffic generation rates used in this study were developed after studying the available average rates for non-CBD land uses and adjusting these rates based on expected differences due to the CBD location. Four categories of hotel generated traffic (guests, employees, meeting-goers, and others) and three commercial categories (retail, office, and restaurant) were evaluated.

Two adjustments were made to reflect the CBD location. The pedestrian orientation of the project is expected to result in a smaller proportion of trips using vehicles to the site. Higher average vehicular occupancies are also expected because of the CBD location. Table 2 shows the reductions applied to the daily traffic generation of the various categories to reflect these adjustments.

Table 2  
TRAFFIC GENERATION ADJUSTMENTS

<u>Use</u>	<u>Adjustment Due to Differences in:</u>	
	<u>Vehicular Use</u>	<u>Vehicular Occupancy</u>
Hotel: Guests	0.8	1.0
Employees	0.75	0.8
Meeting-goers	0.3	1.0
Others	0.4	0.8
Commercial: Office	0.7	0.92
Retail	0.2	0.86
Restaurant	0.3	0.75

Peak hour traffic generation rates were developed using a simulation of the daily traffic activity at the site. Traffic generation rates developed for this project are shown in Table 3 along with comparable rates for non-CBD areas based on other sources. Table 4 shows the proposed project's peak hour traffic generation.

Table 3  
TRAFFIC GENERATION RATES

	<u>Daily</u>	<u>AM Peak Hour</u>		<u>PM Peak Hour</u>	
	<u>(In + Out)</u>	<u>In</u>	<u>Out</u>	<u>In</u>	<u>Out</u>
<u>Non-CBD Areas:</u>					
Hotel (vehicles per occupied room)	10.5	0.57	0.28	0.36	0.37
Commercial (vehicles per 1000 square feet, gross floor area)	18.7	1.88	0.48	0.67	1.89
<u>CBD Area: (used in this study)</u>					
Hotel (vehicles per room)	5.0	0.27	0.30	0.40	0.35
Commercial (vehicles per 1000 square feet, gross floor area)	9.0	0.79	0.21	0.32	0.71

Table 4

TRAFFIC GENERATION  
(vehicles per hour)

	AM Peak Hour		PM Peak Hour	
	In	Out	In	Out
Hotel	135	150	200	175
Commercial	119	32	48	107
TOTAL	254	182	248	282

Traffic Generation-Other Uses

The traffic generated by an interisland ferry terminal at Pier 8 was considered separately from the proposed project. Although space has been allocated by the Aloha Tower Plaza proposal, finish construction and operation of the terminal has not been defined. Possible groundside traffic due to a fully operational interisland ferry system was estimated to identify the total traffic at the site. The peak interisland traffic hour is expected to coincide with the peak hours (AM & PM) for highway traffic.

Two independent methods were used to estimate the interisland ferry traffic. Information obtained from the State Harbors Division indicated that the likely vessel used would carry approximately 270 passengers and that probable peak activity periods would have three vessels per hour served at Pier 8. The study analysis estimated that the vessels would be 80% occupied and that groundside vehicle occupancy would average four persons per vehicle. This method resulted in a peak volume of 324 vehicles per hour.

The second method assumed a diversion of interisland airline passengers onto the waterborne mode. Travel data gathered during a study of groundside access to Honolulu International Airport<sup>6</sup> was used with estimates of: 2 million total annual ferry passengers, peak day activity equal to 130% of average day, and peak hour activity equal to one-sixth of peak day activity. This method resulted in a peak volume of 315 vehicles per hour.

The traffic impact of a fully operational interisland terminal was identified using a peak hour volume of 330 vehicles. All of these vehicles were assumed to use the drop-off/pickup area near the Ala Moana Boulevard and Bishop Street intersection.

The proposed project also includes removal of the existing 115 metered public parking spaces in Irwin Park. The maximum impact of the proposed project, however, would also include retention of this existing parking and full utilization of the interisland terminal.

#### Traffic Distribution and Assignment

The traffic generated by the hotel and commercial users on site were distributed using Oahu employment as a travel indicator.<sup>7</sup> Trip distribution of groundside vehicular traffic generated by the interisland ferry was based on locations of existing hotel rooms.<sup>8</sup> Three general directions were identified; the distribution, by generator, is shown in Table 5.

Table 5

#### TRIP DISTRIBUTION

	<u>Hotel and Commercial</u>	<u>Interisland</u>
Ewa on Nimitz Highway	40%	6%
Diamondhead on Nimitz/Ala Moana	24%	92%
Mauka through downtown Honolulu	36%	2%

The traffic was assigned to the proposed roadway system using the distribution factors and assuming that other parts of the regional system were unchanged from existing. Traffic assignments, i.e., forecasts, of future traffic are shown in Figures 3 and 4 for two future cases with the proposed project.

#### Proposed Improvements

The traffic analyses assumed that the following improvements will be made at the project site and to nearby roadways:

- o Circulation on site is altered; two-way traffic would be allowed on Ala Moana Boulevard (between Bishop and Fort Streets) and on Fort Street (makai of Nimitz Highway).
- o Fort Street is relocated and only right turns will be allowed from Fort Street at Nimitz Highway.
- o Northbound (to Iwilei) traffic on Nimitz Highway is shifted to provide a storage lane for the new left turn (northbound) into Fort Street.

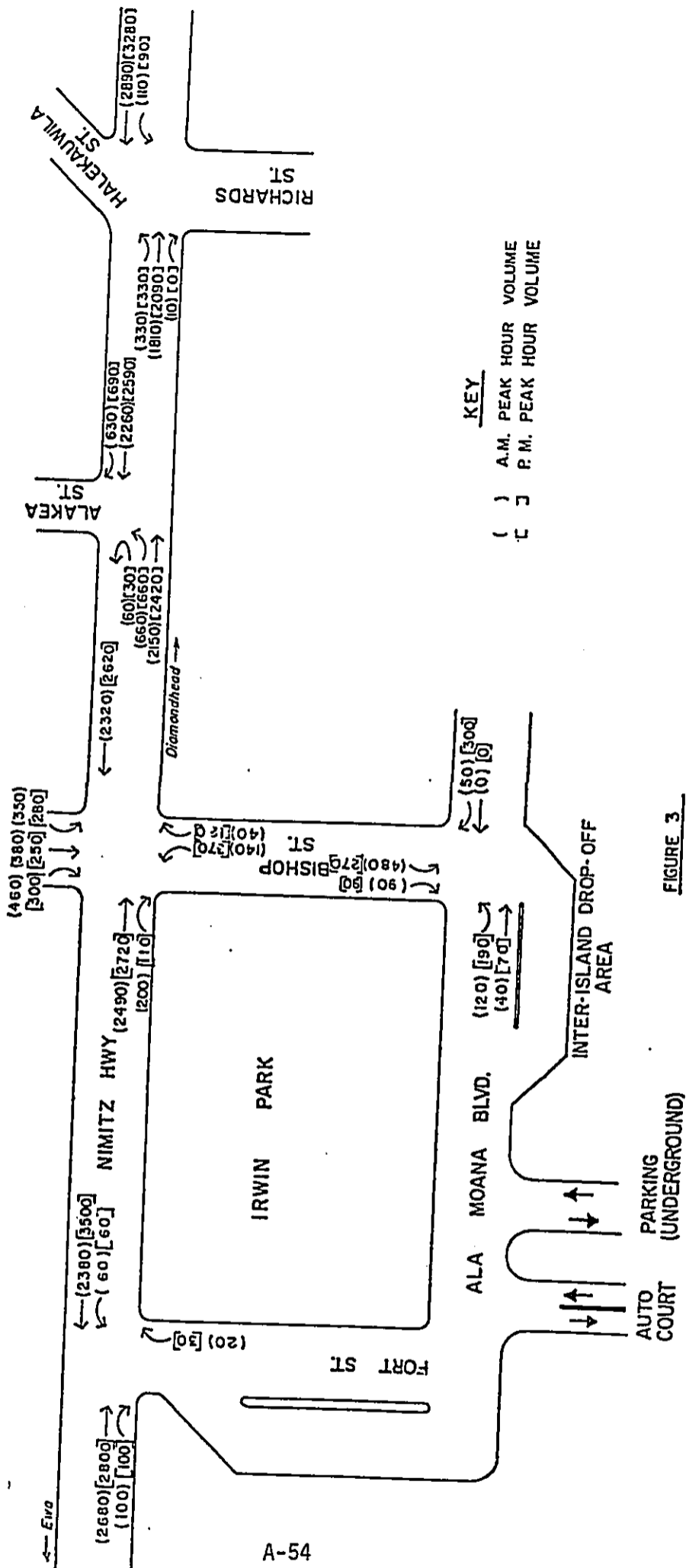
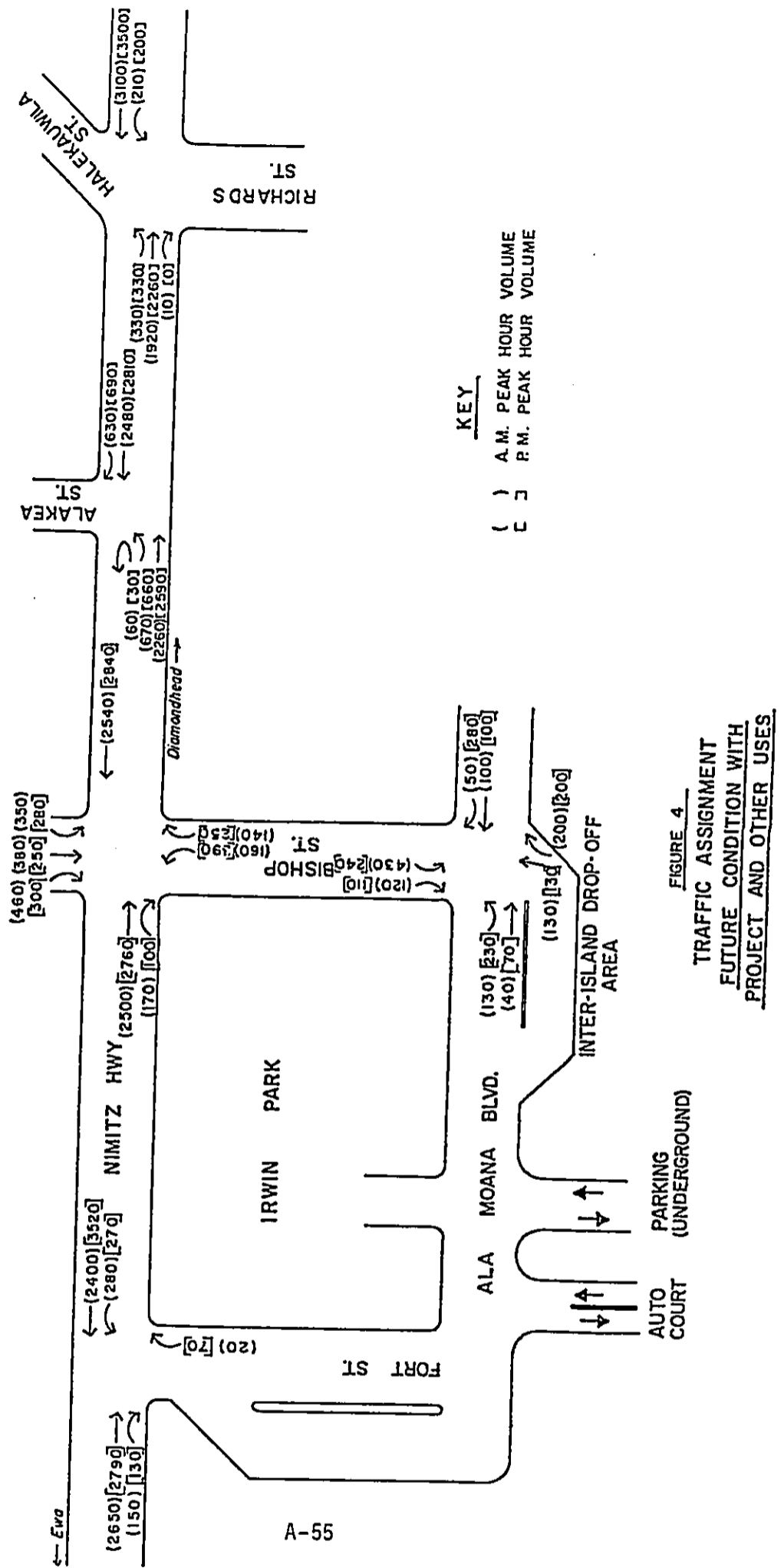


FIGURE 3  
 TRAFFIC ASSIGNMENT  
 FUTURE CONDITION WITH PROJECT





- o Bishop Street, between Queen Street and Nimitz Highway, is restriped to improve lane uses. A new traffic island channelizing makai-bound right turns and minor modifications to existing islands at the Bishop Street and Nimitz Highway intersection are provided as necessary.

Figures 5 and 6 show the existing and proposed layouts.

#### Levels of Service - Proposed Project

Intersection levels of service were determined for the traffic assignment shown in Figure 3 using Highway Capacity Manual procedures. The results, shown in Table 6, indicate that the Nimitz Highway and Fort Street intersection would adequately serve the forecasted traffic.

Conditions at the Nimitz Highway and Bishop Street intersection, however, will be near level of service E, or capacity. The demand volume for makai-bound right turns from Bishop Street to Nimitz Highway and for southbound left turns from Nimitz Highway to Alakea and Halekauwila Streets exceed computed capacities in both peak hours. As indicated in the earlier discussion of the existing condition, in which computed capacities were exceeded, the actual turn capacities could be expected to be somewhat higher than computed.

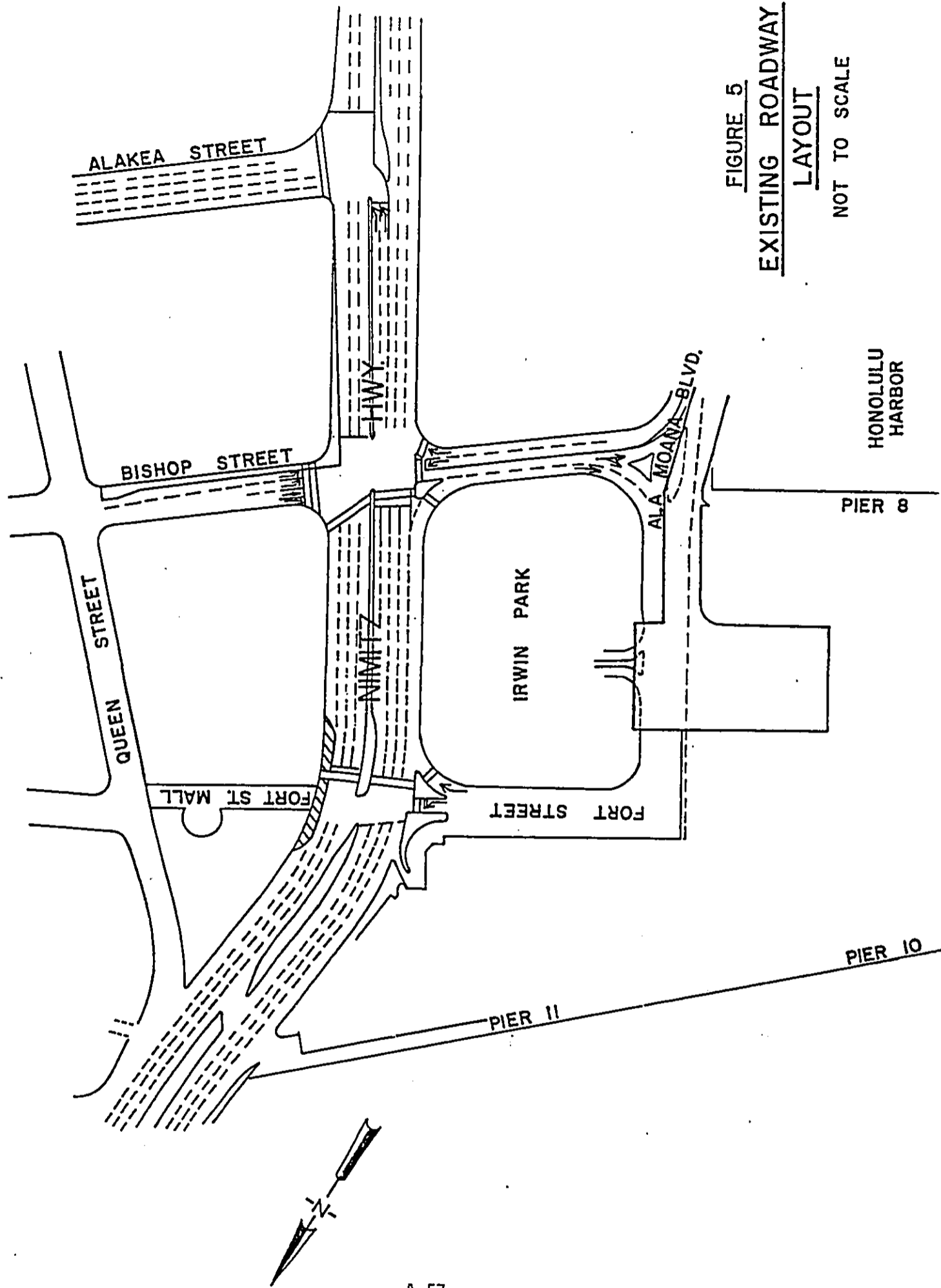


FIGURE 5  
EXISTING ROADWAY  
LAYOUT

NOT TO SCALE

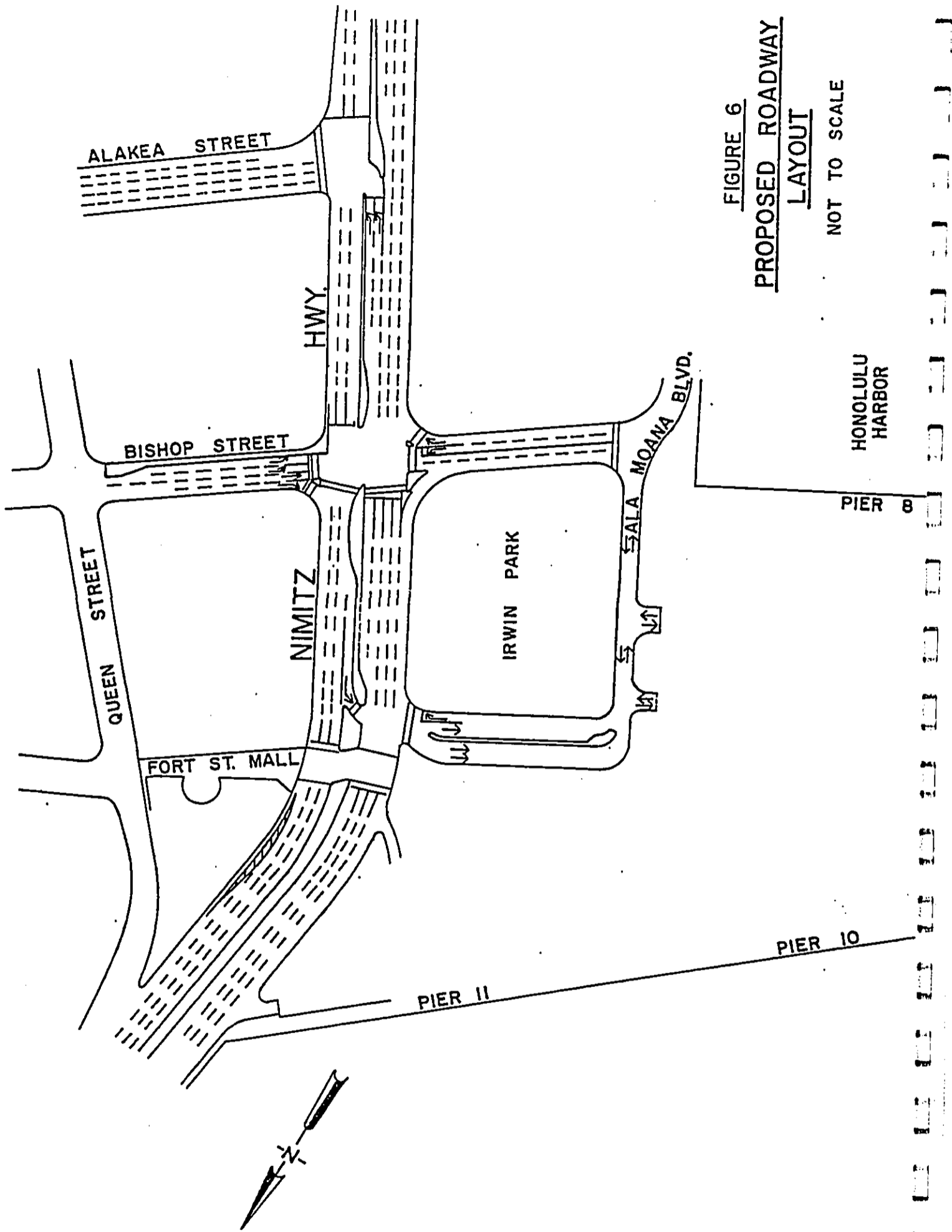


FIGURE 6  
PROPOSED ROADWAY  
LAYOUT

NOT TO SCALE

Table 6

FUTURE LEVELS OF SERVICE <sup>1</sup>  
WITH THE PROPOSED PROJECT

	<u>AM Peak Hour</u>	<u>PM Peak Hour</u>
Nimitz Highway, southbound (toward Waikiki)		
at Richards Street	A	A
at Bishop Street	A	B
at Fort Street	A	A
Nimitz Highway northbound (toward Iwilei)		
at Halekauwila Street	D	E
at Alakea Street	D	E
at Bishop Street	C	C
at Fort Street	A	D
(left turn)	C	C
Nimitz Highway left turns		
northbound, to Richards Street	C	C
southbound, to Halekauwila Street	F	F
southbound, to Alakea Street	F	F
Bishop Street, at Nimitz Highway		
West (makai)bound (left turn)	C	D
(through)	D	D
(right turn)	E	D
East (mauka)bound (left turn)	D	F
(right turn)	A	A
Fort Street, eastbound (mauka-bound)	A	A

Notes: 1) Levels of Service are defined in the Appendix.

### On-Site Parking

The project's conceptual plan shows 500 parking spaces in an underground parking garage. The development prospectus estimates that 450 spaces will be necessary to conform to the requirements of the proposed "B-4" zoning.<sup>9</sup> The developer will be required to provide parking as required by the zoning code, up to a maximum of 550 spaces.

Existing parking on the project site will be affected by the proposed project. The reorganization of the maritime activities near Pier 11, the removal of the roadway ramp at Pier 6, and a restriping scheme for the Piers 5-6 parking lot would provide 195 new parking spaces in the area. These will replace the 187 existing parking spaces at the site.

Another 230 existing spaces, used primarily by downtown employees and visitors, are located at SeaFlite's Pier 8 terminal and in Irwin Park; these will be lost if the proposed plan is implemented. This parking, an interim use of available facilities was not considered in a recent study of downtown parking supply and demand.<sup>10</sup> Loss of this parking, which is primarily in long-term use, is not considered crucial since a surplus of long-term downtown parking has been projected.<sup>11</sup>

### Public Bus Service

The proposed project is not expected to have significant impacts on the public bus system. Bus routes would not be affected by the project; scheduling, however, may be affected by increased patronage if additional service on existing routes becomes necessary. Existing bus stops at Alakea Street near Nimitz Highway and at Bishop Street near Queen Street are less than 1/4 mile from the project. Existing routes stopping at these locations include routes between Waikiki and Honolulu International Airport and between Ala Moana Shopping Center and Windward Oahu. Present peak period service at these locations is twenty-one buses per hour, or 1050 seats per hour, per direction. Other bus stops in downtown Honolulu serve more than 200 additional buses in the peak hour.

The proposed project's estimated peak hour bus patronage is 200 persons. Using a trip distribution similar to that used for automobile traffic, and assuming all loading at the nearest bus stops, the highest loading would occur at the Alakea Street bus stop, with 80 additional bus patrons entering the system. Transfers at King and at Hotel Streets would then occur to accommodate the varied destinations.

### Other Localized Impacts

The reorganization of the Aloha Tower area will also impact service access to maritime activities in the Piers 8 to 11 area. Service and emergency vehicles would be routed along the Piers 9, 10, and 11 aprons. Access from the highway network would be from Nimitz Highway near Pier 11.

The proposed project would close the existing median opening so that only right turns in from and out to the southbound lanes of Nimitz Highway would be allowed. The additional traffic due to the deletion of left turns from the northbound lanes of Nimitz Highway is not expected to have significant impact because of its low volume and the availability of alternative routes through downtown Honolulu.

The storage lane that could be provided for left turns to Fort Street from northbound Nimitz Highway would be adequate for the proposed project's traffic generation. The peak-hour volumes indicate that a storage capacity of four vehicles would be needed; the hourly left turn volumes at this location with cruise ship operations are not expected to be greater. With maximum use, i.e., interisland ferry in operation, the storage capacity would not be adequate. In this case, more of the left turns may have to be accommodated at Richards Street.

### Levels of Service - Maximum Use

The traffic assignment shown in Figure 4 included traffic generated by the proposed project plus a fully operational interisland ferry system. This assignment also assumed that the public (metered) parking at Irwin Park would remain. Intersection levels of service were determined and are shown in Table 7.

This additional traffic would generally lower the levels of service at the Nimitz Highway intersections with Bishop, Fort, Alakea, Richards and Halekauwila Streets.

Table 7  
 FUTURE LEVELS OF SERVICE  
 WITH THE PROPOSED PROJECT  
 AND OTHER USES

	<u>AM Peak Hour</u>	<u>PM Peak Hour</u>
Nimitz Highway, southbound (toward Waikiki)		
at Richards Street	A	A
at Bishop Street	A	C
at Fort Street	B	A
Nimitz Highway northbound (toward Iwilei)		
at Halekauwila Street	D	F
at Alakea Street	D	E/F
at Bishop Street	D	D
at Fort Street	C	D
(left turn)	D	E
Nimitz Highway left turns		
Northbound, to Richards Street	E	E
southbound, to Halekauwila Street	F	F
southbound, to Alakea Street	F	F
Bishop Street, at Nimitz Highway		
West(makai)bound (left turn)	C	D
(through)	D	D
(right turn)	E	D
East(mauka)bound (left turn)	E	F
(right turn)	A	C
Fort Street, eastbound (mauka-bound)	A	A

Notes: 1) Levels of Service are defined in the Appendix.



### Volume-to-Capacity Ratios

Volume-to-capacity (V/C) ratios were calculated at several locations. These ratios provide an additional indicator of the proposed project's traffic impacts on the roadway system. The greatest impact occurs during the PM peak hour; V/C ratios are shown in Table 8.

Table 8

#### V/C Ratios

<u>(PM Peak Hour)</u>	<u>Existing</u>	<u>Future Condition</u>		
		<u>W/O Project</u>	<u>With Project</u>	<u>At Maximum Use</u>
Nimitz Highway at Fort Street				
Northbound	0.82	0.87	0.99	1.00
Southbound	0.62	0.66	0.66	0.67
Nimitz Highway at Bishop Street				
Northbound	0.57	0.66	0.93	1.02
Southbound	0.60	0.64	0.78	0.80
Ala Moana Blvd. and Bishop St. (4-way stop)	0.23	0.23	0.68	0.80

### Regional Impacts

Traffic generated by the proposed project could also affect conditions on other streets and at other intersections. This study did not include forecasts or intersection analyses beyond the immediate vicinity of the project, which would require a system-wide study. Expected impacts, however, are generalized herein.

The proposed Aloha Tower Plaza would increase traffic at three locations as shown in Table 9. Because of different conditions, each location is discussed separately and in a different manner.

Table 9

## REGIONAL IMPACTS

	<u>AM Peak Hour</u>	<u>PM Peak Hour</u>
Nimitz Highway at Pier 18		
Ewabound	+70 vph	+110 vph
Waikikibound	+100 vph	+100 vph
Ala Moana Blvd. at Punchbowl Street		
Ewabound	+60 vph	+60 vph
Waikikibound	+40 vph	+70 vph
Downtown Honolulu		
Maukabound	+70 vph	+100 vph
Makaibound	+90 vph	+90 vph

The State Highways Division is currently studying alternatives to increase capacities along Nimitz Highway ewa of Aloha Tower. The project, whose nearest point to Aloha Tower is at Pier 18, uses a traffic assignment<sup>12</sup> which assumed implementation of the Honolulu Harbor Master Plan. The uses proposed by the Aloha Tower Plaza project are consistent with the Master Plan, therefore the highway study's traffic assignment should not be affected. Table 9 and the highway's traffic assignment indicate that the Aloha Tower project's traffic contribution at Pier 18 is approximately three percent of the total design year peak hour highway traffic.

The project's impact to Ala Moana Boulevard is discussed in terms of existing traffic. Potential traffic increase on Ala Moana Boulevard due to the project is between 2 and 3 percent of existing traffic, based on Table 9. Future traffic increases greater than this could be expected without development of the project because travel between existing hotel and commercial areas and downtown is likely to occur on this corridor.

Mauka- and makai-bound traffic through downtown Honolulu is served by a network of one-way streets. The traffic assignment assumed that all makai-bound traffic generated by the Aloha Tower project would use Bishop Street, in order to identify the maximum impact conditions; Nuuanu Avenue, however, also serves makai-bound traffic through downtown Honolulu. The proposed layout requires that mauka-bound traffic first use Nimitz Highway, then turn onto Smith, Bethel, or Alakea Streets. Increased capacities on these mauka-makai streets may be necessary to maintain traffic service through downtown Honolulu.

### Mitigative Alternatives

Several mitigative alternatives which could improve levels of service at the Nimitz Highway and Bishop Street intersection were considered. Conversion of either (or both) the traffic signals at Bishop or Fort Streets to three-phase operation could improve levels of service. At Bishop Street, conversion would separate the mauka- and makai-bound movements and allow option lanes on the Bishop Street approaches to achieve better lane utilization. At Fort Street, a third signal phase could serve left turns from Fort Street to northbound Nimitz Highway and relieve some of the demand at Bishop Street. Conversion to three-phase operation, however, would cause additional conflicts between vehicular and pedestrian movements across the highway and could cause bottleneck situations for Nimitz Highway traffic.

Another alternative would be to eliminate parking along the kokohead side of Bishop Street between Queen Street and Nimitz Highway. This action would increase intersection capacity by providing an additional makai-bound lane; on-street parking and loading, however, would be affected.

Although these alternatives are not recommended at this time, variations of them should be considered if the traffic demands forecasted for the maximum use case are realized.

### CONCLUSIONS AND RECOMMENDATIONS

Traffic in the vicinity of the proposed project is expected to increase with or without the proposed project. The additional traffic generated by the proposed project would result in lower service levels of the nearby roadways; however, roadway capacities would be sufficient. The following improvements are recommended so that the expected traffic volumes can be accommodated:

- o Allow two-way traffic on Ala Moana Boulevard and Fort Street. Provide left turn lanes separate from through traffic lanes as required to serve driveways into the parking garage and hotel.
- o Relocate Fort Street approximately sixty feet in the diamondhead direction and allow only right turns out of Fort Street.
- o Provide a storage lane for left turns from Nimitz Highway northbound into Fort Street.
- o Restripe Bishop Street between Queen Street and Nimitz Highway for better lane use and provide or alter traffic islands as necessary for new traffic layout.

- o Adjust signal phasing at the Nimitz Highway intersections with Bishop Street and Fort Street.

Specific actions should be coordinated with the State Highways Division and the City Department of Transportation Services during the public facility design stage of the proposed project.

FOOTNOTES

1. State of Hawaii, Department of Transportation, Highways Division, Planning Branch. Various counts.
2. City and County of Honolulu, Department of Transportation Services, Traffic Planning Section. Various counts.
3. National Academy of Sciences, National Research Council, Highway Research Board, Special Report 87, Highway Capacity Manual, Washington D. C., 1965.
4. State of Hawaii, Department of Transportation, Highways Division, Planning Branch. Traffic Assignment for Project No. F-092-1(16), TA 80-16.
5. Institute of Transportation Engineers, Trip Generation, Arlington, Virginia, 1979.
6. State of Hawaii, Department of Transportation, Airports Division. Groundside Operations Study and Development Plan, Honolulu International Airport, Project No. O-1090. August 1979.
7. State of Hawaii Department of Planning and Economic Development, State of Hawaii Data Book 1980, Table 8.
8. State of Hawaii Department of Planning and Economic Development, State of Hawaii Data Book 1982, Table 544.
9. City and County of Honolulu. Comprehensive Zoning Code (CZC), 1978, as amended.
10. City and County of Honolulu. Honolulu Parking Management Study, May 1981.
11. Ibid.
12. SDOT, TA 80-16.

## APPENDIX

The Highway Capacity Manual defines six levels of service, labelled A through F, from the best to worst condition. Characteristics of each level of service for intersections and for highways are described below. Level of Service C is typically used for highway design and Level of Service D is considered adequate for urban arterials; corresponding Level of Service for rural highways are B and C.

Intersections

Level of Service A: Drivers operate in a free flow situation with no delays and easy turn movements.

Level of Service B: This level represents stable conditions; drivers may be slightly restricted in movements, however, no delays exceed one cycle.

Level of Service C: Small back-ups may occur behind turning vehicles and drivers may experience delays exceeding one cycle. Although movements may be somewhat restricted, they are not objectionable as stable operation continues.

Level of Service D: Drivers experience restrictions which approach instability. Delays may occur during short peaks, however, periodic clearance of developing queues prevents excessive back-ups.

Level of Service E: This level represents conditions at capacity which serve the most vehicles the intersection is able to accommodate. Long queues and substantial delays occur at capacity.

Level of Service F: Capacity of intersection exceeded. Conditions are jammed and volumes that can be carried are unpredictable. Congestion with excessive delays and very long queues are typical of this service level.

Highways

Level of Service A: A free flow situation with low volumes and high speeds. There is a high level of maneuverability with speeds controlled by driver discretion, speed limits, and physical constraints.

Level of Service B: A condition of stable flow, drivers may experience a slight reduction in operating speeds, but still have a reasonable amount of maneuverability.

Level of Service C: Stable flow continues although drivers may start to feel restricted as speeds and maneuverability become controlled by higher volumes. A satisfactory speed is still obtainable in this service level.

Level of Service D: Changes in operating conditions approach unstable flow. Volume fluctuations and temporary restrictions reduce operating speeds and maneuverability. Low comfort and convenience can be tolerated for short durations.

Level of Service E: Volumes are near or at capacity of the highway. Operating speeds are less than 30 mph and momentary stoppages may occur in this unstable flow.

Level of Service F: Capacity of highway section exceeded; conditions deteriorate. Forced flow situation with low speeds and unpredictable volumes dropping below capacity. Downstream congestion may cause delays of varying duration. The possibility exists that both speed and volume may drop to zero.

APPENDIX E  
COMMENTS AND RESPONSES  
ON THE  
DRAFT ENVIRONMENTAL IMPACT STATEMENT



COMMENTS AND RESPONSES ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT

The following agencies, organizations and individuals reviewed and commented on the draft Environmental Impact Statement. Those who made substantive comments concerning the proposed action received written responses to their concerns. They are indicated by an asterisk (\*) in the following list. All of the letters received, together with responses to all substantive comments, are reproduced on the following pages of this Appendix.

State Agencies:

Department of Defense  
Department of Accounting and General Services  
Department of Agriculture  
Office of Environmental Quality Control  
\*Department of Health  
\*Department of Land and Natural Resources  
University of Hawaii  
\*Environmental Center  
\*Water Resources Research Center

County Agencies:

Police Department  
Building Department  
Department of General Planning  
Department of Housing and Community Development  
\*Department of Public Works  
\*Office of the Mayor  
\*Department of Parks and Recreation  
\*Board of Water Supply  
\*Department of Land Utilization  
\*Department of Transportation Services  
\*Fire Department

State/County:

Oahu Metropolitan Planning Organization

Federal Agencies:

U.S. Department of Agriculture, Soil Conservation Service  
U.S. Department of the Interior, Fish and Wildlife Service  
Department of the Air Force  
U.S. Department of Transportation, U.S. Coast Guard  
Department of the Army  
Naval Base, Pearl Harbor

Individuals and Organizations:

\*American Lung Association  
\*Hawaiian Electric Company, Inc.  
\*The Chamber of Commerce of Hawaii  
\*Jack F. Schweigert, Esq. (For SeaFlite, Inc.)

CHONG N. ABOTOM  
COMPTROLLER



STATE OF HAWAII  
DEPARTMENT OF DEFENSE  
OFFICE OF THE ADJUTANT GENERAL  
715 PALMWOOD WALK, HONOLULU, HAWAII 96813

ALVIN I. LUM  
Sergeant Major  
Adjutant General  
715 PALMWOOD WALK, HONOLULU, HAWAII 96813

CHONG N. ABOTOM  
COMPTROLLER



STATE OF HAWAII  
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES  
P. O. BOX 115, HONOLULU, HAWAII 96810

IRVING S. ITOYAMA  
COMPTROLLER  
ALVIN I. LUM  
Sergeant Major  
Adjutant General  
715 PALMWOOD WALK, HONOLULU, HAWAII 96813  
LETTER NO. (P) 1552.3

MEMO

16 JUN 1983

JUN 21 1983

Ms. Jacqueline Parnell, Director  
Office of Environmental Quality Control  
550 Halekauwila Street, Room 301  
Honolulu, Hawaii 96813

Dear Ms. Parnell:

Aloha Tower Plaza Development Plan

Thank you for providing us the opportunity to review the proposed project, "Aloha Tower Plaza Development Plan" Environmental Impact Statement Draft. We have completed our review and have no comments to offer at this time.

Yours truly,

*Jerry H. Matsuda*  
JERRY H. MATSUDA  
Captain, MAJG  
Civil & Engr Officer

cc: Aloha Tower Dev. Corp.  
Group 70  
Env. Quality Comm w/EIS

Ms. Jacqueline Parnell, Director  
Office of Environmental  
Quality Control  
550 Halekauwila Street, Room 301  
Honolulu, Hawaii 96813

Dear Ms. Parnell:

Subject: Aloha Tower Plaza Development Plan

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

Very truly yours,

*Aldeo Hiramani*  
ALDEO HIRAMANI  
State Comptroller

GEORGE R. ANIYISIII  
GOVERNOR



JACK K. SUWA  
CHAIRMAN, BOARD OF AGRICULTURE  
SUZANNE D. PETERSON  
DEPUTY TO THE CHAIRMAN

State of Hawaii  
DEPARTMENT OF AGRICULTURE  
1428 So. King Street  
Honolulu, Hawaii 96814

June 15, 1983

GEORGE R. ANIYISIII  
GOVERNOR



STATE OF HAWAII  
OFFICE OF ENVIRONMENTAL QUALITY CONTROL  
510 HALEKUAHUA STREET  
HONOLULU, HAWAII 96813

July 6, 1983

Melvin K. Koizumi  
Acting Director

MEMORANDUM

TO: Ms. Jacqueline Parnell, Director  
Office of Environmental Quality Control  
State of Hawaii

SUBJECT: Draft Environmental Impact Statement for  
Aloha Tower Plaza Development Plan  
Aloha Tower Development Corp.  
THK: 2-1-01; various  
Honolulu, Hawaii

The Department of Agriculture has reviewed the subject document and does not have any comments or objections to offer.

Thank you for the opportunity to comment.

*Jack K. Suwa*  
JACK K. SUWA  
Chairman, Board of Agriculture

Mr. Robert Holman  
Aloha Tower Development Corporation  
Aloha Tower, Eighth Floor  
Honolulu, Hawaii 96813

Dear Mr. Holman:

Subject: Aloha Tower Plaza Development Plan Draft EIS,  
Honolulu, Hawaii

We have reviewed your draft EIS and have no substantive comments. Thank you for the opportunity to review your draft EIS.

Sincerely,

*Melvin K. Koizumi*  
Melvin K. Koizumi  
Acting Director

cc: ~~George R. Aniyisiii~~

"Support Hawaiian Agricultural Products"

GEORGE R. SHIBUKI  
Deputy Director



STATE OF HAWAII  
DEPARTMENT OF HEALTH  
P.O. BOX 3218  
HONOLULU, HAWAII 96811  
June 24, 1983

CHARLES G. CLARK  
Director of Health

STATE F. CHALMERS, M.D.  
Deputy Director of Health  
HELEN M. THOMPSON, M.A.  
Deputy Director of Health  
MELVINE E. EDWARDS  
Deputy Director of Health  
ANGELA WALSHOW SHAW, M.A., J.D.  
Deputy Director of Health

MEMORANDUM

To: Mrs. Jacqueline Parnell, Director  
Office of Environmental Quality Control

From: Deputy Director for Environmental Health

Subject: Environmental Impact Statement (EIS) for Aloha Tower Plaza Development  
Plan, Honolulu, Oahu, Hawaii

Thank you for allowing us to review and comment on the subject EIS.

We submit the following comments for your information and consideration:

1. Noise disturbances originating from activities related to operation of the proposed development will adversely impact residents of Harbor Square. The following factors may contribute to noise impacts:
  - a. Increase in vehicular traffic volume, including tour buses.
  - b. Activities relating to deliveries of goods and services, including commercial refuse collection.
  - c. Activities relating to maintenance work.
  - d. Open air type entertainment.
  - e. Increase in cruise ship volume with whistles, bells or entertainment using amplification.
2. At the same time, noise originating from the Hawaiian Electric power plant located near the proposed development will impact guests of the proposed hotel.
3. Through facility design, noise from any equipment, such as air conditioning/ventilation units, heat pumps, water pumps and exhaust fans, must be attenuated to meet the allowable levels of Title II, Administrative Rules Chapter 42, Community Noise Control for Oahu.
4. Our Community Noise Permit requirement for construction noise is addressed under Section 4.1 of page 67. The following additional comments should be added:
  - a. Construction equipment and on-site vehicles or devices requiring an exhaust of gas or air must have a muffler.
  - b. The conditional use of the permit must be complied with as specified in the regulations and the conditions issued with the permit.
  5. Traffic noise from heavy vehicles traveling to and from the construction site must be minimized in residential areas and must comply with the provisions of Title II, Administrative Rules Chapter 42, Vehicular Noise Control for Oahu.

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: Aloha Tower Development Corp. ✓  
Group 70

*Melvin E. Edwards*  
Melvin E. Edwards

ALOHA TOWER DEVELOPMENT CORPORATION

Major Eileen Anderson Mr. Kent H. Keith, Chairman  
Mr. Stephen H. Hoshino Mr. Stephen H. Hoshino  
Mr. Robert Holmes, Executive Officer

26 July 1983

Mr. Melvin Koizumi  
Deputy Director for Environmental Health  
State Department of Health  
P.O. Box 3378  
Honolulu, Hawaii 96801

Dear Mr. Koizumi:

SUBJECT: Environmental Impact Statement for Aloha Tower Plaza  
Development Plan, Honolulu, Oahu, Hawaii (DOH File EPHIS-SS)

Thank you for reviewing and commenting on the subject EIS. In response to your specific comments:

1. Noise disturbances impacting residents of Harbor Square

In general, it should be noted that the Harbor Square Condominium is located approximately 800 feet southeast of the nearest edge of the proposed development, approximately the same distance as from Harbor Square to the Bank of Hawaii. It is separated from the project by Himitz Highway and buffered from the project site by Hawaiian Electric, Grosvenor Center, the Dillingham Transportation building and Irwin Park. In addition, it is situated mauka of the Aloha Tower site and thus, under prevailing northeast tradewinds, noise emanating from the project will be directed seaward and away from the condominiums. Although we recognize the legitimacy of your concerns, we believe that noise impacts on Harbor Square residents from operation of the proposed project will normally be insignificant. The ATDC will, however, monitor the situation carefully and adhere to Community Noise Regulations. This should insure appropriate mitigation of any potential adverse noise impacts which might occur as a result of project operations. In regard to the factors listed in your letter:

July 26, 1983  
Page 2

a. Increase in vehicular traffic volume, including tour buses

As stated in Appendix A of the draft EIS, the project is served primarily by State Route 92 (Himitz Highway/Aloha Moana Boulevard) which is also the primary highway link between Honolulu International Airport and Waikiki. This 6- to 8-lane facility serves a mix of traffic, including commuters, visitors, and commercial traffic. Traffic on the facility includes users originating from or destined to the downtown Honolulu/civic center area as well as through traffic between the Waikiki-Aloha Moana-Kakaako areas and the Iwilei-Kalihi-Airport area. Traffic along this arterial, in the vicinity of Harbor Square, is projected to increase at a rate of 1.3 percent per year from 1983 to 1988 resulting in a AM peak hour volume of 5070 vehicles per hour without the project. Operation of the project will add 130 vehicles to the peak hour traffic stream, 3 percent of total volume. Although these 130 additional vehicles could conceivably raise the highway noise level slightly, the impact on Harbor Square residents is expected to be insignificant.

Tour buses serving the new development were not considered a major factor as the expected market for the hotel and business travelers rather than resort guests. If tour buses occasionally serve the hotel they will discharge and pickup passengers within the landscaped auto court which is well within the project and at least 1,000 feet from Harbor Square. To further mitigate noise problems, the design guidelines recommend that the auto court include an overhead canopy. This solution has been effectively applied at the Stanford Court in San Francisco, which has guest rooms located above its auto court.

Any increase in tour bus activity which results from an increase in cruise ship activity would occur with or without the project. If the project is developed as set forth in the plan buses will pick up and discharge passengers only "at-grade" and not on the second level, as occasionally occurs at the present time. On rare occasions when Ala Moana Boulevard between Piers 7 and 8 (as shown on Figure 14 of the

ALOHA TOWER DEVELOPMENT CORPORATION HONOLULU, HAWAII 96813 (808) 548-5127

draft EIS) is used for tour bus staging (primarily in the daytime), the drivers will be required to shut off their engines while waiting to proceed to the Pier 10/11 pickup area. This will help to mitigate any potential noise impacts to Harbor Square residents. However, it is uncertain at this time if this area will even be used for tour bus staging.

b. Activities Relating to Deliveries, Refuse Collection, etc.

The design guidelines specify that refuse from the hotel will be stored within the building and will be collected within the covered service dock/loading area as shown on Figure 7 of the EIS. Service and delivery vehicles will also use this area. Restricting these activities to an interior area will isolate the sound and act to minimize potential noise impacts.

As shown on Figure 9 of the EIS, deliveries, loading and refuse collections related to office use will be permitted at the mauka end of the office building, 1,000 feet from Harbor Square. Using construction trucks as an extreme example of vehicular noise (94 dB(A) at 50 feet), with a 9 dB(A) reduction due to the location of Grosvenor Center in relation to the project and Harbor Square, peak sound levels at Harbor Square would be 59 dB(A). This is within the daytime limit for business zoning of 60 dB(A) and below the typical urban ambient level of 70+ dB(A). It should be noted that this noise level will be a maximum which will occur only intermittently during daylight hours. In addition, prevailing tradewinds will carry the noise seaward on most days, thus reducing noise impacts significantly.

c. Activities Related to Maintenance Work

Except in emergencies, maintenance activities will take place during daytime hours. In most cases the distance of the project from Harbor Square and its separation by Wimitz Highway, the prevailing tradewinds, the presence of medium and high-use structures between the proposed project and the condominiums, and the proposed design and layout of the project will act to mitigate noise impacts.

Trimming trees in Irwin Park might be one instance where noise levels have the potential of annoying residents, if they have their windows open and if atmospheric conditions such as kona winds are present. This would occur very rarely.

d. Open Air Type Entertainment

As stated in the EIS, the ATDC development objectives (and Chapter 206J Hawaii Revised Statutes) clearly indicate that the Aloha Tower Plaza complex should be a major public gathering place and that new activities should be created which will bring people to the waterfront. Fulfilling these objectives may result in increased noise levels at the project site. Among the activities being considered are open air concerts in the plaza area.

It is unlikely that sounds emanating from public areas (where open air entertainment is most likely to take place) would reach adverse levels. Existing noise regulations require that nighttime sound emissions from business zoned parcels be 50 dB(A) or less at the property line. Although stringent, the ATDC will be responsible for insuring that these noise levels are not exceeded in public areas. (Hotel management will be responsible for containing entertainment noise from that source).

e. Increase in Cruise Ship Volume

Increases in the number of cruise ships calling at Piers 8-11 are not a function of the proposed Aloha Tower development. Any increase in noise levels resulting from increased maritime activity would occur even if the Aloha Tower site is not redeveloped. DOT Harbors will be responsible for insuring that maritime activities do not violate Community Noise Regulations.

2. Noise From Hawaiian Electric Power Plant


As stated in the Air Quality Impact Study appended to the draft EIS, the generators in question are only used for peak periods (6:00 a.m. to 9:00 p.m. weekdays) unless other Hawaiian Electric (HECO) generating units on the system are down for maintenance. Of the three units at the station, one will be retired in December 1983. (See Appendix A, draft EIS, page A6).

July 26, 1983  
Page 5

We have discussed the noise factor with HECOD's Environmental Department. Their records indicate that they have received no noise complaints from either Harbor Square residents or Grosvenor Center tenants in the past seven or eight years. Complaints were received in the early 1970's; as a result of these complaints modifications were made at the plant to attenuate noise. From time to time, when it is necessary to blow off steam, adverse noise may be generated. People in surrounding buildings, however, are notified prior to these occurrences of the time and duration of the disturbance. We, therefore, do not believe that noise from the power plant will significantly impact hotel guests at the Aloha Tower Plaza. Please contact Jim Peck, HECOD Environmental Department, if you require additional information concerning noise characteristics of the power plant.

3. The developer will be required to design the facility so that noise from any equipment is attenuated to meet the allowable levels of Title 11, Administrative Rules Chapter 43, Community Noise Control for Oahu.
4. The additional comments will be added to the final EIS.
5. Traffic noise from heavy vehicles traveling to and from the construction site will be minimized in the event they must travel through residential areas. In addition, heavy vehicles will comply with the provisions of Title 11, Administrative Rules Chapter 42, Vehicular Noise Control for Oahu.

Very truly yours,

  
Robert W. Holman  
Executive Officer  
RH/dh

cc: Group 70  
City and County Department of  
Land Utilization (Folder 83/2-1(CC))

GEORGE R. ANTONIO  
DIRECTOR OF PLANNING



STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
P O BOX 921  
HONOLULU HAWAII 96809

June 28, 1983

Mr. Robert W. Holman  
Aloha Tower Development Corp.  
Aloha Tower, 8th Floor  
Honolulu, Hawaii 96813

Dear Mr. Holman:

Thank you for the opportunity to review the draft environmental impact statement (EIS) for the development of the Aloha Tower Plaza. We have two concerns regarding the project.

HISTORIC SITES CONCERNS:

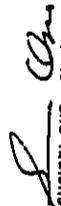
We concur with your plans to retain and/or enhance historic structures or features, such as the Aloha Tower (listed on the Hawaii and National Register of Historic Places), Pier Gallery, and the Irwin Park.

If during the course of your project's land excavation operations, buried archaeological deposits are uncovered, please notify our office at 548-6408. Should such deposits be significant or determined potentially significant, you will be requested to have such materials to be retrieved by professional archaeologists.

RECREATION CONCERNS:

Overall, considerations for public shoreline access, open space, and retention of Aloha Tower are positive. However, the EIS does not address how the project will affect the observation deck on the tenth floor of Aloha Tower. Specifically, will the general public be allowed to continue using the tenth floor as an observation deck? If so, a) how will the project affect the view from the deck and b) will the elevators be improved to adequately handle the visitors wishing to get to the deck?

Very truly yours,

  
SUSUMU ONO, Chairman  
Board of Land and Natural Resources and  
State Historic Preservation Officer



SUSUMU ONO, CHAIRMAN  
BOARD OF LAND AND NATURAL RESOURCES  
EDGAR A. HANAU  
DIRECTOR  
DIVISIONS:  
PLANNING AND DEVELOPMENT  
PROGRAMS  
AGRICULTURE  
CIVIL ENGINEERING  
CONSERVATION  
CONTRACTS  
LAND USE AND ZONING  
LAND SURVEY AND MAPPING  
STATE TREASURY  
WATER AND LAND DEVELOPMENT

**ALOHA TOWER DEVELOPMENT CORPORATION**

Mayor Elima Amadio Dr. Epuleh Ifeolupe Mr. Kent H. Keith, Chairman  
Mr. Stephen H. Scahill Mr. Susumu Ono Mr. Donald Kupper Mr. Arim Trimer Mr. Thomas Tera  
Mr. Robert Holman, Executive Officer

July 22, 1983

Mr. Susumu Ono, Chairman  
Board of Land and Natural Resources  
and State Historic Preservation Officer  
P.O. Box 621  
Honolulu, Hawaii 96813

Dear Mr. Ono:

Subject: Aloha Tower Plaza Development Plan - Draft EIS

Thank you for reviewing and commenting on the EIS. In answer to your specific concerns:

Historic Sites Concerns:

As stated in the EIS (pp. 47-48), the existing pier complex at the Aloha Tower site, where excavation and grading will take place, falls seaward of the shoreline that existed in 1810. Historical maps indicated that the main part of this complex was produced by fill land between the years 1810 and 1843. It is expected, due to the long time interval and heavy traffic, that the underlying materials are consolidated and highly compacted. It is, therefore, unlikely that archaeological deposits will be found on-site unless they were deposited there as part of the landfill operation. The developer will, however, be instructed to notify your office if buried archaeological deposits are uncovered and to undertake specific mitigation measures at your direction.

Recreational Concerns:

Aloha Tower will be an integral part of the proposed development and as such will continue to be an important visitor attraction within the area. The general public will be encouraged to use the observation deck.

ALOHA TOWER HONOLULU, HAWAII 96813 (808) 548-5377



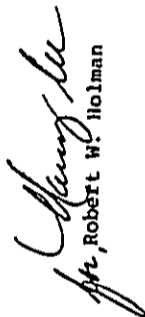
Mr. Susumu Ono

(2)

July 22, 1983

The Aloha Tower observation deck is 135 feet above pier deck and the proposed development will be restricted to a 65 foot height limit. Therefore, as stated in Appendix C of the draft EIS, the proposed project will have no effect on distant views from this observation area. The design concept for the Aloha Tower rehabilitation includes a new elevator (Figure 13, draft EIS).

Very truly yours,



Mr. Robert W. Holman

RWH:nrl

cc: Group 70



# University of Hawaii at Manoa

Environmental Center  
Crawford 317 • 2550 Campus Road  
Honolulu, Hawaii 96822  
Telephone (808) 948-7001

Director  
Office of Environmental Quality Control  
550 Halekauwila Street, Room 301  
Honolulu, Hawaii 96813

Dear Sir/Madam:

Draft Environmental Impact Statement  
Aloha Tower Plaza Development Plan  
Honolulu, Oahu

The Environmental Center review of the above cited document has been prepared with the assistance of Donald Bell, Real Estate; John Craven, Ocean Engineering/Law School; Peter Flachsbarf, Urban and Regional Planning; and Pamela Balansen, Environmental

In general, our reviewers have found this DEIS to be a comprehensive document that adequately describes the potential environmental impacts associated with the development of the Aloha Tower Plaza. The specific concerns that follow have been identified by our reviewers.

### Development Objective and Design

Presently in the DEIS we are unable to determine in what capacity the Aloha Tower will be used. Discussion of its proposed usage should be included in the Revised EIS. We do note, however, that it is under consideration to install a central air conditioning system in the building (page 28) and yet it is stated on page 6, as one of the development objectives, that a naturally comfortable microclimate be created along with an energy efficient design (page 9). We suggest, in light of energy conservation concerns, that the effectiveness of an alternative method for natural air flow through the tower be examined.

We note on pages 13 through 21 that certain design requirements are to be required of the private developer whose primary area of development is to be the hotel, office building, restaurants and retail shops. How will these design and use criteria be implemented and enforced in the private developer's design and subsequent construction? Will the terms/requirements of the project's design, as specified in the DEIS, be stipulated in the contract/agreement between ATDC and the private developer? (See pages v, vi, 10, 13, 14, and 33)

AN EQUAL OPPORTUNITY EMPLOYER

Director, OEQC

### Historical Attributes

A more serious concern raised by our reviewers does not apply to any question of adequacy of the DEIS, but addresses the cultural/historical significance of the site and its use in the design of the project.

We note that one of the proposed development's objectives is to, "Design buildings and open spaces to be of the highest quality, in the Hawaiian tradition and in the tradition of waterfronts (page 9)." We concur with the intent of promoting the "Hawaiian tradition" in the design, however we find little evidence in the plan of specific actions that will be required to emphasize the cultural and historical Hawaiian "marine" traditions of the Honolulu waterfront. Given the location of the project, emphasis on the marine historical attributes would be the singular feature that would set this development apart from all other "Hawaiian" commercial complexes.

We would like to suggest that greater consideration be given to a design that would reflect both the present and past histories of the abutting Honolulu Harbor and its maritime activities. Possible methods of implementing this historical maritime theme would be to 1) design the Aloha Tower to accommodate an expanded and comprehensive maritime museum that would trace Hawaii's maritime history in a chronological sequence by floor levels; 2) incorporate the historical maritime theme into the design, decor, and furnishings of the hotel, office building, restaurants, retail shops and mall areas. The historical maritime design could create a unique atmosphere through provision of open space for ancient canoes, perhaps the Hokule'a or other appropriate examples of Hawaiian maritime history, would complement and emphasize the significance of the Aloha Tower and the accompanying docks.

A-79

Given the special location and recognized landmark significance of the Aloha Tower (page A-15) and the opportunity to create an unparalleled internationally visible cultural and historic maritime commercial complex, it would seem of utmost importance that the cultural and historical theme of the site be emphasized to the maximum extent possible to avoid the alternative of an isolated "Tower" and "well designed" but standard commercial complex on a water front. It is our understanding that the cities of Baltimore, Boston, and Victoria B.C. have created complexes somewhat similar to what we are suggesting with outstanding success.

We appreciate the opportunity to comment on this DEIS and hope you will find our suggestions of interest in your preparation of the Revised EIS and further development of this project.

Sincerely,

Jacquelin N. Miller  
Acting Director

cc: Aloha Tower Development Corporation  
Group 70  
Donald Bell  
John Craven  
Peter Flachsbarf  
Pamela Balansen



# ALOHA TOWER DEVELOPMENT CORPORATION

Major Eileen Anderson Mr. Robert H. Keith, Chairman  
Dr. Bradichi Higashimura Mr. Seamus O'Neil Mr. Harold Lupper Mr. James Irvine Mr. Thomas Tross  
Mr. Robert H. Keith, Executive Officer

July 26, 1983  
Page 2

July 26, 1983

Ms. Jacquelin H. Miller  
Acting Director, Environmental Center  
University of Hawaii Crawford 317  
2550 Campus Road  
Honolulu, Hawaii 96822

Dear Ms. Miller

Subject: Aloha Tower Development Plan  
Draft Environmental Impact Statement

Thank you for reviewing the subject DEIS. In answer to your specific comments:

1. Usage of Aloha Tower

Plans for usage of the Aloha Tower have not been finalized as yet. The goal of ATDC, as stated in the DEIS, is to encourage public access and use of the waterfront area; this includes the Aloha Tower itself. Page 89 of the draft EIS states:

"The Aloha Tower is envisioned as being the focal point of the new development. Because of an increased accessibility and visual prominence it is expected that more people will be encouraged to visit it. Much interest has also been expressed by the local maritime museum in locating its expanding collection there. It is anticipated that these actions will reinforce public attraction not only to the "Tower" itself but to other features and activities on the site."

- 2. Air Conditioning  
Alternatives to central air conditioning will certainly be examined during the design of the public improvements. As stated on page 28 of the DEIS, central air conditioning was suggested so that existing window units could be removed. Window units are energy inefficient as well as being unattractive appurtenances to the refurbished tower.
- 3. Design and Use Criteria  
Five developers are presently preparing proposals for the Aloha Tower Plaza development. Selection of the winning team will be based, in part, on the development proposal's adherence to the spirit of the design guidelines. The ATDC will monitor the implementation phase of the development from design through operation. In addition, the developer's lease with the ATDC will contain a provision that the lessee will design, construct and maintain all improvements on the leased premises in accordance with the design guidelines and the proposed physical program.
- 4. Historical Attributes

1. Public Improvements/Aloha Tower

Your suggestion that the Aloha Tower accommodate an expanded maritime museum is being considered. (See response to your first comment.) Your suggestions as to emphasizing the "maritime" traditions of the waterfront in the design of the public open spaces have been forwarded to the Board Members of the ATDC for their consideration.

2. Private Development Program

The design guidelines adopted by the ATDC are intended as a framework within which development of the Aloha Tower Plaza can take place. They are specific, where conformance is essential to the public purpose of the project, and more general where this concern is not as critical. For example, guidelines are specific in requiring particular treatment at the ground level edge of each development site (e.g., arcades, awnings, active uses), because of the important relationship

ALOHA TOWER

TELEPHONE

HONOLULU, HAWAII 96813

(808) 548-5127

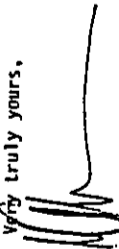
July 26, 1983  
Page 3

to the planned public open spaces. The guidelines are less specific and more general in addressing matters such as the organization and layout of guest room or office floors.

The AIDC will be looking for an imaginative response to these guidelines, one that understands and enhances the overall design concept for the project. To mandate that all proposals follow a particular theme would restrict the creativity of the professionals involved and limit the range of responses to the design problem.

The Board, however, will made aware of your concerns and will evaluate them in the context of the overall development concept.

Very truly yours,



Robert W. Holman  
Executive Officer

RHH:byb

cc: Group 70



**University of Hawaii at Manoa**

Water Resources Research Center  
Holmes Hall 283 • 2540 Dole Street  
Honolulu, Hawaii 96822

16 June 1983

Ms. Jacqueline Parnell, Director  
Office of Environmental Quality Control  
550 Halekaunuiia St., Room 301  
Honolulu, Hawaii 96813

Dear Ms. Parnell:

Subject: Draft EIS Aloha Tower Development Plan, Honolulu, Oahu,  
Hawaii, June 1983

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

1. P. 7, Fig. 2 and many other maps could use a north arrow.
2. P. 51, para 2.1, line 1 has missing words.
3. P. 54, Table 1, "Water Quality Data for Pier 11". The numbers given are means and contain too many significant figures. Analyses are not accurate to the figures shown.

Also under Turbidity the units are FTU, not FTO as shown.

Thank you for the opportunity to comment. This material was reviewed by WRRRC personnel.

Sincerely,  
*Edwin T. Murabayashi*  
Edwin T. Murabayashi  
EIS Coordinator

ETH:jm

cc: Aloha Tower Development Corp.  
Group 70

AN EQUAL OPPORTUNITY EMPLOYER



**ALOHA TOWER DEVELOPMENT CORPORATION**

Major Officers: Mr. Kent H. Keith, Chairman; Mr. Robert Holmes, Executive Officer; Mr. Edwin T. Murabayashi, EIS Coordinator; Mr. Donald Kasper, Water Resources Research Center; Mr. Robert Holmes, Executive Officer.

June 29, 1983

Mr. Edwin T. Murabayashi  
EIS Coordinator  
Water Resources Research Center  
Holmes Hall 283  
2540 Dole Street  
Honolulu, Hawaii 96822

Subject: Aloha Tower Development Plan - Draft EIS

Dear Mr. Murabayashi:

Thank you for reviewing the subject EIS. The errors which you have pointed out will be corrected in the Final EIS.

Very truly yours,

*Robert W. Holman*  
Robert W. Holman

RWH:nrl

cc: Group 70

AUHIA TIME

EIGHTH FLOOR

HONOLULU, HAWAII 96813

(808) 548-5127

BUILDING DEPARTMENT  
CITY AND COUNTY OF HONOLULU  
HONOLULU MUNICIPAL BUILDING  
505 SOUTH KING STREET  
HONOLULU, HAWAII 96813



FILIP W. ANDERSON  
MAYOR

ROY M. TANZI  
PRESIDENT AND BUILDING SUPERINTENDENT  
WILLIAM P. KECULAN  
DEPUTY DIRECTOR  
PB 83-464

June 20, 1983

Ms. Jacqueline Parnell, Director  
Office of Environmental Quality Control  
550 Halekauwila Street, Room 301  
Honolulu, Hawaii 96813

Dear Ms. Parnell:

Subject: Draft EIS for Aloha Tower  
Plaza Development Plan

We have reviewed the subject draft EIS and have no comments.  
Thank you for the opportunity to review it.

Very truly yours,

*ROY H. TANZI*  
ROY H. TANZI  
Director and Building Superintendent

cc: J. Harada  
Aloha Tower Develop. Corp.  
Group 70

POLICE DEPARTMENT  
CITY AND COUNTY OF HONOLULU  
1495 SOUTH KEELEMAN STREET  
HONOLULU, HAWAII 96813



FILIP W. ANDERSON  
MAYOR

OUR REFERENCE EC-ES

June 17, 1983

Ms. Jacqueline Parnell, Director  
Office of Environmental Quality Control  
550 Halekauwila Street, Room 301  
Honolulu, Hawaii 96813

Dear Ms. Parnell:

Subject: Aloha Tower Plaza Development Plan EIS

We do not have any comments to add to those furnished in response to the  
Notice of Preparation of EIS for Aloha Tower Plaza Development Plan.

Thank you for allowing us to review this draft EIS.

Sincerely,  
HAROLD FALK  
Acting Chief of Police

By *ROY MAMA*  
ROY MAMA  
Acting Assistant Chief  
Administrative Bureau

cc: Aloha Tower Development Corp.  
Aloha Tower, Eighth Floor  
Honolulu, Hawaii 96813  
Attention: Robert Holman

Group 70  
924 Bethel Street  
Honolulu, Hawaii 96813  
Attention: Harilynn Metz

DEPARTMENT OF GENERAL PLANNING  
CITY AND COUNTY OF HONOLULU

630 SOUTH KING STREET  
HONOLULU, HAWAII 96813



EILEEN R. ANDERSON  
MAYOR

MM

JUN 28 1983

7:15 AM  
RALPH PORTIMORE  
SENIOR CHIEF PLANNING OFFICER

DGP6/83-6953

June 27, 1983

Ms. Jacqueline Parnell, Director  
Office of Environmental Quality Control  
550 Halekauwila Street, Room 301  
Honolulu, Hawaii 96813

Dear Ms. Parnell:

Aloha Tower Plaza Development Plan  
Draft Environmental Impact Statement

We have no further comments on the subject draft environmental impact statement. Our earlier comments have been acknowledged by the applicant and are discussed in the EIS.

Sincerely,

*Ralph Kawamoto*  
RALPH KAWAMOTO  
Planner

APPROVED:

*Willard T. Chong*  
WILLARD T. CHONG

cc: Aloha Tower Development Corporation  
/Group 70

DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT  
CITY AND COUNTY OF HONOLULU

630 SOUTH KING STREET  
HONOLULU, HAWAII 96813



EILEEN R. ANDERSON  
MAYOR

JOSEPH K. CONANT  
MAYOR

CHARLES K. TORIODE  
SENIOR DIRECTOR

June 30, 1983

Ms. Jacqueline Parnell, Director  
Office of Environmental Quality Control  
550 Halekauwila Street, Room 301  
Honolulu, Hawaii 96813

Dear Ms. Parnell:

Subject: Environmental Impact Statement (EIS)  
for the Aloha Tower Plaza Development Plan

Our previous comments on traffic volume, air and noise quality, and relocation issues are addressed in the subject draft EIS.

We thank you for the opportunity to review your EIS.  
We will retain the report for our files.

Sincerely,  
JOSEPH K. CONANT  
Original Signed  
JOSEPH K. CONANT

cc: Aloha Tower Development Corporation  
Aloha Tower, Eighth Floor  
Honolulu, Hawaii 96813  
Attention: Robert Holman

Group 70  
924 Bethel Street  
Honolulu, Hawaii 96813  
Attention: Marilyn Metz

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



STEVEN R. ANDERSON  
MAYOR

MICHAEL J. CHUN, P.E.  
DIRECTOR AND CHIEF ENGINEER  
DIVISION OF WASTEWATER MANAGEMENT  
MURRIEL H. KATA  
DEPUTY DIRECTOR  
ENV 83-157

June 28, 1983

Ms. Jacqueline Parnell, Director  
Office of Environmental Quality Control  
State of Hawaii  
550 Halekuanui Street, Room 301  
Honolulu, Hawaii 96813

Dear Ms. Parnell:

Re: EIS for Aloha Tower Plaza Development Plan,  
Honolulu, Oahu, Hawaii

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

1. The calculated peak sewage flow should be 982,000 gallons per day (gpd) instead of 939,250 gpd (7.2b, Page 82). This corrected figure is derived by adding the infiltration/inflow rate of 2,750 gallons per acre per day multiplied by 16 acres to the sewage daily flow (938,000 + 44,000 = 982,000 gpd).
2. Under 7.2c, "Impacts" on page 82, additional capacity may be provided with a parallel line at the inadequate section of the existing 36-inch trunk sewer; however, the exact pipe size will have to be determined.

Me ke aloha pumehana,

MICHAEL J. CHUN  
Director and Chief Engineer

cc: Aloha Tower Development Corp.  
/ Group 70  
/ Div. of Wastewater Management

ALOHA TOWER DEVELOPMENT CORPORATION

Major Offices: Honolulu Mr. Kent H. Keith, Chairman  
Mr. Kenneth Higashimura, Mr. Jerome Iino, Mr. Donald Kappert, Mr. Arnie Levine, Mr. Thomas Tack  
Mr. Robert Johnson, Executive Officer

July 22, 1983

Mr. Michael J. Chun  
Director and Chief Engineer  
City and County of Honolulu  
Department of Public Works  
650 South King Street  
Honolulu, Hawaii 96813

Dear Mr. Chun:

Subject: EIS for Aloha Tower Plaza Development Plan  
(Your letter ENV 83-157)

Thank you for reviewing and commenting on the EIS.  
In response to your specific comments:

1. Peak Sewage Flow

After discussions between a representative of our Civil Engineering Consultant, Sam O. Hirota, Inc., and a staff member of your Division of Wastewater Management, we have corrected the inflow/infiltration factor to reflect 2750 gallons per acre per day multiplied by 13 acres. Peak sewage flow is, therefore, 938,000 + 35,750 or 973,750 gpd. This revision will be incorporated in the final EIS.

2. Sewer Line

The reference to the size of the parallel line will be deleted in the final EIS.

Very truly yours,

for, Robert W. Holman

RWH:nt1  
cc: Group 70

ALOHA TOWER

1000 KALANOAUE

HONOLULU, HAWAII 96813

(808) 548-5327



# CORRECTION

THE PRECEDING DOCUMENT(S) HAS  
BEEN REPHOTOGRAPHED TO ASSURE  
LEGIBILITY  
SEE FRAME(S)  
IMMEDIATELY FOLLOWING

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



EILEEN ANDERSON  
 445000

June 28, 1983

Ms. Jacqueline Parnell, Director  
 Office of Environmental Quality Control  
 State of Hawaii  
 550 Halekauwila Street, Room 301  
 Honolulu, Hawaii 96813

Dear Ms. Parnell:

Re: EIS for Aloha Tower Plaza Development Plan,  
Honolulu, Oahu, Hawaii

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

1. The calculated peak sewage flow should be 982,000 gallons per day (gpd) instead of 939,250 gpd (7.2b, Page 82). This corrected figure is derived by adding the infiltration/inflow rate of 2,750 gallons per acre per day multiplied by 16 acres to the sewage daily flow (938,000 + 44,000 = 982,000 gpd).
2. Under 7.2c, "Impacts" on page 82, additional capacity may be provided with a parallel line at the inadequate section of the existing 36-inch trunk sewer; however, the exact pipe size will have to be determined.

Me ke aloha pumehana,

*Michael J. Chun*  
 MICHAEL J. CHUN  
 Director and Chief Engineer

cc: Aloha Tower Development Corp.  
 Group 70  
 Div. of Wastewater Management

*Michael J. Chun*  
 MICHAEL J. CHUN, Ph.D.  
 Director and Chief Engineer  
 WASTEWATER DIVISION  
 SAUNDERS H. HATA  
 445000  
 ENV 83-157

**ALOHA TOWER DEVELOPMENT CORPORATION**

Mayor Eileen Anderson Dr. Kenneth H. Healy, Chairman  
 Mr. Robert Libman, Treasurer (Wife)  
 Mr. Donald Taylor Mr. James Irvine Mr. Thomas Irack

July 22, 1983

Mr. Michael J. Chun  
 Director and Chief Engineer  
 City and County of Honolulu  
 Department of Public Works  
 650 South King Street  
 Honolulu, Hawaii 96813

Dear Mr. Chun:

Subject: EIS for Aloha Tower Plaza Development Plan  
(Your letter ENV 83-157)

Thank you for reviewing and commenting on the EIS.  
 In response to your specific comments:

1. Peak Sewage Flow

After discussions between a representative of our Civil Engineering Consultant, Sam O. Hirota, Inc., and a staff member of your Division of Wastewater Management, we have corrected the inflow/infiltration factor to reflect 2750 gallons per acre per day multiplied by 16 acres. Peak sewage flow is, therefore, 938,000 + 35,750 or 973,750 gpd. This revision will be incorporated in the final EIS.

2. Sewer Line

The reference to the size of the parallel line will be deleted in the final EIS.

Very truly yours,

*Robert W. Holman*  
 for, Robert W. Holman

RWH:nrl  
 cc: Group 70

ALPHA TOWER  
 ENGINEERING  
 HONOLULU, HAWAII 96813  
 (808) 548-5337

OFFICE OF THE MAYOR  
CITY AND COUNTY OF HONOLULU  
HONOLULU, HAWAII 96813 AREA CODE 808 535-4111

EILEEN R. ANDERSON  
MAYOR



June 24, 1983

Mr. Robert Holman, Executive Officer  
Aloha Tower Development Corporation  
Aloha Tower, Eighth Floor  
Honolulu, Hawaii 96813

Dear Mr. Holman:

Aloha Tower Plaza Development Plan  
Draft Environmental Impact Statement (EIS)

Thank you for forwarding the subject draft EIS. Potential environmental effects in urban Honolulu, particularly developments along the harbor, are a major concern of my administration.

I am aware that affected City agencies have previously indicated their interest in the construction of the proposed development at the EIS preparation stage. EIS procedures call for your providing them copies of the draft EIS, containing new and significant information. The agencies will be submitting their respective comments to you separately.

Thank you for including us in the review and evaluation process.

Very truly yours,

*Eileen R. Anderson*  
EILEEN R. ANDERSON

ALOHA TOWER DEVELOPMENT CORPORATION

Mayor Eileen Anderson Mr. Kent M. Keith, Chairman  
Mr. Robert Holman, Executive Officer Mr. Donald Kayper Mr. Adam Levine Mr. Thomas Turk  
Mr. Stephen Lee Mr. Stephen Lee Mr. Stephen Lee

July 22, 1983

The Honorable Eileen R. Anderson  
Mayor  
City and County of Honolulu  
Honolulu, Hawaii 96813

Dear Mayor Anderson:

Subject: Aloha Tower Plaza Development Plan Draft  
Environmental Impact Statement

Thank you for your comments on the subject EIS. For your information, copies of the draft EIS were distributed to ten agencies of the city through the Environmental Quality Commission (EQC). To date, eight have submitted comments and we anticipate that comments will be received from all recipient agencies.

We appreciate your continued support for the project and your stated goals of revitalizing the important downtown area of our city.

Very truly yours,

*Robert N. Holman*  
for Robert N. Holman

RHH:nrl  
cc: Group 70

ALOHA TOWER

EIGHTH FLOOR

HONOLULU, HAWAII 96813

(808) 548-5127

DEPARTMENT OF PARKS AND RECREATION  
CITY AND COUNTY OF HONOLULU  
550 SOUTH KING STREET  
HONOLULU, HAWAII 96813



EMIKO I. KUDO  
DIRECTOR  
SAM L. CARL  
DEPUTY DIRECTOR  
OSCAR M. ABANINA  
EXECUTIVE ASSISTANT

July 5, 1983

Ms. Jacqueline Parnell, Director  
Office of Environmental Quality Control  
550 Halekuanila Street, Room 301  
Honolulu, Hawaii 96813

Dear Ms. Parnell:

SUBJECT: ENVIRONMENTAL IMPACT STATEMENT  
ALOHA TOWER PLAZA DEVELOPMENT PLAN

Thank you for the opportunity to review the Environmental Impact Statement for the Aloha Tower Plaza Development Plan. The Department of Parks and Recreation is pleased to see that the Irwin Memorial Park will be restored to open space and park use as originally intended. We do not have any specific comments to make at this time on other plan elements, but we would appreciate the opportunity to review more detailed plans of the plaza area and the park when they are prepared.

Sincerely yours,

(Mrs.) EMIKO I. KUDO, Director

EIK:vc

cc: ~~Environmental Quality Control~~  
Group 70

ALOHA TOWER DEVELOPMENT CORPORATION

Major Office Address: Mr. Kent M. Keith, Chairman  
Mr. Yoshiki Hirasaka, Jr. Secretary Mr. Donald Kasper, Sr. Assistant  
Mr. Robert Holman, Executive Officer

July 22, 1983

(Mrs.) Emiko I. Kudo, Director  
City and County of Honolulu  
Department of Parks and Recreation  
650 South King Street  
Honolulu, Hawaii 96813

Dear Mrs. Kudo:

Subject: Environmental Impact Statement Aloha Tower  
Plaza Development Plan

Thank you for your comments on the subject EIS and Plan. I will inform the Board of Directors of the ATDC of your request to see more detailed plans of the Plaza area and park when they are prepared.

Very truly yours,

for, Robert W. Holman

RWH:nrl  
cc: Group 70

A-87

ALOHA TOWER HONOLULU, HAWAII 96813 (808) 548-5122



COPY



**ALOHA TOWER DEVELOPMENT CORPORATION**

Mr. Kent H. Keith, Chairman  
Mr. Sessome Ito, Mr. Donald Sawyer, Mr. Arthur Kuyper, Mr. Thomas Hask  
Mr. Robert Ishikawa, Errethier District

July 5, 1983

Ms. Jacqueline Parnell, Director  
Office of Environmental Quality Control  
550 Halekauwila Street, Room 301  
Honolulu, Hawaii 96813

Dear Ms. Parnell:

Subject: Draft Environmental Impact  
Statement for Aloha Tower Plaza  
Development Plan

We appreciate the opportunity to review the environmental document and have the following comments:

1. Estimates of Future Demand, pgs. 79-80:  
The total average daily water demand should be 441,000 gallons per day. This correction also affects the figure for the total average daily demand for the new development plus existing demand and the maximum daily demand. Our water distribution lines will need to be upgraded to accommodate the increased demand of this and other projects planned for the downtown area.
2. Impacts, pg. 80:  
The Board of Water Supply does not issue water permits. A commitment to serve water for the development will be made when the construction drawings or building permits are submitted to us for our review and approval. However, all action required by the City's Department of Land Utilization must be approved by them before we will take any action on the development.

If you have any questions, please contact Lawrence Whang at 527-5221.

Very truly yours,

*Kazu Hayashida*

KAZU HAYASHIDA  
Manager and Chief Engineer

cc: Aloha Tower Development Corp.  
Group 70

July 22, 1983

Mr. Kazu Hayashida  
Manager and Chief Engineer  
Board of Water Supply  
City and County of Honolulu  
630 South Beretania Street  
Honolulu, Hawaii 96843

Dear Mr. Hayashida:

Subject: Draft Environmental Impact Statement for Aloha  
Tower Plaza Development Plan

Thank you for reviewing the draft EIS. In response to your specific comments:

1. Estimates of Future Demand, pgs. 79-80:

Thank you for calling to our attention the error in the computation of water demand for the Aloha Tower Project. The final EIS will be corrected to indicate the following:

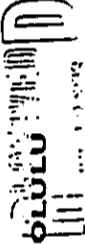
Total average daily water demand for new development:	441,000 gpd
Total development (incl. existing)	495,920 gpd
Maximum daily water demand:	743,880 gpd
Peak Hourly Flow:	1.5 million gallons

The last sentence of page 80 of the draft EIS states that... "The developer may also be required to pay an additional assessment for his proportional share for water system improvements that are required in the downtown area to accommodate new developments." This would conceivably include upgrading water distribution lines.

*Plm*



CITY AND COUNTY OF HONOLULU  
DEPARTMENT OF LAND UTILIZATION  
550 SOUTH KING STREET  
HONOLULU, HAWAII 96813-1002



ALOHA TOWER DEVELOPMENT CORPORATION

Major Officers: Mr. Kent H. Keith, Chairman  
Mr. Robert W. Jones, President  
Mr. Robert W. Jones, Vice President  
Mr. Robert W. Jones, Secretary  
Mr. Robert W. Jones, Treasurer  
Mr. Robert W. Jones, Director

SILKEN S. ANDERSON  
50100



July 8, 1983

6/28/83 7/6

MICHAEL M. McELROY  
DIRECTOR  
ROBERT W. JONES  
DEPUTY DIRECTOR

LU6/03-2636 (SH)

Mr. Melvin K. Koizumi, Acting Director  
Office of Environmental Quality Control  
State of Hawaii  
550 Halekauwila Street, Room 301  
Honolulu, Hawaii 96813

Dear Mr. Koizumi:

Draft Environmental Impact Statement (EIS)  
Aloha Tower Plaza Development Plan

We have reviewed the above, and find it to be a well-prepared document, addressing the major concerns related to the project's implementation. There are a few areas which are yet unresolved, i.e., the final traffic circulation patterns, archaeological/historical concerns (should any artifacts be discovered during construction), water commitment, and sewage infrastructure.

The Design Branch of the Department of Land Utilization will review the details of this project under the provisions of the Capitol District-Historic, Cultural and Scenic District.

If there are any questions, please contact Sampson Har of our staff at 577-5044.

Very truly yours,

*Michael M. McElroy*  
MICHAEL M. McELROY  
Director of Land Utilization

MHM:st

cc: Aloha Tower Development Corp.  
Group 70

July 22, 1983

Mr. Michael M. McElroy  
Director of Land Utilization  
City and County of Honolulu  
650 South King Street  
Honolulu, Hawaii 96813

Dear Mr. McElroy:

Subject: Draft Environmental Impact Statement (EIS)  
Aloha Tower Plaza Development Plan

Thank you for reviewing the EIS. As stated in the draft EIS, final traffic circulation patterns and specific roadway and traffic improvements will be coordinated with the State Highways Division and the City Department of Transportation Services.

In regard to your archaeological/historical concerns, it is unlikely that archaeological deposits will be found, unless they were deposited there as part of the landfill operation that created the site. The developer will, however, be instructed to notify the State Historic Preservation Office if buried archaeological deposits are uncovered and will be required to undertake specific mitigation measures as directed by that office. The water commitment and sewage infrastructure issues will be resolved prior to project implementation.

Very truly yours,

*Robert W. Holman*  
Robert W. Holman

RWH:nrl  
cc: Group 70

ALOHA TOWER

DEPARTMENT OF LAND UTILIZATION

550 SOUTH KING STREET

(808) 548-5177

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



ELIYAH W. ANDERSON  
DIRECTOR  
ENVIRONMENTAL CONTROL  
DIVISION

WILLIAM A. BONNETT  
DIRECTOR  
DEVELOPMENT  
DIVISION

Mr. Melvin Koizumi, Acting Director  
July 12, 1983  
Page 2

July 12, 1983

TE 6/83-2356

Mr. Melvin Koizumi, Acting Director  
Office of Environmental Quality Control  
550 Halekauwila Street, Room 301  
Honolulu, Hawaii 96813

Dear Mr. Koizumi:

Subject: Aloha Tower Development Plan  
Environmental Impact Statement

We have reviewed the Draft EIS on the Aloha Tower Development Plan and offer the following comments for your consideration:

1. The relocation of State employee parking, change in the traffic pattern within the Honolulu Harbor complex, and the traffic projected from the proposed development will also have an impact on the following intersections:

Alakea Street - Nimitz Highway  
Halekauwila Street - Nimitz Highway  
Nimitz Highway - Richards Street

These intersections are part of the overall traffic complex within the Aloha Tower project site, and as such, should be included in the traffic assignments. Capacity analyses should also be made for these intersections.

2. Our field observations and study of traffic counts on Nimitz Highway indicate this roadway is a heavily travelled arterial; and we question the excellent levels of service and volume to capacity ratios shown in the various tables for this highway.
3. The study should also address the impact to the City bus service by the projected bus patrons using City buses to and from the proposed development.
4. It should be noted that the City is considering development of a hotel and convention hall at the Kaahumanu parking facility site which will generate

additional traffic onto the same highway and streets affected by the Aloha Tower Plaza Development Plan. The report should address this concern.

Thank you for giving us the opportunity to review this Draft Environmental Impact Statement.

If you have any questions, please contact Kenneth Hlrata at 527-5031.

Sincerely,

WILLIAM A. BONNETT  
Director

cc: Aloha Tower Development  
Corporation  
Group 70





# ALOHA TOWER DEVELOPMENT CORPORATION

Mr. Kent H. Keith, Chairman  
Department of Transportation Services  
City and County of Honolulu  
650 S. King Street  
Honolulu, Hawaii 96813

August 2, 1983

Dear Mr. Bonnet:

RE: ALOHA TOWER DEVELOPMENT PLAN-DRAFT ENVIRONMENTAL  
IMPACT STATEMENT

Thank you for reviewing the subject draft EIS. In answer to your specific comments:

1. Traffic assignments and capacity analysis for the intersections you suggest will be included in the Final EIS.
2. We agree with your observations concerning the levels of service and capacity ratios for Himitz Highway. We have identified this apparent discrepancy (and the reasons for the differences between observed and calculated results) on Page A-44 of the draft EIS.
3. Impacts to city bus service will be addressed in the Final EIS.
4. We are aware that the City has recently announced that it is considering development of a hotel and convention hall at the Kaahumanu parking facility site. This development will generate an unknown amount of traffic in the vicinity of the Aloha Tower complex. This will be noted in the Revised Traffic Impact Study which will be appended to the Final EIS.

Very truly yours,

Robert H. Holman

(RHL:nr)

cc: Group 70

ALPHA FILE

PLANNING

DEPARTMENT OF TRANSPORTATION SERVICES

ROOM 540-5127

FIRE DEPARTMENT  
CITY AND COUNTY OF HONOLULU  
1455 S. BERETANIA STREET, ROOM 305  
HONOLULU, HAWAII 96814



ESTABLISHED 1842



MELVIN M. NONAKA  
FIRE CHIEF  
THOMAS C. BLONDIN  
FIRE DEPUTY CHIEF

June 17, 1983

Ms. Jacqueline Parnell, Director  
Office of Environmental Quality Control  
550 Halekauwila Street, Room 301  
Honolulu, Hawaii 96813

SUBJECT: Aloha Tower Development Plan

Dear Ms. Parnell:

We have reviewed the EIS for the subject project.

As mentioned in your report (on page 85), the Waterfront Fire Station is 1 1/2 to 2 minutes away from the project area; however, the fire station houses only a fireboat that primarily provides fire protection for the Honolulu Harbor and Wharf areas.

Should a fire occur at the project site, an initial dispatch of 3 engine companies, 2 ladder companies, 1 rescue company and a Chief Fire Officer will provide the necessary fire protective equipment and manpower.

We have determined that adequate fire protection is available. Your EIS Report for the subject project will be retained for further study and review.

Very truly yours,  
  
MELVIN M. NONAKA,  
Fire Chief

MMN:ct/NSKW

ALOHA TOWER DEVELOPMENT CORPORATION

Mr. Kent H. Keith, Chairman  
Mayor Eugene Anderson Mr. Yoshida Higashimura Mr. Samuel Lee Mr. Donald Kuyper Mr. Aaron Levine Mr. Thomas Oost  
Mr. Robert Johnson, Executive Officer

August 3, 1983

Mr. Melvin Nonaka  
Fire Chief  
City and County of Honolulu  
1455 South Beretania Street  
Honolulu, Hawaii 96814

Dear Mr. Nonaka:

Subject: Aloha Tower Development Plan Draft EIS

Thank you for reviewing the subject EIS. Your comments will be incorporated into the text of the final document.

Very truly yours,

ROBERT W. HOLMAN

RWH:nrl

cc: Group 70

A-93

ALOHA TOWER

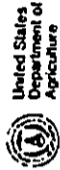
ENGINEERING

ENGINEERING, HAWAII 96813

(HAW) 510-5177

**OMPO**

Oahu  
Metropolitan  
Planning  
Organization



Soil  
Conservation  
Service

P.O. Box 50004  
Honolulu, Hawaii  
96850

June 24, 1983

Suite 1509  
1185 Bishop Street  
Honolulu, Hawaii 96813  
(808) 523-4178  
(808) 548-2838

June 13, 1983

Ms. Jacqueline Parnell, Director  
Office of Environmental Quality Control  
550 Halekauwila Street, Room 301  
Honolulu, Hawaii 96813

Subject: Aloha Tower Plaza Development Plan - Draft EIS

Dear Ms. Parnell:

We have reviewed the above mentioned draft EIS and found that our comments raised on the EIS Preparation Notice have been adequately addressed. We have no further comments.

Sincerely,

*Cathy D. Arthur*

Cathy D. Arthur  
Acting Executive Director

CDA:GL/pjc

cc: 1) Aloha Tower Development Corporation  
2) Group 70

Ms. Jacqueline Parnell, Director  
Office of Environmental Quality Control  
550 Halekauwila Street, Room 301  
Honolulu, Hawaii 96813

Dear Ms. Parnell:

Subject: EIS for Aloha Tower Plaza Development Plan  
Honolulu, Oahu, Hawaii

We have reviewed subject EIS and have no comments to make.  
Thank you for the opportunity to review this document.

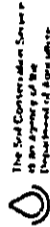
Sincerely,

*Francis C. H. Lum*

FRANCIS C. H. LUM  
State Conservationist

cc: Aloha Tower Development Corporation  
Aloha Tower, Eighth Floor  
Honolulu, Hawaii 96813  
Atten: Robert Holman

Group 70  
924 Bethel Street  
Honolulu, Hawaii 96813  
Atten: Marilyn Metz





United States Department of the Interior

FISH AND WILDLIFE SERVICE  
300 ALA MOANA BOULEVARD  
P. O. BOX 5045  
HONOLULU, HAWAII 96850

JUN 16 1983

RECEIVED 7:05  
Room 6307

JUN 14 1983

Ms. Jacqueline Parnell  
Director, Office of Environmental  
Quality Control  
550 Halekuanua Street, Room 301  
Honolulu, Hawaii 96813

Re: Aloha Tower Plaza  
Development Plan,  
Honolulu, Oahu, Hawaii

Dear Ms. Parnell:

Due to current budget and budget restrictions, the Office of Environmental Services cannot devote the time necessary to conduct a thorough review of fish and wildlife concerns associated with the referenced action at this time. We strongly recommend that you consult directly with the State of Hawaii, Department of Land and Natural Resources, Division of Aquatic Resources and consider their recommendations in your project planning.

Please be advised that this notification does not abrogate your responsibilities to comply with the requirements of the Fish and Wildlife Coordination Act, nor does it represent Service approval of, or support for, the proposed activity. The Service may review future actions related to this proposal should administrative constraints be alleviated or if adverse impacts to significant fish and wildlife resources are identified. Please continue to keep this office apprised of the project's status.

Sincerely yours,

/s/

William Kramer  
Project Leader  
Office of Environmental Services

cc: Aloha Tower Development Corporation  
Group 70  
RHS-4710  
HWR



Save Energy and You Save America!



DEPARTMENT OF THE AIR FORCE  
HEADQUARTERS BUREAU OF MILITARY AIRCRAFT  
TRICK AND AIR FORCE (DAS) - HAWAII (APO)

JUN 17 1983  
16 JUN 1983

REPLY TO DEEV (Mr Yamada, 449-1831)

SUBJECT: Draft Environmental Impact Statement for the Aloha Tower Plaza Development Plan

Ms Jacqueline Parnell, Director  
Office of Environmental Quality Control  
550 Halekuanua Street, Room 301  
Honolulu, HI 96813

1. This office has reviewed the subject EIS and has no comment relative to the proposed project.
2. We greatly appreciate your cooperative efforts in keeping the Air Force apprised of your project and thank you for the opportunity to review the document. The draft EIS is returned for your file.

*Robert M. Okazaki*

ROBERT M. OKAZAKI  
Chief, Engrg & Civl Engrng  
Directorate of Civil Engineering

1 Atch  
Draft EIS

Cy to: Aloha Tower Development Corporation  
Aloha Tower, 8th Floor  
ATTN: Mr Robert Holman  
Honolulu, HI 96813

Group 70  
ATTN: Ms Marilyn Melz  
924 Bethel Street  
Honolulu, HI 96813

15-4



Commander (G)  
Fourteenth Coast Guard District

Prince Kalahele  
Federal Building  
300 Ala Moana Blvd.  
Honolulu, Hawaii 96850  
Phone: 546-2861



DEPARTMENT OF THE ARMY  
HEADQUARTERS UNITED STATES ARMY SUPPORT COMMAND, HAWAII  
FORT SHAFTER, HAWAII 96858

REPLY TO  
ATTENTION OF:  
June 30, 1983

Directorate of Facilities Engineering

Jacqueline Parnell, Director  
Office of Environmental Quality Control  
550 Halekauwila Street, Room 301  
Honolulu, Hawaii 96813

Dear Ms. Parnell:

The Fourteenth Coast Guard District has reviewed the Environmental Impact Statement for the Aloha Tower Plaza Development Plan and has no objection or constructive comments to offer at the present time.

Sincerely,

J. E. SCHWARTZ  
Commander, U. S. Coast Guard  
District Planning Officer

By direction of  
Commander, Fourteenth Coast Guard District

Copy: Aloha Tower Development Corporation  
-Group 70

Ms. Jacqueline Parnell, Director  
Office of Environmental Quality Control  
550 Halekauwila Street, Room 301  
Honolulu, Hawaii 96813

Dear Ms. Parnell:

The Draft Environmental Impact Statement (DEIS) for the Aloha Tower Plaza Development Plan, Honolulu, Oahu has been reviewed and we have no comments to offer. There are no Army installations or activities in the vicinity of the proposed project.

Thank you for the opportunity to comment on the DEIS.

Sincerely,

Ronald A. Borrello  
Colonel, CE  
Director of Facilities Engineering

Copies Furnished:

Aloha Tower Development Corporation  
Attention: Mr. Robert Holmann  
Aloha Tower, Eighth Floor  
Honolulu, Hawaii 96813

Group 70  
Attention: Ms. Hirtlynn Metz  
924 Bethel Street  
Honolulu, Hawaii 96813

GROUP 70

RECEIVED  
JUN 15 1983  
JUN 17 1983



HEADQUARTERS  
NAVAL BASE PEARL HARBOR  
BOX 110  
PEARL HARBOR, HAWAII 96324

IN REPLY REFER TO:  
#021:01B:jm  
SRT 1539  
7 JUL 1983

Mrs. Jacqueline Parnell, Director  
Office of Environmental Quality Control  
59 Kulehannia Street, Room 301  
Honolulu, Hawaii 96813

Dear Ms. Parnell:

Environmental Impact Statement  
Aloha Tower Plaza Development Plan

The FIS for the Aloha Tower Plaza Development Plan has been reviewed and the Navy has no comments to offer. As this comment has no further use for the FIS, the FIS is being returned to the Environmental Quality Commission, by copy of this letter.

Thank you for the opportunity to review the FIS.

Sincerely,

A. J. PARNELL  
CAPTAIN, U.S. NAVY  
OFFICE OF THE COMMANDER  
NAVAL BASE PEARL HARBOR

Enclosure

Copy to:  
Environmental Quality Commission  
Aloha Tower Development Corporation  
6/20/83



**AMERICAN LUNG ASSOCIATION  
OF HAWAII**

**ENVIRONMENTAL IMPACT STATEMENT REVIEW**

... on air quality assurance program



**ALOHA TOWER DEVELOPMENT CORPORATION**

Mayor Filipe Anderson Dr. Spalding H. Keolu Mr. Robert Holman, Executive Officer  
Mr. Kent H. Smith, Chairman  
Mr. William L. McKeown, Jr., Secretary  
Mr. James H. Keolu, Treasurer

Project: Aloha Tower Plaza Development Plan Date: 7/8/83

1. We have reviewed the EIS for the subject project with particular attention to those sections pertaining to air quality. Our detailed comments follow.
2. Page A-8: Emissions estimates are presented as pounds (lb). The significance of these estimates is uncertain because there is no indication of the time period over which they occur. In other words, are they pounds per minute, pounds per hour, pounds per day, etc.  
Because of the use of outdated references (see Comment 4), all the emissions have been very likely underestimated. Since the time of publication of the original reports, EPA has continued to perform tests on in-use motor vehicles. The findings have shown that actual emissions are substantially greater than originally projected; therefore, EPA has periodically published updated reports on automotive emissions.
3. The overall impact analysis made no attempt to assess ambient concentrations. While emissions estimates alone are somewhat informative, it is ambient concentrations to which the public is exposed; therefore, an analysis of ambient impacts should have been included. Carbon monoxide is commonly used as a surrogate for the other automotive pollutants in such analyses (see Reference 5.a listed below).
4. Page A-9: Two of the three cited references are outdated and have been superseded by subsequent publications.
5. References:
  - a. U.S. Environmental Protection Agency. Guidelines for Air Quality Maintenance Planning and Analysis, Volume 9 (Revised): Evaluating Indirect Sources, EPA 450/4-78-001, September 1978
  - b. U.S. Environmental Protection Agency. Compilation of Air Pollutant Emission Factors: Highway Mobile Source (Final Report), EPA 460/3-01-005, March 1981

*James W. Morrow*  
James W. Morrow  
Director  
Environmental Health

August 3, 1983

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

Dear Mr. Morrow:

Thank you for reviewing the subject EIS. Because your comments were technical in nature, we forwarded your letter to Dames & Moore, our air quality consultants. Their response to your specific comments is attached.

Very truly yours,  
*Robert W. Holman*  
Robert W. Holman

RWH:nrl  
encl.

cc: Group 70 - w/o encl.  
Dames & Moore - w/o encl.

STATE OF HAWAII  
DEPARTMENT OF HEALTH  
DIVISION OF ENVIRONMENTAL HEALTH  
1555 KALANOAUOUE AVENUE  
HONOLULU, HAWAII 96813  
(808) 546-5377

**Dames & Moore**

1144 10th Avenue, Suite 210  
Honolulu, Hawaii 96813  
(808) 235-1585  
Telex: 614100 Cable Address: DAMEMOORE

**Dames & Moore**

Group 70, Inc.  
924 Bethel Street  
Honolulu, Hawaii 96813

Attention: Mr. Francis Oda

Response to Lung Association Comments  
Air Quality Impact Opinion  
Proposed Aloha Tower Plaza Development Plan  
Honolulu, Oahu, Hawaii

We have reviewed the letter of July 8, 1983 from the American Lung Association of Hawaii providing comments to the Air Quality Impact Opinion prepared for the proposed Aloha Tower Plaza Development Plan. We would suggest the following points be included in your response to the Lung Association's letter.

1. The emission estimates presented on page A-8 are presented in pounds of carbon monoxide, hydrocarbons, and oxides of sulfur in terms of peak hour traffic volumes. Therefore, the amounts presented (pounds) are per the unit of traffic volume (hour). The estimates are thus presented in terms of pounds per hour at peak traffic volume.
2. We have reviewed the revised compilation of vehicle emission factors (EPA460/3-81-005, March 1981-005) over the reference utilized in our report. While the publication provides somewhat more refined emission factors for certain mixes of vehicle types, the differences between 1981 reference and the 1978 reference are not generally significant. Graphic comparisons of the 1978 estimates (mobile) and the 1981 estimates (mobile) are presented on the attached figures. For the level of precision of the estimate, the differences are insignificant.

Group 70, Inc.  
July 29, 1983  
Page 2

July 29, 1983

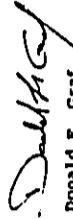
3. Because the results of the emissions analysis indicate a reduction of emissions over present levels, we estimate a subsequent increase in the ambient air quality, based upon the project description presented in the environmental impact statement. The project area should continue to enjoy high ambient air quality under normal tradewind conditions; and because of its leeward location, also should enjoy excellent ambient air quality under "Kona" or on-shore wind conditions.

4. We have noted the revised references and reviewed those references in relation to the two cited in our opinion. While the Guidelines for Air Quality Maintenance Planning and Analysis and Compilation of Vehicle Emission Factors have been somewhat refined, the differences in the two documents would not lead to significantly different conclusions.

We appreciate the input of the American Lung Association and will continue to consult with them in any further evaluation of significant air quality impacts of the proposed project.

Yours very truly,

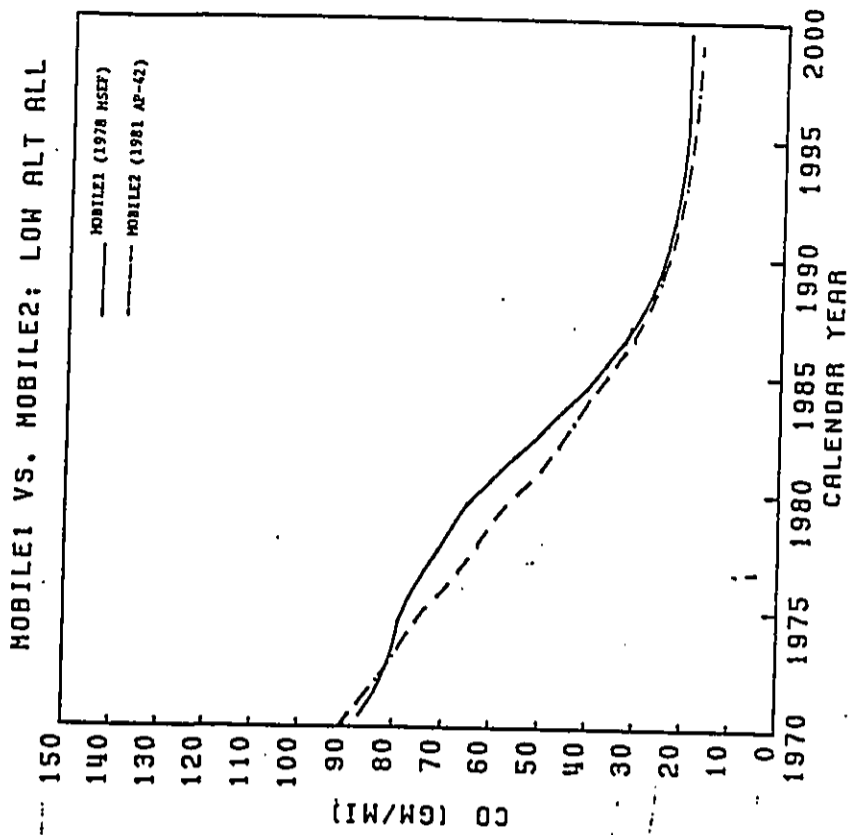
DAMES & MOORE

  
Donald F. Graf  
Associate

DFG:0145A/03014-113-11/0109/0577A  
(Three copies)

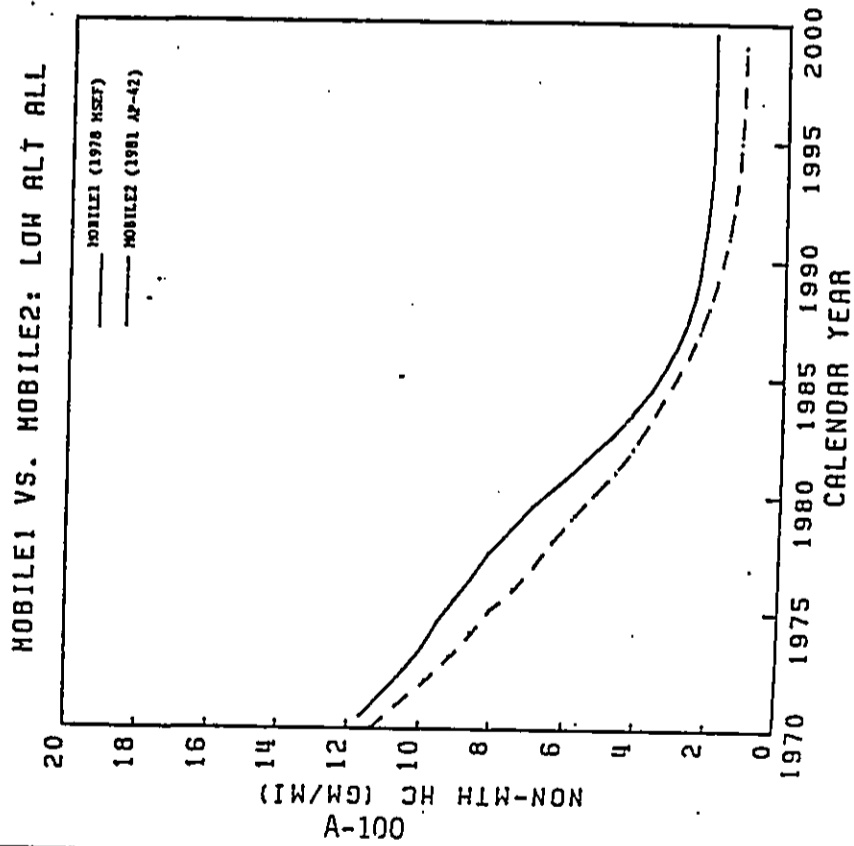


Figure 2  
 Low Altitude Non-California  
 CO Emissions vs. Calendar Year  
 For all Eight Vehicle Types Combined



xiv

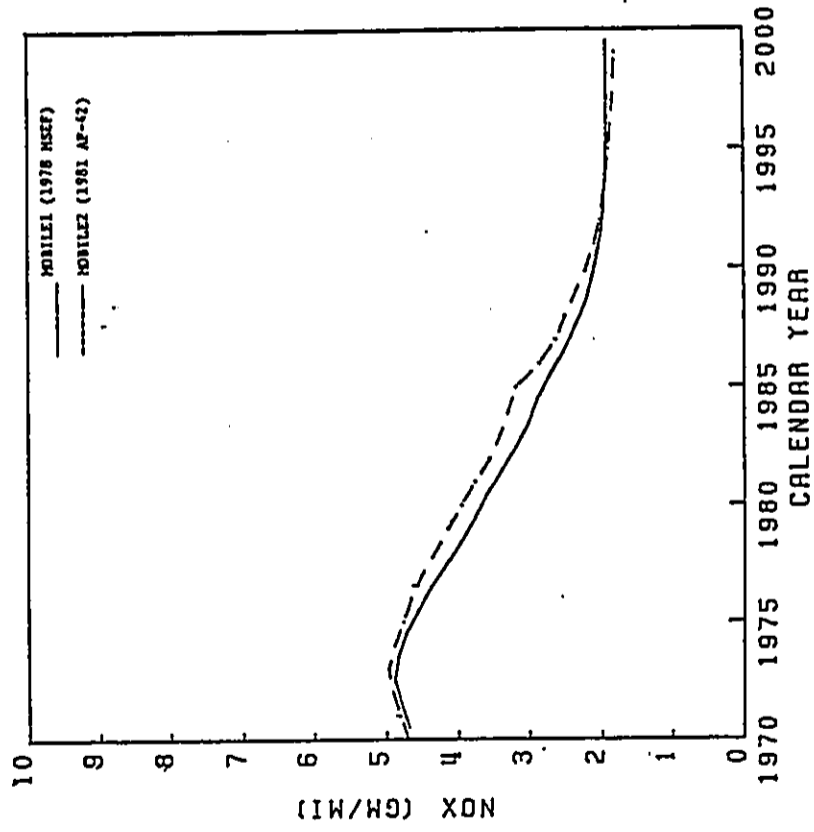
Figure 1  
 Low Altitude Non-California  
 Non-Methane HC Emissions vs. Calendar Year  
 For all Eight Vehicle Types Combined



xiii

Figure 3  
Low Altitude Non-California  
NOx Emissions vs. Calendar Year  
For all Eight Vehicle Types Combined

MOBILE1 VS. MOBILE2: LOW ALT ALL



HAWAIIAN ELECTRIC COMPANY, INC.  
 Box 2750 / Honolulu, Hawaii / 96840  
 JULY 8, 1983  
 PERMIT 241  
 HV/G

RICHARD L. O'CONNELL, P.E.  
 MUNICIPAL ENVIRONMENTAL DEPARTMENT  
 (808) 548-4889

Mr. Melvin Koizumi, Acting Director  
 Office of Environmental Quality Control  
 550 Halekauwila Street, Room 301  
 Honolulu, Hawaii 96813

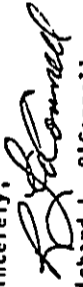
Dear Mr. Koizumi:

Subject: Aloha Tower Plaza Development Plan  
Draft Environmental Impact Statement

We have reviewed the above Draft Environmental Impact Statement and offer the following comments:

1. Pages 34 and 53 - Fuel oil lines and electrical underground lines owned by HECO have been added to Figures 16 and 24, enclosed.
2. Page 33, Paragraph 3.6 - HECO underground lines may also require relocation at ATDC or developer expense.
3. Page 71, Paragraph 4.2b - Clarify first sentence by rewording as follows: "Outdoor noise levels experienced by HECO employees at the Honolulu Power Plant..."
4. Page 83, Paragraph 7.4a - The site is now served by a three-wire, 4.16 kv system (from Halekauwila Substation) not an 11.5 kv system as stated.

Thank you for the opportunity to comment on this Draft Environmental Impact Statement.

Sincerely,  
  
 Richard L. O'Connell  
 Manager, Environmental Department

JHP:cal  
 Enclosures  
 Cc: Aloha Tower Development Corp.  
 Group 71V

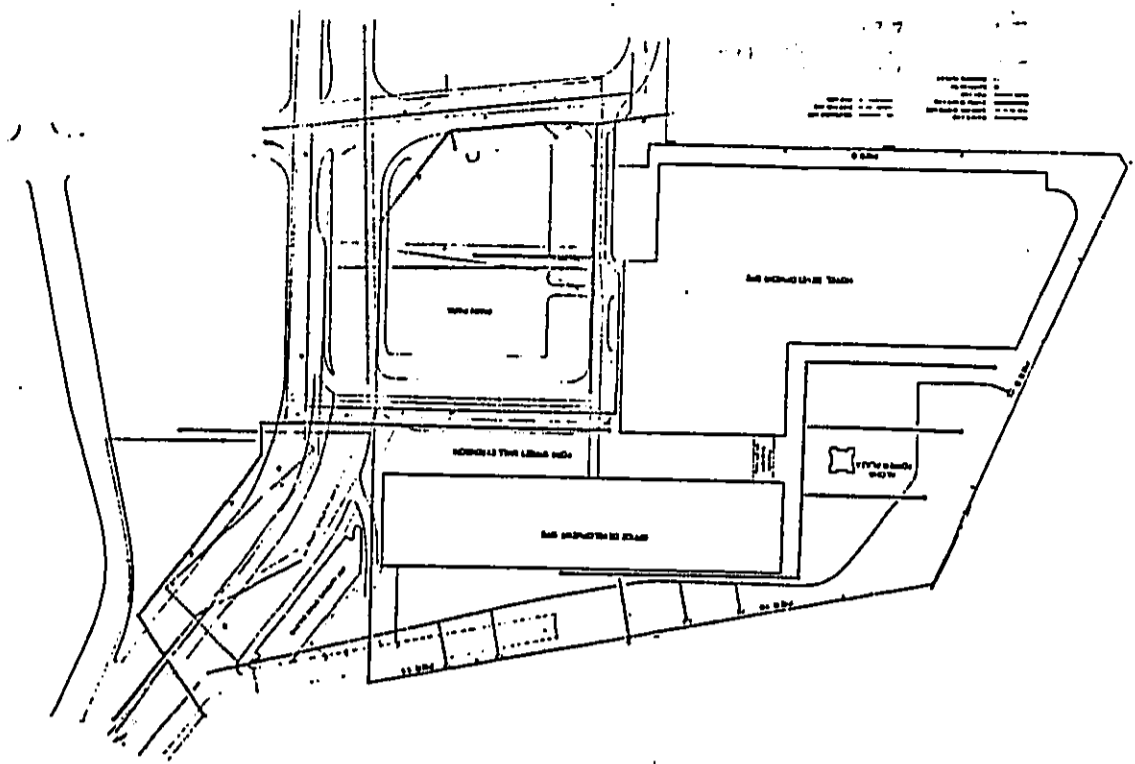


Figure 18 - Conceptual Utility Plan  
 URBAN DESIGN PLAN AND  
 IMPLEMENTATION PROGRAM

# ALOHA TOWER DEVELOPMENT CORPORATION

Major Office Address: Mr. Kent H. Keitt, Chairman  
Mr. Richard L. O'Connell, Manager  
Mr. Robert H. Holman, Executive Officer  
Mr. Robert H. Holman, Executive Officer  
Mr. Robert H. Holman, Executive Officer  
Mr. Robert H. Holman, Executive Officer  
Mr. Robert H. Holman, Executive Officer

July 26, 1983

Mr. Richard L. O'Connell  
Manager, Environmental Department  
Hawaiian Electric Company, Inc.  
Box 2750  
Honolulu, HI 96840

Dear Mr. O'Connell:

Subject: Aloha Tower Plaza Development Plan Draft Environmental Impact Statement (EIS)

Thank you for reviewing the subject draft EIS. In response to your specific comments:

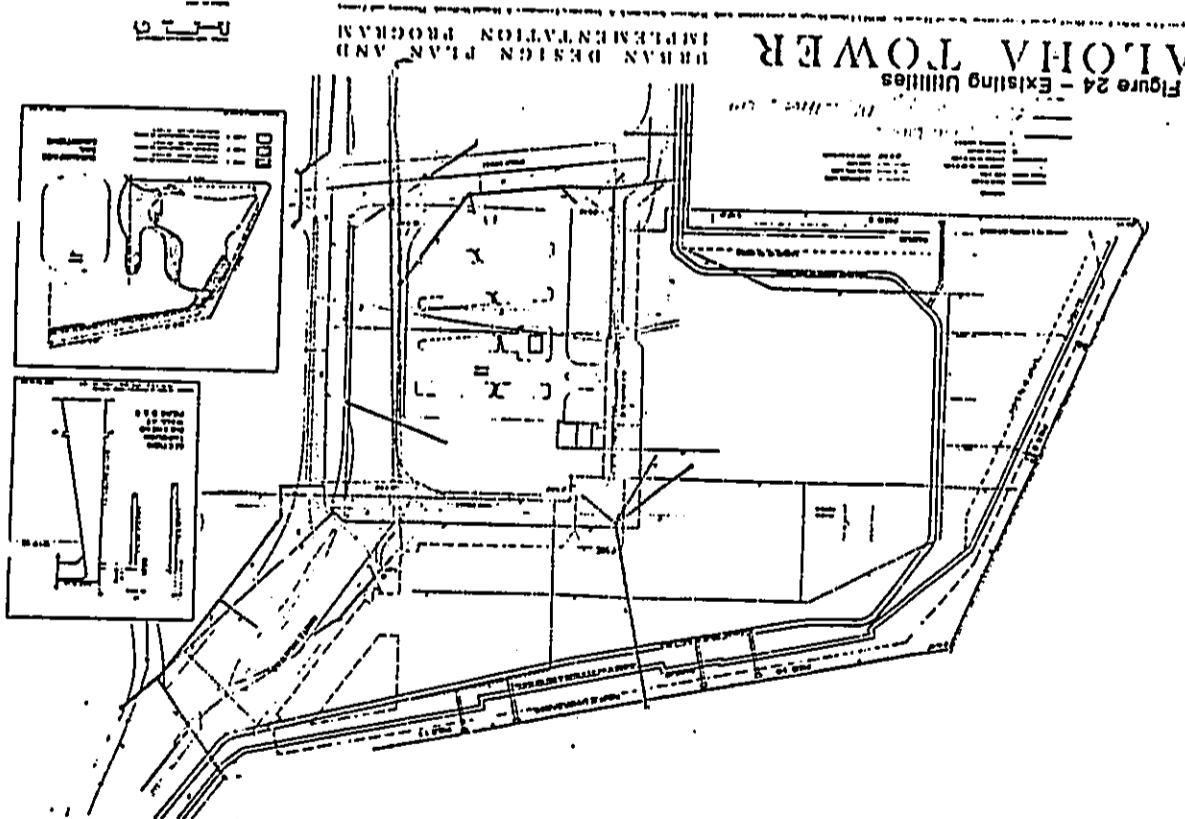
1. HECO fuel oil lines and electrical underground lines will be added to Figures 16 and 24 in the Final EIS. In addition, each team currently preparing proposals for the development will also be made aware of the location of HECO lines.
2. The statement that "HECO underground lines may also require relocation at ATDC or developer expense" has been added to Part III, Section 7.4 b., Electrical Service - Impacts, in the Final EIS.
3. The sentence has been reworded to reflect your clarification.
4. The description of existing electrical service to the project site has been corrected.

truly yours,

Robert H. Holman  
Executive Officer

RH/tyb

cc: Group 70





The Chamber of Commerce of Hawaii  
Established 1850

July 8, 1983

Ms. Jacqueline Parnell, Director  
Office of Environmental Quality Control  
550 Halekuanila Street, Room 301  
Honolulu, Hawaii 96813

Dear Ms. Parnell:

We appreciate the opportunity to comment on the Environmental Impact Statement proposed by the Aloha Tower Development Corporation entitled "Aloha Tower Plaza Development Plan".

The Maritime Affairs Committee of the Chamber of Commerce includes maritime users of the development, and, consequently, concern lies mainly in the area of economic impact. We are vitally concerned that maritime use of this uniquely maritime property be maintained as required by the law establishing the Aloha Tower Development Corporation, particularly to serve the growing needs of the cruiseship industry.

The number of cruiseship calls expected annually has risen to at least 119 as earlier told to the Aloha Tower Development Corporation instead of the 65 cited in the EIS because American Cruises' S.S. INDEPENDENCE has rejoined their S.S. CONSTITUTION in weekly Around-the-Islands cruises with both ships sailing Honolulu each Saturday commencing June 18, 1983. This has increased the peak loads on the proposed maritime and vehicular traffic facilities by 83% as compared to the figures upon which the EIS is based.

We offer the following comments stemming from this greater than anticipated maritime use of the facility as noted on the following pages and elsewhere in the EIS:

Page 12 - Vehicular traffic congestion is a third aspect of the proposed project which cannot be resolved at this time.

Page 4 - Conversion of Irwin Park to 100% park area will further exacerbate the problem of inadequate parking to meet peak demands.

Ms. Jacqueline Parnell, Director  
Office of Environmental Quality Control  
July 8, 1983  
Page 2

Page 10 - About 119 cruiseships calls per year are presently served instead of 65 as indicated.

Page 25 - About 52 American Hawaii Cruise ships will call at Pier 9 annually, making it a regular rather than back-up pier. A larger baggage facility is required at Pier 8 to handle a potential third cruiseship.

Page 29 - Taxi and tour bus staging areas are proposed outside the limits of the project between Piers 7 and 8. Commitment of this area for this purpose must be secured in advance, as otherwise the staging areas must be accommodated within the project area further congesting traffic, most likely including that on Nimitz Highway.

Page 30 - No left turn is indicated for east-bound traffic onto the Pier 11 apron to serve vessels at Piers 8-9-10-11. Traffic would have to proceed to Iwilei before being able to turn back to gain access to the pier aprons.

Page 37 - Phased demolition could permit the retention of cover at Pier 11 to handle passengers, ships provisions, and baggage during the lengthy construction period. Also, adjacent berthing of the S.S. CONSTITUTION and INDEPENDENCE is highly desirable at all times to avoid a split operation. Access to Pier 9 apron from Pier 10 apron could permit this during most of the construction phase.

Page 132 - During the construction phase, provision must be made to bring passengers and their baggage together at the street level adjacent to land transportation rather than at the upper level Galley Area, as proposed.

Page 133 - It is also necessary to insure construction and maintenance of adequate apron lighting and fuel and water lines along the pier aprons to serve the safety and refueling requirements not only of cruiseships, but also other vessels requiring for replenishment in order to maintain the economic utilization and maritime character of the area.

Ms. Jacqueline Parnell, Director  
Office of Environmental Quality Control  
July 8, 1983  
Page 3

Properly addressing these issues will minimize the adverse economic impacts of the plan and enhance the numerous positive social and economic aspects of this proposal. We thank you for the opportunity to place the views of the maritime users of the facility before you.

Very truly yours,

MARITIME AFFAIRS COMMITTEE

Barnaby F. Smith  
Chairman

cc: Aloha Tower Development Corporation ✓  
Group 70



# ALOHA TOWER DEVELOPMENT CORPORATION

Mayor Ellison Anderson    Dr. Spalding Hays    Mr. Keith    Chairman  
Mr. Robert Williams, Treasurer    Mr. Ronald Taylor    Mr. Adam Lerner    Mr. Thomas Pratt

28 July 1983

Mr. Barnaby F. Smith  
Chairman, Maritime Affairs Committee  
Chamber of Commerce of Hawaii  
735 Bishop Street  
Honolulu, Hawaii 96813

Dear Mr. Smith:

SUBJECT: ALOHA TOWER PLAZA DEVELOPMENT PLAN-DRAFT EIS

Thank you for reviewing and commenting on the subject draft EIS which was filed with the Environmental Quality Commission on June 6, 1983. Since that time, the S.S. Independence was put back in service increasing the number of estimated annual cruise ship calls at the Aloha Tower piers. The final EIS will reflect this new development. It should be noted, however, that this ship also sails on Saturdays and the traffic impact report reflects peak hour traffic on weekdays, when the Aloha Tower generated traffic is added to normal commuter traffic. Saturday traffic in the vicinity of the project site is considerably lighter than morning and afternoon weekday rush hours and, therefore, we do not anticipate any problems with traffic congestion.

In response to your specific comments:

1. Page 12: Chapter 206 J, HRS, requires the ATDC to incorporate the needs of the Department of Transportation (DOT) in its development plans. This includes requirements for maritime-related vehicular circulation. Since the draft EIS was filed, minor revisions have been made to the circulation plan (particularly in reference to truck traffic from Pier 10/11 apron). These revisions, which have been agreed upon with the DOT, will be incorporated into the revised traffic impact report and appended to the Final EIS. Specific operational controls will also be developed to prevent traffic problems from occurring.

ALOHA TOWER

TELEPHONE

HONOLULU, HAWAII 96813

(808) 548-5177

V-105

2. Page 4: Negative impact of removing parking from Irwin Park were stated on pages 66, 90 and 91 of the draft EIS. Page 66 states:

"Removing parking from Irwin Memorial Park will negatively impact those who use the metered stalls when they are stopping in the area for a short time on business or to visit Aloha Tower. These people will have to find alternative parking downtown or utilize the private subsurface parking garage for an hourly fee."

Pages 90 and 91 further discuss the potential negative impacts of this action:

"Negative impacts could result from converting the area to 100 per cent park. In addition to the loss of public parking spaces, which could function as overflow parking when the subsurface garage is full, revenues from parking meters (\$90,000 in 1982) will be foregone."

Retention of metered parking in the area could provide convenient short-term parking for people who just want to wander through the Aloha Tower grounds or watch a ship come in. It is conceivable that such parking could be free (or at a nominal rate) on weekends and in the evening. When parking is removed from this park, visitors will either have to use the hotel/office garage or find alternative parking off-site."

3. Page 10: The final EIS will be updated to reflect the fact that a second cruise ship was recently returned to regular service.

4. Page 25: The reference to the Pier 9 facility as a backup terminal has been revised; the final EIS will refer to it as a "second cruise ship terminal".

The DOT specified that it required two cruise ship terminals and one inter-island terminal. It is our understanding that Pier 8 has been officially designated as a terminal for inter-island operations. DOT would have to redesignate it for a third cruise ship. DOT has stated that the Pier can be used occasionally by international carriers until an inter-island operator has been secured. When full inter-island service is in operation the pier apron will be leased out to the operator and no longer be available to other ships.

International carriers need separate facilities because of customs and security requirements. It is anticipated, however, that the number of passengers disembarking in Honolulu will be minimal and the Pier 8 baggage facility will be more than adequate to serve those needs.

5. Page 29: We agree that if the area between Pier 7 and 8 is required for tour bus staging a commitment for use of this area must be secured in advance. Discussions are currently being held on this matter with representatives of the DOT.

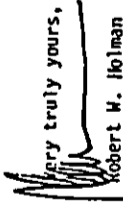
6. Page 30: The DOT has recommended that left-turns for east-bound traffic onto the Pier 11 apron not be allowed. Traffic can either proceed to Iwilei, as you suggest, or proceed up Alakea or Bethel, across Beretania or down Kuuu Avenue to Nimitz Highway.

7. Page 37: The demolition strategy presented in the draft EIS is based on agreements between the AIDC and DOT. We agree, however, that adjacent berthing of the S.S. Constitution and S.S. Independence would be desirable from an operations perspective. Although such an arrangement is not a part of the adopted strategy, the AIDC believes that the staging plan could still be accomplished with cruise ship operations continuing at Pier 9. Since the ship will be in port on Saturday, and construction work would normally be undertaken on weekdays, conflict between the two activities is not anticipated.

8. Page 132: Operations within the maritime areas are under DOT jurisdiction, both during and after construction. The plan is now to bring passengers and baggage together at the Gallery and use porters to carry the bags to other options, however, such as constructing the ground level covered operations area immediately and using that area for baggage handling. As stated above, operation of the maritime facilities is under DOT jurisdiction and the matters that you discuss must be worked out with the DOT.

9. Page 133: Fuel and water lines along the pier aprons will be maintained and adequate pier lighting will be provided.

We hope our responses answer your concerns satisfactorily. Please feel free to call me personally if you wish to discuss these matters further.

  
Very truly yours,  
Robert W. Holman  
Executive Officer

cc: Group 70



- I. Gato, Esq.
- A. Clark, Esq.
- L. Williams
- B. Drayton

**SCHWEIGERT & ASSOCIATES**

JACK F. SCHWEIGERT  
 250 South Hotel Street, Suite 200  
 Honolulu, Hawaii 96813  
 Telephone: 533-7491

Attorney for Seaflyte, Inc.

IN THE MATTER OF THE  
 ALOHA TOWER PLAZA PROJECT )  
 )  
 ) SEAFLYTE'S OBJECTIONS TO  
 ) DRAFT ENVIRONMENTAL IMPACT  
 ) STATEMENT FOR THE ALOHA  
 ) TOWER PLAZA PROJECT )

OBJECTIONS TO DRAFT ENVIRONMENTAL IMPACT STATEMENT  
 FOR THE ALOHA TOWER PLAZA PROJECT

COMES NOW Seaflyte, Inc., by and through its attorney, Jack F. Schweigert, and pursuant to H.R.S. Chapter 343 and EQC Regulations G-1:61 submit the following comments to the draft Environmental Impact Statement (hereinafter "EIS") published by the Aloha Tower Development Corporation (hereinafter "ATDC"):

(A) §11(D) at page 10 identifies that the project site is presently under the Department of Transportation's jurisdiction. Although this statement is true in part, it is also misleading for it fails to identify Seaflyte, Inc.'s claim to all of Pier 8 pursuant to a 35-year lease which

commenced in 1975. Seaflyte, Inc. v. Department of Transportation, Sup.Ct.No. 9095 (filed -- Hawaii, January 6, 1983).

(B) §11(E), 12 at page 14 indicates a key component of the private development will be a 400-500 room executive hotel presumably above the space presently occupied by Seaflyte. This too is misleading for it fails to mention Seaflyte, Inc., intends to use the air space above its present structure for development and expansion of its facilities. As to Seaflyte's right to air space, see memorandum attached hereto as Exhibit "A" and "B", respectively. Is the hotel to be private and if so can the ATDC condemn Seaflyte's space for a private venture? Moreover, is it even possible to condemn the Seaflyte space in view of the fact Seaflyte was upon completion of construction to be returned to its Pier 8 premises?

(C) Part III(C) §11.4(a) wherein it is mentioned that "...[a]ll current Department of Transportation leases on Piers 8 to 11 have leases which require 30-day notice by either party prior to termination." This is a gross misrepresentation for Seaflyte, Inc., has a 35-YEAR lease to this parcel executed in 1975. (Seaflyte, Inc. v. Department of Transportation, Sup.Ct.No. 9095 (filed -- Hawaii, January 6, 1981.) The prospects of this lease and consequences to



A. H. R. R.  
AIR

March 4, 1983

MAIL TO:

Head of Directors  
Sea Transportation, Limited  
1000 Kalia Boulevard  
Honolulu, Hawaii 96813

Dear Sirs:

The recent announcement that the State of Hawaii intends to develop a portion of the Aloha Tower Project, a substantial portion of which would use the area in which the Company holds a leasehold interest (Pier B) for its improvement (its improvement) from the State of Hawaii, the Company wishes to determine the extent of its protection of facilities and its rights under the lease of its lease with the State.

The concern of the Company is magnified due to a plan to erect a hotel in the space above the Company's 100,000 square foot facility on Pier B, and due to the fact that the Company would also desire to bid upon the project as the developer.

Accordingly, I have been requested to study the leasehold documents and render a legal opinion as to the following matters:

1. Who has the rights to use the air space above the Company's facilities?
2. Did the State of Hawaii reserve or except for itself any rights in or to the use of the leased premises?
3. Does the State have any right to grant an easement of said air space to any third party?
4. What is the extent of the rights granted to the Company under the terms of said lease?
5. What limitations on use of the premises by the Company?

A leasehold is an interest in, or ownership of real property. The extent of ownership or limitations thereupon are controlled by the words granting the interest. The words of grant in the instant lease are broad and comprehensive, stating in Paragraph 3, page 3b, thereof, "TO HAVE AND TO HOLD the demised premises, together with all improvements, tenements, rights, easements, privileges and appurtenances thereunto belonging or appurtenant or held and enjoyed therewith, for the primary purpose of the establishment, operation and maintenance of an inter-island marine transportation system."

100 Ala Moana Blvd. - Honolulu, Hawaii 96813 - Phone 521-2111 - Telex 3400-111001 - Cable "Seaflyte"

Exhibit A

the ADTC are nowhere discussed in the EIS and Seaflyte finds such omission terribly misleading.

(D) Part VI -- Relocation is also misleading for under the 1979 Consolidated Lease Seaflyte is to return Pier B!

(E) Part XI at page 138 -- Unresolved issues -- fails to identify what impacts the present Seaflyte litigation will have on the ADTC.

DATE: Honolulu, Hawaii, June 22, 1983.

Respectfully submitted,

By: *Jack F. Schurz*  
JACK F. SCHURZ  
251 South Hotel Street  
Suite 700  
Honolulu, Hawaii 96813

Board of Directors  
Pacific Sea Transportation, Limited  
March 4, 1981 - Page 2

A

in accordance with the common law, later adopted by the common law of England, and then accepted by all jurisdictions in the United States, it has been held firmly that ownership of land includes to the center of the earth and upwards to the blue sky.

In *Islands & Young Sun Inc. v. Hawaii*, 73 Hawaii 660, it was held that, under the term "easements" in a deed or lease, only such rights or privileges as are necessary to the land pass.

"Appurtenance to land" is something incidental to it and necessary to it; and enjoyment.

In *Lynn v. Hale*, 11 Conn 177 (1836) it was held a landowner has not only a right to the soil, but the right in contemplation of law includes everything as a direct line up to the heavens, and everything downwards to the center of the earth. The owner of the surface of the ground owns all that is over and under it.

The surface owner has property rights in the space over his land as a sort of appurtenance which is inextricably connected to surface ownership. What he has is an automatic right which goes along with ownership of the land surface, and therefore is inseparable from it. 16 Yale L.J. 275; 186 N.Y. 486, 79 N.E. 716.

The cases are too numerous and voluminous to cite here, holding that ownership of land carries with it the right to the sole and exclusive use of the space above the land and to the use and enjoyment of the air occupying that space.

The space to which the landowner is exclusively entitled is that immediately above his land which he occupies or may occupy with buildings or other improvements. Co. Litt. 4a; 2 Bl Comm 18; 3 Kent Comm 401; *Peabody v. U.S.*, 231 U.S. 530, *Portsmouth v. U.S.*, 250 U.S. 1; 260 U.S. 327.

It is clear from the above that, in the absence of any specific restrictions or limitations in the leasehold document, PSIL (Seafite) has the exclusive right to the use of the air space above the leasehold property. Paragraph 1 (1.), page 1, states that "Fast Land (39,136 square feet) - Honolulu Harbor, shall be under the exclusive use and jurisdiction of LESSEE."

Paragraph 32(d), page 28, states "Demised premises" shall be deemed to include the land hereby demised and all buildings and improvements now or hereinafter constructed and installed thereon" (underlining by me).

The only rights reserved by Lessor are: (a) all minerals and access to remove same; (b) all prehistoric and historic remains found on the premises; and (c) to create easements over and across the demised premises as are required for maritime or utility purposes, provided that said easements shall not unreasonably interfere with Lessee's use of the premises (underlining mine).

Board of Directors  
Pacific Sea Transportation, Limited  
March 4, 1981 - Page 3

It is therefore my opinion that the Lessor has no right to grant an easement or right in or to the air space above the Company's premises without the consent of PSILite.

Like all governments have the power of condemnation, the only question remaining is whether the State of Hawaii reserved the right to condemn the premises for its own uses. By the terms of Paragraph 24, page 23, the right of condemnation is limited to public use. Since the proposed Aloha Tower project is to be bid and operated by the private sector, condemnation would not be available to the State of Hawaii.

Four (4) most protective clauses on behalf of the Company are:  
Lessor's Right to Enter, Paragraph 27, page 23: Only for the purpose of performing any public or official duties, so long as the rights of Lessee to the use and enjoyment of the demised premises shall not be unreasonably interfered with;

Paragraph 16, page 15a, specifically provides for plans for the development of the Aloha Tower Area to provide for the demised premises to continue to be used for Lessee's operations, with the State being obligated to continue to Lessee with a suitable temporary alternate site in the event the development disrupts Lessee's operation or affects safety of the public. The State acquires no additional rights, nor are there any new limitations or restrictions affecting the Company's lease.

Paragraph 28, page 25: Inspection by Prospective Bidders - without defining who or what Prospective Bidders are, the lease provides for notice to Lessee, at reasonable hours, in the presence of Lessee if so required, but no authorization to be given more than one year before expiration of this lease;

The Covenant of Lessor, page 5: At law, a covenant is of greater force and effect than a promise or an agreement. Covenants affecting real property are strictly construed and enforced. In this case, Lessor covenants and agrees that Lessee, so long as not in default, shall have, hold and enjoy the demised premises for the term granted, without hindrance or interruption by the Lessor or any other person claiming under or through Lessor.

In conclusion, it is my considered opinion that the development of the Aloha Tower project cannot be awarded to third parties, without the permission, approval, collaboration and/or cooperation of Pacific Sea Transportation, Limited (Seafite).

LAW OFFICES OF  
**Schweigert & Associates**

280 KUHIOHOLE STREET, SUITE 200  
HONOLULU, HAWAII 96813  
TELEPHONE: 535-1111

March 27, 1981

Lee Martin  
61-789 Papekonoa Road  
Haleiwa, Hawaii 96712

Re: Status of Hawaii Law Regarding  
Rights to Air Space

Dear Lee:

The purpose of this letter is to inform you of the current status of the law of Hawaii regarding air rights as pertains to the development of the Aloha Tower Project by the State of Hawaii over premises leased by SeafLite.

In *In re Honolulu Rapid Transit Co., Ltd.*, 54 Haw 402 (1973), the Supreme Court of Hawaii articulated the law regarding the rights of the owner of an interest in land to the airspace above that land. The Court stated:

"Under the common law, a landowner owns not only the surface of the land, but everything below it to the center of the earth and above it to the sky.... The advent of air navigation has resulted in the curtailment of the extent of surface owners' ownership under the common law, but still the landowner owns at least as much of the space above the ground as he can occupy or use in connection with the land." *Id.* at 408 citing *United States vs. Causby*, 328 U.S. 256, 264 (1946).

It is important for purposes of this discussion, that the court in *Causby* noted,

"The fact that he does not occupy it in a physical sense - by the erection of buildings and the like - is not material." *United States vs. Causby*, supra at 264.

Absent a reservation of the right to use the air space above the leased premises by the State of Hawaii, it is the opinion of Schweigert and Associates that SeafLite has leased and retains rights to the

*Exhibit B*

Board of Directors,  
Sea Transportation, Limited  
1981 - Page 4

My further firm opinion that the air space above SeafLite's facilities be built upon without the express consent of the Lessee of Pier B.

Respectfully submitted,

*[Signature]*

Attorney  
at Law  
Counsel

March 27, 1984  
Page 2

usable air space above the leased premises, whether or not Seafire physically occupies that space.

This letter does not respond to comments on any right the State of Hawaii may have under its lease with Seafire to take the usable airspace above the leased premises in condemnation proceedings. However, the Cauby Court provides guidance as to the measure of liability for such a taking should it ultimately occur. The Court makes it clear,

"It is the owner's loss, not the take-or-pay which is the value of the property taken. [Citations omitted.] Market value fairly determined is the normal measure of recovery. [Citations omitted.] And that value may reflect the use to which the land could be readily converted. United States vs. Cauby, supra at 361.

In conclusion, Schweigert and Associates concur in the conclusions of Seafire's general counsel in its letter dated March 4, as to Seafire's rights in the airspace above Aloha Tower subject only to the limitations of the above cited cases and to any lease provisions to the contrary.

Respectfully Submitted,

*Jack F. Schweigert*  
JACK F. SCHWEIGERT

PHM:115



# ALOHA TOWER DEVELOPMENT CORPORATION

Mayor Eileen Anderson    Dr. Ryoichi Hasekuma    Mr. Kent H. Keith, Chairman  
Mr. Robert Habaue, Executive Director    Mr. Ronald Harper    Mr. Anne Troner    Mr. Thomas Iredell

29 July 1983

Mr. Jack F. Schweigert, Esq.  
Suite 200  
250 South Hotel Street  
Honolulu, Hawaii 96813

Dear Mr. Schweigert:

SUBJECT: Aloha Tower Development Plan Draft EIS

We are in receipt of your comments (objections) to the subject draft EIS and we have some general comments concerning the issues which you have raised:

An Environmental Impact Statement, as defined in the EIS Regulations, Sub-Part A, Section 1:4 (4), is a full disclosure document focusing on the impact of projects on the environment. Issues of clear title go beyond the scope of the EIS process and are customarily addressed within other legal processes.

In our opinion, your comments are important, yet related primarily to legal problems involving your clients and the Department of Transportation. They do not directly relate to the environmental implications of the proposed action. In addition, because this matter is under litigation, we do not believe that it is an appropriate subject to discuss in this Environmental Impact Statement.

Our responses to your specific comments follow:

A. Jurisdiction (page 10)

Part II, Subheading D, is titled Governmental Jurisdiction. The Department of Transportation is the governmental agency which currently has jurisdiction over the 13 acre planning area. Incumbrances are not discussed in this section.

B. Part II - Ibtel

Chapter 206J-5, IRS, empowers the AIDC to ... "prepare or cause to be prepared a development plan for the Aloha Tower Complex, incorporating the needs of the department of transportation." The plan, the Aloha Tower Urban Design Plan and Implementation Program, as adopted by the AIDC Board of Directors in May 1983, was described and assessed in the subject EIS. The plan was developed in conjunction with all concerned agencies, including especially DOI Harbors, to better serve modern maritime uses, and comply with the purposes of IRS 206J.

It should be emphasized that the EIS is concerned with the subject plan; the one that is described in the subject document. Although this plan cannot be implemented until the necessary lease agreements are in place, the EIS can and does assess the environmental impacts of the project as if it were to be implemented as planned. If the plan changes significantly prior to implementation, an amendment to the EIS might be required.

The AIDC powers enumerated in Chapter 206J-5 do not include the power to condemn property.

C. Part III (c)

The statement has been revised to read - "almost all current DOI lessees on Piers 8 to 11 have leases which require 30-day notice by either party prior to termination." As stated previously, the litigation between Seafite and the Department of Transportation is not an appropriate subject for discussion within the EIS.

D. Part VI - Relocation

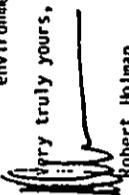
Page 27, paragraph 4, of the draft EIS states that "DOI has received indications from private enterprise of their interest in providing inter-island service which would use the Pier 8 facility." However in the EIS it stated who this will be (if not Seafite) nor is it customary in an environmental assessment that such interests be identified. Chapter 206J-6 IRS. Limitations on the powers of the development corporation, clearly states, however, that "the development corporation or its lessees shall not exercise any jurisdiction over the provided replacement facilities located within the project, required for necessary maritime purposes and

activities: jurisdiction over the replacement facilities shall be in the department of transportation. [L 1981, c 236, pt of 1] Therefore, the AIDC has neither authority nor control over present or future DOI lessees of these facilities.

DOI's sole jurisdiction over maritime facilities at Aloha Tower is clearly stated on pages 10 and 21 in the draft EIS.

E. Part XI - Unresolved Issues

The litigation is not stated as an unresolved issue because it is not technically an unresolved environmental issue.

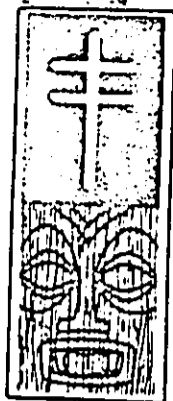
Very truly yours,  


Robert Holman  
Executive Officer

RH/dh

cc:

- F. Goto, Esq.
- A. Chock, Esq.
- B. Drayov
- L. Williams
- D. Wolbrink



PVB

# AMERICAN LUNG ASSOCIATION of Hawaii

HAWAII STATE  
245 N. Kukui St.  
Hono., Hawaii 96817  
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MAUI COUNTY  
Cameron Center  
Wailuku, Hawaii 96793  
Telephone 244-5110

August 11, 1983

Mr. Robert W. Holman  
Aloha Tower Development Corporation  
Aloha Tower - Eighth Floor  
Honolulu, Hawaii 96813

Dear Mr. Holman:

Subject: Aloha Tower Plaza Development Plan EIS

Thank you for forwarding the response of your consultants Dames & Moore to our EIS review of July 8, 1983. I regret to inform you, however, that we find their response as inadequate as the original air quality impact analysis. In fact, as noted in both your letter and the Dames & Moore letter to Group 70, Inc. which was incorporated in the EIS, their work was not intended to be a thorough analysis but rather an "Air Quality Impact Opinion". I shall now address the specific responses provided by Dames & Moore.

1. Page A-8: The response did answer our question concerning the time period for the emissions estimates presented; however, since emission factors for motor vehicles are expressed as grams per vehicle mile travelled (g/mi), some explanation of what travel distance was assumed and the basis for that assumption should have been provided.

It also appears that the report and the subsequent letter incorrectly identified nitrogen oxides emissions as sulfur oxides.

2. Use of Outdated References: The response was inadequate. As shown in the attached Figure 1, emissions based on current emission factors and Oahu's vehicle registration data are significantly higher than those based on the outdated publications.
3. Lack of Ambient Impact Analysis: The response was inadequate. The fact remains that no attempt was made to determine existing or future ambient pollutant concentrations at the project site. An emissions analysis alone is of some interest but is of limited value. It must be accompanied by an ambient impact analysis since it is the ambient pollutant concentrations to which the public is exposed and on which decisions about acceptability and standards violations are based.

The fact that the emissions analysis showed an apparent decline in emissions over the time period studied is significant but only one part of a complete study. As shown in Figure 1, the presence of the project actually causes an increase in emissions over what would have occurred without the project. In other words, the theoretical improvement in air quality due to federal emission controls on new vehicles is set back by about 1 - 2 years because of the project.

Christmas Seals Fight TB, Asthma, Emphysema, Air Pollution

Mr. Robert W. Holman  
August 11, 1983

This is not unusual, but rather typical of traffic-generating projects. Unless they are extremely large, they do not completely offset the effects of the federal program but rather delay it. In the long run, it is the cumulative effect of many projects which may completely offset the emission reduction program. This is why it is extremely important for EIS's to accurately as possible identify the impact of each project. Reviewing agencies keeping track of the many relatively small projects can then begin to foresee the long term cumulative impact and at the appropriate time implement preventive measures.

Since there was no ambient air quality analysis included in the EIS, there appears to be little or no basis for the following assertion made in the Dames & Moore letter of 29 July 1983:

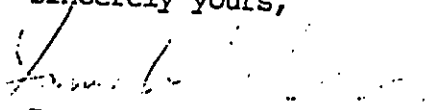
"The project should continue to enjoy high ambient air quality under normal tradewind conditions; and because of its leeward location, also should enjoy excellent ambient air quality under 'Kona' or on-shore wind conditions."

From our own measurements of carbon monoxide in the vicinity of heavily traveled streets in Honolulu, we have found 1-hour concentrations exceeding the State's standard at times when northeast tradewinds were blowing at 8 - 18 mph. Under stagnant Kona conditions, even higher concentrations can occur.

For this particular project, we did a screening analysis using the 1986 traffic projection (with project) and EPA's point, area, and line source model, PAL. Under low wind speed, stable air conditions, the 1-hour carbon monoxide concentration at 10 meters from the roadway was 25 mg/m<sup>3</sup>. This is substantially higher than the State standard of 10 mg/m<sup>3</sup>. Since the value was also based on a free-flow condition at 19.6 mph along Nimitz Highway fronting the project and did not account for acceleration/deceleration movements as well as queuing due to traffic signals, it is probably underestimated.

The proverbial bottom line in these comments is that the EIS was deficient in that it by no means provided full-disclosure of current or projected ambient air quality both with and without the project. As such it is of little use to the decision-maker in determining cumulative impact and ultimate air quality.

Sincerely yours,

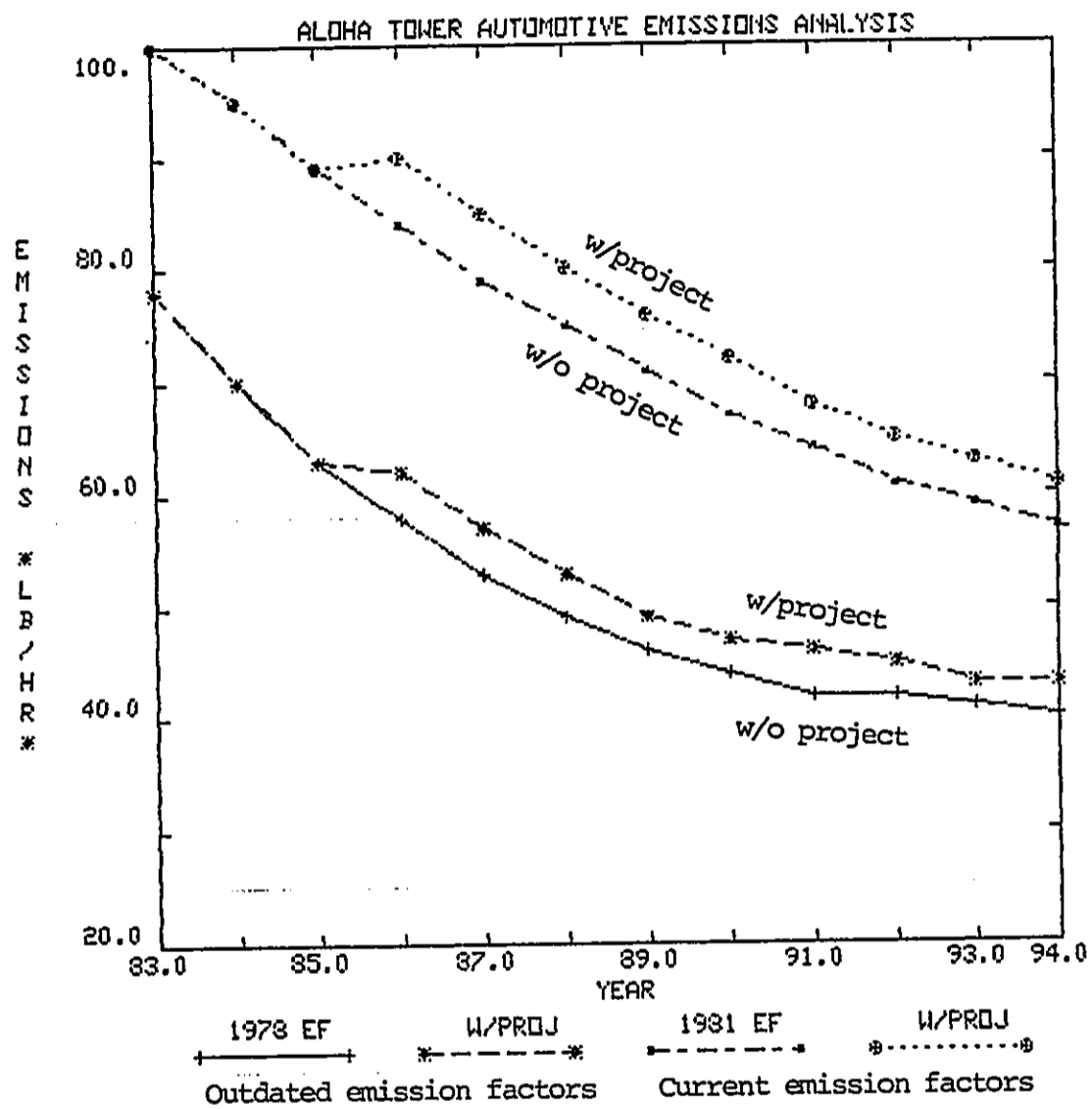
  
James W. Morrow  
Director  
Environmental Health

JWM:ma

cc: OEQC, EQC  
Dames & Moore  
Group 70



FIGURE 1





# ALOHA TOWER DEVELOPMENT CORPORATION

Mr. Kent M. Keith, Chairman

Mayor Eileen Anderson Dr. Ryokichi Higashionna Mr. Susumu Ono Mr. Donald Kuyper Mr. Aaron Levine Mr. Thomas Trask  
Mr. Robert Holman, Executive Officer

August 26, 1983

RECEIVED  
AUG 29 1983

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

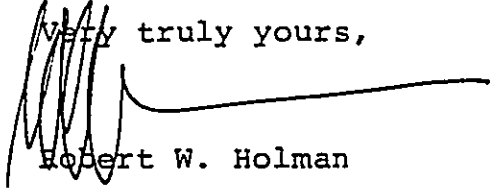
GROUP 70

Dear Mr. Morrow:

Subject: Aloha Tower Plaza Development Plan EIS

Your air quality concerns have been discussed with our consultants and they agreed to respond to your comments of August 11, 1983 in greater detail. Their letter to me on this subject is enclosed. Their explanations are the result of professional education, experience and evaluation, and, like your letters, represent informed opinions as to the significance of the air quality issue in respect of the Aloha Tower project. Please feel free to contact Group 70 or Dames & Moore directly for further professional comment.

Very truly yours,

  
Robert W. Holman

RWH:nrl  
Enclosure  
cc: Group 70  
Dames & Moore  
OEQC/EQC - with enclosure

# Dames & Moore



1144 10th Avenue, Suite 200  
Honolulu, Hawaii 96816  
(808) 735-3585  
Telex: 634100 Cable address: DAMEMORE

August 22, 1983

Aloha Tower Development Corporation  
Aloha Tower - Eighth Floor  
Honolulu, Hawaii 96813

Attention: Mr. Robert W. Holman

Gentlemen:

Response to Lung Association Comments  
Air Quality Impact Opinion  
Proposed Aloha Tower Plaza Development Plan  
Honolulu, Oahu, Hawaii

We have reviewed the American Lung Association of Hawaii letter of August 11, 1983 providing comments to our clarification of July 29, 1983. Based upon discussions with Group 70 Inc., we are providing this response directly to you. We would suggest the following points be included in your response to the American Lung Association.

#### General Comments

The U.S. Council on Environmental Quality regulations regarding the content of Environmental Impact Statements, and those promulgated by the Hawaii Office of Environmental Quality Control direct that the EIS process examine "significant issues" relevant to proposed projects, and disclose adverse or beneficial consequences of the proposed action. This focused, rather than encyclopedic, approach has evolved to make the EIS process more relevant to decisionmakers. It is with this guidance, we approached the examination of potential air quality impacts of the proposed Aloha Tower Plaza Development Plan. Specifically, we examined potential changes in air emissions caused by the project and those planned to occur concomitant with the project during the 1983-1986 period. We identified emissions from the Hawaiian Electric Company generating station, those from ship traffic, and those from vehicles as being the more significant sources.

The planned emissions from the HECO facilities show a thirty-five percent reduction, due to the closure of one of the generating units. Ship traffic was anticipated to remain stable. The remaining vehicle emissions thus received the focus of our attention. In examining these emissions we made several assumptions. These assumptions included the use of standard U.S. emission rate information for a standard vehicle (automobile and truck)



population, traveling at a constant speed, and over the distance identified in the provided traffic study as being the most affected area. (The "worst case" increase in traffic with the project.) We also assumed that the Federal vehicle air emission control program would continue to be implemented, and that this implementation will result in a decrease in emissions per vehicle through 1986. Given the small increase in traffic identified with the project, and the great reduction in emissions caused by the planned shutdown of a HECO generating unit, these assumptions appear warranted to examine an issue of this small magnitude.

The methodology used has been explained briefly in our May 18, 1983 letter, and subsequent clarification of July 29. The results of our analysis were that total vehicular emissions would be less in 1986 than they are in 1983. Given the cautions against using generalized air quality computer algorithms in areas where buildings and other structures form wind channels and distort the assumptions and algorithm validity, we believe the prudent approach to an issue of this small magnitude is to let the reductions in emissions stand on their own merit and not conduct a modeling scenario to confirm the anticipated results.

#### Specific Responses to American Lung Association Questions

1. The emission estimates presented in our air quality impact opinion are presented in grams per mile at 19.6 miles per hour for a 0.16 mile travel distance. This distance was selected as the "worst case" based upon a provided traffic study. The area includes the Nimitz highway - Bishop Street intersection.
2. In our opinion, the graphic information provided with our July 29 letter indicates that the differences in the 1978 and 1981 emissions estimates are insignificant. These values are emissions estimates for the United States vehicle population in general. We have not subjected these emission rates to an inventory of Oahu's vehicle registrations.
3. We are pleased that the American Lung Association of Hawaii Point, Area, Line (PAL) emission algorithm indicates that vehicular emissions decrease during the life of the project. This provides additional confirmation of the opinion expressed on page A-8 of our letter of May 18, 1983.
4. The other comments and analysis provided by the American Lung Association are important input into the development impact review process, and as such provide a context in which decisionmakers review these types of projects. The assumptions and refinements to environmental issues can always receive additional input from many viewpoints. However, limited public and private resources are best expended in examining significant adverse impacts that can be mitigated through the development of mitigative measures, rather than through more detailed examination of issues that have been examined and identified as "non-problems".

# Dames & Moore



Aloha Tower Development Corporation  
August 22, 1983  
Page 3

If we may be of additional assistance in clarifying the basis of our opinion,  
please contact us.

Sincerely,

DAMES & MOORE

A handwritten signature in dark ink, appearing to read "Donald F. Graf".

Donald F. Graf  
Senior Environmental Scientist

DFG:rcp(0145A/2136A)