



ENVIRONMENTAL IMPACT STATEMENT

Proposed
CRYSTAL
PROMENADE
Condominium
Development

GA 319

FINAL
ENVIRONMENTAL IMPACT STATEMENT
FOR THE PROPOSED
CRYSTAL PROMENADE DEVELOPMENT
Moiliili, Oahu
TMK: 2-7-15:1

This environmental document is
submitted pursuant to Chapter 343, HRS

Accepting Authority: Governor, State of Hawaii

Responsible Official:



Paul A. Tom
Executive Director
Hawaii Housing Authority

October 17, 1983

Date

December, 1983



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A	Chapter 359 G
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C	Air Quality
D	Traffic
E	Potable Water
F	Sewer



I SUMMARY

I. SUMMARY

Project Name: Crystal Promenade

Proposing Agency: Hawaii Housing Authority (HHA)
Department of Social Services and Housing
State of Hawaii

Developer: BAL Corporation
1581 Kapiolani Boulevard, Suite 1704
Honolulu, Hawaii 96814

Landowner: Raymond S. Shirai and Wife Alice M.
Shirai and BAL Corporation

Agency Action: The development and infrastructure
will be constructed at the developer's
and HHA's expense.

Accepting Authority: Governor, State of Hawaii

Project Description: The developer proposes to construct a
452-unit condominium and rental project.

Project Location: The lot area consists of 49,326 square
feet and is bounded by Kapiolani
Boulevard on the south and Kamoku
Street on the west.

Tax Map Key: 2-7-15:1,2, & 30

Engineering Consultant: Engineering-Surveyors Hawaii, Inc.
1020 Auahi Street, Building No. 6
Honolulu, Hawaii 96814

Architectural Consultant: Jo Paul Rognstad & Associates, Inc.
1750 Kalakaua Avenue
Honolulu, Hawaii 96826

Environmental Consultant: Environmental Communications, Inc.
P.O. Box 536
Honolulu, Hawaii 96809

Traffic Consultant: Parsons, Brinckerhoff, Quade, &
Douglas, Inc.
700 Bishop Street, Suite 615
Honolulu, Hawaii 96813

Air Pollution Consultant: Barry D. Root
46-198 Lilipuna Road
Kaneohe, Hawaii 96744

Socio-Economic Consultant:

R.H. Hahn, Inc.
700 Bishop Street, Suite 1933
Honolulu, Hawaii 96813

Anticipated Impacts

- A. Impact on the physical environment is not anticipated to be significant or adverse. Grading activity proposed for the site will consist mainly of altering and improving the existing ground surface for the building and landscaping.
- B. Short-term environmental impacts will include dust, noise, and traffic disruptions due to the grading and construction on the project site. These impacts will be mitigated to a large extent by adhering to the Grading Ordinance, Air Quality Standards, and Construction Noise Standards and Regulations.
- C. Long-term environmental quality impacts include: discharge of surface water runoff into the existing Manoa-Palolo Drainage Canal; increased vehicular air emissions; increased noise from the project site; and alteration of the project site.
- D. The proposed action is non-conforming with the current zoning and Development Plan. The developer and HHA, pursuant to the provisions of Chapter 359 G, HRS, are requesting the City Council to exempt the project from County regulations.
- E. The existing infrastructure, e.g. telephone, electricity, governmental services, are available and can adequately accommodate the proposed project. Sewage will be collected in existing lines and disposed of at the Sand Island Sewage Treatment Plant (STP). The Board of Water Supply will not commit potable water to the development until the construction drawings or building permits are reviewed and it is determined that sufficient water and facilities are available to serve the development.

- F. There will be an infusion of cash into the local economy resulting from increased real property tax values. The project will also increase the number of construction-related employment opportunities.



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PROJECT DESCRIPTION

A vertical strip of 20 small, square images showing various patterns and textures. The patterns include a grid, a cross, a heart, and other abstract designs. The images are arranged in a single column, with each image being a small square. The patterns are diverse, ranging from simple geometric shapes to more complex, textured designs. The overall effect is a dense, vertical sequence of visual information.

II. PROJECT DESCRIPTION

A. Project Location

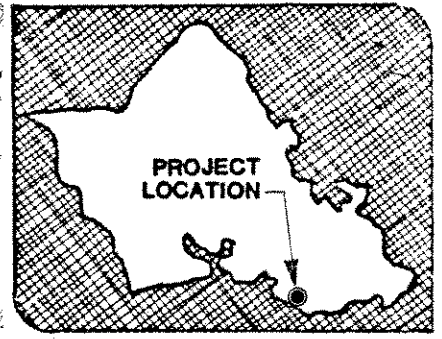
The project site is located within the Moiliili area of Honolulu, on the island of Oahu and is defined by Tax Map Key: 2-7-15:1 (Figure 1).

The lot area consists of 49,326 square feet and is bounded by Kapiolani Boulevard on the south and Kamoku Street on the west (Figure 2).

B. Project Description

The developer, BAL Corporation, proposes to construct a 452-unit condominium and rental project. The structure will be at a building height of 350 feet and will consist of 44 stories. Building bulk will be approximately 72 feet by 72 feet or 5184 square feet per floor. Table 1 presents the type of units being proposed, the amount of units to be provided, and the area of each unit type. Of the total 452 units, 48 elderly-rental units will be provided, including 14 1-bedroom units and 34 studios.

The elderly units will be located on the first four floors of the development and will be provided to the Hawaii Housing Authority (HHA) by the developer. Lower floor units were selected because the units would be more easily accessible to the elderly in emergency situations such as in power outages and would function as if the units were in a low-rise; and secondly, since the values of units on lower floors are less than higher floors, the greatest number of elderly units could be provided based on the reduction of the project costs due to the preemption of certain zoning regulations. The project is located in a very accessible area of the city and is on central buslines.



PROJECT
LOCATION

KAMOKU STREET

PROJECT SITE

KAPIOLANI BOULEVARD

MANOA-PALOLO DRAINAGE CANAL

ALA WAI CANAL

CRYSTAL
PROMENADE
Condominium

SC: 1"=2000'

Diamond Head
Crater

FIGURE 1
LOCATION
MAP

* SITE PLAN REVISED 11/1983

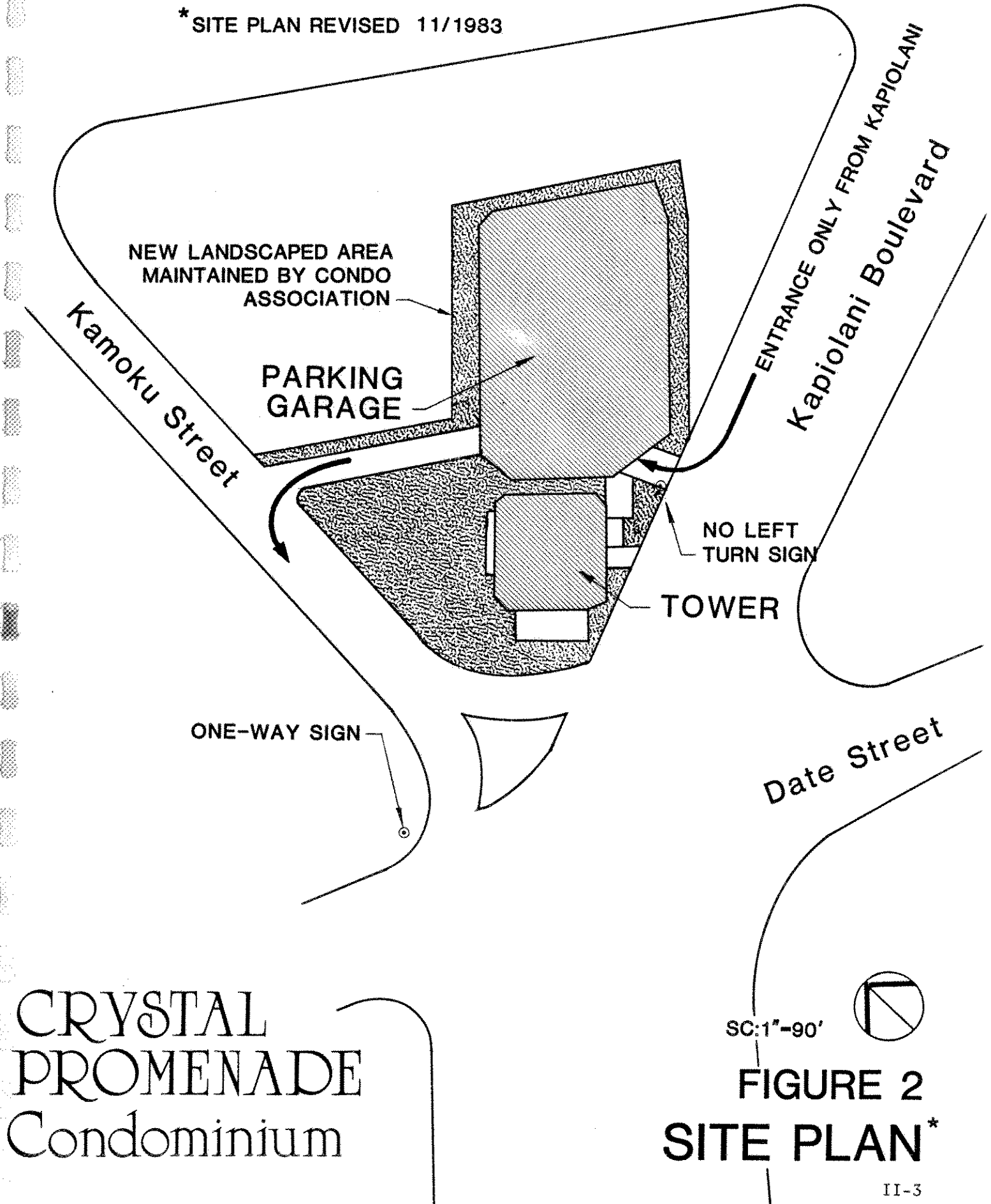


TABLE 1
TYPE OF UNITS

<u>Type</u>	<u>Amount</u>	<u>Area</u> (in square feet)
Studio	224	310
1-Bedroom	108	500
2-Bedroom	120	780

The 48 elderly-rental units will be owned by HHA and will be rented to the elderly at below-market rents, in accordance with HHA elderly rental program requirements. The developer will be selling the remaining 404 units at prices affordable to approximately 40 to 50 percent of all households on Oahu. Therefore, the units will be affordable to most households earning the median income or higher. The units will be on a 65-year lease. It is estimated that the 2-bedroom units could be sold at a price within the range of \$113,500 to \$144,250; the 1-bedroom units within the price range of \$84,150 to \$94,500; and the studios within the price range of \$59,050 to \$73,600.

The developer is seeking a method by which the 404 units could be offered on a first refusal basis to owner-occupant buyers living in the McCully-Moiliili area. Current State law requires advertising one-half of all units to owner-occupant buyers, but does not require notifying potential owner-occupant buyers in the surrounding community prior to advertising the commencement of sales to the general public.

Required infrastructure and utilities, including potable water, sewerage, roadway, parking, telephone, electrical, and drainage systems will be provided.

Landscaping will be designed to enhance the natural environment. Selection of plant material will be based on their water and shade requirements, as well as their ornamental value.

Parking will be provided in a 6-story structure attached to the main structure that houses the condominium and rental units. A total of 467 stalls, including 191 compact stalls will be constructed. Table 2 presents a breakdown of this parking stall total, detailing stalls per floor and provisions for compact stalls.

TABLE 2
PROVISION OF PARKING STALLS

<u>Floor</u>	<u>Number of Stalls</u>	<u>Compact Stalls</u>
1	77	31
2	78	32
3	78	32
4	78	32
5	78	32
6	<u>78</u>	<u>32</u>
TOTAL	467	191

C. Statement of Objectives

The HHA and BAL Corporation have worked toward a project which meets both the needs of the public and private sector. The project involves the combination of the abilities and capabilities of a private sector developer together with the resources of a governmental agency to provide a wide range of housing opportunities which neither entity could provide on its own. This blending of capabilities makes possible the provision of elderly rental units at rates elderly persons are able to afford and provides affordable housing to first-time buyers and provides market rate units. The market rate units will undoubtedly be a combination of owner-occupants and investors which will provide a good cross-section of building occupants as well as providing additional rental units in the community. Since the market rate units are proposed for sale at substantially lower prices than other units being proposed for development in this area, it can be expected that investor-owned units which end up on the rental market may be available at lower rental rates than would be expected in other condominiums proposed for development.

This wide range of housing opportunities is made possible by the City Council providing exemptions for height, density, general excise tax exemptions, and below market rate financing, as is allowable pursuant to the provisions of Chapter 359 G, Hawaii Revised Statutes (Appendix A). Appendix A also provides a discussion of HHA's primary role in implementing Chapter 359 G and a list of HHA projects that were constructed, pursuant to the law. This law enables the HHA to request that the City Council allow developments supported by the HHA to be exempt from certain planning and zoning regulations in order to reduce the cost of housing. The value of these exemptions and waivers has been calculated to equal approximately \$3 million, which equals in value the 48 units which will be deeded to the HHA. Appendix B Exhibit A, indicates how this figure was derived.

HHA feels that the benefits to the public which can be derived from this project is an equitable trade-off for HHA's assistance. HHA also believes that the developer cannot provide more units to HHA without jeopardizing the ability to provide units for sale at affordable prices or the overall feasibility of the project.

The project will be able to contribute significantly toward solving a number of housing concerns. Physically it provides immediate housing units. More importantly, it can demonstrate that a privately developed project, which solves housing concerns not normally addressed by the private sector, can be built with a minimum of government funding. This has become increasingly important due to the shortage of government funding for housing programs. For this reason, projects of this type are very important to the provision of housing for Hawaii's people.

D. Existing Tenants

Presently, a four-story apartment, a two-story apartment, a four-plex, and three houses exist on-site. The tenants in the apartments rent according to a monthly lease.

E. Phasing

The total project will take approximately 24 months to construct. Construction would commence by early 1984.

F. Funding

Based on 1983 dollars, the proposed Crystal Promenade development is estimated to cost \$32 million to construct. The development and infrastructure will be constructed at the developer's and HHA's expense. HHA will provide \$5.6 million in government money for construction financing. The points charged to the development for the short-term use of this money is generally 4 points lower than market rates.



ENVIRONMENTAL SETTING

Figure 1 shows a vertical sequence of 14 mathematical diagrams, labeled 1 through 14 from top to bottom. These diagrams represent the steps of a proof for the Poincaré inequality. The diagrams include various mathematical expressions, such as integrals, derivatives, and inequalities, which are used to derive the final result. The diagrams are arranged in a vertical column, with the first diagram at the top and the last at the bottom.

III. DESCRIPTION OF THE ENVIRONMENTAL SETTING

A. Geographical Characteristics

1. Topography. The proposed project site is level and lies approximately 5 feet above mean sea level. The site has been in urban use for several years and has been improved for the existing structure on the site. The site does not have any unique or unusual topographical or natural features.
2. Soils. The project site consists of Kawaihapai clay loam, 0 to 2 percent slopes (KIA). In a representative profile, the surface layer is dark-brown clay loam about 22 inches thick. The next layer is dark-brown stratified sandy loam 32 inches thick. The substratum is stony and gravelly. The soil is neutral in reaction throughout the profile. Permeability is moderate. Runoff is slow, and the erosion hazard is no more than slight. The available water capacity is about 1.8 inches per foot in the surface layer and about 1.6 inches per foot in the subsoil. In places, roots penetrate to a depth of 5 feet or more.

B. Climatical Characteristics

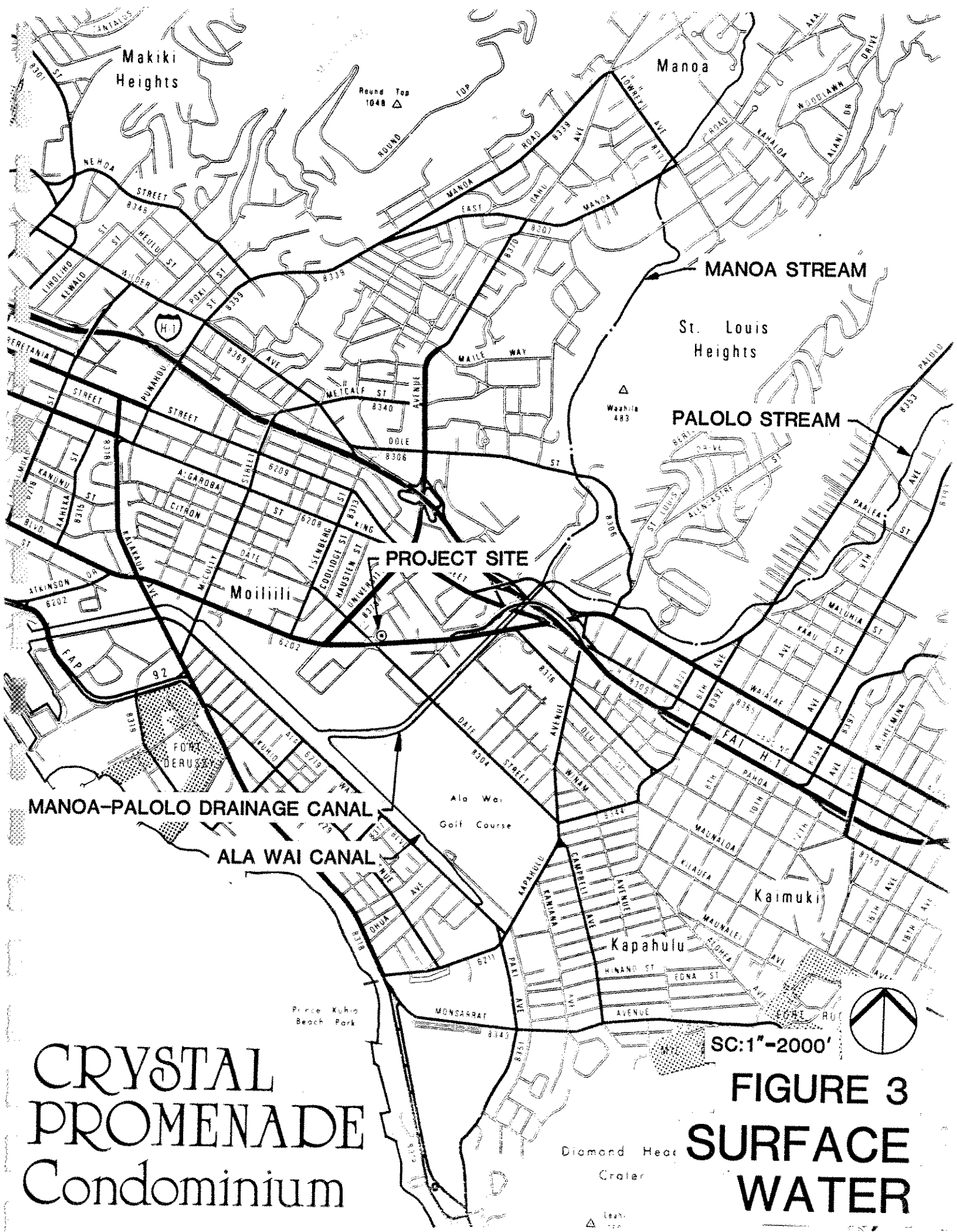
1. Rainfall. The average rainfall at the site is approximately 20 inches.
2. Wind. The prevailing wind, 70 percent of the year, is the northeasterly tradewind.
3. Temperature. The temperature at the site is generally dry, mild, and uniform. Temperature, much like the rest of the island, ranges from 60°F to 85°F.

C. Hydrological Characteristics

1. Surface Water. The Manoa-Palolo Drainage Canal is located several blocks southeast of the site. The Manoa and Palolo Streams flow into the drainage canal and ultimately discharge into the Ala Wai Canal (Figure 3).

The Ala Wai Canal is a man-made canal extending southeast by northwest. The canal was built in 1927 as a marsh land reclamation project to control mosquitoes. What were previously taro patches, rice paddies, duck and fish ponds were filled in with the dredged material. The canal was dredged to the Ala Wai Yacht Harbor, then continued west along the shore to Kewalo Basin, and then out to sea. Later in the 1950's, the present channel at the Ala Wai Yacht Harbor was dredged out to the sea. Physically, the canal separates Waikiki and its tourist attractions from the rest of urban Honolulu. Soon after it was built, the canal became a popular fishing and crabbing location for the local residents. Aesthetically, it was a pleasant body of water in the midst of upcoming Waikiki and numerous small boats could be seen cruising the calm waters and moored along the banks.

However, the Ala Wai Canal whose function was to drain water from surrounding areas soon began to deteriorate from excessive silt and trash. Construction activity in Waikiki, urbanization of the McCully-Kapiolani district, and Manoa and Palolo Valleys led to increased erosion and runoff that eventually ended up in Ala Wai Canal. The canal soon began to take the appearance of a settling basin. Over the past 54 years, maintenance dredging was required to remove the accumulations of sediment and trash, the last dredging was several years ago. The Ala Wai Canal is probably one of the most constructive pieces of public work done in urban Honolulu. The canal acts as an effective



CRYSTAL
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Condominium

FIGURE 3
SURFACE
WATER

settling basin and buffer zone, reducing the impact of storm-water runoff at Waikiki and Ala Moana Beach Park. However, after heavy Kona storms, turbid waters frequently surround the shoreline fronting Waikiki and Ala Moana Beach.

Water quality for Ala Wai Canal is shown in Table 3. Water quality exceeds standards except for dissolved oxygens. This is not surprising considering the many miles of storm drains that empty into the Ala Wai Canal which drain urban residential and business zones. Subsequently, developments near these high rainfall areas undoubtedly produce the turbid storm runoff which flow into the streams, thus, affecting their water quality. Direct runoff from the Ala Wai Field and Golf Course and the area's roadway systems also affect the streams' and canal's water quality.

2. Flood Hazard. According to the Civil Defense "Tsunami Inundation Maps," the project site should not be affected by any tsunami activity (Hawaiian Telephone Company, 1982).

The revised Flood Insurance Rate Map dated January 6, 1983 for the Waikiki-Manoa-Palolo area designates the site, Zone C or area of minimal flooding, according to the Flood Insurance Study for the City & County of Honolulu, prepared by the Federal Insurance Administration. Under the National Flood Insurance Program, Zone C areas are not regulatory flood plain areas.

D. Ambient Air Quality

An Air Quality Study was prepared for this project by Barry D. Root, Air Pollution Consultant and included in this report as Appendix C. According to the study, present air quality in the project area is estimated to be acceptable for all regulated pollutants except

TABLE 3
WATER QUALITY SUMMARY
ALA WAI CANAL AT ALA MOANA BRIDGE

NUMBER OF VALUES	Ammonia Nitrogen (ug/l)	Nitrate- Nitrite-N (ug/l)	Total Kjeldahl-N (ug/l)	Ortho- Phosphate (ug/l)	Total Phosphorus (ug/l)	Turbidity (NTU)	Suspended Solids (ug/l)	Dissolved Oxygen (mg/l)
14	39	39	39	13	39	24	32	38
MEAN	120.7	287.7	294	35.5	47.1	3.567	35,190	5.918
MEDIAN	100.0	200.0	250	24.0	33.0	1.950	23,250	5.950
NUMBER OF VIOLATIONS	6	39	13	12	5	19	7	0
PERCENT VIOLATION	43	100	33	92	13	79	22	0
MINIMUM VIOLATION	90.0	70.0	360	21.0	77.0	1.600	38,000	0
MEAN VIOLATION	148.3	287.7	537	37.6	146.8	4.200	95,710	0
MAXIMUM VIOLATION	260.0	1,030.0	1,060	075.0	249.0	31.000	275,000	0
MAXIMUM CRITERIA	15.0	25.0	350	17.0	60.0	1.50	35,000	—

Source: Department of Health, 1981.

carbon monoxide. A summary of air pollutant measurements from State of Hawaii long-term monitoring stations located nearest to the project site is presented in the study.

E. Biological Characteristics

1. Flora. Due to the existence of an already developed apartment structure, flora found at the site is basically limited to the periphery. Flora species include trees, shrubs, and other ornamental plants which are common in urbanized areas. These plants have been planted and maintained by man's efforts and are not considered indigenous or rare.
2. Fauna. Common urban birds, such as mynahs, doves, and sparrows can be found in the immediate vicinity of the project site. No threatened or endangered birds are known to inhabit the area. Wildlife inhabiting the area include stray cats and mice. These too, are common in urbanized areas.

F. Archaeological Sites

There are no known historical and/or archaeological sites at the project area, since it is currently developed.

G. Public Utilities and Improvements

1. Drainage. The present drainage system consists of runoff collecting on the lower end of the project site and the eventual drainage into the streets where stormwater flows into the street drainage system and the Manoa-Palolo Drainage Canal. The flows then drain into the Ala Wai Canal.
2. Potable Water. Several potable waterlines exist in roads adjacent to the project site. These include a 6-inch line in Kaaha Street; 12-inch in Kapiolani Boulevard; and 5-, 12-, and 30-inch lines in Date Street.

3. Sewage Disposal. A 12-inch sewer line in Kapiolani Boulevard, together with an 8-inch lateral is currently serving the site. Sewage is discharged at the Sand Island Sewage Treatment Plant.
4. Other Utilities. Electrical and telephone lines run along the major streets bordering the project site.

H. Service Facilities

1. Solid Waste Collection and Disposal. Solid waste generated by the existing apartment at the project site is collected by commercial companies.
2. Police Protection. The Honolulu Police Department is located within a few miles of the project site. Patrol service is provided by District or Beat Patrol Cars.
3. Fire Protection. Fire protection services are available from the McCully Fire Station with supportive services from the Pawaa and Waikiki Fire Stations.
4. Public Education Facilities. The schools serving the area are the Kuhio Elementary, Washington Intermediate, and Kaimuki High Schools.
5. Medical Services. Several medical and emergency care facilities are available to the area, including Queens Medical Center, Kapiolani and Kaiser Hospitals, and Straub Clinic.
6. Recreational Facilities. The Crane and Ala Wai Playgrounds, Stadium Park, and Ala Wai Field are currently found in the vicinity of the project site.

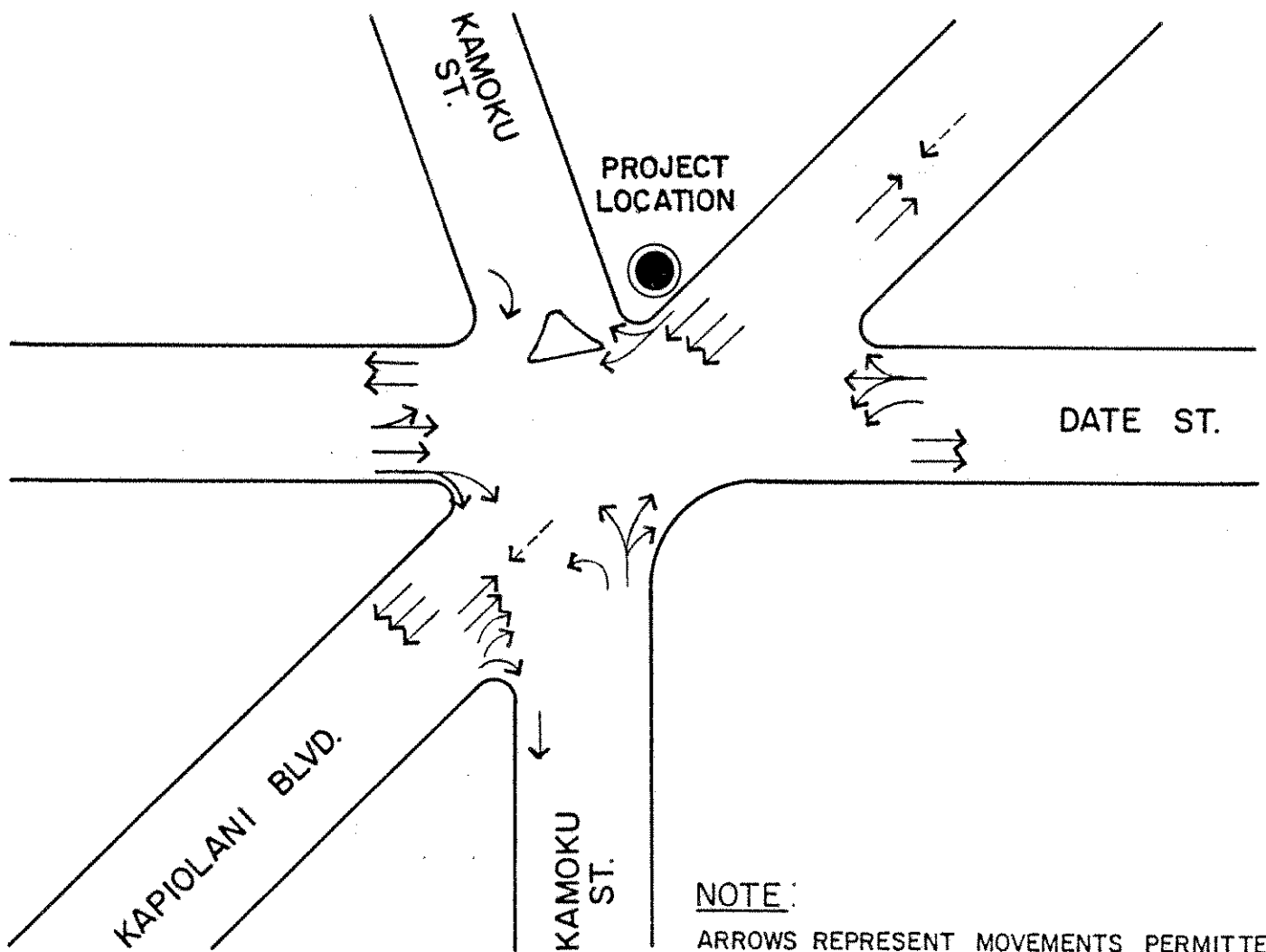
I. Highway System

Kapiolani Boulevard is a major arterial connecting the downtown area with Moiliili and Kaimuki. Kapiolani Boulevard is an eight-lane roadway at its intersection with Date and Kamoku Streets. During the PM peak hour and off-peak hours, ewa-and kokohead-bound traffic each have four approach lanes at this intersection. However, during the AM peak hour, Kapiolani Boulevard is coned for reversed traffic, with an additional ewa-bound lane and one less kokohead-bound lane.

Date Street is a collector street between the Moiliili and Kapahulu areas. Kamoku Street is a local street serving Iolani School, Ala Wai Elementary School and the surrounding residential area. The existing laneage configuration of the Kapiolani Boulevard and Date and Kamoku Streets intersection is shown in Figure 4.

Kaaha Street intersects Kapiolani Boulevard at a T-intersection approximately 800 feet kokohead of Date Street. At this location, four ewa-bound lanes and two kokohead-bound lanes are provided at Kapiolani Boulevard. Present coning practice in the AM peak hour extends beyond this intersection. Kaaha Street is a minor street serving the "Moiliili Triangle" area, and connects Kapiolani Boulevard to Kamoku Street via Kaaloa Street.

Descriptions of the existing traffic conditions are based on State Highways Division counts and field counts and observations taken in May and July, 1983. Peak hour traffic volumes from this data are shown in Table 4. The Kapiolani Boulevard/Kamoku Street/Date Street intersection is controlled by a four-phase traffic signal. Kapiolani Boulevard and Kamoku Street are each allotted one phase, while Date Street has separate phases for the kokohead-bound and ewa-bound approaches. The mauka leg of Kamoku Street is limited to right-turns in and right-turns out. Left turns are not permitted from Kapiolani Boulevard onto either Kamoku or Date Streets. In



NOTE:

ARROWS REPRESENT MOVEMENTS PERMITTED IN EACH LANE.

DASHED ARROW REPRESENTS THE A.M. REVERSE FLOW MOVEMENT.

CRYSTAL
PROMENADE
Condominium

FIGURE 4
EXISTING
LANEAGE
CONFIGURATION

Table 4

PEAK HOUR TRAFFIC COUNTS

Kapiolani Boulevard/Date Street/Kamoku Street

<u>Approach Volumes (counted)</u>	<u>Kapiolani Blvd.</u>		<u>Date Street</u>		<u>Kamoku Street</u>
Direction of Travel: Kapiolani Blvd./Date Street/ Kamoku Street Intersection	<u>Ewa</u>	<u>KKH</u>	<u>Ewa</u>	<u>KKH</u>	<u>Mauka</u>
<u>AM Peak Hour</u>					
SDOT 2/1/78	2193	396	974	491	350
SDOT 5/18/78	--	392	--	--	--
PBQD 5/18/83	2040	394	1115	604	466
PBQD 7/07/83	2205	--	--	--	--
<u>PM Peak Hour</u>					
SDOT 1/31/78	808	1469	434	735	205
PBQD 5/13/83	851	1711	534	783	327
PBQD 7/07/83	946	--	--	--	--
Manoa-Palolo Drainage Canal Screenline					
<u>AM Peak Hour</u>					
SDOT February 1978	897	332	636	507	--
SDOT September 1979	948	409	707	548	--
PBQD May 1981	1023	319	766	561	--
<u>PM Peak Hour</u>					
SDOT February 1978	576	1168	389	1046	--
SDOT September 1979	504	1042	469	1112	--
PBQD May 1981	515	1055	482	1076	--

Abbreviations Used:

KKH = Kokohead
SDOT = State DOT, Highways Division
PBQD = Parsons Brinckerhoff Quade
& Douglas, Inc.

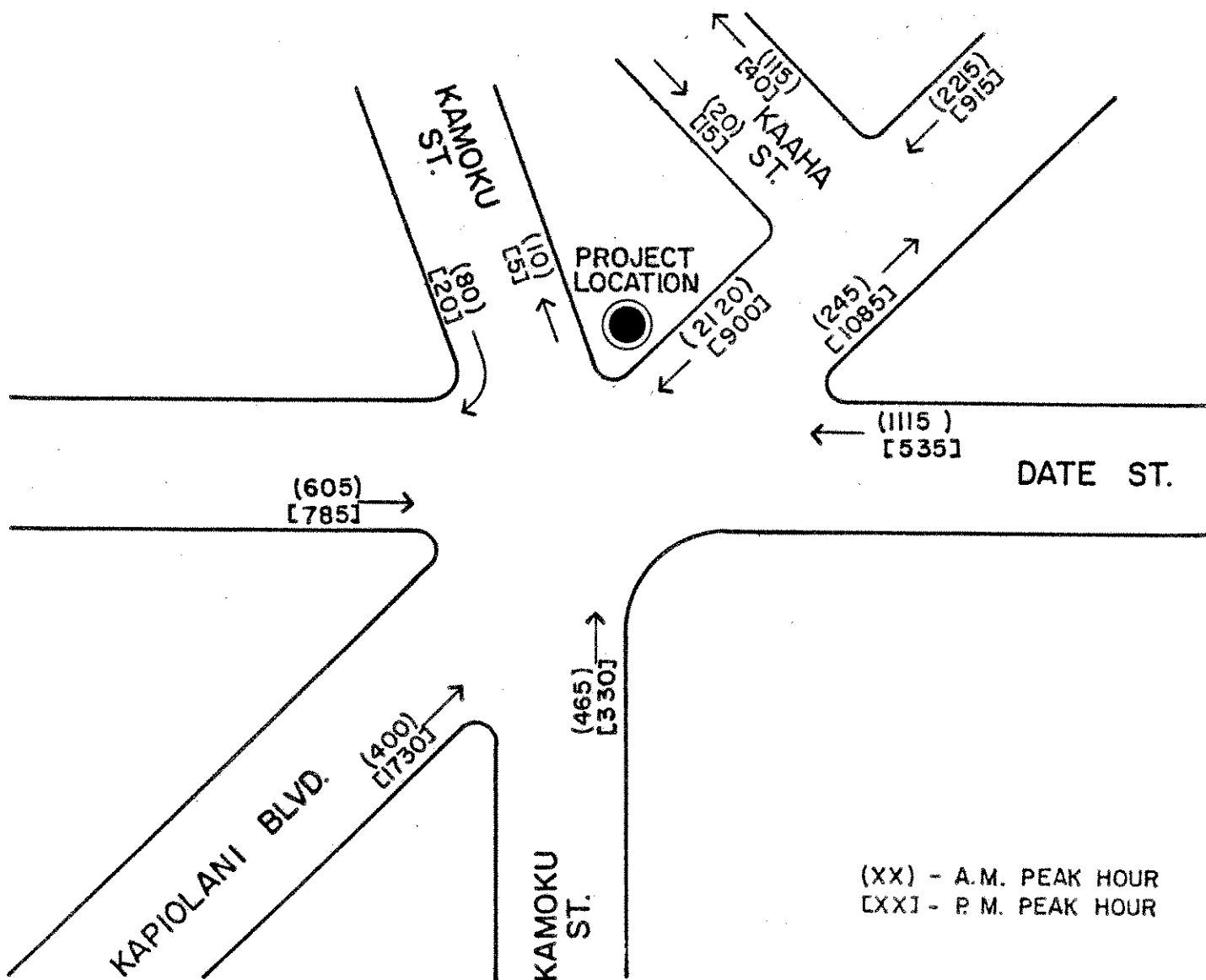
AM = 7:00 a.m. - 8:00 a.m.
PM = 4:30 p.m. - 5:30 p.m.

addition, left turns from Date Street kokohead-bound to Kapiolani Boulevard are prohibited during the AM peak hour, allowing additional green time for the Date Street ewa-bound through movement. Figure 5 presents the existing traffic assignment at the intersection.

The existing conditions at the Kapiolani Boulevard/Kamoku Street/Date Street intersection have been analyzed by the Highway Capacity Manual (National Academy of Sciences, 1965), Critical Movement Analysis (Transportation Research Board, 1980), and Traffic Institute (Traffic Institute, 1979). All methods show the intersection operating over calculated capacities during the AM peak hour. Results from the Critical Movement Analysis indicate that the intersection is over capacity by 10 percent in the AM peak hour.

The conditions observed during field surveys indicate Levels of Service D and E. Ewa-bound queues on Kapiolani Boulevard were observed to back-up past Kaaha Street during a portion of AM peak hour. Queues that formed during the PM peak hour were usually able to clear in the next green phase. Right turns from the Moiliili Triangle using Kamoku Street turning onto Date Street are controlled by a stop sign. Ewabound traffic on Date Street include vehicles from Date Street proceeding straight ahead and right turn traffic from Kapiolani Boulevard. Existing Levels of Service are B (AM) and A (PM).

Left turns into and out of Kaaha Street experienced considerable delays during the morning peak. The long queues in the Kapiolani Boulevard ewa-bound lanes often blocked the unsignalized Kaaha Street intersection and, in effect, cause a right turn in, right turn out situation at Kaaha Street during the AM peak hour. An analysis of the traffic volumes at the Kapiolani Boulevard/Kaaha Street intersection indicates that it would operate at Level of Service D if it were not blocked by queues. Left turns out of Kaaha Street encountered some delay (Service Level D) during the PM peak hour, but the intersection was not blocked by Kapiolani Boulevard queues.



CRYSTAL
PROMENADE
Condominium

FIGURE 5
TRAFFIC
ASSIGNMENT

J. Socioeconomic Characteristics

The following data was provided by the "Date/Citron Neighborhood Data Book" prepared by the City & County of Honolulu Office of Human Resources in 1980. The data book is comprised of census information for the Date/Citron area, which the Crystal Promenade project site is located in.

The population in the area increased between 1970 and 1979 at a higher rate than that of total Oahu. The population is generally young, primarily composed of two ethnic groups, Japanese and Caucasians, and comprised basically of small households. There are few households which include elderly or handicapped members. Most of the residents have resided in Hawaii for twenty or more years.

More than a fifth of the households are headed by women. More than half of all persons employed work in clerical, professional/technical, or craftsmen/foremen occupations. The unemployment rate, doubling between 1970 and 1979 generally parallels total Oahu trends.

Housing units increased between 1970 and 1979 at a greater rate than Oahu's total housing unit growth during the same period. More units are rented rather than owned. A majority of structures are less than twenty-one years old. Apartments, generally of two to four and eleven or more floors with approximately one to two bedrooms, predominate.

A large majority of the residents are high school graduates. Welfare cases more than doubled between 1971 and 1980. The area exhibits a crime rate higher than that for total Oahu.



Z

**RELATIONSHIP TO LAND USE
PLANS, POLICIES, AND CONTROLS**



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

A. City and County of Honolulu

1. General Plan. The General Plan for the City and County of Honolulu, a requirement of the City Charter, is a written commitment by the City and County to a future for the island of Oahu which it considers desirable and attainable. The General Plan is a guide for all levels of government, private enterprise, neighborhood and citizen groups, organizations, and individual citizens. The plan is a two-fold document: First, it is a statement of the long-range, social, economic, environmental, and design objectives. Secondly, the plan is a statement of broad policies which facilitate the attainment of the objectives. The following are applicable objectives and policies and a discussion of the proposed action's compliance with them.

"To preserve and enhance the natural monuments and scenic views of Oahu for the benefit of both residents and visitors." (Natural Environment; Objective B)

"Protect Oahu's scenic views, especially those seen from highly developed and heavily travelled areas." (Natural Environment; Objective B; Policy 2)

View corridor analyses conducted from Punchbowl National Memorial Cemetery and Round Top indicate that the proposed project would not impede makai views from those points. The project is one of several high-rise buildings already existing within the immediate vicinity. Views of Diamond Head and other natural monuments should remain unaffected.

"Encourage and participate in joint public-private development of low-and moderate-income housing." (Housing; Objective A; Policy 8)

The BAL Corporation is proposing to construct a condominium and rental project for the people of Oahu.

"Encourage the production and maintenance of affordable rental housing." (Housing Objective A; Policy 12)

"Encourage the provision of affordable housing designed for the elderly and the handicapped." (Housing; Objective A; Policy 13)

The project will provide 48 elderly-rental units, to be rented at a price determined later. It is anticipated that the units would be rented at below-market rents, in accordance with HHA elderly rental program requirements.

"Encourage residential developments that offer a variety of homes to people of different income levels and to families of various sizes." (Housing; Objective C; Policy 1)

The project will provide a varied mix of unit types, including condominiums and elderly-rentals, studios, 1- bedrooms, and 2- bedrooms.

"Encourage residential development near employment centers." (Housing; Objective C: Policy 3)

The project site is situated within a mile of Waikiki and 5 miles of downtown Honolulu.

"Coordinate the location and timing of new development with the availability of adequate water supply, sewage treatment,

drainage, transportation, and public safety facilities." (Physical Development and Urban Design; Objective A; Policy 2)

The project will be provided with adequate infrastructure and utilities, in accordance with applicable State and County regulations and standards.

2. Development Plan. The project site is located within the Development Plan for the Primary Urban Center and is designated Medium Density (90 dwelling units per net acre), with a maximum height of 150 feet. The project design is inconsistent with the density and height limitations defined for the area.
3. Zoning. The project site is currently zoned A-2 Apartment District, with a maximum height of 150 feet. The minimum lot area for this district should not be less than 10,000 square feet (City & County of Honolulu, 1978). The project, which consists of 49,326 square feet, is therefore, in conformance with the minimum lot size requirements of the CZC.

The floor area ratio (FAR) for the project is 4.7. While it is understood that this figure exceeds the allowable FAR for the project area, it must also be noted that several other projects exist with FARs similar in density to that of Crystal Promenade's. Table 5 presents other projects in the area with FARs similar to Crystal Promenade's proposed FAR of 4.7. Therefore, as is indicated by the table, the construction of buildings with similar densities is not an uncommon occurrence on the island. It should also be noted that this project, unlike the others, will provide 48 units for the elderly rental market.

4. Bill 48: Inclusionary Zoning. When the project was conceived, all savings attributed to the proposed density increase were

TABLE 5
FARS FOR BUILDINGS IN AREA

<u>Name</u>	<u>TMK</u>	<u>Lot Size</u> <u>(in Square Feet)</u>	<u>FAR</u>
Iolani Court Plaza	2-7-19:14	37,208	4.4
Mott-Smith Laniloa	2-4-28:5	155,707	5.4
Royal Iolani	2-7-20:9	119,000	4.4
Ala Wai Plaza	2-7-13:9	159,366	4.7
Ala Wai Plaza Sky Rise	2-7-13:8	46,992	4.9
Marco Polo	2-7-4:1	171,292	4.7

credited to the elderly units in order to increase the number of units. If a 10 per cent additional requirement is desired, the number of elderly units to be received by the HHA will need to be reduced in order to retain a financially feasible project. It should be emphasized that the 48 units are to be conveyed by the developer to the state at no cost and not at a reduced price as is commonly the case. The project then, will provide low-and moderate-income housing.

B. State of Hawaii

1. Chapter 359 G, Hawaii Revised Statutes. Since Crystal Promenade is an HHA-supported housing project, it is pursuant to the provisions of Chapter 359 G, Hawaii Revised Statutes, which would allow the City Council to exempt the project from County regulations, including zoning and Development Plan land use.

The HHA and developer are requesting an increase in height from 150 feet to 350 feet, and an increase in density. The two waivers primarily reduce the unit or project costs of the development by allowing more units to be built (reduces the land cost per unit and other fixed project costs).

2. Hawaii State Plan. The Hawaii State Plan identifies the goals, objectives, and policies of the State to serve as a guide for future development. The following are the relevant objectives and policies of the Hawaii State Plan and a discussion of how the proposed action relates to them:

"Effectively accommodate the housing needs of Hawaii's people, especially the elderly, handicapped, displacees of redevelopment areas, and newly formed households." (Section 19; Objectives and Policies for Sociocultural Advancement-Housing (b) (1))

The project will provide 48 elderly-rental units, to be rented

at a price determined later. It is anticipated that the units would be rented at below-market rents, in accordance with HHA elderly rental program requirements.

"Increase homeownership and rental opportunities and choices in terms of quality, location, cost, densities, style, and size of housing." (Section 19; Objectives and Policies for Sociocultural Advancement-Housing (b) (3))

The project will provide a varied mix of unit types, including condominiums and elderly-rentals, studios, 1-bedrooms, and 2-bedrooms.

"Promote design and location of housing developments taking into account the physical setting, accessibility to public facilities and services, and other concerns of existing communities and surrounding areas." (Section 19; Objectives and Policies for Sociocultural Advancement-Housing (b) (5))

The project site is situated within close proximity of major employment centers; police and fire services; emergency medical services; public schools; and community and recreational centers.

"Facilitate the use of available urban lands to accommodate the housing needs in various communities." (Section 19; Objectives and Policies for Sociocultural Advancement-Housing (b) (6))

The State Land Use Designation for the project site and the surrounding area is urban. The residential project is therefore, in conformance with the intent of the policy.

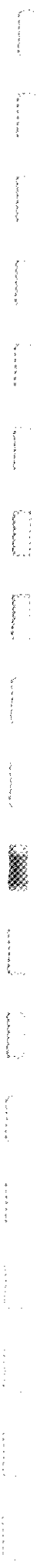
3. State Environmental Policy, Chapter 344, Hawaii Revised Statutes. The purpose of this chapter is to establish a state policy which will encourage productive and enjoyable harmony between man and his environment, promote efforts which will prevent or eliminate damage to the environment and biosphere and stimulate

the health and welfare of man, and enrich the understanding of the people of Hawaii. This Environmental Impact Statement represents the project's commitment in satisfying Chapter 344, HRS, since the document discloses the impacts resulting from the project and also provides measures and efforts which would prevent or eliminate damage to the environment. The developer will ensure compliance with the State Environmental Policy.



<

ANTICIPATED ENVIRONMENTAL IMPACTS



V. ANTICIPATED ENVIRONMENTAL IMPACTS AND MITIGATIVE MEASURES
TO MINIMIZE ADVERSE IMPACTS

A. Introduction

The proposed Crystal Promenade project will generate both short-term and long-term impacts. Short-term impacts, beneficial and adverse, generally result from construction-related activities. Consequently, these impacts are of short duration and should not last longer than the duration of the construction. Long-term impacts, beneficial and adverse, result from the implementation and operation of the proposed project.

B. Short-Term Impacts

1. Topography. Grading activity proposed for the project site will consist mainly of altering and improving the existing ground surface for the building and landscaping. Since the site is basically flat, extensive excavation and dirt-hauling operations are not anticipated.

To minimize the occurrence of soil erosion, temporary soil erosion and sediment control measures will be designed and implemented during the construction phase in accordance with Chapter 23, Grading, Soil Erosion, and Sediment Control, Revised Ordinances of Honolulu, 1978, as amended; the City & County of Honolulu's Grading, Grubbing, and Stockpiling Ordinance No. 3968, 1972; and the USDA Soil Conservation Services Erosion and Sediment Control Guide for Hawaii, 1981. Approval by the City & County of Honolulu Department of Public Works will be required to ensure proper grading and erosion control.

2. Soils. Only minimal impact on the site's soil is anticipated. An apartment building is currently in operation on-site. The proposed action then, will be consistent with the existing use.

Piles will be driven to support the proposed building. Construction plans for the support and fill materials (if needed) will follow the recommendations of a detailed soil study. The preparation of a soil study is a normal procedure in which a qualified soil engineering consultant is retained to take soil borings so that the site's specific soil conditions are known and the appropriate engineering measures for structural support can be undertaken. A soil study will be prepared at a more appropriate time.

3. Air Quality. During the demolition, site preparation and construction phases of this project, a certain amount of fugitive dust will be generated. Field measurements of such emissions from shopping center and apartment construction projects has yielded an estimated emission rate of 1.2 tons of dust per acre of activity per month of activity. This figure assumes medium level activity in a semi-arid climate with a moderate soil silt content. Since the project site is relatively small and nearly level there should be a minimum of dirt moving and hauling so that monthly emission rates of fugitive dust may be even lower than the average emission rate cited above.

The major generator of fugitive dust is heavy construction equipment moving over unpaved surfaces. This problem can be mitigated to a certain extent by completing and paving work areas as early in the development process as possible. Given that most of the area adjacent to the project site is already in residential use, dust control will have to be an area of special concern. The State of Hawaii Department of Health Administrative Rules stipulate the control measures that are to

be employed to reduce this type of emissions. Primary control consists of wetting down loose soil areas with water or suitable chemicals. An effective watering program can reduce particulate emission levels from construction sites by as much as 50 percent. Other control measures include good housekeeping on the jobsite and pavement or landscaping of bare soil areas as quickly as possible.

It is also inevitable that construction equipment will emit some air pollutants in their exhausts as they are used at various points within or adjacent to the project site. The largest equipment is generally diesel-powered. Carbon monoxide emissions from large diesel engines are usually no more than those of the average automobile, but nitrogen dioxide emissions can be quite high. Fortunately nitrogen dioxide emissions from other sources in the area should be relatively low and the overall impact of pollutant emissions from construction equipment should be minor compared to levels generated by normal traffic on Kapiolani Boulevard nearby.

4. Noise Quality. During site preparation, clearing, and construction activities, an increase of ambient noise is inevitable. Noise levels generated by construction machinery are presented in Figure 6.

The following are methods for minimizing noise produced during construction:

- Place mufflers on construction machinery, equipment, etc.
- Instruct workers to avoid unnecessary "gunning" of construction equipment and to turn off equipment when not in use.
- Create earth berms which would absorb some of the noise.
- Conduct construction activity during daylight hours, between 8:00 a.m. to 5:00 p.m.

		NOISE LEVEL (dba) AT 50 FT					
		60	70	80	90	100	110
EQUIPMENT POWERED BY INTERNAL COMBUSTION ENGINES	EARTH MOVING	COMPACTERS (ROLLERS)		H			
		FRONT LOADERS		-----			
		BACKHOES		-----			
		TRACTORS		-----			
		SCRAPERS, GRADERS		-----			
		PAVERS			H		
		TRUCKS		-----			
	MATERIALS HANDLING	CONCRETE MIXERS		-----			
		CONCRETE PUMPS			H		
		CRANES (MOVABLE)		-----			
		CRANES (DERRICK)			H		
	STATIONARY	PUMPS		H			
		GENERATORS		-----			
		COMPRESSORS		-----			
IMPACT EQUIPMENT		PNEUMATIC WRENCHES			-----		
		JACK HAMMERS AND ROCK DRILLS			-----		
		PILE DRIVERS (PEAKS)				-----	
OTHER		VIBRATOR		-----			
		SAWS		-----			

SOURCE: Noise From Construction Equipment and Operations, Building Equipment, and Home Appliances, EPA, 1971

CRYSTAL
PROMENADE
Condominium

FIGURE 6
NOISE
RANGES

The contractor will ensure that all construction equipment is in proper condition and will attempt to enforce the methods mentioned above and comply with the provisions of the Occupational Safety and Health Administration (OSHA) Standards; Title II, Administrative Rules Chapter 43, Community Noise Control for Oahu; and Title II, Administrative Rules Chapter 42, Vehicular Noise Control for Oahu.

A noise permit must be obtained if the noise levels from the construction activities exceed allowable noise levels of the regulations.

5. Water Quality. Potential incidences of erosion and sedimentation may impact the water quality of Ala Wai Canal during a significant storm, resulting in increased constituent loads, nitrogen, phosphorus, and suspended solids. However, impacts to these waters are not anticipated to be significant, since erosion and sedimentation problems would arise only during heavy storms and secondly, since all efforts would be made to minimize erosion problems on-site. The impact of construction activities could be mitigated by conforming to strict erosion control measures, particularly those specified previously, in addition to the State Department of Health's Water Quality Standards, Chapter 37-A, Public Health Regulations, 1968.
6. Flora. The proposed action will involve clearing activities which will result in the removal of most of the existing vegetation on the project site. In general, because none of the biota are considered to be endangered, the impact of removal will not be significant. The existing vegetation will be replaced by new species as a result of the proposed project's landscaping program.
7. Fauna. Neither the project site, or any adjacent area provide

suitable habitat for endemic or introduced bird species. In addition, only mammal species common to urbanized areas were sighted at the project site. Therefore, the proposed action will pose no impact to threatened or endangered species of avifauna or mammals.

During construction, avifauna and mammals in the immediate vicinity of the project site may relocate into adjacent areas. However, upon completion of construction, the fauna may adapt to the proposed action and return to the site for food and shelter.

8. Traffic. Construction activities will partially disrupt the normal traffic flow on adjacent roadway systems. However, all disruptions will exist only during the duration of construction.

Precautions will be written into the construction specifications to ensure for safe movement of traffic during construction activities.

9. Archaeological Sites. The absence of historical and/or archaeological sites at the project area is anticipated, since it is currently developed. However, in the event that any unanticipated sites or remains are uncovered, the contractor will halt work and the State Historic Preservation Officer will be notified.
10. Socioeconomic. The project will increase the number of construction-related employment opportunities.

C. Long-Term Impacts

1. Air Quality. Traffic generated by the project will increase

emissions of carbon monoxide in the project area. Computer modeling of carbon monoxide levels after project construction indicate that State of Hawaii standards for that pollutant are likely to be exceeded under worst case traffic and meteorological conditions in the years immediately following construction; but by the year 2003 carbon monoxide concentrations are predicted to be within allowable State and Federal Ambient Air Quality Standards. Table 6 presents the State and Federal Ambient Air Quality Standards. Table 7 and 8 present results of the peak hour carbon monoxide analysis and eight hour carbon monoxide analysis, respectively. Appendix C, Air Quality Study, will further discuss calculations and assumptions regarding the carbon monoxide diffusion model and locations of the receptor sites.

Indirect air quality impacts are expected to result from demand for electrical energy. These impacts are most likely going to occur in the Waianae area near the Kahe Power Plant where increased particulate and sulfur dioxide emissions can be expected. Solar water heating is suggested as a mitigative measure to reduce the impact of increased electrical demand.

2. Noise Quality. Though the proposed action is similar to the use already existing at the site, the long-term impact on ambient noise levels is expected to increase due to the increased development scale of the project. The proposed project will indirectly generate more noise, since more automobiles are going to and from the site.

Tire squeal noise will be generated by some automobiles in the parking structure. Noise from tire squeal is dependent on the turning radius, car weight, tire condition, speed of the car when making the turns, and type of surface. The turning ramps will be designed to minimize tire squeal and car speed

TABLE 6

SUMMARY OF HAWAII AND NATIONAL AMBIENT AIR QUALITY STANDARDS
(Micrograms per Cubic Meter)

POLLUTANT	SAMPLING PERIOD	AMBIENT AIR QUALITY STANDARDS		
		NATIONAL		HAWAII
		Primary	Secondary	
Particulates	Annual Geometric Mean	75	60	--
	Annual Arithmetic Mean	--	--	55
	Maximum 24-Hour Average	260	150	100
Sulfur Dioxide	Annual Arithmetic Mean	80	--	20
	Maximum 24-Hour Average	365	--	80
	Maximum 3-Hour Average		1300	400
Nitrogen Dioxide	Annual Arithmetic Mean		100	70
Ozone	Maximum 1-Hour Average		240	100
Carbon Monoxide	Maximum 8-Hour Average		10	5
	Maximum 1-Hour Average		40	10
Lead	Calendar Quarter		1.5	1.5

Notes: 1. Carbon Monoxide Standards are in milligrams per cubic meter.
 2. National Standards based on 40 CFR Part 50; Hawaii Standards based on Title 11, Administrative Rules, Chapter 59.

TABLE 7

RESULTS OF PEAK HOUR CARBON MONOXIDE ANALYSIS
(milligrams per cubic meter)

	1983	1986	2003
SITE 1			
Without Project	10.4	8.3	6.1
With Project		8.6	6.3
SITE 2			
Without Project	9.8	7.7	5.5
With Project		8.1	5.8
SITE 3			
Without Project	13.2	10.3	7.4
With Project		10.8	7.7
SITE 4			
Without Project	11.5	8.9	6.4
With Project		11.7	8.3

STATE OF HAWAII AQS: 10

FEDERAL AQS: 40

Note: Refer to Figure 2 of Appendix C, Air Quality Study for location of receptor sites.

TABLE 8

RESULTS OF EIGHT HOUR CARBON MONOXIDE ANALYSIS
(milligrams per cubic meter)

	1983	1986	2003
SITE 1			
Without Project	6.2	5.0	3.7
With Project		5.2	3.8
SITE 2			
Without Project	5.9	4.6	3.3
With Project		4.9	3.5
SITE 3			
Without Project	7.9	6.2	4.4
With Project		6.5	4.6
SITE 4			
Without Project	6.9	5.3	3.8
With Project		7.0	5.0

STATE OF HAWAII AQS: 5

FEDERAL AQS: 10

Note: Refer to Figure 2 of Appendix C, Air Quality Study, for location of receptor sites.

limits will be controlled by posted speed limits or speed bumps. People within the building should not be affected by vehicular or tire squeal sounds because of the enclosed building construction and the anticipated number of people utilizing air conditioning, which prevent outside noises from affecting the interior. The problem of vehicular speed and noise created by tire squeals is predicated on the driving habits of individual drivers. If and when this problem occurs, control via warning signs or directing individuals to stop this type of activity would be more realistic.

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 43, Community Noise Control for Oahu.

The noise that would be created on-site, due to the proposed project, is similar to the noise currently being generated in the vicinity of the site. Therefore, it is expected that generated noise would blend into the surrounding background vehicular noise and would not constitute an adverse effect on the adjacent land uses.

The large vehicular traffic volume presently utilizing the intersection of Kapiolani, Date, and Kamoku Streets may result in some adverse noise impact on residents of the project. However, the building will be designed with spaces at the windows for the installation of individual air conditioning units. This will limit the amount of external noise impacting the project's residents.

3. Water Quality. The added concrete and building surfaces will increase the amount of surface runoff; however, this amount will not be a significant increase, nor will the quality of the runoff differ from the present quality (both will reflect the urban uses of the project site).

4. Flora. The proposed project will develop landscaping in accordance with the Comprehensive Zoning Code (CZC). The relevant CZC requirements call for landscaping to minimize potential adverse influences on property in the same or neighboring zoning districts (City and County of Honolulu, 1978). The net result should be one of replacing exotic flora species with other exotic vegetation.

5. Fauna. No threatened or endangered species of birds or mammals were sited at the project site or adjacent areas. Therefore, the proposed action will pose no significantly adverse impact to fauna species at the site.

During construction, avifauna and mammals in the immediate vicinity of the project site may relocate into adjacent areas.

However, upon completion of construction and operation of the project, the fauna may adapt to the proposed action and return to the site for food and shelter.

6. Archaeological Sites. The existence of on-site archaeological sites would have been uncovered during the construction stage of the proposed action. Therefore, all necessary measures to minimize impacts on the sites would have been considered and undertaken at that time. Subsequently, there will be no adverse impacts on potential on-site archaeological sites during the operation of the Crystal Promenade project.
7. Flood Hazard. Under the National Flood Insurance Program, the project site is located in Zone C, a region not considered a regulatory flood plain area. Special features then, need not be incorporated into the project design, to minimize impacts resulting from flooding.

8. Public Utilities and Improvements

- a. Drainage. Four options for storm water disposal is available to the developer. These include:
- 1) Construct a drain intake and extend a new drain line, diagonally across the large intersection of Kapiolani, Kamoku and Date Street into a reinforced concrete box culvert on Date Street.
 - 2) Construct a new storm drainage intake and piping system along Kapiolani Boulevard over to the University Avenue box drain.
 - 3) Construct an intake and piping network, up to Kaaha Street then on to University Avenue connecting to the University Avenue box drain.
 - 4) Do nothing.

The cheapest alternate available is to do nothing and wait until the proposed Moiliili Triangle improvements are constructed. This will result in having a nuisance after minor storms of some light shallow puddling until the water can percolate into the ground. The improvements in the area would occur when the inner-connecting pipe system on Kaaha Street is completed.

The next most economical alternative is the constructing of an intake and piping system along Kapiolani Boulevard to the University Avenue drain. The disadvantage of this alternative is the disruption to the heavy traffic on Kapiolani Boulevard during construction. The other two alternatives are significantly more expensive and at this time would not be prudent to pursue.

At a more appropriate time, the developer will be in contact

with the City & County of Honolulu Department of Public Works to solicit recommendations for selection of the most feasible and economical option for storm water disposal.

- b. Potable Water. The Board of Water Supply (BWS), in their letter of May 26, 1983, has confirmed the availability of water for the project (Appendix E). However, the BWS will not make advance water commitments for the project at this time, but will, after construction plans for water service connections are submitted for their approval.

Construction plans to determine fixture unit count, average daily demand, lateral sizes, and meter sizes will be completed at a more appropriate time. It is not anticipated that preparation of the construction plans would pose any problems though, since the selection of mains in Kapiolani or Kamoku Streets for water service connections, is a routine matter.

- c. Sewage Disposal. The Division of Sewers, Department of Public Works, in their letter of July 25, 1983, has indicated the availability and adequacy of the existing sewer system for accomodation of the proposed project (Appendix F). The Department has also determined the location and lateral size of the connection. The point of connection is the 12-inch sewer line located in Kapiolani Boulevard.
- d. Other Utilities. There are existing electrical and telephone lines in the area. The developer will be in contact with the Hawaiian Electric Company and Hawaiian Telephone Company at a later date, to determine connections.

9. Service Facilities

- a. Solid Waste Collection and Disposal. The solid waste

generated by the proposed action will be collected and disposed of by a private refuse collection company.

- b. Police Protection. The Police Department, in their letter of September 2, 1983 stated the following: "We have no objection to the proposed development since it is not likely to have an adverse impact on police services." The project then, will be accomodated with adequate police protection services.

The developer is also considering providing inter-phone systems and alarms on the ground floor, and wiring windows, for additional security.

- c. Fire Protection. The Fire Department, in their letter of August 28, 1983, stated the following: "We have no objections to the proposed project...." The project will be accomodated with adequate fire protection services.
- d. Public Education. The Department of Education, in their letter of September 2, 1983, indicated that the project would "have a negligible enrollment impact on Kuhio Elementary (K-6), Washington Intermedite (7-9), and Kaimuki High (10-12) Schools." Existing public schools in the area are therefore, adequate enough to accomodate the project.
- e. Recreational Facilities. Several public parks are available within driving distance of the project site. The project's residents will be encouraged to utilize these facilities.

Since the project is a multi-family residential project, compliance with the City's Park Dedication Ordinance No. 4621 will be required. There is a lack of sufficient on-site park space to comply with the park dedication

requirement and the developer is therefore, exploring other means for compliance.

Common facilities such as meeting rooms will be provided for the elderly and residents of the project. A convenience store will also be provided on-site.

- f. Medical Facilities. The proposed project can be serviced by existing medical facilities.
- g. Commercial/Retail Facilities. The project is located in a region currently developed as a residential community. Therefore, several nearby supermarkets and retail outlets exist.

10. Traffic and Parking

- a. Expected Traffic Without Project. Historical traffic counts do not indicate any growth except from specific developments in the immediate vicinity. At present, no other project affecting traffic in the area has been identified, except for the Kapiolani Interchange.

The Kapiolani Interchange on-ramp to the H-1 Freeway is currently under construction and is expected to be completed by the end of 1983. The project would not generate additional traffic in the overall area; however, it is expected to alter travel patterns and may have localized effects. The State Department of Transportation (DOT) assignments for the Kapiolani Interchange project indicates that over 800 vehicles are expected to use the on-ramp during the PM peak hour (Department of Transportation, 1979). A correlating decrease in kokohead-bound on-ramp traffic from King Street is expected to

occur as a result. Some of the traffic destined for Waialae and Harding Avenues presently using Kapiolani Boulevard would be expected to then divert to King Street as traffic on the overall street system adjusts to the new pattern. No significant change in Kapiolani Boulevard traffic volume is expected.

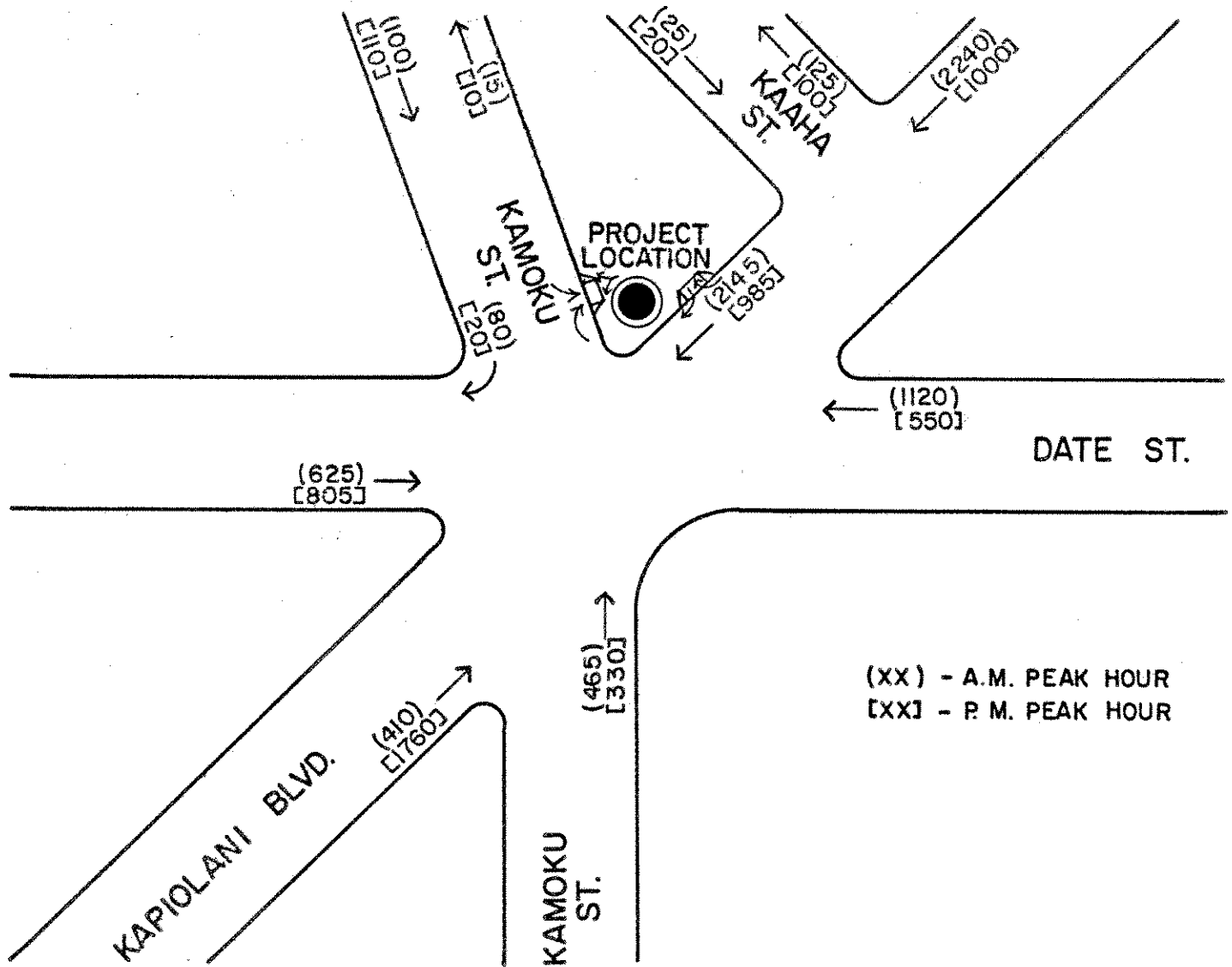
- b. Trip Generation. The proposed project is expected to be completed in 1986. Projected generation rates and the actual number of trips due to the operation of the proposed project are presented in Tables 9 and 10 respectively.
- c. Access. Two access points are being proposed, one each on Kapiolani Boulevard and Kamoku Street. Three alternate operational schemes for access are also being considered. In Access Alternate A, only right turn movements would be allowed at the Kapiolani Boulevard driveway. Alternate B would have a one-way pattern; only ewabound traffic from Kapiolani Boulevard could enter, and traffic leaving the project would exit onto Kamoku Street. Alternate C would be similar to B except that Kamoku and Kaaloa Streets, makai of Kaaha Street, would be converted to one-way (makai-bound) traffic only. Existing mauka-bound traffic would use Kaaha Street to enter the Moiliili Triangle. In Alternate C, the existing right turn lane into Kamoku Street would be closed. Otherwise, the intersections of Kapiolani Boulevard/Kamoku Street/Date Street and Kaaha Street/Kapiolani Boulevard are assumed to retain their existing configuration. Figures 7, 8 and 9 present the projected traffic volumes at the site with the addition of the expected project traffic for each alternative. The traffic generated by the proposed project is expected to increase traffic volumes in the project area. Table 11 presents the critical volume-to-capacity changes at the Kapiolani Boulevard/

TABLE 9
TRIP GENERATION RATES
(Vehicles Per Dwelling Unit)

	<u>Elderly</u>	<u>Condominium</u>
Daily (Enter and Exit)	3.3	6.1
AM Peak Hour		
Enter	0.07	0.1
Exit	0.33	0.5
PM Peak Hour	0.27	0.4
Enter	0.13	0.2

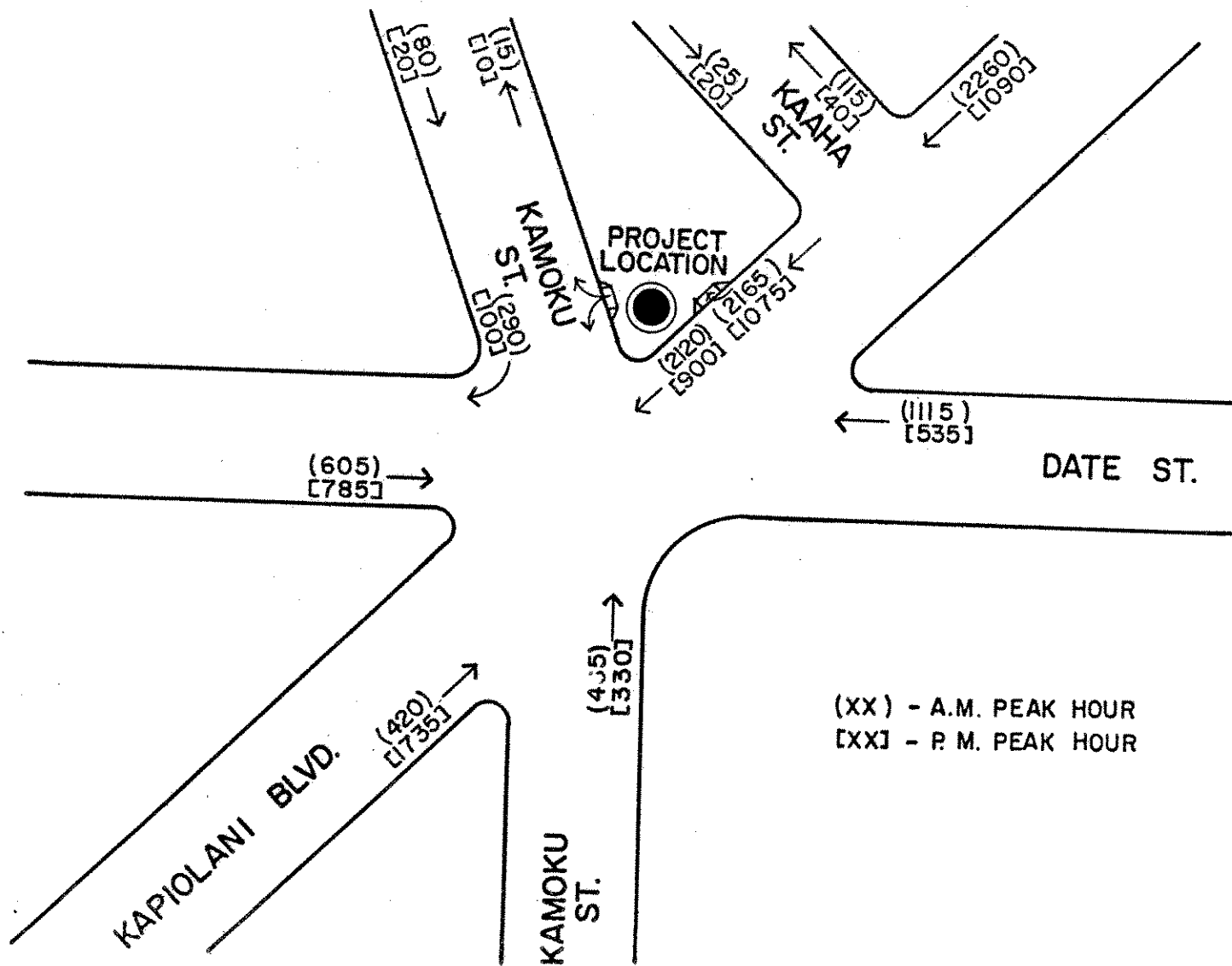
TABLE 10
TRIP GENERATION

	<u>Vehicles</u>
Daily (Enter and Exit)	2620
AM Peak Hour	
Enter	45
Exit	215
PM Peak Hour	
Enter	175
Exit	85



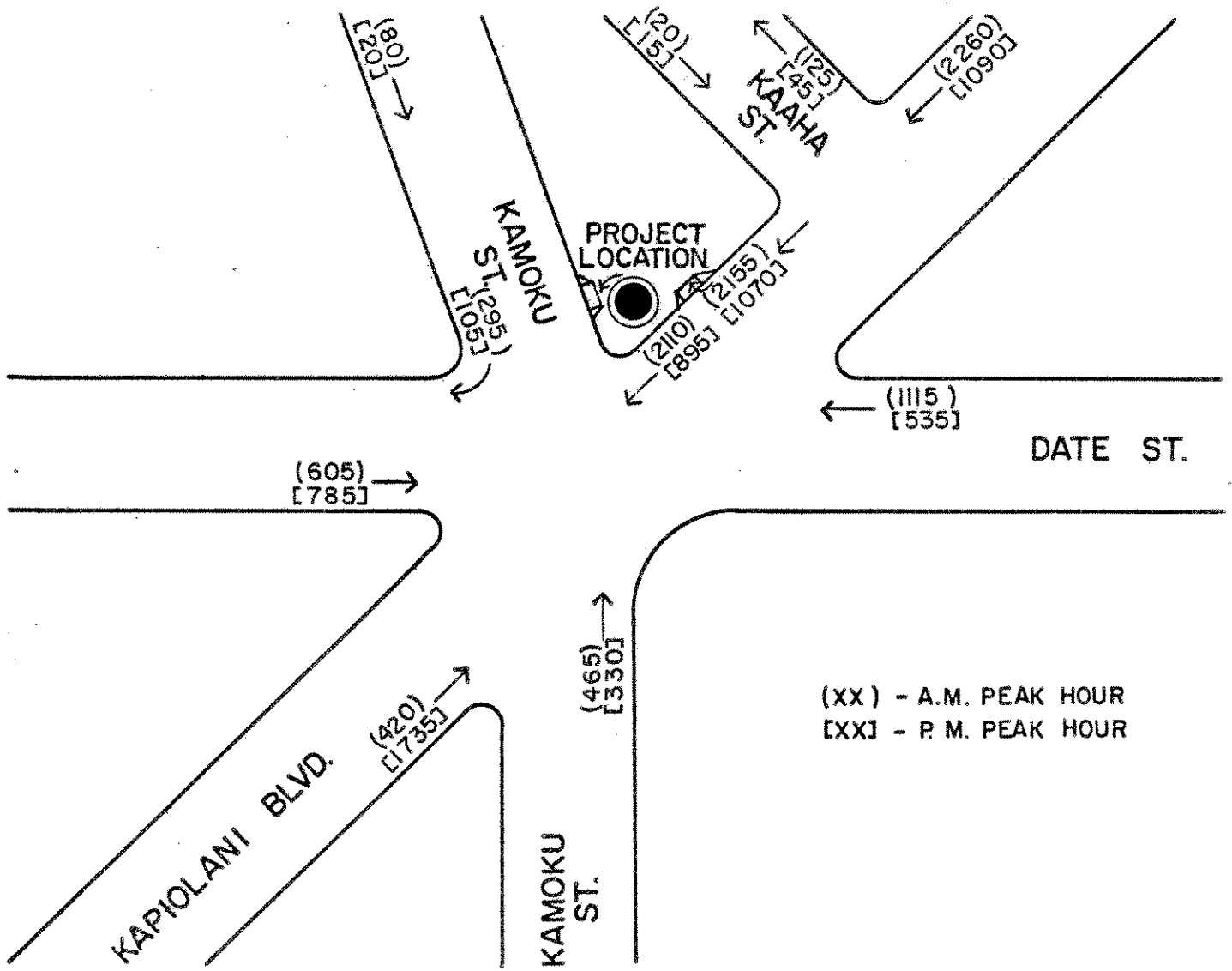
CRYSTAL
PROMENADE
Condominium

FIGURE 7
ACCESS
ALTERNATIVE A



CRYSTAL
PROMENADE
Condominium

FIGURE 8
ACCESS
ALTERNATIVE B



CRYSTAL
PROMENADE
Condominium

FIGURE 9
ACCESS
ALTERNATIVE C

TABLE 11
CRITICAL VOLUME TO CAPACITY RATIO
KAPIOLANI BOULEVARD/KAMOKU STREET/DATE STREET

		<u>AM Peak Hour</u>	<u>PM Peak Hour</u>
Existing		1.10	0.98
With Proposed Project			
Access Alternate	A	1.13	1.00
(Change)		(±3%)	(±2%)
Access Alternate	B	1.10	0.98
(Change)		(0%)	(0%)
Access Alternate	C	1.10	0.98
(Change)		(0%)	(0%)

Kamoku Street/Date Street intersection for each of the various access schemes.

The right turn from Kamoku Street to Date Street would increase traffic; Levels of Service would be lower (worse), becoming C or D depending on the Alternate selected. Levels of Service at the Kapiolani Boulevard/Kaaha Street intersection would not change despite the small increases in traffic.

Traffic on the internal Moiliili Triangle Streets would also be affected by the proposed project. It is anticipated that traffic in the Triangle could increase upon completion of the project. In Alternate A, traffic entering the project from ewa of the site would be expected to use these streets and the Kamoku Street driveway. In Alternates A and B, existing traffic desiring to go in the kokohead direction could exit on Kamoku Street, use Kaaloa and Kaaha Streets and turn left onto Kapiolani Boulevard. In Alternate C, traffic now turning into Kamoku Street is assumed to turn at Kaaha Street. Alternate C would eliminate an existing traffic movement, the right turn from ewa-bound Kapiolani Boulevard to mauka-bound Kamoku Street. However, a reasonable alternative routing is available; traffic would turn right off of Kapiolani Boulevard at Kaaha Street then left (assuming destinations on Kamoku Street) at Kaaloa Street, and proceed makai onto Kamoku Street.

Analysis of the unsignalized Kaaha Street/Kapiolani Boulevard intersection shows that the Kapiolani Boulevard traffic would experience the same Levels of Service (B or better) with or without the project. Kaaha Street levels of service would also remain the same at Level D.

Appendix D, Traffic Impact Study, discusses the assumptions utilized in calculating the project's impact on traffic and provides further detail regarding results of all analyses undertaken.

The Traffic Impact Study found only minor differences in traffic impacts between Alternatives B and C and has recommended either Alternative on an equal basis. The developer has subsequently selected Alternative B as the preferred alternative.

- d. Off-Street Parking. The off-street parking required by the City's Comprehensive Zoning Code is presented in Table 12. According to the CZC, 446 stalls will need to be provided. However, assuming that one stall per condominium unit and one stall for every four elderly units will be provided, only 416 stalls will need to be built.

Off-street parking for the proposed project will be in a separate structure on the site. A total of 467 stalls (276 regular and 191 compact) will be provided or, 51 more stalls will be built than is required.

- e. Bus Service. Route 9 travels along Kapiolani Boulevard at a rate of 2 buses per hour in the day and Route 3, travels along Date Street (Diamond Head of Kapiolani) and Kapiolani Boulevard (Ewa of Date) approximately 4 buses per hour in the day. Peak hour services increase to approximately double of the above.
- 11. Aesthetics and Viewplanes. Landscaping will be designed to enhance the natural environment. Selection of plant material will be based on their water and shade requirements, as well as their ornamental value.

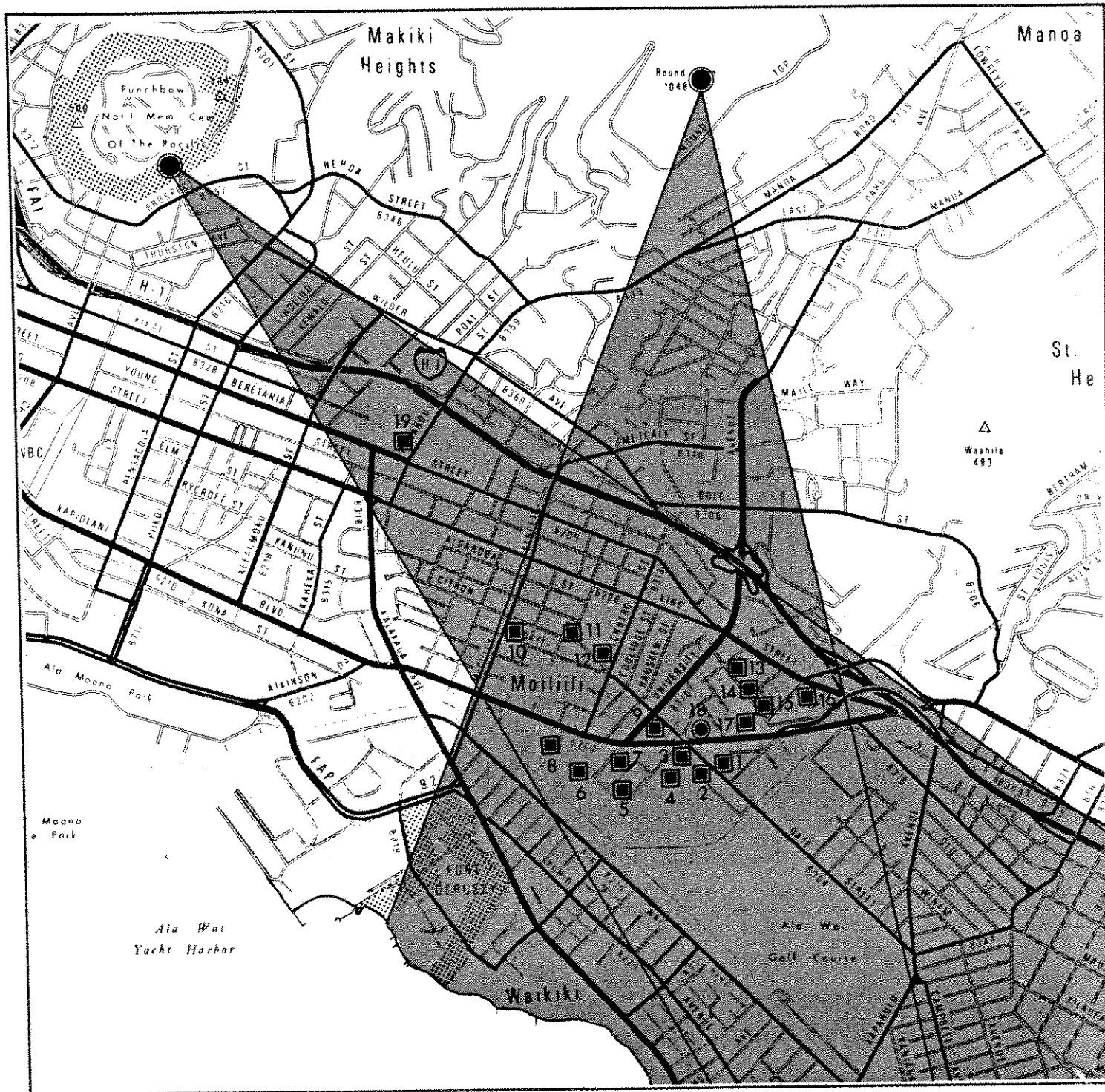
TABLE 12
OFF-STREET PARKING REQUIRED
ACCORDING TO CZC

<u>Type of Dwelling</u>	<u>Units</u>	<u>Rate (Stalls/unit)</u>	<u>Total</u>
Elderly	48	0.25	12
Multiple-family 600-800 sq. ft.	120	1.25	150
Less than 600 sq. ft.	284	1.00	<u>284</u>
Stalls required =			446
Regular size stalls required (60%) =			<u>268</u>

There will be some loss of view planes, since the Crystal Promenade structure will block views from certain mauka and makai points. However, viewplane studies from Punchbowl and Round Top, that were conducted for this project, indicate that the project's effect on either view perspective is only minimal. This is primarily due to the number of existing highrise buildings located makai of the project site, and from the Punchbowl view, the location of the Banyan Tree Plaza highrise development located between the proposed project and the Punchbowl Lookout. Figure 10 and Table 13 presents the locations of existing highrise buildings surrounding the project site. The illustration clearly indicates that viewplanes from mauka perspectives are already impacted due to the existence of buildings. Figure 11 presents profiles of those buildings that stand directly in the line-of-sight of the proposed Crystal Promenade structure from the Punchbowl and Round Top perspectives. As is indicated by the figure, Kings Gate and Hale Kulanui stand directly in front of Crystal Promenade from the Round Top view and the Banyan Tree Plaza, Parkside Tower, and Scenic Tower front the project from the Punchbowl perspective. Therefore, the proposed project itself, does not constitute the primary feature interrupting makai and mauka views, rather it would be only one of several buildings in the area.

12. Socioeconomic. The tenants currently occupying the apartments existing on-site will need to be relocated.

In regards to the displaced renters, it should be understood that the rental units existing on the property have a relatively short remaining economic life and that either the buildings will be demolished with or without redevelopment or major refurbishing will be needed which will result in a major rent increase.



CRYSTAL PROMENADE Condominium

SC: 1"=2000'

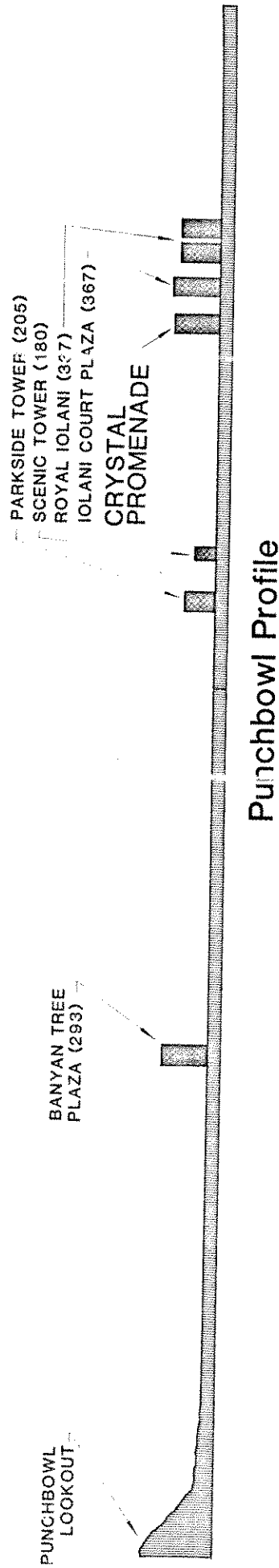
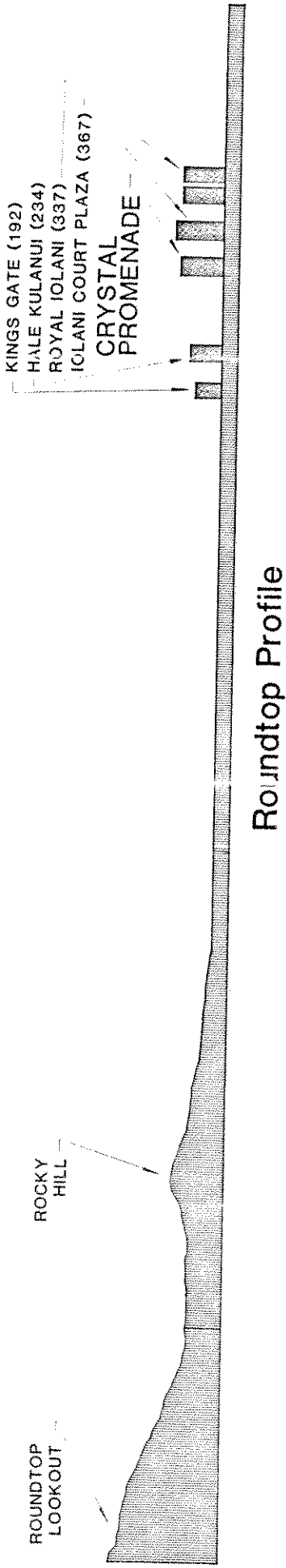


FIGURE 10 VIEW CORRIDORS

TABLE 13
BUILDING LOCATIONS AND HEIGHT

<u>Location</u>	<u>Building</u>	<u>Stories</u>
1	Plaza at Century Court	20
2	Regency Tower	42
3	Iolani Court Plaza	38
4	Royal Iolani	39,39
5	Kaimana Lanais	24
6	Ala Wai Plaza	25
7	Ala Wai Plaza Skyrise	38
8	Marco Polo	36
9	Kapiolani Royale	20
10	2100 Residence	24
11	Parkside Tower	25
12	Scenic Tower	20
13	Kings Gate	24
14	Hale Kulanui	27
15	Rainbow Place	20
16	Contessa	37
17	Plumeria Hale	20
18	Project Site	
19	Banyan Tree Plaza	





CRYSTAL
PROMENADE
Condominium

SC: 1/8" = 100'

FIGURE 11

VIEW
PROFILES

V-30

Further, until five months ago, the number of occupied units was reduced to 12 or 30 per cent occupied in anticipation of the project start. Due to processing delays, the landlord/landowner has allowed new tenants to occupy the units on month-to-month leases. It is anticipated that these short-term leases will be terminated at the beginning of the year. Secondly, if development were to occur in compliance with current medium density zoning, the existing tenants would be displaced. Displacement is a result of all development and not unique to this project or a result of any zoning exemption.



VI

PROBABLE ADVERSE ENVIRONMENTAL EFFECTS AND MITIGATION MEASURES

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

A. Introduction

The following are adverse environmental effects (both short- and long-term) which cannot be avoided and methods for mitigating them.

B. Short-Term

1. Noise Quality. Short-term noise originating from construction activity can be mitigated by limiting construction activities to regular work hours. Other noise reduction measures include installing mufflers on all construction equipment and trucks and discouraging the "gunning" of trucks and construction equipment. There are specific State, County, and OSHA Standards and Codes which must be complied with. Compliance with these standards will effectively reduce noise levels during construction, and are included in the construction specifications.
2. Air Quality. There are several methods for reducing fugitive dust during construction. The most popular method is to frequently "water down" the disturbed area with water or oil. Other methods include good housekeeping and working only small areas at any one time. The proposed project will also regard construction specifications and the State Department of Health, Rules and Regulations, which stipulate control measures.
3. Traffic. Construction activities will partially affect the normal flow on adjacent roadways. Standard precautions will be written into the construction specifications to ensure for safe movement of traffic during construction activities.

C. Long-Term

1. Traffic. Traffic will increase because of the number of vehicles going to and from the proposed project. The traffic consultants have recommended alternative access schemes to reduce the potential of congestion at the site.
2. Air Quality. Increased carbon monoxide from motor vehicles will be decreasing over the next several years due to Federal laws which will require automobile manufacturers to reduce air emissions from new automobiles. As the vehicular fleet replaces the cars on the road, the newer automobiles will contribute less to the air pollution.

VII

ALTERNATIVES



VII. ALTERNATIVES TO THE PROPOSED ACTION

This section will discuss alternatives to the proposed action which have been considered.

- A. Development as Allowed by Current Zoning. As an alternative plan, the developer may propose to construct a 102-unit luxury condominium project that would be consistent with building height, FAR, etc. as regulated by the area's current A-2 zoning. The structure would be at a building height of 150 feet and would consist of 17 living floors and a sunken atrium lobby five feet below the ground level. Building bulk will be approximately 5,439 square feet per floor. Proposed unit size and mix will be as follows:

<u>TYPE</u>	<u>NUMBER</u>	<u>AREA</u>
1-Bedroom	34	690
2-Bedroom	68	950

Parking would be provided in a three story parking structure attached to the main structure. Parking stall allocation and number should be as follows:

<u>TYPE</u>	<u>STALL PER UNIT</u>	<u>TOTAL</u>
1-Bedroom	1	34
2-Bedrooms	2	136
FOR SALE		5
Guest Parking		<u>4</u>
		179

Energy conservation systems such as heat exchangers, solar water heating, energy efficient lighting systems etc. would be used on the project.

Park dedication requirements would be satisfied by the construction of a 9,000 sq. ft. private park which would contain a swimming pool, barbeque areas and landscaping. Since the dedication requirement would be satisfied, it is anticipated that no fee would be paid to the Park and Recreation Department.

Unit mix would be 2 one-bedrooms and 4 two-bedrooms per floor. It is estimated that the 2-bedroom units could be sold at an average price of \$160,000.00 and the 1-bedroom units at an average price of \$118,000.00.

- B. No-Action. An alternative of no-action exists and if such an alternative is followed, the present uses of the project site will continue. From the standpoint of developer, this alternative is not feasible or desirable, since it is unlikely that the landowner and developer could achieve their greatest return on their investments. In addition, the retention of the project site in its present use would eliminate the increased annual real property tax collections anticipated with the development and the 48 elderly rental units being proposed under the current plan. Finally, the no-action alternative would not obtain the objectives of the proposed action.
- C. Other Site. The developer has the development rights for this parcel and no other sites in the vicinity are available for this type of development.

VIII

SHORT-TERM USES/LONG-TERM
PRODUCTIVITY AND
ANY IRREVERSIBLE AND IRRETRIEVABLE
COMMITMENT OF RESOURCES



VIII. THE RELATIONSHIP BETWEEN LOCAL SHORT-TERM USES OF MAN'S ENVIRONMENT AND THE MAINTENANCE AND ENHANCEMENT OF LONG-TERM PRODUCTIVITY AND ANY IRREVERSIBLE AND IRRETRIEVABLE COMMITMENTS OF RESOURCES

It is anticipated that the construction of the proposed project will commit the necessary construction materials and human resources (in the form of planning, designing, engineering, construction labor, and landscaping). Some of the construction materials could be reused if and when the project is demolished. However, at the present time and due to the state of our economy, it is felt that the reuse of much of these materials is not practical. Labor expended for this development is not retrievable. However, labor will be compensated during the various stages of the project by the developer.

There will be some loss of view planes, since the Crystal Promenade structure will block views from certain mauka and makai points. However, as was cited previously, viewplane studies from Punchbowl and Round Top indicate that the project's effect on either view perspective is only minimal.

Traffic generated by the project will increase emissions of carbon monoxide in the project area. Computer modeling of carbon monoxide levels after project construction indicate that State of Hawaii standards for that pollutant are likely to be exceeded under worst case traffic and meteorological conditions in the years immediately following construction, but by the year 2003 carbon monoxide concentrations are predicted to be within allowable State and Federal Ambient Air Quality Standards.

The project development will result in a commitment of land for a long-term period. Once developed, it is unlikely that the land will be reverted to a lower use in the long-term future. Commitment of land

for these purposes will also foreclose the future land use options of the land, such as recreational use, open space, and agricultural use. However, it should be noted that even if the proposed project did not occur, the high cost of the land (inherent in the zoning) would likely foreclose these less intense land uses.

The project development will, in the long-term, result in the availability of low-cost rental housing for the elderly and affordable market housing for the first-time buyer, while also providing a development that is located in close proximity to commercial and recreational amenities.

IX

GOVERNMENT POLICY OFFSETTING ADVERSE EFFECTS



IX. AN INDICATION OF WHAT OTHER INTERESTS AND CONSIDERATIONS OF GOVERNMENTAL POLICIES ARE THOUGHT TO OFFSET THE ADVERSE ENVIRONMENTAL EFFECTS OF THE PROPOSED ACTION

Since Crystal Promenade is an HHA-supported housing project, it is pursuant to the provisions of Chapter 359 G, Hawaii Revised Statutes, which should allow the City Council to exempt the project from County regulations, including zoning and Development Plan land use. The HHA and developer are requesting an increase in height from 150 feet to 350 feet and an increase in density.

Regulatory requirements (such as fire protection devices and equipment, building design and structural support, and access) are set forth in various standards, regulations, and codes. Subsequently, the developer must adhere to these requirements. It is felt that compliance of mitigation measures set by government are inherent in the present project plan.



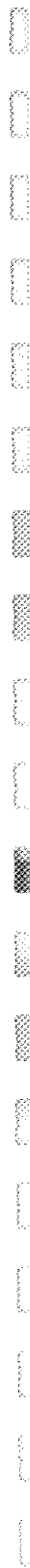
X

SUMMARY OF UNRESOLVED ISSUES



X. SUMMARY OF UNRESOLVED ISSUES

- A. The HHA and developer are currently in the process of requesting the City Council to endorse the project and exempt certain planning and zoning regulations, in accordance with Chapter 359 G, HRS.
- B. The Board of Water Supply (BWS) will not make advance water commitment for the project and will determine the availability of water when construction plans for the water service connections are submitted for BWS approval.
- C. The HHA is currently determining the necessity of presenting the Corporation Counsel's opinion on Chapter 359 G to the Attorney General's Office.
- D. There is a lack of sufficient on-site park space to comply with the park dedication requirement and the developer, therefore, is exploring other means for compliance.



APPROVALS



XI. LIST OF NECESSARY APPROVALS

A. State of Hawaii

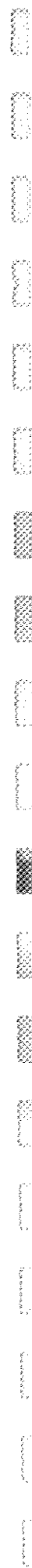
1. Department of Health: Noise Permit, Construction Plan Approval.
2. Department of Transportation: Approval of ingress and egress points.

B. City and County of Honolulu

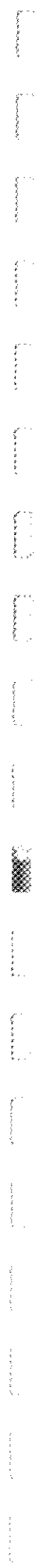
1. Department of Public Works, Engineering Division: Grading Permit (if necessary).
2. Department of Public Works, Division of Wastewater Management: Approval by Department to accept sewage generated by project into the Sand Island STP.
3. Department of Transportation Services: Approval of ingress and egress points.
4. Board of Water Supply: Commitment of potable water supply.
5. Building Department: Building Permits must be obtained by the developer or the retained contractor or sub-contractor from the Building Department. Such permits involve the checking of the plans by the Department of Public Works, and Fire Department in order to assure that governmental codes and standards have been incorporated into the building plans.

C. Private

Utility easements, connections, and relocations must be approved by the respective utility companies.



PARTIES CONSULTED



XIIA. ORGANIZATIONS AND PERSONS CONSULTED DURING THE PREPARATION NOTICE CONSULTATION PERIOD AND REPRODUCTION OF COMMENTS AND RESPONSES MADE DURING THE CONSULTATION PROCESS

The EIS Preparation Notice appeared in the EQC Bulletin of August 23, 1983.

A total of 20 letters were received in response to the EIS Preparation Notice. In most cases, the comments identified specific concerns that should be addressed in the EIS.

Table 14 identifies the agencies to whom copies of the EIS Preparation Notice were sent, the date comments were received, the date of the letter, and date of response (if necessary).

The DEIS will be sent to parties from which, comments from the Preparation Notice, were received.

Reduced, half-sized copies of the letters received and responses to the comments are provided in the following section.

TABLE 14

COMMENTS RECEIVED ON EIS PREPARATION NOTICE

<u>Organization:</u>	<u>Date Received:</u>	<u>Date of Letter:</u>	<u>Date of Response:</u>
<u>City and County</u>			
Department of General Planning	*09/27/83	09/23/83	10/20/83
Department of Land Utilization	09/13/83	09/12/83	10/20/83
Department of Transportation Services	09/23/83	09/16/83	10/20/83
Department of Parks & Recreation	09/12/83	09/08/83	10/20/83
Department of Public Works			
Department of Housing and Community Development	*09/29/83	09/26/83	10/20/83
Department of Police	09/07/83	09/02/83	10/20/83
Department of Fire	08/30/83	08/28/83	10/20/83
Board of Water Supply	09/12/83	09/07/83	10/20/83
<u>State</u>			
Department of Land and Natural Resources	09/23/83	09/16/83	10/20/83
Department of Health	09/06/83	08/31/83	10/20/83
Department of Planning & Economic Development	09/23/83	09/20/83	
Department of Social Services & Housing			
Department of Transportation	09/06/83	08/30/83	10/20/83
Department of Education	09/09/83	09/02/83	10/20/83
Environmental Center			
Water Resources Research Center	*10/06/83	10/03/83	
Office of Environmental Quality Control			
<u>Federal</u>			
U.S. Army Corps of Engineers	09/16/83	09/14/83	10/20/83
Soil Conservation Service	09/15/83	09/13/83	
<u>Private</u>			
McCully/Moiliili Neighborhood Board No. 8	*09/29/83	09/19/83	10/20/83

TABLE 14
(continued)

<u>Organization</u>	<u>Date Received:</u>	<u>Date of Letter:</u>	<u>Date of Response:</u>
<u>Private</u>			
McCully/Moiliili Community Center	09/22/83	09/21/83	10/20/83
Kokua Council			
Americal Lung Association			
Outdoor Circle			
Life of the Land			
Lee E. Takagi	09/22/83	09/21/83	10/20/83
Makiki/Lower Punchbowl	09/23/83	09/23/83	10/20/83
Tantalus Board No. 10			

* Letters received after the Consultation Period.

FIRE DEPARTMENT
CITY AND COUNTY OF HONOLULU

1455 S. BERETANIA STREET, ROOM 305
HONOLULU, HAWAII 96814



LEEN R. ANDERSON
MAYOR

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

F. J. RODRIGUEZ,
PRESIDENT

ENVIRONMENTAL
COMMUNICATIONS
INC.

August 28, 1983

Environmental Communications, Inc.
P. O. Box 536
Honolulu, Hawaii 96809

Attention: Mr. F. J. Rodriguez

Gentlemen:

SUBJECT: Proposed Crystal Promenade Condominium Project

We have no objections to the proposed project, provided all
fire code regulations are met.

Should you have any questions, contact Captain Winston Lum
of our Fire Prevention Bureau at 943-3861.

Very truly yours,

MELVIN M. NONAKA,
Fire Chief

MMN:ct/EYS

October 20, 1983

Chief Melvin M. Nonaka
Honolulu Fire Department
City and County of Honolulu
1455 S. Beretania Street, Room 305
Honolulu, Hawaii 96814

Dear Chief Nonaka:

Thank you for your letter dated August 28, 1983 regarding the proposed
Crystal Promenade condominium project. Please be assured that applicable
fire code requirements will be met in the design and construction of this pro-
ject. As the design phase reaches completion, the project consultant team
will be in touch with your department should any changes require your review
and approval.

Thank you for your continuing interest.

Very truly yours,

F. J. Rodriguez

FJR:ls
cc: BAL Corporation
Hawaii Housing Authority

ALL 3, 1009

1152 BISHOP BUILDING, SUITE 407 • P. O. BOX 538 • HONOLULU, HAWAII 96809 • TELEPHONE (808) 521-4391

POLICE DEPARTMENT
CITY AND COUNTY OF HONOLULU

1405 SOUTH BERTANIA STREET
HONOLULU, HAWAII 96814 - AREA CODE (808) 942-3111

THILEEN R. ANDERSON
MAYOR



OUR REFERENCE CMS-MJP

September 2, 1983

DOUGLAS G. GIBB
CHIEF
WARREN FERREIRA
DEPUTY CHIEF

Mr. F. J. Rodriguez
September 2, 1983
Page 2

- 3) If the driveway remains on Kapiolani Boulevard, some drivers will attempt to turn left from and into the driveway. This will require them to negotiate four lanes of traffic. This may also cause traffic in the kokohad-bound lanes to back up into the intersection as cars wait to negotiate the left turn.

Although we realize that motor vehicle accidents cannot be totally eliminated, we would like to minimize the likelihood of accidents on a main thoroughfare such as Kapiolani Boulevard.

We have no further comments at this time, but may have more as plans for this project are developed.

Sincerely,

DOUGLAS G. GIBB
Chief of Police

By *Edwin Ross*
EDWIN ROSS
Assistant Chief
Administrative Bureau

Mr. F. J. Rodriguez
Environmental Communications, Inc.
P. O. Box 536
Honolulu, Hawaii 96809

Dear Mr. Rodriguez:

Subject: Proposed Crystal Promenade Condominium Project

We have reviewed the Environmental Assessment and Preparation Notice for the proposed Crystal Promenade Development in Moiliili, Oahu, Hawaii.

We have no objection to the proposed development since it is not likely to have an adverse impact on police services. However, we would like to comment on the subject of traffic safety in the area. We are concerned that the addition of 467 vehicles to be generated after the project is completed will cause further congestion and hazards on an already busy street (Kapiolani Boulevard). To avoid this, we would like to recommend that the driveway for this project be located on a street other than Kapiolani. Our principal reasons are as follows:

- 1) The driveway is too close to a major intersection for vehicles to safely enter any but the extreme right lane which happens to be a right turn only lane.
- 2) If the driveway remains on Kapiolani Boulevard, vehicles using the driveway will have to enter the traffic flowing from a freeway off-ramp, where cars will be crossing in an "X" pattern.

SEP 7 1983

BOARD OF WATER SUPPLY

CITY AND COUNTY OF HONOLULU

630 SOUTH BERETANIA

HONOLULU, HAWAII 96843

ENVIRONMENTAL
COMMUNICATIONS
INC.

F. RODRIGUEZ,
PRESIDENT

October 20, 1983

Chief Douglas G. Gibb
Honolulu Police Department
City & County of Honolulu
1455 South Beretania Street
Honolulu, Hawaii 96814

Dear Chief Gibb:

Thank you for your letter dated September 2, 1983 regarding the proposed Crystal Promenade condominium project. Your department's concern over the potential traffic impacts due to this project have been forwarded to the traffic consultant firm of Parsons, Brinckerhoff, Quade & Douglas. They are preparing a traffic impact study for this project and will take into consideration your recommendations on treatment of the traffic flow onto Kapiolani Boulevard. Please be assured that every effort will be made to meet with the concerns expressed in your letter. We are confident that in the Draft Environmental Impact Statement (EIS), we can provide the solutions that will meet both applicable code and your department's concerns.

Thank you for your continuing interest.

Very truly yours,

F. J. Rodriguez

F. J. Rodriguez

FJR:ls
cc: BAL Corporation
Hawaii Housing Authority

XII-6

EILEEN R. ANDERSON, Mayor

YOSHIE H. FUJINAKA, Chairman
DORNA M. HOWARD, Vice-Chairman
MILTON J. AGADER
MICHAEL J. CHUN
WALTER A. DODS, JR.
KATHLEEN K. HANAU
ERNEST A. WAKARI

KAZU HAYASHIDA
Manager and Chief Engineer

September 7, 1983

Mr. F. J. Rodriguez
Environmental Communications, Inc.
P. O. Box 536
Honolulu, Hawaii 96809

Dear Mr. Rodriguez:

Subject: Your Letter of August 22, 1983,
on the Proposed Crystal Promenade
Condominium Project

Thank you for allowing us the opportunity to review the environmental assessment for the proposed project. We have the following comments:

1. The availability of water will be determined when the Building Permit is submitted to us for approval.
2. A discussion on the projected water demand for the development should be included in the environmental document.

If you have any questions, please call Lawrence Whang at 527-6138.

Very truly yours,

K. Hayashida
KAZU HAYASHIDA
Manager and Chief Engineer

SEP 12 1983

ENVIRONMENTAL
COMMUNICATIONS
INC.

F. RODRIGUEZ,
CLIENT

October 20, 1983

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

Dear Mr. Hayashida:

Thank you for your letter dated September 7, 1983 regarding the proposed Crystal Promenade condominium project. The consulting engineer for this project, Engineers, Surveyors, Hawaii, Inc. has been in contact with your staff on a preliminary basis and indications are that subject to normal processing of water applications, there will be water available for this project. We realize that this is not a commitment and availability is subject to final review and approval of the building's plans.

Thank you for your continuing interest.

Very truly yours,

F. J. Rodriguez

F. J. Rodriguez

FJR:ls
cc: BAL Corporation
Hawaii Housing Authority

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

EILEEN R. ANDERSON
MAYOR



EMIKO I. KUDO
DIRECTOR

SAM L. CARL
DEPUTY DIRECTOR
OSCAR K. ASAHINA
EXECUTIVE ASSISTANT

September 8, 1983

Mr. F. J. Rodriguez
Environmental Communications, Inc.
P. O. Box 536
Honolulu, Hawaii 96809

Dear Mr. Rodriguez:

SUBJECT: EIS PREPARATION NOTICE
CRYSTAL PROMENADE CONDOMINIUM - MOILIILI
TMK: 2-7-15; 1

We have reviewed the EIS Preparation Notice for the proposed Crystal Promenade Condominium Project and make the following comments and recommendations.

The size of the proposed project would have a significant impact on our public parks in the subject area. There are no major public parks available within a quarter-mile of the project site. (See attached map.)

We are concerned that the preparation notice report has implied that there are adequate existing recreational facilities located to serve the project. The service facilities at Moiliili Community Center and Stadium Park, as indicated on Page 9 of the report, are not City parks. They are a private recreation center and a State passive park facility, respectively. Since most of the Moiliili Triangle area is designated for high density apartment use, the existing parks in the surrounding area are inadequate to serve the Triangle area.

Since the project is a multi-family residential project, compliance with the City's Park Dedication Ordinance No. 4621 will be required. We recommend that the private park method be used to comply with the ordinance. We also recommend that the developer contact Mr. Jason Yuen of our Advance Planning Section at 527-6315 to discuss the project's park dedication requirements.

Sincerely yours,

Emiko I. Kudo
(Mrs.) EMIKO I. KUDO, Director

EIK:vc
Attach.
cc: OEQC
HHA

SEP 12 1983

ENVIRONMENTAL
COMMUNICATIONS
INC.

F. J. RODRIGUEZ,
PRESIDENT

October 20, 1983

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

Dear Mrs. Kudo:

Thank you for your letter dated September 8, 1983 regarding the proposed Crystal Promenade condominium project. We share your concerns over the potential impacts that this project may have on available park space in the district. The concerns expressed in your letter have been forwarded to the project's developer and design team and they will be examining the alternatives that are available to reduce the anticipated impacts on City resources. Please be assured that all requirements will be met to comply with your department's concerns.

Thank you for your continuing interest.

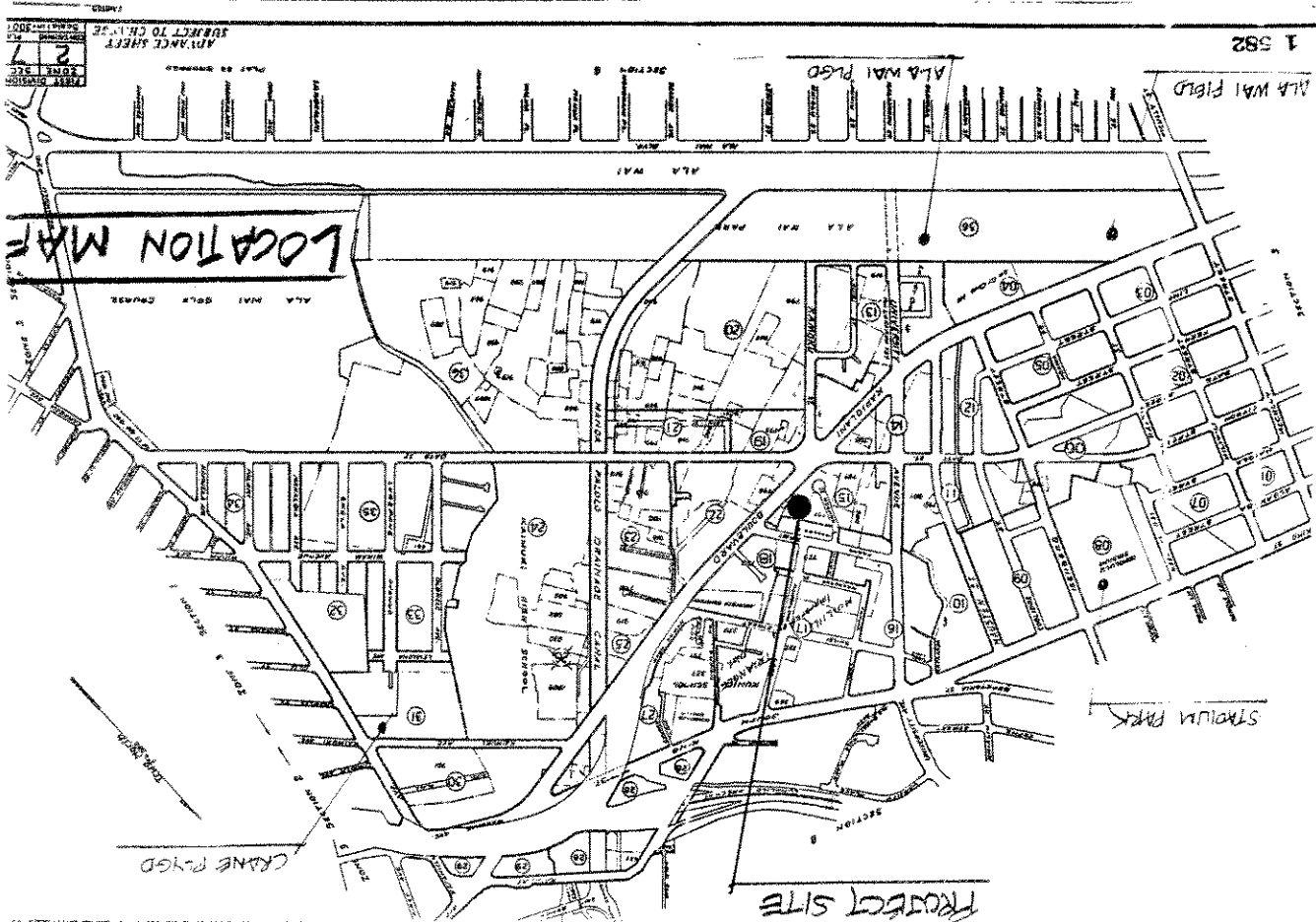
Very truly yours,

F. J. Rodriguez

F. J. Rodriguez

FJR:ls
cc: BAL Corporation
Hawaii Housing Authority

1132 BISHOP BUILDING, SUITE 407, P. O. BOX 538 • HONOLULU, HAWAII 96809 • TELEPHONE (808) 521-4391



DEPARTMENT OF LAND UTILIZATION
CITY AND COUNTY OF HONOLULU
 450 SOUTH KING STREET
 HONOLULU, HAWAII 96813 • (808) 528-4422



GILBERT R. ANDERSON
 MAYOR

MICHAEL M. McELROY
 DIRECTOR

ROBERT B. JONES
 DEPUTY DIRECTOR

93/EC-2(SM)

September 12, 1983

Mr. Fred J. Rodriguez
 Environmental Communications, Inc.
 P.O. Box 536
 Honolulu, Hawaii 96809

Dear Mr. Rodriguez:

Comments to Environmental Impact Statement
 Preparation Notice (EISP/N)
Crystal Promenade, Honolulu

We have reviewed the above and have the following comments to offer:

1. The zoning for the project site is A-2 Apartment District, which allows for a maximum of 90 units per acre, and a height of 150 feet above grade. We question the appropriateness of a development of this magnitude in this location, especially since the parcel is less than an acre in area. This construction of 452 condominium units (400% increase) at a height of 350 feet and 44 stories must be justified.
2. The ownership of the parcel should be disclosed in the EIS.
3. The EIS should discuss the building materials and architectural treatment of the building. If reflective glass is being proposed, appropriate reflection and shade studies should be included in the EIS.
4. Is the infrastructure in the area adequate to accommodate the proposed project?
5. What will be the traffic and circulation impact resultant from the proposed project?

Mr. Fred J. Rodriguez
 Page 2

5. Visual/view plane studies should be included in the EIS.
 7. Park dedication requirements and how they will be satisfied should be thoroughly addressed in the EIS.
 8. Hawaii Housing Authority's role in this project should be further elaborated upon in the EIS.
- If there are any further questions, please contact Sampson Mar of our staff at 527-5039.

Very truly yours,

Michael M. McElroy

MICHAEL M. McELROY
 Director of Land Utilization

MNM:s1

SEP 13 1983

ENVIRONMENTAL
COMMUNICATIONS
INC.

RODRIGUEZ,
CLIENT

October 20, 1983

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

Dear Mr. McElroy:

Thank you for your letter dated September 12, 1983 regarding the proposed Crystal Promenade condominium project. You will be pleased to note that the concerns expressed in your letter (8 in total) have been reviewed by the consultant team working on this project. We are confident that we can provide you with responses to the items listed that will be satisfactory. We look forward to working with you and your staff on this project and will remain in contact with your department.

Thank you for your continuing interest.

Yours very truly,

F. J. Rodriguez

F. J. Rodriguez

FJR:ls
cc: BAI Corporation
Hawaii Housing Authority

1152 BISHOP BUILDING, SUITE 407 • P. O. BOX 536 • HONOLULU, HAWAII 96809 • TELEPHONE (808) 521-8391

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



EILEEN R. ANDERSON
MAYOR

ANDREW J. T. CHANG
MANAGING DIRECTOR

WILLIAM A. BONNETT
DIRECTOR
DAIL RHEE
DEPUTY DIRECTOR

September 16, 1983

TE 8/83-3378

Mr. F. J. Rodriguez
President
Environmental Communications, Inc.
P. O. Box 536
Honolulu, Hawaii 96809

Dear Mr. Rodriguez:

Subject: Proposed Crystal Promenade Condominium Project
TMK: 2-7-15: 1

The traffic study should address the adequacy of the project access and the adequacy of the off-street parking stalls that will be provided.

In addition, it should be noted that access from Kapiolani Boulevard will be restricted to right turns in and out.

If there are any questions, please contact Kenneth Hirata, of my staff, at 523-4190.

Sincerely,

William A. Bonnet

WILLIAM A. BONNETT
Director

SEP 23 1983

ENVIRONMENTAL
COMMUNICATIONS
INC.

F. RODRIGUEZ,
CLIENT

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

EILEEN R. ANDERSON
MAYOR



WILLARD T. CHOW
CHIEF PLANNING OFFICER
RALPH PORTHORE
DEPUTY CHIEF PLANNING OFFICER

September 23, 1983

Mr. Fred J. Rodrigues
Environmental Communications, Inc.
P. O. Box 536
Honolulu, Hawaii 96809

Dear Mr. Rodrigues:

Crystal Promenade Condominium Project
TMK 2-7-15:1 Moiliili

We are in agreement with the determination that an EIS is necessary for the proposed project.

In addition to the concerns indicated in your preparation notice, we have the following concerns.

Soils It is indicated that the soil type at the site is Kawaihapai clay loam (KIA). However it should be noted that the change in soil types from Filled Land (FL) to Kawaihapai clay loam occurs in the vicinity of this property. The EIS should include information on the soil type from actual borings on the property. Borings will be necessary since a multi-story structure is proposed.

Noise Noise from construction activities is to be considered. Since the proposed project is at a major intersection, the EIS should indicate ambient noise levels, and discuss the relationship of ambient noise levels on proposed apartment users.

Heat and Glare The architect for the project is noted for glass buildings. If the walls of the proposed building are to consist of large areas of reflective glass, the impact of this on surrounding properties and traffic should be discussed.

Traffic Since the proposed project is at a 5-point intersection, access to the project will be critical. The impact of project-related traffic on Kapiolani Boulevard and Date Street traffic, as well as the converse, should be discussed.

October 20, 1983

Mr. William A. Bonnet, Director
Department of Transportation Services
City & County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Bonnet:

Thank you for your letter dated September 16, 1983 regarding the proposed Crystal Promenade condominium project. The basic concerns regarding traffic impacts have been provided to the consultant, Parsons, Brinckerhoff, Quade & Douglas for their review and response. This will be included in the Draft Environmental Impact Statement in the appropriate section.

Thank you for your continuing interest.

Very truly yours,

F. J. Rodriguez

F. J. Rodriguez

FJR:ls
cc: BAL Corporation
Hawaii Housing Authority

SEP 27 1983

Crystal Promenade
Page 2
September 23, 1983

The City had plans to close off one of the streets here to simplify traffic patterns. If these plans will need revision as a result of the proposed project, the resultant changes should be discussed.

Relationship to City Plans It is indicated that the proposed project is nonconforming and that preemption of land use and zoning regulations will be sought under provisions of Chapter 359G (HRS).

We note that only 48 elderly-rental units will be provided out of the proposed 452-unit project.

The EIS should discuss how provisions of Chapter 359G apply to this project. This has implications for all future projects, particularly if the 10 percent inclusionary zoning bill is passed. A ruling or opinion from the Attorney General's office might be included and discussed in the EIS.

Cumulative Impacts The cumulative impact of projects of similar density in this particular area should be discussed. How many other lots of the same size as this project remain to be developed or redeveloped? What would be the impact on street circulation, sewerage and water systems if these and other lots are developed to the same density as the proposed project?

We trust that our concerns will be adequately discussed in the EIS.

Sincerely,

Ralph Portmore
for Willard T. Chow

cc: Office of Environmental Quality Control
Environmental Commission
Hawaii Housing Authority
Corporation Counsel

ENVIRONMENTAL
COMMUNICATIONS
INC.

F. J. RODRIGUEZ,
PRESIDENT

October 20, 1983

Mr. Ralph Portmore
Deputy Chief Planning Officer
Department of General Planning
City & County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Portmore:

Thank you for your letter dated September 23, 1983 on the proposed Crystal Promenade condominium project. The comments offered by your department are for the most part, incisive and project specific. The requests for additional data to be included in the EIS document that would require specific studies (Soils, Attorney General's opinion) need to be evaluated by the applicant/developer in terms of appropriateness and timeliness. The final subject of Cumulative Impacts also is a matter of concern since the applicant/developer is not as intimately acquainted with the various projects that are being contemplated or proposed for the vicinity that would result in a cumulative impact analysis. There is no assurance that any of the proposed projects would be moved forward in a related time period, if at all. It is our understanding that as these projects are offered to the governmental agencies for initial review and subsequent approval, the capacity of the traffic, sewerage, and water systems is evaluated at the time of application. For a private entity to conduct an evaluation of the type you are suggesting, would appear presumptuous.

All items that you have covered will be evaluated and responded to in the EIS to the best of our ability and in consonance with the applicant/developer and the accepting authority. Thank you for your continuing concern.

Yours very truly,

F. J. Rodriguez

F. J. Rodriguez

FJR:ls
cc: BAL Corporation
Hawaii Housing Authority

DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET
HONOLULU, HAWAII 96813
PHONE 923-4131



ILKEEN R. ANDERSON
MAYOR

JOSEPH K. CONANT
DIRECTOR
CHARLES K. TORIGOE
DEPUTY DIRECTOR

September 26, 1983

Mr. F. J. Rodriguez
Environmental Communications, Inc.
P. O. Box 535
Honolulu, Hawaii 96809

Dear Mr. Rodriguez:

Subject: Environmental Impact Statement Preparation Notice
Proposed Crystal Promenade Condominium Project
Tax Map Key: 2-7-15: 1
Area: 38,570 Square Feet
Location: Moiliili, Oahu

Thank you for the opportunity to review the EIS preparation notice for the proposed Crystal Promenade Condominium Project.

The construction of new affordable housing is needed to address problems of overcrowding, overpaying and removal of substandard housing which cannot feasibly be rehabilitated. The City's Housing Assistance Plan indicates that over 36,000 lower income households are in need of some form of housing assistance.

The developer proposes to construct a 452-unit condominium structure at a height of 350 feet in an A-2 zone. The developers will dedicate to the Hawaii Housing Authority (HHA) 48 units--14 one-bedrooms and 34 studios--to be used as rentals for elderly households. In exchange, under the authority granted it by Chapter 359-G, Hawaii Revised Statutes, HHA will request from City Council exemptions necessary for the project to exceed the Development Plan and the A-2 zoning limits on density and height. The balance of 404 units will be sold at market prices.

Under the A-2 zoning district, density is restricted to 1.87 Floor Area Ratio (F.A.R.) and height to 150 feet. Under the developer's proposal, the Crystal Promenade Project would have an F.A.R. of 5.63, based on the following calculation:

Mr. F. J. Rodriguez
September 26, 1983
Page 2

Type of Unit	Average Size (S.F.)	Number	Total Square Feet
Studio	310	224	69,440 s.f.
1-Bedroom	500	108	54,000 s.f.
2-Bedroom	780	120	93,600 s.f.
GRAND TOTAL		452	217,040 s.f.

The height is proposed to be 350 feet. According to these figures, the exemptions will increase the allowable floor area by 201% and the height by 133%.

In evaluating HHA's request for zoning exemptions for the Crystal Promenade Project, the City Administration will have to weigh the project's housing benefits against the nature and extent of the requested exemptions. In this context, it would be helpful to know the rationale for the number and type of units being dedicated to public sector ownership. Why are the units restricted to elderly rental? Why is HHA being given only studio and one-bedroom units? Would it be possible also to dedicate some two-bedroom units for rental use?

I hope you can appreciate the need to thoroughly justify the substantial Development Plan and zoning exemptions to be requested for this project.

Sincerely,

JOSEPH K. CONANT

SEP 29 1983

ENVIRONMENTAL
COMMUNICATIONS
INC.

J. RODRIGUEZ,
PRESIDENT

STP 8.9340

August 30, 1983

Mr. Joseph K. Conant, Director
Department of Housing and
Community Development
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Conant:

Thank you for your letter dated September 26, 1983 regarding the proposed Crystal Promenade Condominium project.

The decision to provide elderly rental units was made by HHA, based on the length of their "waiting list" for these types of units. It was their rationale that the length of the list was a function of demand and need.

It can be assumed that the elderly have no need for units larger than one-bedroom, since the elderly no longer have any dependents.

On the subject of 2 bedroom units, it was determined during negotiations, that the present plan being proposed represented the most feasible alternative and was of mutual benefit to the developer and HHA.

We appreciate your comments and continuing interests.

Very truly yours,

F. J. Rodriguez

F. J. Rodriguez

FJR:ls
cc: BAL Corporation
Hawaii Housing Authority

Mr. F.J. Rodriguez, President
Environmental Communications, Inc.
P.O. Box 536
Honolulu, Hawaii 96809

Dear Mr. Rodriguez:

Proposed Crystal Promenade
Condominium Project

Thank you for the opportunity to be consulted on the subject project.

We suggest your traffic analyses and studies include an examination of the impact of the traffic flowing from the Kapiolani Blvd. Off-Ramp with the traffic entering and leaving the project.

Very truly yours,

Ryokichi Higashionna

Ryokichi Higashionna
Director of Transportation

ENVIRONMENTAL
COMMUNICATIONS
INC.

F. J. RODRIGUEZ
PRESIDENT

GEORGE R. ARIVOSH
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF HEALTH

P. O. BOX 3378
HONOLULU, HAWAII 96801

August 31, 1983

CHARLES G. CLARK
DIRECTOR OF HEALTH

In reply, please refer to:
EPHSD-

October 20, 1983

Dr. Ryokichi Higashionna, Director
Department of Transportation
State of Hawaii
869 Punchbowl Street
Honolulu, Hawaii 96813

Dear Dr. Higashionna:

Thank you for your letter dated August 30, 1983 regarding the proposed Crystal Promenade condominium project. The retained traffic consultant, Parsons, Brinckerhoff, Quade & Douglas are preparing a traffic impact study that evaluate all aspects of traffic that will result due to this project. We are aware of the heavy traffic volumes on Kapiolani Boulevard and appreciate your concerns on this matter. Please be assured that all traffic impacts and proposed mitigative measures will be provided to your staff for their review and input.

Thank you for your continuing concern.

Very truly yours,

F. J. Rodriguez

F. J. Rodriguez

FJR:ls
cc: BAL Corporation
Hawaii Housing Authority

Mr. F. J. Rodriguez, President
Environmental Communications, Inc.
P. O. Box 536
Honolulu, Hawaii 96809

Dear Mr. Rodriguez:

Subject: Request for Comments on Proposed Environmental Impact Statement
(EIS) for Proposed Crystal Promenade Condominium Project

Thank you for allowing us to review and comment on the subject proposed EIS. Our comments are as follows:

1. The proposed development is compatible with present land use for the area. In preparing the Environmental Impact Statement, the following concerns should be addressed.
 - a. The large vehicular traffic volume currently utilizing the intersection of Kapiolani, Date and Kamoku Streets may result in some adverse noise impacts on residents of the proposed development.
 - b. 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 11, Administrative Rules Chapter 43, Community Noise Control for Oahu.
 - c. The proposed parking structure or multi-level garage should be designed to control noise, specifically towards tire squeals and vehicular emissions.
 - d. Activities associated with construction phase must comply with the provisions of Title 11, Administrative Rules Chapter 43, Community Noise Control for Oahu.
 - 1) A noise permit must be obtained if the noise levels from the construction activities are expected to exceed the allowable noise levels of the regulations.
 - 2) Construction equipment and on-site vehicles or devices requiring an exhaust of gas or air must have a muffler.

ENVIRONMENTAL
COMMUNICATIONS
INC.

F. J. RODRIGUEZ,
PRESIDENT

Mr. F. J. Rodriguez

-2-


August 31, 1983

3) The conditional use of the permit must be complied with as specified in the regulations and the conditions issued with the permit.

e. 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 11, 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.

Sincerely,


MELVIN K. KOIZUMI
Deputy Director for
Environmental Health

October 20, 1983

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

Dear Mr. Koizumi:

Thank you for your letter dated August 31, 1983 regarding the proposed Crystal Promenade condominium project. Your department's concerns over the noise impacts that may result as the result of this project have been forwarded to the design phase consultants for their use. Please be assured that all applicable noise code regulations will be met wherever appropriate. We will be in touch with your department if any changes require your review and approval.

Thank you for your continuing interest.

Very truly yours,



F. J. Rodriguez

FJR:ls
cc: BAL Corporation
Hawaii Housing Authority

GEORGE R. ARRYOSH
GOVERNOR

DR. DONNIS H. THOMPSON
SUPERINTENDENT



STATE OF HAWAII
DEPARTMENT OF EDUCATION
P. O. BOX 336
HONOLULU, HAWAII 96809

OFFICE OF THE SUPERINTENDENT

September 2, 1983

Mr. F. J. Rodriguez
Environmental Communications, Inc.
P.O. Box 536
Honolulu, Hawaii 96809

Dear Mr. Rodriguez:

SUBJECT: Proposed Crystal Promenade Condominium Project

Our review of the subject petition indicates that the 452-unit condominium project, TMK: 2-7-15:1, will have a negligible enrollment impact on Kuliou Elementary (K-6), Washington Intermediate (7-9), and Kaimuki High (10-12) schools.

Thank you for the opportunity to review the proposal.

Sincerely,

Donnis H. Thompson
Donnis H. Thompson
Superintendent of Education

DHT:HL:j1

cc: Mr. James Edington
Honolulu District

ENVIRONMENTAL
COMMUNICATIONS
INC.

F. J. RODRIGUEZ,
PRESIDENT

October 20, 1983

Dr. Donnis H. Thompson, Superintendent
Department of Education
State of Hawaii
P.O. Box 2360
Honolulu, Hawaii 96804

Dear Superintendent Thompson:

Thank you for your letter dated September 2, 1983 regarding the proposed Crystal Promenade condominium project. We appreciate the prompt and concise response to the anticipated impacts attributable to this project on the schools within the district.

Thank you for your continuing interest.

Very truly yours,

F. J. Rodriguez
F. J. Rodriguez

FJR:ls
cc: BAL Corporation
Hawaii Housing Authority

AN EQUAL OPPORTUNITY EMPLOYER

SEP 9 1983

1152 BISHOP BUILDING, SUITE 407 P. O. BOX 536 HONOLULU, HAWAII 96809 TELEPHONE (808) 527-8391



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

P. O. BOX 821
HONOLULU, HAWAII 96809

SUSUMU ONO, CHAIRMAN
BOARD OF LAND & NATURAL RESOURCES
EDGAR A. HAMASU
DEPUTY TO THE CHAIRMAN
DIVISIONS:
LAND USE DEVELOPMENT
PROGRAM
NATURAL RESOURCES
CONSERVATION AND
RESOURCES ENFORCEMENT
CONVEYANCES
FOREST AND WILDLIFE
MANAGEMENT
STATE PARKS
WATER AND LAND DEVELOPMENT

September 16, 1983

Mr. F. J. Rodriguez
Environmental Communications, Inc.
P. O. Box 536
Honolulu, Hawaii 96809


Dear Mr. Rodriguez:

Thank you for notifying us that an environmental impact statement is to be prepared for the Crystal Promenade condominium development.

We suggest the developer coordinate water requirements for the project with the Board of Water Supply.

We are pleased to note that the contractor will halt work and notify the State Historic Preservation Office if anthropological or paleontological sites are uncovered (Ph. 548-7460).

Sincerely,


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

ENVIRONMENTAL
COMMUNICATIONS
INC.

F. J. RODRIGUEZ,
PRESIDENT

October 20, 1983

Mr. Susumu Ono, Chairperson
Department of Land and Natural Resources
P.O. Box 621
Honolulu, Hawaii 96809

Dear Mr. Ono:

Thank you for your letter dated September 16, 1983 regarding the proposed Crystal Promenade condominium project. On the two items discussed in your letter, contact has been established with the Board of Water Supply and they have determined availability of water for the project. Final approval will be provided upon compliance with the Board's requirements of demand and improvements necessary to connect to the site.

The archaeological impacts that may be realized upon start of construction activities onsite will be monitored by the applicant. He will contact your staff in the event that any discoveries of archaeological significance are discovered.

Thank you for your continuing interest.

Yours very truly,


F. J. Rodriguez

FJR:ls
cc: BAL Corporation
Hawaii Housing Authority

SEP 23 1983



United States
Department of
Agriculture

Soil
Conservation
Service

P.O. Box 50004
Honolulu, Hawaii
96850

September 13, 1983

Mr. F. J. Rodriguez
Environmental Communications, Inc.
P.O. Box 536
Honolulu, Hawaii 96809


Dear Mr. Rodriguez:

Subject: Environmental Assessment and Preparation Notice for the
Proposed Crystal Promenade Development, Moiliili, Hawaii

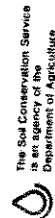
We have reviewed the subject preparation notice and have no comments to make.

Thank you for the opportunity to review this document.

Sincerely,


FRANCIS C.H. LUM
State Conservationist

NO RESPONSE NECESSARY



The Soil Conservation Service
is an agency of the
Department of Agriculture

SEP 15 1983



DEPARTMENT OF THE ARMY
PACIFIC OCEAN DIVISION, CORPS OF ENGINEERS
FT. SHAFTER, HAWAII 96858

September 14, 1983

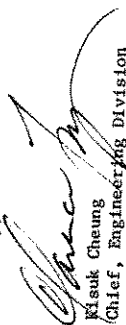
Mr. Fred Rodriguez
Environmental Communications Inc.
P. O. Box 536
Honolulu, Hawaii 96809

Dear Mr. Rodriguez:

Thank you for the opportunity to review and comment on the Environmental Impact Statement Preparation Notice for Crystal Promenade Condominium Project. The following comments are offered:

- a. A Department of the Army permit is not required.
- b. Page 8, III.C.3. The revised Flood Insurance Rate Map dated January 6, 1983 for the Waikiki-Manoa-Palolo area (Enclosure 1) designates the proposed condominium project site Zone C or area of minimal flooding according to the Flood Insurance Study for the City and County of Honolulu prepared by the Federal Insurance Administration. Under the National Flood Insurance Program, Zone C areas are not regulatory flood plain areas.

Sincerely,


Kiatuk Cheung
Chief, Engineering Division

Enclosure

SEP 16 1983



DEPARTMENT OF PLANNING
AND ECONOMIC DEVELOPMENT

Kamamalu Building, 250 South King St., Honolulu, Hawaii • Mailing Address: P.O. Box 2399, Honolulu, Hawaii 96801

GEORGE R. ARYOSHI
Governor
Kent M. Keith
Director
FRANK SRIVANEK
Deputy Director

September 20, 1983

Ref. No. 8107

Mr. Fred J. Rodriguez
Environmental Communications, Inc.
P.O. Box 536
Honolulu, Hawaii 96809

Dear Mr. Rodriguez:

Subject: Environmental Assessment and Preparation Notice
for the Crystal Promenade Condominium Project, Oahu

We have reviewed the subject environmental assessment and
preparation notice and have no comments.

Very truly yours,

Kent M. Keith
Kent M. Keith

cc: Office of Environmental Quality Control

NO RESPONSE NECESSARY

SEP 23 1983

AN EQUAL OPPORTUNITY EMPLOYER

OCT 6 1983



University of Hawaii at Manoa

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

3 October 1983

F.J. Rodrigues
Environmental Communications, Inc.
P.O. Box 536
Honolulu, Hawaii 96809

Dear Mr. Rodrigues:

Subject: EIS Preparation Notice for Proposed Crystal
Promenade Condominium Project

The subject environmental assessment and preparation notice has been re-
viewed by WRRC personnel and we have no comments to offer. Thank you for the
opportunity to read and comment on this EIS preparation notice.

Sincerely,

Henry K. Gee
Acting EIS Coordinator

HKG:jmn

cc: H. Gee
Y.S. Fok
C. Liu

NO RESPONSE NECESSARY

FEDERAL FLOOD INSURANCE PROGRAM

FLOOD INSURANCE RATE MAP

CITY AND COUNTY OF HONOLULU, HAWAII

PANEL 120 OF 135

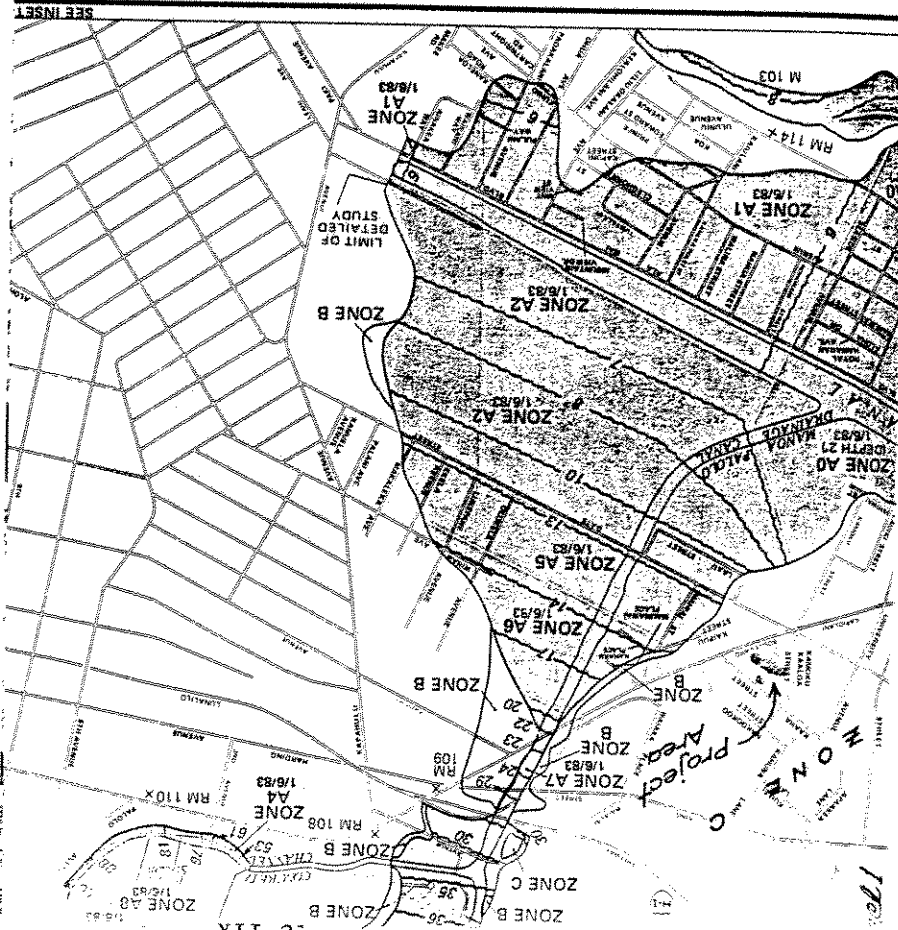
COMMUNITY-PANEL NUMBER 150001 0120 B

MAP REVISED: JANUARY 6, 1983

Scale: 1"=1000'

Federal Emergency Management Agency

12-II-X



ENVIRONMENTAL
COMMUNICATIONS
INC.

F. J. RODRIGUEZ,
PRESIDENT

October 20, 1983

Mr. Kleuk Cheung
Chief, Engineering Division
Department of the Army
Pacific Ocean Division, Corps of
Engineers
Ft. Shafter, Hawaii 96858

Dear Mr. Cheung:

Thank you for your letter dated September 14, 1983 regarding the proposed Crystal Promenade condominium project. The inclusion by your office of the Flood Insurance Rate map is greatly appreciated and the designation of Zone C will be duly noted in the Draft Environmental Impact Statement.

Thank you for your continuing interest.

Very truly yours,

F. J. Rodriguez

F. J. Rodriguez

FJR:ls
cc: BAL Corporation
Hawaii Housing Authority

Written response to Crystal Promenade proposal

A Misnomer?

What does the term "affordable housing" imply? As I understand this term, this is housing not only in a price range affordable to families in middle income groups but also housing that "meets the needs of families in terms of size, design, location, and facilities" (Quoted from Consumers' Housing Task Force brochure.) I do not believe Crystal Promenade qualifies as an affordable housing project based on the above requirements, especially if allowed the "trade-offs" and pre-emptions it requests. (Summary of Issues and Concerns related to The Crystal Promenade, p. 3, Sec. F)

1833A Fern St.
Honolulu, HI 96826
September 21, 1983

Mr. F. J. Rodriguez
Environmental Communications, Inc.
P.O. Box 536
Honolulu, HI 96809

Dear Mr. Rodriguez:

I would like to submit my written response to the Crystal Promenade proposal.

Please take this into consideration in your drafting of the Environmental Impact Statement.

Thank you for this opportunity to respond to this proposed development.

Sincerely,

Lee E. Takagi

Lee E. Takagi
Neighborhood Planning and
Development Committee Member,
McCully Resident

Enc.

cc: Mr. Harold Edwards
Hawaii Housing Authority
Councilmember Leigh-Wai Doo
Councilmember Marilyn Bornhorst

The Problem

In exchange for 48 units the MHA will take over for elderly rentals, the project becomes a very overcrowded building, 200 feet taller than allowed in the area, consisting of very small studio and one bedroom units on the lower floors, with the two bedroom units all on upper floors, the only units families could conceivably live in. As Crystal Promenade is requesting an increase in the density, it contributes to the poor living conditions for these families. The City and County density code for the proposed site allows 72,126 square feet for the total living space (38,570 lot x 1.87 ratio for floor area). At the proposed 5,184 square feet per floor, this total would be accomplished with fourteen (14) stories. The proposed structure would rise thirty (30) stories higher than existing density requirements allow. The density waiver is no small concession. The developer needs to consider just who your tenants will be, when you construct a non-luxury, lower-cost/lower rent apartment building on Kapiolani Boulevard. It is obvious that it will not be your upper-middle class professionals, working couples without children, or middle class single persons, although this is the income group that the housing structure is targeted for! They would most likely keep renting a decent apartment than to own a tiny 500 sq. ft. 1-bedroom or even smaller 310 sq. ft. studio. If they did qualify to purchase one of these units for the first time, they would probably be doing this as an investment (a fairly poor one at that) and would rent out their apartment and live elsewhere. I foresee a large turnover in owners, based on dissatisfaction with the building and very small size of apartments in a densely populated building. The people who would end up living there will be your middle and lower-middle income families with one-three children, working single parents with one or more children, and ABC or Section 8 one-parent families with one or more children. There is also a very large immigrant population including Vietnamese, Korean, Filipino, Tongan, and Samoan that lines Kapiolani Boulevard and environs in older, walk-up apartments, similar to the one that will be razed for Crystal Promenade. As more of these old buildings come down, Crystal Promenade will be where these people will seek housing. How many units will accommodate a family with children, even families with just one child? Only

SEP 22 1983

Written response to Crystal Promenade, p. 2

120 units, just a little over one-fourth of all the units in the building. This small number of units must accommodate all middle-class, lower-middle, and ABC, Section 8 families that will seek an apartment with an affordable rent. If the family happens to be eligible for Section 8 approved housing, these 2 bedroom units must have 120 sq. ft. and 80 sq. ft. bedrooms, the one-bedroom units must have a bedroom with 120 sq. ft., and if the parent has two children of opposite sex older than five, s/he needs a bedroom for each child.

The argument may be that this is not intended to be a low-income housing project, but this will be one of the few new places in the area with somewhat affordable rents. Owner-occupied, you say? I believe these units will not appeal to the people who can afford to buy them and they will inevitably be rented to students, single persons desperate for affordable rentals, and small families. Ironically, the target population you say you are reaching will not want to live there on account of overcrowding, tiny units, and very little green space, parks in the area, play equipment for children, or amenities for the adults.

Solutions?

Before this becomes a very poor example of how not to build affordable housing, the planners of Crystal Promenade should go back to the drawing boards. It is highly unlikely that the City Council and many concerned citizens will allow such a large, densely-populated building to go up, especially when the developers want to forego most of the park dedication requirements of 1/2 acre of greenspace (5184 x 44 x 10% = 22,810) or the nearly \$500,000 in park dedication fees (38,570 sq. ft. x \$12.00/sq. ft.), waive important City and County density requirements (90 units an acre ideally), reduce greenspace further by reducing setbacks on Kamoku, and build a 350 foot structure instead of a hard-fought-for, reasonable 150 ft. height. I urge the developers to plan a good middle-income, mid-rise structure no more than 20 stories tall, to accommodate the many families in real need of good and decent housing in this urban area.

The tradeoffs for the 48 elderly units are too great. Either the PHA should receive a much smaller number of units, or it too should find better ways to house our elderly population, instead of allowing them to live in this superstructure in a tiny studio. They too should be accountable to the families that will seek to live in an "affordable housing" building. I'm sure a lower structure, with fewer apartments per floor could be built for middle income families where they would be truly able to raise their families. This will inevitably benefit the developers in the long run, so they won't be holding the bag with numerous unsold units as is the case right now in the luxury condominium market (eg. Craigside, Continental Plaza, etc.)

Written response to Crystal Promenade, p. 3

This will happen on the other end of the housing market with the building of unfeasible, unsuitable, small units that people will not want to own, live in, and rent out continually (as renters continue to look for more suitable housing.) I certainly hope a decent, alternative plan can be worked out. The new project should provide park space - possibly closing off Kamoku St. as it now is, and turning it into a park, or improving the mini-park on Kaaha/ Kaaloa streets and providing something suitable at the site itself. Please give this matter your utmost attention. Thank you.

Sincerely,

Lee E. Takagi

Lee E. Takagi
Neighborhood Planning and Development
Committee Member, McCully Resident

ENVIRONMENTAL
COMMUNICATIONS
INC.

J. RODRIGUEZ,
PRESIDENT

October 20, 1983

Ms. Lee E. Takagi
1833A Fern Street
Honolulu, Hawaii 96826

Dear Ms. Takagi:

Thank you for your letter dated September 21, 1983 regarding the proposed Crystal Promenade Condominium project. The format of your letter has posed some difficulty to us, in that we are unable to distinguish your specific questions from your personal assumptions. In light of this problem, we will respond to your questions and elaborate on your comments that are either incorrect or in need of further clarification.

1. Affordability means many different things to different people. For some people, studio's and one bedrooms are legitimate forms of affordable housing. For other's it may not meet their needs. In this neighborhood, a strong demand for studio and one bedroom affordable units especially in highrises has been demonstrated. Recently, expensive large units in low or highrises have generally not been received well from a market viewpoint.
2. Target group for Crystal Promenade includes the following:
 - o One person households
 - o Two person households (young couple and "empty nesters")
 - o Couple with one or two children

The demand from these groups should increase as evidenced by the changing demographic characteristics.

- o Household size has been decreasing
- o The average age of the population has been increasing
- o People are marrying later in life
- o Couples are having fewer children
- o Couples are having children later in life.
3. The "for sale" portion of the project is intended to meet the demand of some of the "gap" group (those earning too much to qualify for rental assistance programs but too little to qualify for market rate for sale units using conventional financing). As is indicated in earlier material, the project is expected to be affordable to 40-50 percent of all households which is a significantly deeper penetration of the market than most other condominiums.
4. While the intent is to provide housing for owner/occupants, it's expected that some units will be purchased by investors. Investors serve an important function in the provision of rental housing by renting units

1152 BISHOP BUILDING, SUITE 407, P. O. BOX 536 • HONOLULU, HAWAII 96809 • TELEPHONE (808) 521-4391

Ms. Lee E. Takagi
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October 20, 1983

at rates below their equivalent monthly purchase cost. Changes in the tax laws and the location of the project should make it possible for investor/buyers to rent to relatives or children. Proximity to the University of Hawaii could indicate that investor/buyers renting to children or relatives will be a significant proportion of investor/buyers. Even though the units are small, the rental amount, central location, and project quality would make it attractive for investors to buy and rent some of the units to individual and families.

5. Current trends in rental vacancy levels and rental rates indicate a shortage of rental units. As rental rates continue to rise, the difference in costs between renting and owning Crystal Promenade units in the projected price range diminishes.
6. It's expected that rental occupants would be desirable residents of the project due to the following factors.
 - o Investors desire to protect their investment.
 - o Shortage of rental units and high demand by renters results in intense competition for rental units as they become available.
 - o Landlords can choose the most qualified tenant.
 - o Supply-demand imbalance of rental units is expected to continue in the foreseeable future due to the few condominium new starts in this area.
 - o Central location of the project should create more than adequate demand from renters for the investor/buyer.
7. All occupants would be subject to the condominium By-Laws which would set limits on the number of occupants and unit sizes.
8. The current fiscal situation has also resulted in severe cutbacks and in some cases, elimination of government funding of rental programs. The project is intended to provide some relief here. Perhaps more important than the number of units, is the benefit derived by demonstrating to others in the private sector, that it is possible to provide housing for groups normally not serviced by the private sector with a minimum of tax dollars being utilized. This could potentially become a guide for other projects in the future, not necessarily in size or scale but in concept.
9. While the units are intended to be below comparable new units in pricing, it is not intended to be below market in finishes or fixtures. If the first buyer has the potential to gain equity faster, this will serve as an attractive starter unit for many renters to purchase, and as their housing needs change provide these families an opportunity to buy another unit.
10. The developer is looking for input from all concerned parties at this time. Project design as to amenities, recreation facilities, traffic flow, etc., have not been finalized. If these items are a concern, they will address them.

Ms. Lee E. Takagi
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Nothing is cast in stone at this time. The developer wants constructive input on what is needed.

11. Density in and of itself does not necessarily lead to a breakdown of the social structure of building occupants. There are other buildings in Honolulu with comparable floor area ratios which were built under the previous zoning codes (eg. Mott-Smith Lamloa, Marco Polo, Regency Tower). These are well received by the buying community and do not appear to have any measurable adverse affects on its occupants.
12. In today's economic climate, with today's zoning requirements (density, height, open space, etc.), labor, materials, land, and financing cost, it is not very feasible to deliver new units located in urban Honolulu at prices which are affordable to the "gap" group. It's unrealistic to expect that this situation will change without major changes in land pricing, wage rates, material costs or zoning requirements. The result is that most units that are being built are not affordable to any but the upper-income categories.
13. The units are designed to provide the occupant or occupants with adequate space and internal fixtures comparable with any medium priced condominium in Honolulu. Cost efficiency in relation to size was also a consideration in the conceptualization of the unit layout.

While the developer must adhere to all laws regarding equal housing, they would prefer that the community residents be the bulk of the buyers and elderly occupants. Various programs are being investigated to provide neighborhood residents with early notice of forthcoming project sales. Potential resident-buyers are encouraged to advise the developer at the earliest opportunity of their intent.
14. The developer has attempted to create the most affordably priced units, with a design layout which provides living environment comparable to other market units. They are also attempting to address the needs of the elderly renters which are not normally addressed by the private sector. By exempting the height and density, they achieve certain economies of scale and reduce the land cost per unit. The benefits which are achieved are returned to the buyers in the form of lower prices and the community in the form of elderly rental units and direct financial aide. The developer is attempting to minimize the impacts of the structure and have proposed this height because of design concerns and the proximity of the site to other building of comparable heights.

Ms. Lee E. Takagi
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15. Various possible alternatives are being evaluated which if implemented, will substantially meet the park dedication requirement.

Very truly yours,

F. J. Rodriguez

F. J. Rodriguez

FJR:ls
cc: Harold Edwards
Eric T. Nagano



MOILIILI
COMMUNITY
CENTER

September 21, 1983

Mr. F. J. Rodriguez
Environmental Communications, Inc.
P.O. Box 536
Honolulu, HI 96809

Dear Mr. Rodriguez:

The MCC Neighborhood Planning and Development Program Advisory Committee consisting of Moiliili-McCully residents who volunteer their time to assist the Neighborhood Worker with the assessment of neighborhood issues and concerns, has compiled the enclosed list of questions and concerns regarding the proposed construction of Crystal Promenade.

The Environmental Assessment dated August, 1983 and the "Summary of Issues and Concerns Related to the Crystal Promenade" which arrived from Bal Corp on September 14, addressed some of the concerns on our list. However, in many cases we would like more detail, and we also would like to request in writing that our concerns be included in the draft E.I.S.

Thank you for this opportunity to provide our list of comments and questions regarding this proposed development.

Sincerely,

Nancy L. Marker

Nancy L. Marker
Neighborhood Worker

Committee Members:

John Breinich	Ken Okimoto
Daniela Minerbi	Ken Shimata
Alberta Maleleha	Lee Takagi
Ben Naleleha	Jane Yamamoto

Enc.

c.c.: Mr. Harold Edwards
Hawaii Housing Authority
Mr. Rory Iahna
Councilmember Leigh-Wai Doi

A United Way Member Agency

2535 SOUTH KING STREET, HONOLULU, HAWAII 96826 • TELEPHONE (808) 955-1555

SEP 22 1983

ENVIRONMENTAL CONCERNS

TRAFFIC AND PARKING

Discussion of internal street patterns needed in Traffic Study (Kaalaa, Kulei, Kaaloo, Nakoooko, Kamoku, and Waiata Road)

Probability that drivers will use internal streets for entrance to Kamoku and Kapiolani parking driveway entrances

Probability that residents without parking stalls will use internal streets for on-street parking

Probability that residents' guests will use internal streets for on-street parking

Capacity for on-street parking in the vicinity including parking restrictions (hours and locations) on Date, Kapiolani, and Kamoku

Approximate number of on-street parking spaces in Kamoku and Kapiolani area

Traffic congestion in the area during Iolani School hours and special evening and weekend events

Parking difficulties in the area during Iolani School hours and special evening

Location of pedestrian crossings in the vicinity

Pedestrian and vehicular access to the shopping areas

Location of sidewalks in the vicinity

Frequency of bus service in the vicinity

Current accident rate at Kapiolani/Date/Kamoku intersection

City's reason for closing access into Kamoku St. from Kapiolani and Date, and future plans for changes

Length of pedestrian signals at Kapiolani/Date/Kamoku re: crossing times for elderly and handicapped

If length of pedestrian signal or crosswalk locations were changed, what effect would that have on vehicular traffic patterns?

Vehicular entrance to condominium in proximity to lobby, i.e., drop-off provisions

Provision for benches at bus stops and other locations

PARKS AND OPEN SPACE

Definition of "partial waiver of park dedication fees".

Nearest suitable open space or recreation area for elderly

Nearest suitable open space or recreation area for children

Pedestrian access to these open spaces or recreational areas

Safety of these parks and open spaces for all age groups

Future development (opening date, maintenance plan, and security plan) for Pumping Station Park at Kamoku and Date Sts.

Future development of open space, mini-park at Kaalaa between University Ave., and Kaaloo Sts.

Recreational facilities for seniors and condo owners/renters within Crystal Promenade

IMPACT ON RESIDENTS AND ADJOINING PROPERTY OWNERS IN THE SMALL HOUSES AND APARTMENT BUILDINGS ON KAMOKU, KAAHA, KAALOA, NAKOOKOO, AND KAPIOLANI

During construction phase:

Noise level

Noxious fumes (types and levels)

Traffic and on-street parking in Kapiolani and Kamoku area

After completion:

Automobile fumes from 6-story parking structure

Automobile noise from 6-story parking structure

Blockage of sunlight and views by condominium

Blockage of sunlight and views by parking structure

Proximity of trash dumpsters re: odor and collection noise

Traffic and on-street parking for current residents

Water drainage from parking structure and condominium

Impact on value of property in the area

MISCELLANEOUS

Can changes in the structure's plans and design occur after approval

by H.H.A. or City Council?

What future plans does the City have for capitol improvements in the Moillili Triangle?

What future plans does the City have regarding development in the Moillili Triangle?

SOCIAL CONCERNS

SIZE OF UNITS AND IMPACT ON HEALTH STANDARDS

Comparison of floor area ratio legal requirements and Crystal Promenade floor area ratio

Discussion on research regarding the size of housing units and mental and physical health of occupants

Discussion of how condominium units of this nature predetermine characteristics (size of households) of the neighborhood

Would the condominium units meet government housing agency requirements for families of certain sizes i.e., would a single parent with one child receiving Section 8 rental assistance be allowed to rent a studio or one bedroom-unit in Crystal Promenade?

DISPLACEMENT

Number of occupants of Shirai Apartments (one four-story building and two duplexes) including children, i.e., is 18 the actual number of tenants or units?

Variation in the number of tenants expected before construction (new tenants are still moving in)

Number of elderly tenants being displaced

Net gain of affordable elderly rental units, i.e., if three elderly renters are displaced from Shirai Apartments, the net gain is 45 units.

Is house on the corner (TMC 2 7 15 2) to be demolished? If yes, how many residents will be displaced?

Total number of low and moderate income housing units which will be removed from the housing stock in Moillili

How and when will a decision be made about providing the new condo units to Moillili residents on a first refusal basis?

IMPACT ON SCHOOL

Projected number of elementary age children in the proposed condominium

Impact on elementary, intermediate, and high school students on area schools

SAFETY

Fire safety provisions

Provisions for lighting and security of parking structure

Security system of building

Additional details on provisions for handicapped, i.e., number of units, how design requirements will be incorporated

SUPPLEMENTAL INFORMATION ON COMMUNITY INVOLVEMENT
IN NEIGHBORHOOD CONCERNS

We know that you are aware of past efforts by the Neighborhood Board, 3M Council, and other Moiliili-McCully organizations to inform residents, gather citizen input, and formulate recommendations in issues which face the neighborhood. In the 1970's and early 1980's these have included the creation of Stadium Park, the Development Plan process, and the proposed improvements of Moiliili Triangle.

We would like to inform you about a recent community activity sponsored by the MCC Neighborhood Planning and Development Program Advisory Committee.

On April 12, 1983, we sponsored a walk of Moiliili Triangle for City officials, elected representatives, and residents. This event featured a walking tour to get a first-hand view of current conditions in the Triangle, a slide show to review what we had seen, and a discussion period. Some of the concerns which were pinpointed that are relevant to the proposed construction of Crystal Promenade are as follows:

- o Inadequate pedestrian walkways through the Triangle
- o Inadequate on-street parking through the Triangle
- o Flooding and lack of drainage on Kuilei and Kaaloa Streets
- o Tendency of drivers to park on the dirt/gravel areas along the street
- o Contrast between the more low-density portions of the Triangle and the more high-density area across Kapiolani Boulevard
- o Noise and level of traffic in the Kapiolani/Date intersection
- o Use of the Triangle as a cut-through to Kapiolani, University, and Date by some motorists
- o Open space limited to Kaaha/Kaaloa mini-park and proposed Pumping Station Park at Kamoku and Date
- o Kapiolani Banyan condominium--its attractive design and landscaping (Also given an award by the Neighborhood Board in April, 1983 for its design standards and contribution to desirable housing in Moiliili)
- o Use of the street by Kuhio School as a cut-through for traffic and the danger it presented to school children (to be closed permanently soon)
- o Abandoned cars on Triangle streets

Our conclusions were that the City should take into consideration some of these problem areas in its future deliberations about improvements or development in the Moiliili Triangle.

ENVIRONMENTAL
COMMUNICATIONS
INC.

October 20, 1983

F. J. RODRIGUEZ,
PRESIDENT

Ms. Nancy L. Marker
McCully/Moiliili Community Center
2535 South King Street
Honolulu, Hawaii 96826

Dear Ms. Marker:

Thank you for your letter dated September 21, 1983 regarding the proposed Crystal Promenade Condominium project. Your letter raised several points that were reviewed by the consultant team. In the final analysis, it was determined that a great many of the concerns were valid and have therefore, been discussed in the Draft EIS. However, a few points were raised which could not be answered at this time. This is due to the following reasons: (1) Some of the analyses being requested by you are not consistent with the scale of the project. Further, some concerns are not applicable to the scope of the project and cannot be answered. (2) Some of your concerns, specifically those relating to infrastructure and utilities, are unanswerable at this time, since sidewalks, utilities, etc. are not a State matter, but are a function of the City's Capital Improvements Program and their budget scheduling. (3) Some of your concerns deal with specifics which can not be answered by utilizing primary or secondary research methods. These specifics are based on personal preferences and there is no precedent on previous projects of this type that would provide the information you are seeking. Finally, this project is not going to solve the community's ills, but is attempting to address specific housing problems.

Those concerns that are valid and are answerable will be discussed in the Draft EIS. It should be noted that the HHA and developer have committed themselves to providing a project that would facilitate health and safety and would be in conformance to all applicable State and County regulations, codes, and standards. The following will reference those sections in the report that addresses your concerns:

Traffic and Parking

Reference should be made to Section III, Part I, Highway System; Section V, Part 10, Traffic and Parking; and Appendix D, Traffic Impact study, which was prepared by Parsons Brinckerhoff Quade and Douglas, Inc.

We would also respond to your concerns regarding traffic and parking in the following:

Discussions of internal street patterns are not detailed because of minimal project impact expected with the preferred traffic alternates.

Traffic assignments and Table 7 of the Revised Traffic Impact Report indicate estimates of internal street traffic.

Ms. Nancy L. Marker
Page 2
October 20, 1983

Estimates indicate that the project will have sufficient resident parking. However, should residential characteristics be different from those assumed, or if vehicular availability characteristics are significantly different from "average", or if residents opt to park on-street instead of paying for an on-site space, internal streets would probably be used because of the limited number of available spaces on Kapiolani, Date, and University.

Adequate guest parking has been provided. In addition, guests can park on the internal streets when there are circumstances that create excess demand for parking beyond the ability of the project's guest parking.

On-street parking capacity and restrictions need not be evaluated since off-street parking is sufficient.

Traffic count of May 1983 was taken on a day Iolani School was in session. Parking and traffic conditions during special evening and weekend events should not be the responsibility of the developer and should be the responsibility of the school.

No changes to locations of pedestrian crossings, due to project, are anticipated.

The project design does not include special pedestrian or vehicular access to shopping areas.

Location of sidewalks should not be affected due to the project.

Bus Service: Route 9 along Kapiolani Boulevard, 2 buses/hour (day) Route 3, Date Street (Diamond Head of Kapiolani) and Kapiolani Boulevard (Ewa of Date), 4 buses/hour (day). Peak hour services increased to approximately double of above.

Discussions of current accident rates are not warranted or justifiable in view of the very small expected change in traffic conditions at Kapiolani/Date/Kamoku caused by the project.

The city's reason for closing access into Kamoku Street is based on their concern for Kamoku, Kaaloa, Kaaha Street residents and the Iolani School traffic that passes through their neighborhood. No future plans for changes are being contemplated (This information, however, should be verified by M.C.C. directly from the City and not via this project's studies).

The analysis did not indicate a need to alter signal timing. If the phase for pedestrian crossing of Kapiolani needs to be lengthened, an increased cycle length could still maintain existing approach capacities.

Vehicular access to the condominium is dependent upon site layout and has not been finalized at this time.

Ms. Nancy L. Marker
Page 3
October 20, 1983

Presently, there is no provision being made for the placement of benches at bus stops.

In summary, we would like to define the intent and purpose of the traffic study. The intent of the traffic impact study for Crystal Promenade is to identify the project's impact during the existing peak period, to traffic conditions and to future street adequacy. Future conditions are based on existing and known improvements and other developments. The traffic impact study by the developer is not intended to be a study of all existing conditions, deficiencies, etc. of the area (that is a public transportation agency responsibility); therefore, many of the concerns are not addressed because the proposed project is projected to have a minimal impact especially outside of the immediate project area.

Parks and Open Space

Reference should be made to Section III, Part H, Service Facilities and Section V, Part 9, Service Facilities.

Impact On Residents and Adjoining Property Owners

In regards to noise level, reference should be made to Section V, Part B, Short-Term Impacts. In regards to noxious fumes, reference should be made to Section V, Part B, Short-term Impacts and Appendix C, Air Quality Study, prepared by Barry D. Root. In regards to Traffic, reference should be made to Section V, Part 10, Traffic and Parking and Appendix D, Traffic Impact Study.

Miscellaneous

No changes in the structure's plans and design may not occur after approval by the City Council. As part of the negotiation process, the council may impose conditions that may include revisions to the project's design at the time the project is approved. Any major subsequent change would require council approval.

Size of Units and Impact on Health Standards

The project's proposed FAR is non-conforming with the area's allowable FAR. The HHA and developer are requesting the council to waive this requirement, pursuant to Chapter 359 G, HRS. It should be noted that density in and of itself does not necessarily lead to a breakdown of the social structure of building occupants. There are other buildings in Honolulu with comparable floor area ratios which were built under the previous zoning codes. (eg. Mott-Smith Laniloa, Marco Polo, Regency Tower). These are well received by the buying community and do not appear to have any measurable adverse affects on its occupants.

The target group for Crystal Promenade includes the following:

- (1) One person households
- (2) Two person households (young couple and "empty nesters")
- (3) Couple with one or two children

Ms. Nancy L. Marker
Page 4
October 20, 1983

The project will be rented in accordance with HHA elderly rental program requirements.

Reference should be made to Section II, Part C, Statement of Objectives for additional information.

Displacement

It should be understood that the rental units existing on the property have a relatively short remaining economic life and that either the buildings will be demolished with or without redevelopment or major refurbishing will be needed which will result in a major rent increase. Further, until five months ago, the number of occupied units was reduced to 12 or 30 percent occupied in anticipation of the project start. Due to processing delays, the landlord/landowner has allowed new tenants to occupy the units on month-to-month leases. It is anticipated that these short-term leases will be terminated at the beginning of the year. Secondly, if development were to occur in compliance with current medium density zoning, the existing tenants would be displaced. Displacement is a result of all development and not unique to this project or a result of any zoning exemption. The developer is attempting to mitigate this problem by initiating a fund targeted specifically at the problem of displaced renters.

Reference should be made to Section II, Part D, Existing Tenants, regarding displacement.

Impact on School

Reference should be made to Section V, Part 9, Service Facilities regarding the projects' impact on public schools.

Safety

The project will be in compliance with all applicable fire and building codes. Therefore, the project will be accorded with necessary fire safety, lighting, and security system provisions.

We appreciate your providing us with information regarding your walk of Moiliili Triangle and thank you for your concerns and interest.

Very truly yours,

F. J. Rodriguez

F. J. Rodriguez

FJR:ls
cc: Harold Edwards
Eric T. Nagano

MAKIKI/LOWER PUNCHBOWL/TANTALUS BOARD NO. 10

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HONOLULU, HAWAII 96822



September 23, 1983

Mr. Fred J. Rodriguez
Environmental Communications Inc.
1152 Bishop Building, Rm. 407
Honolulu, Hawaii 96813

Dear Mr. Rodriguez:

We have reviewed the EIS preparation notice for the Crystal Promenade Condominium Project in Honolulu and wish the answers to the following questions to be in the draft EIS.

1. In addition to the project's floor area, the maximum floor area for a 38,570 sq. ft. parcel in A-2 and A-3 zoning should be included in the EIS for comparison purposes.

2. The bulk of the building should be described in regards to view planes.

3. Affordability of the 404 market units should be shown for the gap-income group of O'ahu because the project is government assisted.

4. Is this project for the 404 market units and 48 elderly-rental units fee simple or leasehold? If they are leasehold, what are the terms?

5. How will the developer pay HHA for the \$5.6 million government funds? How much will HHA pay for the 48 elderly-rental units?

6. What are the minimum requirements of health and safety (HRS 359C-4.1 a(1)) that HHA believes this project to satisfy when the City and County zoned the parcel for A-2?

7. Does this project meet the requirements of HRS 359C-4.1(b) as being a government assistance program? What benefits did the HHA get for assisting this project?

Thank you for the opportunity to comment on the preparation notice. Please send us the draft EIS for our review.

Sincerely,

Dorothy S. Mordock

Dorothy S. Mordock, President
Makiki/Lower Punchbowl/Tantalus
Neighborhood Board No. 10

cc: Neighborhood Commission

SEP 23 1983

Received
McCULLY/MOILIILI NEIGHBORHOOD BOARD NO. 8
SEP 29 1983
c/o MCCULLY-MOILIILI LIBRARY
2211 SOUTH KING STREET
HONOLULU, HAWAII 96828

ENVIRONMENTAL
COMMUNICATIONS
INC.
October 20, 1983

Ms. Dorothy S. Murdock, President
Makiki/Lower Punchbowl/Tantalus
Board No. 10
C/O Makiki Library
1527 Keeaumoku Street
Honolulu, Hawaii 96822

Dear Ms. Murdock:

Thank you for your letter dated September 23, 1983 regarding the proposed Crystal Promenade Condominium project. We would respond to your comments in the following:

1. Current zoning does not regulate maximum floor area by districts. However, minimum lot sizes are subject to compliance with zoning. The project is in compliance with the minimum lot size for an area zoned A-2. According to the CZG, the minimum lot size should not be less than 10,000 square feet.
2. The Draft EIS will discuss in depth building bulk and its impact on view planes.
3. The developer will be selling the units at prices affordable to approximately 40 to 50 percent of all households on Oahu. Therefore, the units will be affordable to most households earning the median income or higher which is a substantially deeper presentation of the market than most condominium projects.
4. The units will be 65 years leasehold, with terms of the lease to be determined at a later time.
5. The Draft EIS will discuss these items.
6. There are no actual HHA requirements regarding health and safety. It is the intent of HHA that the project be in compliance with current building codes and standards and in that way, promote health and safety.
7. Yes, this project meets the requirements of HRS 359 G-4.1(b). The Draft EIS will discuss in detail, the objectives of the project and the specific benefits that will be accrued by HHA.

We appreciate your comments and continuing concern.

Very truly yours,
F. J. Rodriguez
F. J. Rodriguez

FJR:ls
cc: Harold Edwards, Eric T. Nagano

1152 BISHOP BUILDING, SUITE 407, P. O. BOX 326 • HONOLULU, HAWAII 96809 • TELEPHONE (808) 521-8591



September 19, 1983

BAL Corporation
1580 Makaloe Street, Suite 880
Honolulu, Hawaii 96814

Dear Gentlemen:

Subject: Information Packet for Crystal Promenade Project
Moiliili, Honolulu, Hawaii

Thank you for your effort to send us data in advance of the Environmental Impact Statement process for review. We commend your firm for seeking to keep us apprised of the proposal and initiate discussion that will address appropriate development in McCully/Moiliili.

We have examined the material and recommend the following substantive improvements for your consideration:

- Paper A: SIGNIFICANT IMPACTS THAT SHOULD BE ADDRESSED IN THE EIS
- Paper B: QUESTIONS OF CONCERN ON TRAFFIC IMPACT STUDY

We hope that the information is helpful in the sense that any decisions that will be made on the Crystal Promenade can benefit from the opinions and inquiries contained in this enclosure. We will transmit any further data that is developed from the community directly to you or via the EIS process.

Sincerely,

Katherine T. Nakata
Katherine T. Nakata, Chair
Physical Planning Committee

Mary-Jane McMurdo
Mary-Jane McMurdo
Chairman

cc: Councilmember Marilyn Bornhorst
Councilmember Leigh-Wai Doo

SEP 29 1983

PAPER A: SIGNIFICANT IMPACTS THAT SHOULD BE ADDRESSED IN THE EIS

The following list is divided into three categories of concerns:

Community and Neighborhood, which refers to the impact of the proposed project on the entire Moiliili community and on the immediate area surrounding the project, including the areas adjacent to the Kapiolani Boulevard/Date Street/Kamoku Street intersection, and the so-called Moiliili Triangle, bounded by University Avenue, King Street, and Kapiolani Boulevard.

Environmental, which refers to both local, site-specific and more widespread impacts on traffic congestion and consequent delays, air pollution, noise and views of Diamond Head, the mountains and the Ocean.

Social, which refers specifically to impacts of the proposed project on the elderly, both those to be served by the project and those to be displaced by the project, and impacts on others displaced by the project.

I. Community and Neighborhood Concerns

The environmental impact statement should address the relationship between approval of this project and the medium density and 150 feet height limitations adopted for the areas generally mauka of Kapiolani Boulevard in the development plan and supported by the community. This decision should recognize that: 1) Three other proposals to raise density and height limitations are now being considered by the city and county government, and 2) Approval of the proposed Crystal Promenade project might establish precedent-setting effects for drastic waivers of setbacks, floor-area ratio and park dedication requirements by others.

The EIS should address in specific terms the justification for all waivers that the developer is seeking of planning, zoning, subdivision control, or Hawaii Housing Authority requirements, including density, height, floor area ratio, setbacks and park dedication fees.

The environmental impact statement should cover traffic impacts such as parking, congestion and air and sonic pollution in detailed and specific terms. Realistic estimates of traffic impacts should not only consider the Kapiolani Boulevard-Date Street intersection, but specifically address the internal street network of the so-called Moiliili Triangle. This is of particular concern due to the Triangle's narrow, sidewalk-less and poorly lighted streets which would be used as a pedestrian corridor by the project's proposed elderly clientele.

Because estimates of traffic impacts, and associated air pollution and noise impacts, will be based on the Traffic Impact Study of Parsons, Brinckerhoff, Quade & Douglas, Inc., a separate set of comments and questions relating to the Draft Study of July 1983 has been prepared, and is attached to this statement. These comments and questions should be taken into account in preparation of final estimates of traffic impacts of the proposed project on the neighborhood.

Experience has shown that legal requirements for parking stalls in condominium projects do not satisfy the parking demands generated by such developments because households with more than one car and guests seek parking on neighborhood streets. The environmental impact statement should cover the impact of such extra parking needs estimated to be generated by the proposed project.

Attitudes and preferences of residents of the immediate neighborhood of the proposed project are crucial in assessing the project's social impact. The Neighborhood Board and the Moiliili Community Center are currently seeking information on these attitudes and preferences to assist in decisions regarding the Crystal Promenade project and will make such information available to the developer, and others concerned. This information should be incorporated in the environmental statement.

II. Environmental Concerns

Impacts on traffic and parking are important environmental concerns; these have already been mentioned under Community and Neighborhood Concerns, above. Traffic congestion on major streets such as Kapiolani Boulevard and Date Street will have a regional impact on commuters from outside the neighborhood who travel these corridors to reach destinations not necessarily in the neighborhood such as work, school, shopping and recreation. The traffic impact on commuters should be discussed specifically in the EIS.

Air and sonic pollution in the neighborhood of the project should also be addressed. Information should be presented on the estimated timing, concentration and duration of air pollution at the lower floor elevations of the proposed project, where housing for the elderly is to be provided. Similar information should be provided regarding the estimated duration and intensity of noise.

Visual and open-space impacts of the project should also be discussed. These impacts will affect residents and visitors in the immediate neighborhood of the project such as people living in the Moiliili Triangle as well as in the buildings mauka of the project.

Impacts should also address longer-range views, from Waikiki to Kaimuki Heights, Wilhelmina Rise, St. Louis Heights, Manoa and Tantalus-Round Top.

Solar access, landscaping and pedestrian amenities regarding the design of open space on the ground level are of particular concern due to the proposed variance of setback requirements.

III. Social Concerns

Information should be presented on the number of families and individuals to be displaced, their socio-economic status as revealed by income level, rent paid, and including the number of elderly people to be displaced and information on whether any of the displaced would be likely to buy or rent units in the proposed project.

Another important social concern relates to the 48 housing units to be provided for the elderly in the project. What are the social and environmental consequences to the elderly of this housing? A full discussion of this issue should be presented.

Specific items which should be discussed include:

- a) What specific design provisions will be made for the elderly regarding ease of access to the building and apartments, and facilities within apartments for elderly people, including those who must use wheelchairs?
- b) What specific common facilities including meeting rooms, open outdoor spaces and recreational facilities are to be designed and provided for the elderly to meet their special needs?
- c) What suitable park facilities are available to the elderly, where are they located, and how can the elderly reach them (by auto, on foot)?
- d) Where are the nearest supermarkets and how can the elderly reach them? Will there be a convenience store in the project?
- e) What are the implications for the elderly of the air pollution and noise levels identified for the lower floors of the project? Will elderly housing units need separate air-conditioning units to counteract these effects? What effects would this requirement have on costs of these units to the elderly?

Lastly, the Board would like to see the project's participation, if any, to Ordinance 4300 regarding the inclusion of 10% of the units for low-moderate income housing acceptable to the Department of Housing and Community Development described further. Also, in light of the special requests made by the developer, what mechanisms will be used to ensure owner-occupancy of the units rather than purchase by speculators for re-sale or rental purposes?

PAPER B: QUESTIONS OF CONCERN ON THE JULY 1983 DRAFT OF THE TRAFFIC IMPACT STUDY OF THE PROPOSED CRYSTAL PROMENADE PROJECT SUBMITTED BY PARSONS, BRINCKERHOFF, QUADE & DOUGLAS, INC.

Page 2, second paragraph - Kapiolani Boulevard has eight lanes on the makai side of the Kapiolani-Date Street intersection, but only six lanes on the mauka side.

Following page 2, Figure 1 shows an obsolete (incorrect) street pattern for the Moiliili Triangle.

For example, it does not show Kaaha Street connecting to Kapiolani Boulevard. Also, it incorrectly shows Kaaha Street connecting to University Avenue, when, in fact, there is a gap (now used as a mini park) just east of the intersection of Kaaha and Kaaloa Streets. Figure 1 should be replaced with a map showing the existing street patterns accurately.

Page 3, first paragraph - Has the State Highways Division made any traffic counts of the Kapiolani-Date intersection since 1981? If so, are the traffic flows significantly different from the 1981 counts?

Page 3, first paragraph - Was Iolani School in regular session when traffic observations were made in May 1983? (Iolani obviously was not in regular session for the July 1983 traffic observations). Are your peak traffic estimates based on the situation of Iolani being in regular session (September - May)?

Page 3, third paragraph - Please provide a definition of the terms Levels of Service A through E.

Page 4, FUTURE CONDITIONS - The statement that "The existing traffic, therefore, serves as the basis for future conditions without the project" requires further explanation and justification. First, the term "future" must be defined. If it is intended to mean the time (date) that the proposed project is to be completed (1986) then some estimate of the trend in traffic "demand" growth between the time that existing traffic was counted (1981, 1983) and project completion date would be required.

In transportation planning the term "future" usually connotes a longer time period, five to ten years as a minimum. With this definition of "future", the trend of traffic "demand" growth would have to be extrapolated further. Such demand has two components: "local" demand generated by growth in the immediate neighborhood and metro-wide demand generated by increases in commuter traffic on Kapiolani to and from H-1 and on Date Street.

Local demand will increase over the next five to ten years as development proceeds on a medium-density apartment basis as provided in the development plan. The existence of development pressure is revealed by two pending requests to change

density from medium to high, so that two 350 foot condominium can be built near the Kapiolani-Date intersection. Whether these requests are approved or not, locally induced future traffic demands will be greater than existing (1983) demands.

With respect to growth of metro-wide demands, the Oahu Metropolitan Planning Organization as a part of its HALI 2000 study, has made projections of traffic demands on H-1 just koko head of the Kapiolani off-ramp. These and related estimates of growth on Date Street should be analyzed to obtain estimates of future peak metro-wide demands on the Kapiolani-Date intersection.

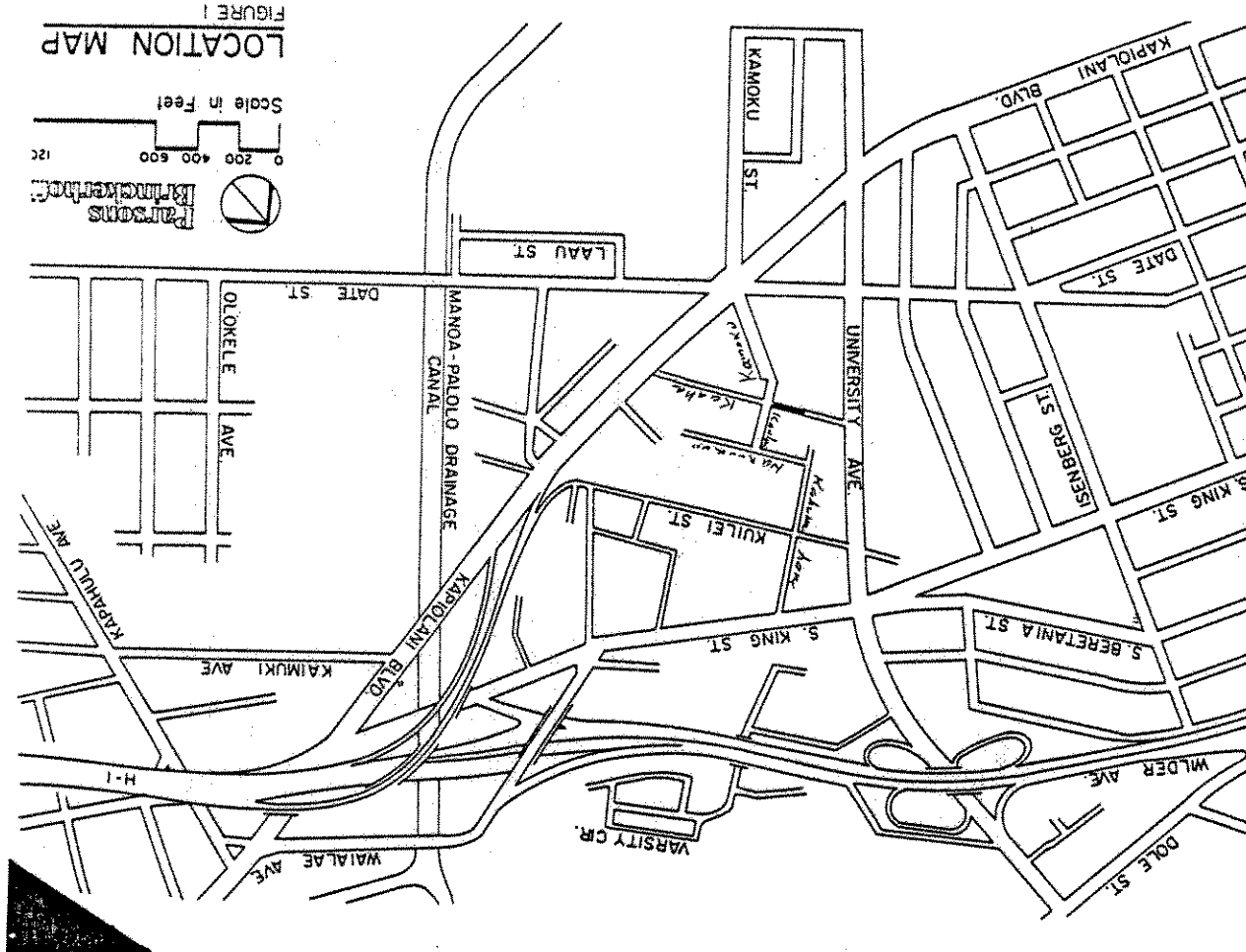
Also, it is not clear how you account for the over 800 vehicles that the State Department of Transportation estimates will use the Kapiolani on-ramp to H-2, due to open this fall. Clearly, these vehicles will impose an additional traffic "demand" on the Kapiolani-Date intersection, over that measured in 1981 and May and July 1983. Yet, on page 4, you state that because... "Kapiolani Boulevard is already over capacity, the intersection is not expected to accommodate significant increases in traffic volumes". Information should be presented in the report on how many additional mauka-bound vehicles will clear the Kapiolani intersection (as shown in Figure 3) as a result of the Kapiolani H-1 on ramp. The "traffic assignment without project" figures, as shown in Figure 3, should include this increment.

Page 5, second full paragraph- Information should be provided on "various travel paths to and from the project", for Kamoku Street and the internal connecting streets of the Moiliili Triangle (Date-University-King and Kapiolani). The information is essential because the project proposed shows an entry-exit on Kamoku Street as well as on Kapiolani Boulevard.

Referring to the map (as corrected) in Figure 1, it is reasonable to expect that some project traffic would use the internal streets to and from University Avenue and King Streets via Kaaloa, Nakookoo, Kahuna and Kuilei Streets. This internal traffic would be especially significant at the p.m. rush hour. With a left-turn from Kapiolani into the project prohibited (as recommended on page 12 of the study), motorists coming mauka on Kapiolani, and from either direction on Date, bound for the project would have to go up University, turn right on King, turn right on Kapiolani and approach the project from the mauka direction on Kapiolani. To avoid this long detour, motorists would turn right off University on Kuilei Street and proceed via Kahuna Lane, Nakookoo, Kaaloa to the Kamoku Entrance to the project. All of these internal streets are very narrow and already bear significant locally-generated rush hour traffic.

Figure 4. The data on peak hour project traffic shown in this Figure need further explanation, as related to Table 2. Trip Generation.

Apparently, of the estimated 218 vehicles exiting from the project in the a.m. peak, 710 leave via the Kapiolani exit, and only 10(87) by the Kamoku Street exit. In view of the difficulties of entering Kapiolani during the a.m. rush hour (see page 3, paragraph 3), it is likely that many motorists would leave by the Kamoku Street exit, either entering Date Street or traversing the internal streets to University and King. Yet, Figure 4, shows no exits to Kamoku Street.



F. J. RODRIGUEZ
PRESIDENT

ENVIRONMENTAL
COMMUNICATIONS
INC.

October 20, 1983

Of the 175 vehicles estimated in Table 2 to enter the project during the p.m. rush hour, only 140 can be accounted for on Figure 4. Of these, 80 are estimated to enter on Kapiolani from the mauka direction. It is not clear from Figure 4, how the 60 vehicles coming from Date Street and coming mauka on Kapiolani will enter the project, as left turn from Kapiolani are to be prohibited and no left turn for these vehicles from Kapiolani to Kaaha are indicated on Figure 4. It appears that these vehicles will have to go up University Avenue and approach the project either by the long way - via King and Kapiolani, or by the shorter way, using the internal streets - Kuilei, etc to Kamoku. Figure 4 should be revised to make it consistent with Table 2, and to reflect the considerations.

Page 8, IMPACT OF PROPOSED PROJECT - This section should be revised (1) to include estimates of impact on the internal streets of the Moiliili Triangle, including estimates of levels of service and (2) to reflect any changes in estimates of future traffic flows at Kapiolani and Date that you make to take account of the comments made earlier in this paper.

Page 10, OFF-STREET PARKING - Specific estimates should be given of the total number of resident cars expected to seek parking (including estimates of second and third car ownership). These estimates should be made independently of the rates established in the City's zoning code as shown in Table 6.

Also, specific estimates should be made of guest parking demand and these should be compared with the number of guest parking spaces to be provided in the project.

Page 11, CONCLUSIONS AND RECOMMENDATIONS - This section should be revised in the light of changes in information and analysis made earlier in the study.

Specifically, traffic impact on the Moiliili Triangle as a result of ingress and egress from the project should be summarized.

Ms. Katherine T. Nakata, Chair
Physical Planning Committee
McCully/Moiliili Neighborhood
Board No. 8
C/O McCully-Moiliili Library
2211 South King Street
Honolulu, Hawaii 96826

Dear Ms. Nakata:

Thank you for your letter dated September 19, 1983 but received after the deadline of October 3, 1983 regarding the proposed Crystal Promenade Condominium project. We would respond to your comments in the following:

I. Community and Neighborhood Concerns

Discussions regarding benefits of the project and justifications for the waiver requests have been included in the Draft EIS. Reference should be made to Section II, Part C, Statement of Objectives and Appendices A & B, which presents Chapter 359 G, HRS and benefits of the project, respectively.

Traffic, air, and sonic pollution impacts have been discussed in detail in the Draft EIS. May we refer you to: (1) Section III, Part I, Highway System; Section V, Part 10, Traffic and Parking; and Appendix D, Traffic Impact Study, which was prepared by Parsons Brinckerhoff Quade and Douglas, Inc. for traffic impacts, (2) Section V, Part B, Short-Term Impacts; Section V, Part C, Long-Term Impacts; and Appendix C, Air Quality Study, prepared by Barry D. Root for air pollution impacts, and (3) Section V, Part B, Short-Term Impacts and Section V, Part C, Long-Term Impacts for noise pollution impacts.

The Draft EIS will discuss the required amount of off-street parking needed to satisfy the City's CZC and the amount that will actually be provided. The project will provide 51 more stalls than is actually required. Please be assured that the project will comply with the CZC requirements.

We agree that community attitudes are important to this project. Therefore, upon receipt of this data in a timely manner, from your group, the information will be incorporated into the EIS.

II. Environmental Concerns

References regarding traffic, air, and noise impacts have already been addressed previously in this letter. On the subject of adequate ventilation and noise control

Ms. Katherine T. Nakata
Page 2
October 20, 1983

for the elderly units located on lower floors, the Building Department requirements for ventilation and external noise control are identified so that all living units must meet applicable codes. There will be spaces left for individual air conditioning units to be installed by each unit renter as an option.

The studies you request are not appropriate in the sense that they would not provide the answers in meeting Building Codes.

Visual and open-space impacts have been discussed in the Draft EIS. Reference should be made to Section V, Part C, Long-Term Impacts.

III. Social Concerns

It is difficult to determine the socio-economic status of the tenants presently residing at the project site. The reasons for this are as follows: (1) The resident manager is the one primarily responsible for managing the existing tenants and not the developer or landowner. Therefore, the type of data being requested is not available and secondly, since the leases run month-to-month, it is difficult to establish residency patterns. It should also be noted that if development were to occur under the current medium density zoning, the existing tenants would still be displaced. Displacement is not a result of the exemptions. The developer is attempting to mitigate this problem by donating money to assist the displaced find adequate housing. Therefore, the socio-economics of the tenants are constantly changing. Finally, much of the data you request on this subject is of a confidential nature and is not provided to private non-governmental inquiry.

It is anticipated that the social and environmental consequences of the project would have similar effects on the elderly as on other residents. The Draft EIS will discuss these social and environmental impacts on the residents.

- a) The specific design provisions for the elderly have not been finalized. The developer understands the importance of such provisions and is open to suggestions regarding design. Presently, the design of the project conforms to all applicable building codes and regulations as they relate to the elderly.
- b) Common facilities including meeting rooms and open landscaped areas will be provided.
- c) Several public parks are available within driving distance of the project site. These include the Crane and Ala Wai Playgrounds, Stadium Park, and Ala Wai Field. The project's residents will be encouraged to utilize these facilities. Open park space will also be provided on-site.

- d) The project is located in a region currently developed as a residential community. Therefore, several nearby supermarkets and retail outlets exist.

Present plans indicate that a convenience store has not been designed on-site.

Ms. Katherine T. Nakata
Page 3
October 20, 1983

However, your suggestion has been brought to the attention of the developer and he will consider the provision of a store in the final designs.

- e) Implications of air pollution and noise pollution has been discussed previously.

At this time, inclusionary zoning has not become law. Subsequently, the developer did not anticipate the necessity for calculating the economic feasibility and the impact of ordinance bill on the project. If the bill becomes law and if it is economically feasible, the developer will consider providing 10% of the units for low-moderate income housing. It should also be noted that when the project was conceived, all savings attributed to the proposed density increase were credited to the elderly units in order to increase the number of units. If a 10 per cent additional requirement is desired, the number of elderly units to be received by the HHA will need to be reduced in order to retain a financially feasible project. It should be emphasized that the 48 units are to be conveyed by the developer to the state at no cost and not at a reduced price as is commonly the case.

The question of owner-occupancy has been discussed in the Draft EIS in Section II, Part C, Statement of Objectives.

The following are responses regarding Paper B: QUESTIONS OF CONCERN ON THE JULY 1983 DRAFT OF THE TRAFFIC IMPACT STUDY:

Map and description have been corrected.

Latest available SDOF counts were obtained and used. Iolani School was in session when the May 1983 counts were taken. Peak hour traffic estimates assume that all schools are in session. Revised Traffic Impact Report includes traffic count data; note that July 1983 count sample is larger than May 1983.

Levels of service are discussed in the Traffic Impact Study.

The report's discussion on future traffic has been expanded to address these concerns. Increased traffic from other developments would not increase peak hour volumes, since capacities would be exceeded. A longer peak period, e.g. 75 minutes instead of 65 minutes could be expected. OMPO's projections were not used because they are accurate only on a screenline basis and have not been calibrated for specific roadway facilities.

Expansion of discussion of traffic in the internal streets is not warranted because of the revised access pattern for the project.

The report's figures have been expanded and revised to better illustrate the traffic assignment.

The impact section has been revised.

An independent estimate of off-street parking has been included in the revised

Ms. Katherine T. Nakata
Page 4
October 20, 1983

study report. Estimates of guests parking demands would require much survey work which is beyond the time or budget constraints of this project.

Conclusions and recommendations reflect the revised access plan.

Yours very truly,


F. J. Rodriguez

FJR:ls
cc: Harold Edwards, Eric T. Nagano

XIIB. REPRODUCTION OF COMMENTS AND RESPONSES MADE DURING
THE DRAFT EIS REVIEW

A total of 28 letters were received during the Draft EIS Review Period.
If a letter contained no comment, no response was drafted.

TABLE 15
COMMENTS RECEIVED FOR THE CRYSTAL PROMENADE CONDOMINIUM
PROJECT ENVIRONMENTAL IMPACT STATEMENT

<u>Organization</u>	<u>Date Received</u>	<u>Date of Letter</u>	<u>Response</u>
<u>STATE AGENCIES</u>			
1. OEQC	11/23/83	11/22/83	12/05/83
2. Dept. of Agriculture	10/31/83	10/27/83	-
3. Dept. of Accounting & General Svcs.	11/04/83	11/03/83	-
4. Dept. of Defense	10/28/83	10/26/83	-
5. Dept. of Education	11/09/83	11/04/83	12/05/83
6. Dept. of Health	11/09/83	11/07/83	12/05/83
7. Dept. of Land & Natural Resources	-	-	-
8. State Historic Preservation Officer	-	-	-
9. Dept. of Planning & Economic Development	11/18/83	11/14/83	12/05/83
10. DPED Library	-	-	-
11. Dept. of Transportation	-	-	-
12. State Archives	-	-	-
13. State Energy Office	-	-	-
14. Environmental Center	* 11/23/83	11/17/83	12/05/83
15. Water Resources Research Center	* 11/30/83	11/19/83	12/05/83
<u>FEDERAL</u>			
1. 15th ABW/DEE, Hickam	11/02/83	10/28/83	-
2. Army-DAFE (Facilities Eng. USASCH)	-	-	-
3. Navy	11/03/83	11/01/83	-
4. Soil Conservation Service	11/18/83	11/16/83	-
5. U.S. Army Corps of Engineers	-	-	-
6. U.S. Coast Guard	11/07/83	11/02/83	-
7. U.S. Fish and Wildlife Service	10/31/83	10/28/83	12/05/83

TABLE 15
(continued)

<u>Organization</u>	<u>Date Received</u>	<u>Date of Letter</u>	<u>Response</u>
<u>CITY & COUNTY OF HONOLULU</u>			
1. Board of Water Supply	11/10/83	11/01/83	12/05/83
2. Building Dept.	-	-	-
3. Dept. of Housing & Community Development	*11/29/83	11/22/83	12/05/83
4. Dept. of General Planning	11/03/83	11/01/83	12/05/83
5. Dept. of General Planning	*11/25/83	11/22/83	12/05/83
6. Dept. of Land Utilization	*11/23/83	11/22/83	12/05/83
7. Dept. of Parks and Recreation	11/17/83	11/14/83	12/05/83
8. Dept. of Public Works	11/10/83	11/08/83	12/05/83
9. Dept. of Transportation Services	*11/28/83	11/28/83	12/05/83
10. Fire Dept.	*11/23/83	11/21/83	12/05/83
11. Municipal Reference & Records Center	-	-	-
12. Police Dept.	11/07/83	11/02/83	-
<u>NON-GOVERNMENTAL AGENCIES</u>			
1. American Lung Association	-	-	-
2. Hawaiian Electric Company	-	-	-
3. Office of Hawaiian Affairs	-	-	-
4. Moiliili Community Center	* 11/23/83	11/22/83	12/05/83
5. Makiki/Lower Punchbowl/Tantalus Neighborhood Board. No. 10	11/22/83	11/22/83	12/05/83
6. McCully/Moiliili Neighborhood Board No. 8	* 11/28/83	11/21/83	12/05/83
7. Daniela Minerbi (Resident)	*11/23/83	11/22/83	12/05/83

* Comments received beyond deadline date

 COPY

ENVIRONMENTAL
COMMUNICATIONS
INC.

F. J. RODRIGUEZ
PRESIDENT

November 1, 1983

Ms. Letitia Uyehara, Interim Director
Office of Environmental Quality Control
550 Halekauwila Street, Room 301
Honolulu, Hawaii 96813

Dear Ms. Uyehara:


Subject: Your Letter of October 21, 1983, on the
Environmental Impact Statement for Crystal
Promenade Condominium

Thank you for your letter of October 21, 1983, allowing us
the opportunity to review the environmental impact statement
for the Crystal Promenade Condominium.

We have no additional comments to those already mentioned in
our letters on page XII-6 and Appendix E of the environmental
document.

If you have any questions, please contact Lawrence Whang at
527-6138.

Very truly yours,


for KAZU HAYASHIDA
Manager and Chief Engineer

cc: Environmental Communications, Inc.

December 5, 1983

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

Dear Mr. Hayashida:

We are in receipt of your letter of November 1, 1983 regarding the Crystal
Promenade Condominium Project Draft EIS. Since you have no further comments,
we trust that our responses to the comments made during the Preparation Notice
Consultation Period were adequate.

We thank you for your continuing interests.

Very truly yours,



F. J. Rodriguez

FJR:ls

NOV 10 1983

1120 BIPAC BUILDING SUITE 407 - P. O. BOX 536 - HONOLULU, HAWAII 96806 - TELEPHONE (808) 527-8281

DEPARTMENT OF PUBLIC WORKS

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET
HONOLULU, HAWAII 96813

EILEEN M. ANDERSON
MAYOR



MICHAEL J. CHUN, Ph.D.
DIRECTOR AND CHIEF ENGINEER

MAURICE M. KAYA
DEPUTY DIRECTOR

ENV 83-383

November 8, 1983

Ms. Letitia Uyehara
Interim Director
Office of Environmental Quality Control
State of Hawaii
550 Halekauwila Street, Room 301
Honolulu, Hawaii 96813

Dear Ms. Uyehara:

Re: EIS for Crystal Promenade Condominium,
Moiiliili, Honolulu, Hawaii

The EIS for the proposed project was reviewed and we have the following comments.

1. Another drainage option that should be considered is the collection and conveyance of the runoff from the project site to the University Avenue drain system along Date Street.
2. The "do nothing" drainage option is not feasible if certain frontage improvements are constructed as required.
3. A drainage study must be made and submitted to the Drainage Section of the Division of Engineering for approval before the determination of the final drainage plan can be made.
4. A portion of the proposed landscaped park is located within the existing right-of-way of Kamoku Street as well as the abandoned site of the Kapahulu sewage pump station. According to our files, both properties are still owned by the City and County and are under our jurisdiction. The site for the pump station has been declared surplus to the needs of this department and is in the process of being transferred to the Department of Parks and Recreation. We are not aware of any initiation to abandon Kamoku Street in the vicinity of the Date/Kapiolani intersection. Unless the landscaped area becomes a City park, a clarification is needed why City lands are being utilized as a private park.

NOV 10 1983

Ms. Letitia Uyehara

- 2 -

November 8, 1983

5. The existing pump station structure has not been modified so that some hazardous conditions exist. The underground portions of the structure (wet and dry wells) are extensive and should be made accident-proof. The superstructure should be examined to determine whether it will be compatible with its intended use. Openings within the site should be sealed to prevent injury and entry.

6. Sewer easements will be required for the existing lines in the existing road right-of-way and the pump station site if and when the City and County relinquishes titles to these lands.

Me ke aloha pumehana,

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

cc: Environmental Communications, Inc.
Division of Engineering
Division of Land Survey & Acquisition
Division of Wastewater Management

ENVIRONMENTAL
COMMUNICATIONS
INC.

December 5, 1983

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

Dear Dr. Chun:

We are in receipt of your letter of November 8, 1983 regarding the Crystal Promenade Project Draft EIS and would respond to your comments in the following:

1. The drainage option you mention will be considered by the engineering consultant.
2. Your comment regarding the feasibility of the "do nothing" options will be reviewed by the engineering consultant. Please be assured that your suggestions will be considered when finalizing the drainage plan and the plan will be submitted to your department for your review.
3. The intent of the project has been revised and will not attempt to acquire public lands for private use as previously stated in the Draft EIS. The Final EIS has been revised to reflect this and has also amended Figure 2, Site Plan.
4. We appreciate your informing us of the sewer easements that would be required for the existing lines.

5. Since the project will no longer attempt to acquire public lands for private use, your concerns raised in these two questions are not applicable and a response is unnecessary.
6. Thank you for your continuing interests.

Very truly yours,

F. J. Rodriguez
F. J. Rodriguez

FJR:ls

1152 RICHMOND BUILDING SUITE 407 - P. O. BOX 326 - HONOLULU, HAWAII 96808 - TELEPHONE (808) 521-8281

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

SILEEN R. ANDERSON
MAYOR



November 14, 1983

EMIKO I. KUDO
DIRECTOR

SAM L. CARL
DEPUTY DIRECTOR

OSCAR K. ASAPHINA
EXECUTIVE ASSISTANT

Ms. Letitia Uyehara, Interim Director
Office of Environmental Quality Control
550 Halekauwila Street, Room 301
Honolulu, Hawaii 96813

Dear Ms. Uyehara:

SUBJECT: DRAFT ENVIRONMENTAL IMPACT STATEMENT (EIS)
CRYSTAL PROMENADE CONDOMINIUM, MOILIILI
TMK: 2-7-15: 1

The recreational impact and park dedication concerns of the proposed Crystal Promenade Condominium project have not been adequately addressed in the Draft EIS.

Although the report acknowledges the project will comply with the Park Dedication Ordinance No. 4621, the private park plan that the applicant proposes is questionable as it includes lands owned by the City. The sewer pump station site that the applicant proposes for traffic and private park purposes are lands that were transferred from the Department of Public Works to the Department of Parks and Recreation for public park purposes. Therefore, the site plan as shown on page II-3 of the report cannot be assumed as conclusive. Coordinated discussions with all City agencies concerned should be done immediately to affirm the viability of the applicant's proposal.

The report also does not indicate what, if any, recreational amenities will be provided to serve a project of this type and size.

Because the applicant is requesting a partial waiver of park dedication requirements, the recreation and park dedication concerns should be more thoroughly addressed in the final EIS. Alternatives other than what is proposed in the report should be provided.

Thank you for the opportunity to comment on the Draft EIS.

Sincerely yours,

(Mrs.) EMIKO I. KUDO, Director

EIK:vc

cc: ENVIRONMENTAL COMMUNICATIONS, INC.
HHIA

NOV 17 1983

ENVIRONMENTAL
COMMUNICATIONS
INC.

F. J. RODRIGUEZ,
PRESIDENT

December 5, 1983

Mrs. Emiko I. Kudo, Director
Department of Parks &
Recreation
650 South King Street
Honolulu, Hawaii 96813

Dear Mrs. Kudo:

We are in receipt of your letter of November 14, 1983 regarding the Draft EIS for the Crystal Promenade Project.

The intent of the project has been revised and will not attempt to acquire public lands for private use as previously stated in the Draft EIS. The Final EIS has been revised to reflect this and has also amended Figure 2, Site Plan. Under this proposal, there is a lack of sufficient on-site park space to comply with the park dedication requirement. The developer is therefore, currently exploring other means for compliance. As is required by law, be assured the project will be in compliance with the Park Dedication Ordinance.

Common facilities such as meeting rooms for the elderly will be provided.

Thank you for your continuing concerns.

Very truly yours,



F. J. Rodriguez

FJR:ls

November 21, 1983

Ms. Letitia Uyehara, Interim Director
Office of Environmental Quality Control
550 Halekauwila Street, Room 301
Honolulu, Hawaii 96813

Dear Ms. Uyehara:

SUBJECT: Crystal Promenade Condominium

Thank you for the opportunity review and comment on the subject project.

We have no objections to this proposed project provided all fire code regulations are met. We are also returning the environmental document to you.

Very truly yours,

MELVIN M. NOMAKA,
Fire Chief

MMN:ct/MSKW
Enclosure

cc: Environmental Communications, Inc.

NOV 23 1983

ENVIRONMENTAL
COMMUNICATIONS
INC.

F. J. RODRIGUEZ,
PRESIDENT

December 5, 1983

Chief Melvin M. Nonaka
Honolulu Fire Department
1455 S. Beretania Street, Room 305
Honolulu, Hawaii 96814

Dear Chief Nonaka:

We are in receipt of your letter of November 21, 1983 regarding the Draft EIS for the Crystal Promenade project.

Please be assured the project will comply with all fire code regulations.

Thank you for your concerns.

Yours very truly,

F. J. Rodriguez

F. J. Rodriguez

FJR:ls

DEPARTMENT OF LAND UTILIZATION
CITY AND COUNTY OF HONOLULU
650 SOUTH KING STREET
HONOLULU, HAWAII 96813 • (808) 923-4432



EILEEN R. ANDERSON
MAYOR

MICHAEL M. MCLENDY
DIRECTOR

ROBERT B. JONES
DEPUTY DIRECTOR

LU10/83-5040 (JDN)

November 22, 1983

Ms. Letitia Uyehara, Interim Director
Office of Environmental Quality Control
State of Hawaii
550 Halekauwila Street, Room 301
Honolulu, Hawaii 96813

Dear Ms. Uyehara:

Draft Environmental Impact Statement (EIS) for
Crystal Promenade Condominium, Moiliili, Oahu
Tax Map Key 2-7-15: 1

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

1. Appropriateness of the Project: The Draft EIS does not adequately justify the appropriateness of a development of this magnitude at this location. This was a major concern raised in our response to the EIS Preparation Notice (Page XII-9). A medium-density development consistent with the zoning and other land use controls is more appropriate. Chapter VII, Alternatives (Page VII-1) discusses a medium-density luxury condominium, no action and other sites. However, it does not discuss the possibility of a reduced development implemented in conjunction with the Hawaii Housing Authority (HHA).
2. HHA Funding: According to the Draft EIS, the 18 elderly units that HHA will receive will be conveyed to the State by the developer at "no cost" (Page IV-5). This statement is misleading because HHA will be providing \$5.5 million in government money for construction financing (Page II-9). With an estimated total cost of \$32 million, HHA will be financing 17.5% of the project in return for only 10.5% of the total units. Furthermore, the Draft EIS indicates that the waivers (made possible by HHA's involvement) are worth \$3 million (Page II-7). On this basis, HHA's involvement in the project is effectively worth \$8.5 million or 26.8% of the total project cost.

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Ms. Letitia Uyehara, Interim Director
Page 2

ENVIRONMENTAL
COMMUNICATIONS
INC.

J. J. RODRIGUEZ,
PRESIDENT

3. FAR Comparison (Pages IV-3 and 4): The Draft EIS reports that the project has an FAR of 5.63 which is comparable to other buildings in the area. However, the most comparable FAR is 5.4 (Mott-Smith Laniloa) on a lot size of 155,707 square feet (SF) which is more than three times the size of the 49,326 SF project site.

4. Aesthetics and Viewplanes (Page V-25): The only critical analysis of viewplanes is from Punchbowl and Round Top to the ocean. However, these viewplanes are not directly applicable to the affected community. The project's effects on street level viewplanes for vehicular traffic, pedestrians and neighboring residences should be evaluated. The Draft EIS merely states that, "there will be some loss of viewplanes, since the Crystal Promenade structure will block views from certain mauka and makai points." It does not specifically identify which viewplanes will be lost.

5. Architectural Design and Building Materials (Page XII-9):

The Draft EIS failed to address Item No. 3 of our response to the EIS Preparation Notice. There is no discussion of architectural design or building materials. In the event that reflective glass is proposed, the applicant should be aware of the Reflective Glass Ordinance No. 83-35 (effective 8/4/82) regulating its use.

6. Clarification of Exemptions: Appendix B states that height, density and one side-yard exemption will be requested. However, the one side-yard exemption is not mentioned or discussed under the applicable sections of the Draft EIS (Page IV-5 and Page IX-1). Also, under the Recreational Facilities Section (Page V-15) it is reported that, "approximately 23,000 square feet of open space will be available for the project, thus satisfying the park dedication requirement." Yet, according to the sections on exemptions (Page IV-5 and page IX-1), a partial waiver of park dedication requirements will be requested. These discrepancies should be clarified.

If there are any questions, please contact John Nakagawa of our staff at 527-5039.

Very truly yours,

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

MMN:s1

cc: Environmental Communications, Inc.

December 5, 1983

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

Dear Mr. McElroy:

Thank you for your comments on the proposed Crystal Promenade condominium project. We are responding to your comments in the following:

1. Appropriateness of the Project: We would refer your department to pp II-7,8,9 to gain a better insight of why this project is being proposed. We realize that from the perspective of DLU, this Statement of Objectives does not completely fulfill the land use aspects your agency administrators. The applicant developer has in his participation with Hawaii Housing Authority, attempted to design a project that will yield certain economic cost benefits that will result in lower priced residential units to the open markets. We use the term lower priced in the context that if developed on a lower density basis as you have described, the resulting units would be comparable to the luxury units at Royal Iolani, Iolani Court Plaza, and other larger sized unit buildings adjacent to this site. This is one prevailing school of thought (economic cost benefits) versus land use policies. We acknowledge your department's position on the latter. The last comment on a reduced sized project developed in conjunction with the HHA is under review at the present time and will be finalized to be presented to the City administration and the City Council for their consideration and approval.

2. HHA Funding: There is serious misunderstanding of the process of HHA participation and the resulting economic benefits to applicant developers. First, the conveyance of the 48 elderly units is as stated, at no cost since the HHA participation of \$5.6 million is not a grant, but is in fact a loan at HHA RATES. As such, it is a revenue producing loan to HHA with interest earned revenues to the Authority. Further, in the waivers attributable to HHA participation, there is in the \$3 million, an identifiable amount of \$336,000 that is saved due to the differential in interest rates charged by HHA as opposed to conventional mortgage lender's rates of interest for comparable loans. These savings all go to the development of a project that will yield units marketable at lower costs to buyers in this income range. We hope that this has clarified the misunderstanding sufficiently.

Mr. Michael M. McElroy
Page 2
December 5, 1983

3. FAR Comparison: The FAR of 5.63 Included in the Draft EIS was erroneously stated. In actuality, the FAR for the site would be approximately 4.7. This figure would be well below the FARs of the other comparable buildings.
4. Aesthetics and Viewplanes: The decision to specifically analyze viewplanes from Punchbowl and Round Top was based on previous discussions with your office. Though we understand the informality of these communications, the urgency of conducting analyses from these points was made apparent to us. We agree that viewplane studies from other points may prove enlightening; however, we strongly believe that the results of the analysis would be similar to analysis that was already conducted from Punchbowl and Round Top.

In regards to street level viewplanes, we believe that because a building structure is to be constructed, some views from at-grade points around the building will obviously be obstructed. However, as is presented in Figure 10, View Corridors, the proposed project is located within an area of several high-rise structures. Therefore, it is anticipated that views would be obstructed not only by the proposed project, but also by the existing structures found in the area and future developments which may be constructed at heights up to 150 feet.

The statement referred to by your office was made in regards to the fact that since a building is to be constructed, views originating from some mauka and makai orientations would surely be blocked. We believe that to specifically identify these points would be unnecessary.
5. Architectural Design and Building Materials: The EIS has disclosed all information currently available. It is too early in the development process to discuss further, architectural design and building materials than is already been provided. Finalized designs and material schedules have not been prepared and it would appear that to discuss these items at the present time would not be in the best interests of the developer. The developer does not intend to use reflective glass screen walls.
6. Clarification of Exemptions: We apologize for any misunderstandings. Appendix B was prepared during the initial planning stages for the project and any subsequent changes to it was not made. The discussions made in the narrative reflect the most current proposal planned. However, the intent of the project has been revised and will not attempt to acquire public lands for private use as previously stated in the Draft EIS. The Final EIS has been revised to reflect this and has also amended Figure 2, Site Plan. Under this proposal, there is a lack of sufficient on-site park space to comply with the park dedication requirement. The developer is

Mr. Michael M. McElroy
Page 3
December 5, 1983

therefore, currently exploring other means for compliance. As is required by law, be assured the project will be in compliance with the Park Dedication Ordinance.

Thank you for your concerns.

Very truly yours,



F. J. Rodriguez

FJR:ls

DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT

CITY AND COUNTY OF HONOLULU

550 SOUTH KING STREET
HONOLULU, HAWAII 96813
PHONE: 522-1151



EILEEN R. ANDERSON
MAYOR

JOSEPH K. CONANT
DIRECTOR

CHARLES K. TONIGOE
DEPUTY DIRECTOR

F. J. RODRIGUEZ
PRESIDENT

ENVIRONMENTAL
COMMUNICATIONS
INC.

November 22, 1983

Ms. Letitia Uyehara, Interim Director
Office of Environmental Quality Control
550 Halekauwila Street, Room 301
Honolulu, Hawaii 96813

Dear Ms. Uyehara:

Subject: Environmental Impact Statement
Proposed Crystal Promenade Condominium Project
Tax Map Key: 2-7-15: 1
Acre: 38,570 Square Feet (0.89 Acre)
Location: Moiliili, Oahu

Thank you for the opportunity to review the EIS for the proposed Crystal Promenade Condominium project in Moiliili, Oahu.

As stated in our letter of September 26, 1983, the needs and benefits of the project, in terms of housing units provided, will be considered when evaluating HHA's request for zoning exemptions.

In response to DHCD's comments on why units are restricted to only elderly rentals, the preparer indicated that the decision was made by Hawaii Housing Authority based on the waiting list for this type of unit. While we agree there is a need for elderly units, the City's Housing Assistance Plan shows a far greater need for family units. Thus our query on the need for larger units for low- and moderate-income families which was not acknowledged by you.

We shall retain the EIS report for our files.

Sincerely,

Charles K. Tonigoe
JOSEPH K. CONANT

cc: Environmental Communications, Inc.
P. O. Box 536
Honolulu, Hawaii 96809

December 5, 1983

Mr. Joseph K. Conant, Director
Department of Housing and
Community Development
City & County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Conant:

Thank you for your comments on the proposed Crystal Promenade condominium project. We note that the comment was received postmarked November 28, 1983. We respond to your comments in the following:

Hawaii Housing Authority and the applicant/developer are aware of the City's plan for Housing Assistance. The decision on the type of units that would be developed on this parcel was made substantially on the basis that first time buyers entering the market would be better served since the developable units were being priced as competitively as possible in the face of current market sales prices. The larger sized family type units you speak of would be unavoidably out of reach for the market segment you are attempting to reach with the Housing Assistance Plan. This is regrettable but unfortunately the truth in today's market place. We are providing a table that demonstrates the current per square foot sales prices that exist in the Kapiolani District as well as the Pali Park project. We hope that we have adequately responded to your comment.

Thank you for your continuing interest.

Very truly yours,

F. J. Rodriguez

F. J. Rodriguez

FJR:ls
Enclosure

NOV 29 1983

11-2 HONOLULU BUILDING, SUITE 407, P. O. BOX 536, HONOLULU, HAWAII 96809 - TELEPHONE (808) 571-8391

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



William A. Bonnet
DIRECTOR
DALE RHEE
DEPUTY DIRECTOR

EILEEN R. ANDERSON
MAYOR
ANDREW L. T. CHANG
MANAGING DIRECTOR

November 28, 1983

COMPARISON TABLE FOR SQUARE FOOT COSTS

1. 2500 Kapiolani

Type Unit	Size S.F.	Sales Price	Per Sq. Ft. Cost
Studio	310	\$59,050	\$190
One Bedroom	500	\$84,150	\$168
2 Bedroom	780	\$113,500	\$146

2. Pali Park

One Bedroom	702+116	\$104,000	\$148
Two Bedroom	920+162	\$133,500	\$145

3. Crystal Park

One Bedroom	600	\$104,000	\$173
Two Bedroom	1000	\$162,000	\$162

4. Kapiolani
Banyan

Two Bedroom	944	\$138,750	\$147
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5. King's Gate

Studio	401	\$74,000	\$185
One Bedroom	791+66	\$109,500	\$138.40
Two Bedroom	817	\$128,000	\$156.67

6. Ala Wai Plaza
Skyrise

One Bedroom	684+124	\$95,000	\$139
Two Bedroom	1226+234	\$199,500	\$163

M.L.S., November, 1983

Ms. Letitia Uyehara
Interim Director
Office of Environmental Quality
Control
Room 301
550 Halekauwila Street
Honolulu, Hawaii 96813

Dear Ms. Uyehara:

Subject: Draft Environmental Impact Statement for the
Proposed Crystal Promenade Development
Tax Map Key 2-7-15:1

Thank you for the opportunity to review and comment on the Draft Environmental Impact Statement for the proposed project. Our comments are as follows:

1. The on-ramp from Kapiolani Boulevard to the H-1 Freeway is now operational. Therefore, we suggest that the traffic impact study include the effect of the on-ramp traffic on the Kapiolani/Dale/Kamoku intersection.
2. To assess the impact of the morning peak traffic on the surrounding major streets, an assignment of the traffic entering Dale Street (210 for Alternate B and 215 for Alternate C) should be made at the Dale/University intersection.
3. A brief explanation should be provided as to why the condominium related traffic through Moiliili Triangle is so low.
4. A direct pedestrian access from Kamoku Street to the Kapiolani/Dale intersection should be maintained. It is our understanding that this project will provide this.

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Ms. Letitia Uyebara
November 28, 1983
Page 2

F. J. RODRIGUEZ,
PRESIDENT

ENVIRONMENTAL
COMMUNICATIONS
INC.

5. The vehicular access from Kamoku Street to Date Street should not be limited to residents of the condominium.
6. We question the adequacy of the guest parking to be provided by the proposed project. Since there is a shortage of parking in Moiliili Triangle, the developer should provide as much parking as possible.

Sincerely,



William A. Bonnet

✓ cc: Environmental Communications, Inc.

December 5, 1983

Mr. William A. Bonnet, Director
Department of Transportation Services
City & County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Bonnet:

We are in receipt of your letter of November 28, 1983 regarding the Crystal Promenade Draft EIS. Our responses, keyed to your numbered comments, are:

1. We are aware that the Kapiolani on-ramp has opened but we will not be reevaluating the Kapiolani/Date/Kamoku intersection for the Final EIS. Our time schedule does not permit us to gather representative traffic data and we do not expect that additional data would change the Traffic Impact Study's findings.

2. The Traffic Impact Report discussed the probable impacts at intersections which were judged to be critical. Observations of existing traffic conditions indicated that the Date Street and University Avenue intersection operated well below its capacity and could be expected to continue to do so in the future.

Questions about the project's traffic impact at this location led to a reevaluation of the intersection. Estimates of future (year 1986) peak hour traffic volumes were made using available 1978 and 1983 traffic count data from other nearby intersections; analyses resulted in Levels of Service C, with or without the project, for both AM and PM peak hours. These results support the initial finding that the intersection would not be critically affected by the proposed project.

3. The traffic assignment used total perceived travel times to select likely travel paths. The only traffic expected to be assigned through the Moiliili Triangle and destined for the proposed project would have an origin ewa of the project and located such that a driver would perceive that he could get from his origin to the King/University intersection faster than from origin to the King/Kapiolani/Harding intersection. From most of the possible origins ewa of the project, we judge that the latter is more quickly accessible and therefore, do not expect significant traffic in the Triangle because of the proposed project.

4. These comments, along with other input received at community meetings
5. and in the review process, have resulted in a project proposal which

Mr. William A. Bonnet
Page 2
December 5, 1983

will not affect the layout of, or vehicular and pedestrian access to, Kamoku Street.

6. The developer recognizes the shortage of on-street parking in the area and will be providing guest parking.

A copy of your letter has been forwarded to the project's architect for his consideration.

Thank you for your interest.

Yours very truly,



F. J. Rodriguez

FJR:ls

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

EILEEN R. ANDERSON
MAYOR



WILLARD T. CHOW
CHIEF PLANNING OFFICER
RALPH PORTMORE
DEPUTY CHIEF PLANNING OFFICER

November 1, 1983

DGP10/83-9027

Mr. F. J. Rodriguez, President
Environmental Communications, Inc.
P.O. Box 536
Honolulu, Hawaii 96809

Dear Mr. Rodriguez:

Crystal Promenade Condominium Project

We have received your letter of October 29, 1983 in response to our comments.

We believe that our request for additional discussion and data is appropriate for the following reasons.

Soils

The information you provided is from a statewide report or survey by the Soil Conservation Service. Accordingly, the information in the report and maps are highly generalized. Additionally, as we indicated, the change in soil types occurs in the vicinity of the proposed condominium.

It seems inconceivable to us that a developer would propose a highrise structure without soil borings. We merely ask that you include information from soil borings on the property.

Relationship to City Plans

The density of the proposed project is considerably higher than that which is specified in the adopted Development Plan covering this area.

NOV - 3 1983

Mr. F. J. Rodriguez
Page 2
November 1, 1983

Mr. F. J. Rodriguez
Page 3
November 1, 1983

We ask that you discuss what is called for in the adopted DP in terms of building heights and dwelling unit density. The EIS should indicate (1) why you feel the DP development controls are not appropriate for the area, and (2) why you feel the proposed condominium height and density is appropriate, not only for the specific parcel, but also for the adjoining area in which the project is proposed. This relates also to the discussion we ask for under cumulative impacts.

Use of Chapter 359G

We ask for discussion of the appropriateness of the use of Chapter 359G (Hawaii Revised Statutes) for the project when only 48 elderly rental units will be provided out of the proposed 452-unit project.

The discussion called for here involves two questions.

1. Should 359G be used considering the small number of units for low/mod families in comparison with the total number of units in the proposed project? What is the Hawaii Housing Authority's total financial involvement?
2. What provisions, regulations, etc. can be preempted?

We have just received an opinion from Corporation Counsel as to whether City Council can now exempt the Hawaii Housing Authority project from the City's General Plan and Development Plans. Corporation Counsel's opinion was, "No." Corporation Counsel Opinion M 83-53, dated October 12, 1983, is attached for your information.

Cumulative Impacts

What we asked for here is reasonable. To make our request a little clearer, we submit the following:

1. It is assumed that the EIS will gauge the impact of the 450-unit project on street circulation, sewage, water and other facility systems in the area.
2. The EIS should also gauge the impact of say five more high density apartment projects like the Crystal Promenade Condo within the general area; then perhaps 10 more such projects.

3. If this project is approved, it will probably have tremendous effects on surrounding properties. The entire area may well be developed into high density apartments like the proposed condo project.

The EIS might indicate how many more units, if constructed in this area, would strain the facility systems in the area so that additional facilities, i.e., street widenings, relief sewers, would be needed.

We do not feel that the request is unreasonable. In the EIS for the Waipio-Gentry project, for instance, it was indicated that an additional 1,000 units in the Waipio-Gentry project would strain Kamehameha Highway capacity beyond its present capacity, so that intersection improvements would be required.

These are the items of particular concern to us as we evaluate projects against the adopted General Plan and Development Plans and which we would like to see discussed in your draft EIS. If you have any questions, please do not hesitate to call me.

Sincerely,

Clarence Tom
CLARENCE TOM
Planner

APPROVED:

Lalor Portmore
for WILLARD T. CHOW

Attachment

SEP 19/80-1963

DEPARTMENT OF THE CORPORATION COUNSEL
REVENUE COUNTY OF HONOLULU
HONOLULU, HAWAII 96813

83 OCT 14 AM 10:27

SILVEN R. ANDERSON
MAYOR

DEPT. OF
GENERAL PLANNING
83-53



October 12, 1983

GARY M. SLOVIN
CORPORATION COUNSEL
STANLEY D. RUYAT
FIRST DEPUTY

MEMORANDUM

TO: WILLARD TIM CHOW -2- October 12, 1983

[R]ules on health, safety, building, planning, zoning, and land use which relate to the development, subdivision, and construction of dwelling units in projects in which the State, through the authority, shall participate; provided that these rules shall not contravene any safety standards or tariffs approved by the public utilities commission provided further that these rules shall follow existing law as closely as is consistent with the production of low cost housing with standards which meet minimum requirements of good design, pleasant amenities, health, safety, and coordinated development.

Upon the adoption of such rules they shall have the force and effect of law and shall supersede, for all projects in which the State through the authority shall participate, all other inconsistent laws, ordinances, and rules relating to the use, zoning, planning, and development of land, and the construction of dwelling units thereon; provided that any rules shall, before becoming effective, be presented to the legislative body of each county in which they will be effective and the legislative body of any county may within forty-five days approve or disapprove, for that county, any or all of the rules by a majority vote of its members. On the forty-sixth day after submission any rules not disapproved shall be deemed to have been approved by the county. [Emphasis added]

Section 359G-4.1, HRS, exempts HHA, in the development of housing projects thereunder, from

[All] statutes, ordinances, charter provisions, and rules of any governmental agency relating to zoning and construction standards for subdivisions, development and improvement of land and the construction of units thereon; provided that:

...

(C) The final plans and specifications for the project approved by the legislative body, shall constitute the zoning, building, construction, and subdivision standards for that project.

TO: WILLARD TIM CHOW, CHIEF PLANNING OFFICER
DEPARTMENT OF GENERAL PLANNING
ATTN: BENNETT MARK, COMMUNITY PLANNING BRANCH
FROM: DONNA Y. L. LEONG, DEPUTY CORPORATION COUNSEL
SUBJECT: HAWAII HOUSING AUTHORITY PROJECTS PURSUANT TO
SECTION 359G-4.1, HRS

This responds to the question as to whether the City Council, pursuant to Section 359G-4.1, Hawaii Revised Statutes (HRS), can exempt a Hawaii Housing Authority (HHA) project from the City's General Plan and Development Plans (hereafter collectively referred to as the "Plans").

We answer in the negative.

APPLICABLE STATUTES

Section 356-20, HRS, states as follows:

Zoning and building laws to be observed. (a) All housing projects of the authority shall be subject to the planning, zoning, sanitary, and building laws, ordinances, and regulations applicable to the locality in which the housing project is situated; provided that housing projects developed pursuant to section 359G-4(d) and section 359G-4.1 shall be exempt from this section. [Emphasis added]

Section 359G-4(d), HRS, permits HHA to adopt

M 83-53

MEMORANDUM

TO: WILLARD TIM CHOW

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October 12, 1983

DISCUSSION

The precise issue is whether the phrase "zoning standards" referred to in Section 359G-4.1, HRS, includes planning considerations that are reflected in the City's recently adopted Plans. In reaching our conclusion that planning considerations are not a part of the zoning standards, we considered the language of the pertinent HRS sections, the policy considerations underlying Chapter 359G, HRS, and the wealth of legislative history of Chapter 359G, HRS, when originally enacted in 1970, and the lack of such history for Section 359G-4.1, HRS, when it was enacted in 1976. We note that this opinion is limited to an interpretation of Section 359G-4.1, HRS, and should not be read to extend to other situations in which a similar issue may arise.

STATUTORY LANGUAGE

Sections 356-20(a) and 359G-4(d), HRS, supra, expressly differentiate between zoning and planning. In addition, Section 356-20(b), HRS, provides that,

(b) Notwithstanding any statute or ordinance to the contrary, multi-story housing projects for the elderly shall be developed only on land which is either zoned or designated for apartment or business use on the general plans of detailed or use plan of the respective county wherein the land to be utilized for such projects are [sic] located and shall be exempt from all county zoning ordinances and zoning codes and restrictions therein, including, but not limited to, building height restrictions, floor area ratio formulas, open space, living space, loading space, recreational space, and land use intensity requirements. The director shall before approving such a project hold a public hearing pursuant to chapter 91. [Emphasis added]

That HRS section clearly recognizes that a distinction exists between the zoning ordinances and the plans. Also, it is important to note the types of restrictions enumerated as falling under the City's zoning ordinance and codes.

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October 12, 1983

Finally, planning legislation existed in the statutes and the Revised Charter of the City and County of Honolulu (RCH) prior to the enactment of Chapter 359G, HRS. Section 201-23, HRS, which authorizes the preparation of a general plan for the City and County of Honolulu, and for development plans thereunder, was enacted in 1957. The provisions of the RCH relating to the Plans existed in the 1956 RCH. As a final note, the planning legislation is set forth in Chapter 201, HRS, whereas the county's zoning powers are found in Chapter 46, HRS.

LEGISLATIVE HISTORY

Chapter 359G, HRS, was originally enacted in 1970 as Act 105. During that legislative session, the legislators expressed deep concern about the housing shortage which existed and also about the development of the communities in the State. As a result of these concerns, House Bill No. 397, which became Act 105, and its companion Bill, Senate Bill No. 1327-70, were introduced. These bills were nearly identical in substance except that House Bill No. 397 proposed the creation of a State Department of Housing and Community Development, while Senate Bill No. 1327 proposed utilizing a special assistant in the Governor's Office and expanding Hawaii Housing Authority's powers.

The legislative history of H.B. No. 397 reflects the fact that the legislators were not only trying to create housing in Hawaii, but were also trying to deal with the community development problems which were associated with housing. Those problems included: (1) haphazard development; (2) destruction and pollution of the State's natural resources; (3) the piecemeal and fragmented approach to housing; (4) community development and environmental quality control; (5) the unreasonable and irresponsible encroachment upon Hawaii's open spaces; and (6) the general improvement of the quality of urban life through proper planning and utilization of the physical, social and economic environment. See House Standing Committee Reports No. 275-70 and 383-70 and Senate Standing Committee Report No. 931-70. The legislators' concerns were summed

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up in Conference Committee Report No. 9 which stated that "[y]our Committee is aware that the housing problem, though immediately critical, is part of the larger problem of urban development and environmental quality control that will be of prime importance during this next generation to determine the quality of life in Hawaii into the new twenty-first century." Given this wealth of legislative history, we conclude that the legislators, in enacting the original Chapter 359G, HRS, intentionally differentiated between zoning and planning concerns.

The question then becomes whether the Eighth State Legislature, in enacting Section 359G-4.1, HRS, in 1976, intended, notwithstanding the original purposes of that chapter, that planning considerations be a part of the zoning standards capable of summary exemption within a 45-day period. There is no legislative history which would assist us in resolving that question. Such a lack of legislative history for that section, coupled with the overwhelming concern of the legislators in 1970 for a planned community and urban growth, leads to but one conclusion: that the phrase "zoning standards" was not intended to include planning considerations.

HHA is not, however, without some authority to modify the City's Plans. Section 359G-4, HRS, permits HHA to promulgate rules on planning which relate to its Chapter 359G projects. These rules, upon proper adoption, would supersede certain other inconsistent ordinances, including the Plans. Section 359G-4, HRS, provides, however, that the rules, before becoming effective, shall be presented to the City Council. Although HHA has promulgated rules pursuant to this section, we understand that they were not presented to the City Council for approval and therefore the rules do not supersede any City ordinances. In addition, the rules do not relate to the planning and development of land.

CONCLUSION

Community development and planning were envisioned by the Fifth State Legislature in 1970 as concerns broader

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than the zoning standards referred to in Section 359G-4.1, HRS. That legislature did not want HHA's housing projects to be built in a vacuum, but desired that such housing be built in the context of the community's development. We conclude, therefore, that the Plans are not a part of the zoning standards referred to in Section 359G-4.1, HRS, capable of being summarily amended by a City Council approval thereunder.

Donna Y. L. Leong
DONNA Y. L. LEONG
Deputy Corporation Counsel

APPROVED:

Gary M. Slovin
GARY M. SLOVIN
Corporation Counsel

DYLL:as

cc: Joseph Conant
Michael M. McElroy

ENVIRONMENTAL
COMMUNICATIONS
INC.

J. J. RODRIGUEZ,
PRESIDENT

Mr. Clarence Tom
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December 5, 1983

Mr. Clarence Tom, Planner
Department of General Planning
City & County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Tom:

We are in receipt of your letter of November 1, 1983 regarding the Crystal Promenade Condominium Project and would respond to concerns in the following:

Soils

We concur with your statement regarding the necessity of a soil borings study for the development of a highrise structure. As was stated in the EIS, "the preparation of a soil study is a normal procedure in which a qualified soil engineering consultant is retained to take soil borings so that the site's specific soil conditions are known and the appropriate engineering measures for structural support can be undertaken." It is currently too premature in the development process for a study to be completed. However, be assured that a study will be prepared at a later time and reviewed by the appropriate government agencies.

Relationship to City Plans

The building height and dwelling unit density allowable within the DP area has been included in the EIS.

The following reflect response by the HHA: (1) By seeking planning and zoning exemptions via Chapter 359 G, we are not passing judgement on the appropriateness of the DP development controls for the area. (2) We believe that the developer has attempted to create the most affordable priced units with a design layout which provides living environment comparable to other market units. They are also attempting to address the needs of the elderly renters which are not normally addressed by the private sector. By exempting the height and density, they achieve certain economies of scale and reduce the land cost per unit. The benefits which are achieved are returned to the buyers in the form of lower prices and the community in the form of elderly rental units and direct financial aid. The developer is attempting to minimize the impacts of the structure and have proposed this height because of design concerns and the proximity of the site to other building of comparable heights.

Use of Chapter 359 G

1. With regard to the requested discussion as to the appropriateness of the use of Chapter 359 G for the project, "when only 48 elderly units will be provided out of the 452-unit project", several comments are germane:
 - a. The 48 elderly rental units are being provided at no direct cost from benefits derived by the development of the entire project.
 - b. A large percentage of the "For Sale" units are proposed for sale at prices which would qualify them as affordable units, and hence, direct assistance from the Authority notwithstanding the provision of the rental units.

As is stated in the EIS, HHA will provide \$5.6 million on government money for construction financing.

2. The Legislature, in enacting the enabling legislation of 359 G "...determined that the problem of providing reasonable priced housing in Hawaii is so complex that existing institutions cannot solve it...." To assist the Authority in carrying out this task, the Legislature gave it numerous tools which may be used individually or in combination. The proposed project uses several of these tools to achieve the desired result of providing elderly housing.

While not strictly applicable to this project, Chapter 359 G-31, HRS, specifically provides that the HHA, "...in connection with the development of any residential units under this Chapter...may also develop commercial, industrial, or other properties if it determines that such uses can be an integral part of the development and can help to preserve the lifestyles of the purchasers of residences in the development. The Authority may designate any portions of the portions of the development as for commercial, industrial, or other use and shall have all the powers granted under this Chapter with respect, thereto, including the power to bypass statutes, ordinances, charter provisions and rules of any governmental agency pursuant to 359 G-4.1. For this purpose, the Authority may use any of the funds authorized under this chapter."

Cumulative Impacts

1. The EIS discusses in detail, impact of the project on street circulation, sewage, water and other facility systems in the area.
2. The subject of cumulative impacts is a matter of concern since the applicant/developer is not as intimately acquainted with the various

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

EILEEN A. ANDERSON
MAYOR



WILLARD T. CHOW
CHIEF PLANNING OFFICER
RALEIGH PORTIMORE
DEPUTY CHIEF PLANNING OFFICER

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projects that are being contemplated or proposed for the vicinity that would result in a cumulative impact analysis. There is no assurance that any of the proposed projects would be moved forward in a related time period, if at all. It is our understanding that as these projects are offered to the governmental agencies for initial review and subsequent approval, the capacity of the traffic, sewerage, and water systems is evaluated at the time of application. For a private entity to conduct an evaluation of the type you are suggesting, would appear presumptuous.

3. While we agree that the project will increase property values and probably affect surrounding areas, we are not certain that the entire area may well be developed into high density apartments like the proposed project. Therefore, speculation of this type may well be premature. It is our contention that after development of the Crystal Promenade Project is completed and other projects are proposed within the area, your office would evaluate the feasibility of each project on their own individual merits.

Your request regarding the amount of additional units from other developments and its potential strain of facility systems has some merit. However, as was stated earlier in this letter, for a private entity to conduct such an evaluation would appear quite presumptuous. Your example discussing the Waipio-Gentry Project cannot be applied to this project, since the additional units analyzed were specifically for Waipio-Gentry and did not relate to other different projects. The Crystal Promenade EIS does discuss various alternatives (i.e. densities, heights, units, etc.) and addresses potential impacts.

Thank you for your concerns and continuing interest.

Very truly yours,

F. J. Rodriguez

F. J. Rodriguez

FJR:ls

Ms. Letitia N. Uyehara, Interim Director
Office of Environmental Quality Control
State of Hawaii
550 Halekauwila Street, Room 301
Honolulu, Hawaii 96813

Dear Ms. Uyehara:

Crystal Promenade Condominium EIS--Comments

Accepting Agency (Page I-1)

The Governor is listed as the accepting authority. Hawaii Housing Authority is listed as the proposing agency, with BAL Corporation as developer.

We feel that this is incomplete inasmuch as approval of 359G exemptions by City Council will be required for the project. Also, it appears that City lands are involved in this proposal, as indicated in Figure 2, page II-3. Accordingly, we feel that the Mayor is also an accepting authority for the EIS.

Project Area (Page II-1)

The EIS indicates that the project is defined by Tax Map Key: 2-7-15: 1. However, Figure 2 (page I-1) shows that the project also involves 15,073 sq. ft. of City-owned property designated for use as a mini-park, and a portion of Kamoku Street which is proposed to be closed with the traffic rerouted through the mini-park site.

Under Chapter 343, Hawaii Revised Statutes, when City lands are involved, the Mayor is the accepting authority.

The EIS should clearly show what parcels are involved in the project, who owns the parcels, and the area of the parcels individually.

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Parking (Page II-6)

Data in Table 2 are incomplete. The EIS should show how the parking requirements were derived as called for in the Comprehensive Zoning Code. This should be indicated here rather than in a later section (page V-26).

Affordability (Page II-5)

The EIS should indicate what criteria were used to determine affordability. For instance, what income data base was used? What assumptions were made with respect to affordability?

The EIS should include a comparison of proposed rents and sales prices with existing rents and sales prices within the Moiliili Triangle area. This should be done not only for the 48 units to be turned over to Hawaii Housing but also the 404 units to be sold or rented.

Value of Exemptions and Waivers (Page II-7 & Appendix B, Exhibit A)

We find the discussion and data provided in this section inadequate and incomplete.

The EIS indicates that the value of exemptions and waivers is approximately \$3 million, which equals the value of the 48 units which will be deeded to HHA.

Park dedication requirements should be detailed and the value of the dedication exemption requested should be indicated.

The EIS states that "No additional dollar value is attached to the partial park dedication waiver as the 'theoretical' project, having a lot area of 91,320 sq. ft., would meet the open space requirements."

We find this statement misleading inasmuch as previously the project area is shown to be only 49,326 sq. ft. (see discussion above).

What specific parcels or non-parcels make up the 91,320 sq. ft. should be clearly shown. The park dedication requirement calculation should be shown, and the land value can be derived from the average land assessment of surrounding parcels in this area.

What is disconcerting is that the EIS indicates that the park dedication requirements will be met using City park lands, rather than with lands dedicated by the developer, or without private open space being provided within the project area as recommended by the Department of Parks and Recreation.

The benefits to the developer are not quantified. This should not be difficult to provide. What would be the gross sales revenues for the proposed project as compared to the gross sales of a project meeting the current zoning and planning requirements for this parcel? The net benefit to the developer should then be indicated.

Soils (Page III-1)

The information provided here is inconsistent. In one paragraph it is indicated that the site has been filled in. In the next paragraph it is indicated that the project site consists of Kawaihapai clay loam, Soil Conservation Service soil type K1A.

The soils information has relevance to the drainage problem.

If the soils within the project are Kawaihapai clay loam, then drainage is a minor problem since the soil is moderately permeable.

If, however, the area is filled land, then drainage through the coral base is poor, and the situation would be aggravated without a drainage system.

Drainage (Page III-6)

The discussion in the EIS on drainage is somewhat misleading. The EIS indicates that, "The present drainage system consists of runoff collecting on the lower end of the project site and the eventual drainage into the streets where stormwater flows into the street drainage system and the Manoa-Paloalo Drainage Canal. The flows then drain into the Ala Wai Canal."

There is no drainage system serving the project site. Drainage is presently being handled via the streets and gutters. Because there is no subsurface drainage system and because of the topography, rainfall collects here at this particular area in case of heavy rainfall. The nearest drainage inlets are at Date and University and at Kapiolani Boulevard, makai of the project area.

Discussion here has implications with respect to discussion on drainage alternatives later in the EIS (page V-13).

Socioeconomic Characteristics (Page III-13)

The EIS should include information such as household size, median age, prior residence, median incomes and percent elderly in the area.

Information should be provided not only for the Moiliili Triangle area, but also for Oahu as a whole for comparison purposes. Statistics from the 1980 Census should be utilized rather than pre-1980 data.

Relationship to Development Plan (Page IV-2)

The discussion on the Development Plan only generally indicates the inconsistency of the project with density and height limitations for the area. It indicates that the maximum height for the area is designated 150 feet and states that the area is designated medium density.

The Director of the Department of Land Utilization has indicated that the density maximum is 90 units per acre. The EIS should indicate specifically what the DP and zoning call for and what is proposed by the developers.

Zoning (Page IV-3)

The EIS should indicate the zoning density maximum for the area so that this could be compared to the proposed FAR.

The EIS lists other projects in the area "...with FARs similar to Crystal Promenade's proposed FAR of 5.63." The EIS then continues with the discussion that what is proposed is not uncommon on the island.

Table 5 lists FARs for buildings in the area. However, the EIS fails to indicate that the projects listed with comparable FARs all have lower FARs than what is proposed.

The list of projects includes the Mott-Smith Laniloa project with an FAR of 5.4, the highest of those listed. This is a project in Makiki as indicated by the tax key and has no relation to the Moiliili Triangle area.

The EIS also fails to note that all of the other projects listed are also not in the Moiliili Triangle area but across the street, i.e., makai of Kapiolani Boulevard and that all of these are zoned for A-3 Apartment use as compared to the A-2 zoning for the project site.

It would be appropriate for the EIS to show, i.e., list and map, projects within the Moiliili Triangle and their FARs for comparison with the proposed project. In particular, the EIS should show and map those projects which have been built recently makua of the proposed development.

A listing of recently constructed buildings would have relevance in the comparison of rents or sales prices as compared to the project.

Air Quality (Pages V-6 & 7)

The EIS shows projected carbon monoxide (CO) levels to exceed State standards initially but that by the year 2000 CO concentrations will be lower and will meet allowable State and Federal ambient air quality standards.

This reduction in carbon monoxide levels is based on reduction of auto emissions which were planned by EPA. However, whether this will happen is not assured, particularly with the pressure from auto makers to eliminate projected tightening of auto emission standards.

Noise Impacts (Page V-11)

The EIS only addresses temporary construction noise which will be generated on the project site.

Section III.d indicates that present air quality is acceptable for all regulated pollutants except carbon monoxide. CO comes from automobile exhaust. Excessive CO means excessive cars; which means excessive ambient noise levels generated by adjacent traffic.

Noise, however, is not addressed, though air quality has been addressed and sampling stations were set up for measurement of air pollutants.

The EIS should indicate what current ambient noise levels are; and what projected ambient noise levels will be. These noise levels should be related to what is recommended for the proposed use of the site--Ldn 55 for single-family residential use and Ldn 60 for multi-family use.

The EIS here indicated that, "The large vehicular traffic volume presently utilizing the intersection of Kapiolani, Date, and Kamoku Streets may result in some adverse noise impact on residents of the project." The EIS provides no quantification of this "adverse noise impact."

Drainage Alternatives (Page V-13)

Drainage alternatives should include alternatives of constructing drainage improvements along Date Street in the ewa direction from the project area to University Avenue. The discussion of alternatives should examine the probability as to whether the alternatives would be allowed.

Recreation Facilities (Page V-15)

It is indicated here that the developer is currently coordinating the circulation plan with the Department of Transportation Services and is negotiating with the Department of Public Works for the acquiring of the pump station site.

As indicated by the developers in their presentation to the Moiliili community on November 16, the pump station site is not under the jurisdiction of the Department of Public Works.

The EIS indicates another assumption--that the developer will have the proposed circulation plan accepted and will also acquire the pump station site.

There are specified procedures for the excessing and sale of surplus City-owned property, and there is no guarantee that the developer will be able to acquire the site.

There is no indication as to whether the developers have officially approached the Department of Parks and Recreation for release of the proposed mini-park site.

Traffic Impacts (Pages V-16 to 25)

Discussion of traffic impacts deals mainly with the Kapiolani-Date-Kamoku intersection. The impact of traffic exiting from the project during the AM peak to Date Street and its intersection with University Avenue should be discussed.

Aesthetics and Viewplanes (Pages V-25 & 27)

Discussion here deals with the view from Punchbowl and Round Top toward Diamond Head.

Views from other areas close to the project, particularly the view from Date Street, Diamond Head of the project, looking toward the project and the pedestrian points of view, are also important and should be discussed.

Use of Chapter 359G (Page IX-1)

As we indicated in our comments on the EIS preparation notice, the EIS should include discussion on whether 359G can be used for the project. Specifically, we asked that the EIS discuss the following:

1. What threshold of participation triggers the use of Chapter 359G for a project? Is this 10%, 5%, 1%, 1 unit?
We asked that an opinion from the Attorney General be provided. We feel that the appropriate time for this is now, not later.
2. What provisions can be preempted under Chapter 359G?
We provided the EIS consultant with an opinion from the City Corporation Counsel. Historical evidence indicates that Development Plan provisions are not to be exempted.

If the developer has historical background indicating the contrary, this information should be discussed in the EIS and presented to City Corporation Counsel for their review.

The applicability of Chapter 359G to this project is an unresolved issue and should be so indicated in the EIS (page X-1).

Park Dedication Requirements (Pages XII-7 & 9)

Calculations for the park dedication requirement are not provided. We feel that the statement in Exhibit B that "...the 'theoretical' project would meet open space requirements" (Section V-B, paragraph 3) is inaccurate and based on a false assumption.

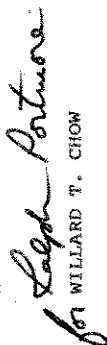
Ms. Letitia N. Uyehara
November 22, 1983
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Thank you for affording us the opportunity of reviewing the EIS. We hope that our comments will be adequately addressed in the interests of full disclosure of the impacts of the development on the site and surrounding area.

Sincerely,

CLARENCE TOM
Planner

APPROVED:


for WILLARD T. CHOW

cc: ✓Environmental Communications, Inc.
DPR
DLU

ENVIRONMENTAL
COMMUNICATIONS
INC.

J. J. RODRIGUEZ,
PRESIDENT

December 5, 1983

Mr. Willard T. Chow
Department of General Planning
City & County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Chow:

We are in receipt of your letter of November 22, 1983 on the Crystal Promenade Draft EIS and would respond to your comments in the following.

Accepting Authority

Due to the shift in thinking regarding project implementation, the acquisition of city lands will no longer be necessary. The intent now is not to acquire any city land. Therefore, the Governor is the accepting authority and not the Mayor.

Project Area

Figure 2. Site Plan has now been revised included in the Final EIS. As the plan indicates, the city-owned property originally presented in the Draft EIS has been deleted. We believe the Final EIS clearly shows what parcels are involved in the project, land ownership, and site area.

Parking

We hope you understand that the EIS provides figures regarding the actual amount of off-street parking required as called for in the CZC and the amount of parking that will be provided as part of the proposed action. We believe that Table 2, Provision of Parking Stalls, has been appropriately included in the EIS in the proper section (i.e. Section II, Project Description). This section of the report describe what the proposed action will provide, Table 12, off-street parking required according to CZC, has been included in Section V, Impacts. This portion of the report is more analytical in nature and details the assumptions utilized deriving project impacts. We therefore, believe that the manner in which the EIS is written is logical and is in no need of format-revision.

Affordability

The "affordability" of the units being proposed is a subjective matter in terms of who can afford to buy based on comparable units of similar size and project location. The applicant developer's position is that for comparable units, his plan is to approach the market on a competitive basis, using present sales of other projects as the base guide. These units are normally, without government

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subsidy and in some instances, have been developed prior to the current economic picture (higher interest rates). It is no secret that costs today are nowhere near 2-5 years ago for financing, construction, materials, and labor. The participation of the Hawaii Housing Authority does permit the development of this project to proceed due to the financial aid provided in return for the elderly units.

For your information, a comparison of sales prices have been included (Table 1).

Value of Exemptions and Waivers

As was previously stated, the revised intent of the project is not to acquire the pump station site. Therefore, there is insufficient land area available on-site to comply with the park dedication requirement. The applicant is currently exploring other means to ensure compliance with the ordinance. Please be assured that the park requirement will be satisfied.

Figure 2. Site Plan clearly shows the project boundaries and the specific parcels involved.

Again, as was previously stated, the use of City park lands will not be utilized to satisfy the park dedication requirement. We apologize for any misunderstandings.

For your information, the benefits associated with the project has been included (Table 2).

Soils

The site is comprised of Kawahapai clay loam and not filled land. The reference you make on "filled" land has been taken grossly out of context. In its proper context the reference made to "filled" land was meant to describe a process of site preparation. The term "filled" has been deleted.

Drainage

We understand that there is no drainage system serving the project site and that runoff is presently being handled via streets and gutters. The term "drainage system" in this context does not refer to specific drainage utilities or appurtenances, but rather the manner in which runoff is disposed.

Socioeconomic Characteristics

The only data available which we believe specifically relates to the project site is the "1980 Date/Citron Neighborhood Data Book." We do not know of any publication which provides census data for the Moiliili Triangle area. We agree that the 1980 census may provide more current data. However, it is our contention that the direct applicability of the data book census to the project more than offsets the negative trade-off.

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The purpose of an EIS is to disclose a specific project's impacts. Therefore, theoretically the document should provide as much information as possible. However, we are not certain what conclusions may be reached in regards to project impacts if information on Oahu's median income, median age, etc. is discussed. Please note that though this type of data was not presented in a specific section of the EIS, references were made to Oahu figures when they were appropriate.

Relationship to Development Plan

Density figures presented in the DP has now been included in the Final EIS in the appropriate section. Adequate discussions on the DP and zoning has been presented in the EIS.

Zoning

The area's allowable maximum density has been included in the EIS. The FAR figure indicated in the Draft EIS was erroneously presented. In actuality, the FAR for the proposed project is not 5.63, but is 4.7. Therefore, some of the comparable FARs shown in Table 5 are above Crystal Promenade's.

The reason why the EIS does not discuss projects makai of Kapiolani Boulevard and why we believe discussion of the projects in the Moiliili Triangle is inappropriate, is because these project represent a different market and are characterized by different unit types, amenity provisions, and costs. We also believe such analysis should be conducted not by the applicant, but rather by the appropriate government agency.

Air Quality

The EPA has planned to reduce auto emissions. Therefore, we anticipate it would be only a matter of time before implementation of the plan is to take place. We believe that your statement that this reduction may not take place is merely conjecture and has no sound basis. The EPA has made it publicly known of their intentions and we shall act accordingly.

Noise Impacts

A formal noise study was deemed unnecessary for the project due to the absence of government enforced regulations regarding noise control. Currently, regulations relate to generators of noise and not recipients. Therefore, the basis or need for such a study would prove meaningless. Further, it is our contention that if the project was to be built in accordance with current and allowable land use regulations the problem would still exist. Therefore, it seems that the need is not to measure excessive noise levels, but to attempt to mitigate its adverse effects. The applicant has stated that the elderly units, those units that would be located nearest to the ground level and which would be most negatively impacted by air pollution and noise will be provided with air conditioning; thereby, significantly reducing impacts resulting from air pollution and noise levels.

Mr. Willard T. Chow
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Drainage Alternatives

Drainage alternatives were examined by the retained engineer consultants, Engineers Surveyors Hawaii, Inc. It was their best recommendation that the alternatives discussed in the EIS would accommodate drainage runoff from the project. Be assured that the project will comply with all applicable government regulations and that the drainage plan will be submitted and reviewed by the Department of Public Works, upon finalization.

Recreation Facilities

As was previously discussed earlier in this letter, the intent now is not to acquire the public owned land. Therefore, there is insufficient land available on-site to comply with the park requirement. The applicant is currently exploring other means of complying with the requirement.

Traffic Impacts

The Traffic Impact Report discussed the probable impact at intersections which are judged to be critical. Observations of existing traffic conditions indicated that the Dale Street and University Avenue intersection operated well below its capacity and could be expected to continue to do so in the future.

Questions about the project's traffic impact at this location led to a reevaluation of the intersection. Estimates of future (year 1986) peak hour traffic volumes were made using available 1978 and 1983 traffic count data from other nearby intersections; analyses resulted in Levels of Service C, with or without the project, for both AM and PM peak hours. These results support the initial finding that the intersection would not be critically affected by the proposed project.

Aesthetics and Viewplanes

In regards to street level viewplanes, we believe that because a building structure is to be constructed, some views from at-grade points around the building will obviously be obstructed. However, as is presented in Figure 10, View Corridors, the proposed project is located within an area of several high-rise structures. Therefore, it is anticipated that views would be obstructed not only by the proposed project, but also by the existing structures found in the area and future developments which may be constructed at heights up to 150 feet.

Use of Chapter 359 G

1. The HHA has no pre-determined threshold of participation and reviews the merits of each individual project as it relates to Chapter 359 G. Note that the HHA does not become involved with all project proposals; however, as was determined in their screening process, this project did possess benefits which made it an attractive project for HHA.

Mr. Willard T. Chow
Page 5
December 5, 1983

It is HHA's contention that since enough "for sale" units would be sold at affordable prices, the need for an opinion from the Attorney General's Office is unwarranted and unnecessary.

2. The EIS clearly states what provisions could be preempted under Chapter 359 G. Regarding your mention of the historical evidence which indicates that the Development Plan provisions are not to be exempted, note that the HHA was involved previously with projects that would have been exempted by DP provisions. HHA has indicated that over 2000 units have been constructed due to Chapter 359 G. Of this total, more than half would have needed DP exemptions.

If the HHA feels that it is necessary to present this historical background to the Corporation Counsel for their review, it will be provided. The HHA will make a decision at a later time; therefore, this will be considered an unresolved issue.

Park Dedication Requirement

Regarding park dedication, may we suggest you read our response written earlier in this letter. You have commented several times on this one point and to respond to your comment again at this time would appear to be repetitious and redundant.

Thank you for your interests.

Very truly yours,



F. J. Rodriguez

FJR:is

Table 1
COMPARISON TABLE FOR SQUARE FOOT COSTS

1. 2500 Kapiolani			
Type Unit	Size S.F.	Sales Price	Per Sq. Ft. Cost
Studio	310	\$59,050	\$190
One Bedroom	500	\$84,150	\$168
2 Bedroom	780	\$113,500	\$146
2. Pali Park			
One Bedroom	702+116	\$104,000	\$148
Two Bedroom	920+162	\$133,500	\$145
3. Crystal Park			
One Bedroom	600	\$104,000	\$173
Two Bedroom	1000	\$162,000	\$162
Two Bedroom	944	\$138,750	\$147
4. Kapiolani Banyan			
Studio	401	\$74,000	\$185
One Bedroom	791+66	\$109,500	\$138.40
Two Bedroom	817	\$128,000	\$156.67
6. Ala Wai Plaza Skyrise			
One Bedroom	684+124	\$95,000	\$139
Two Bedroom	1226+234	\$199,500	\$163

MIS, November, 1983

TABLE 2

AVERAGE PRICE	NUMBER OF UNITS	SALES PRICE VALUE
<u>STUDIOS</u>		
Type A: \$62,300	92	\$5,731,600
Type B: \$67,225	90	\$6,050,250
Type C: \$73,300	6	\$439,800
<u>ONE BEDROOM:</u>		
Type A: \$89,125	96	\$8,556,000
<u>TWO BEDROOM:</u>		
Type A: \$121,275	30	\$3,638,250
Type B: \$117,850	60	\$7,071,000
Type C: \$139,850	30	\$4,195,500
Total Sales Value:	404	\$35,682,400
<u>Estimated Profit: Sales Value less Development Costs</u>		
		\$35,682,400
		-32,000,000
		\$3,682,400 Net Profit



STATE OF HAWAII
DEPARTMENT OF EDUCATION

P. O. BOX 2380
HONOLULU, HAWAII 96844

November 4, 1983

OFFICE OF THE SUPERINTENDENT

November 2, 1983

CS-10

Ms. Letitia Uyehara,
Interim Director
Office of Environmental Quality Control
550 Halekauwila St., Room 301
Honolulu, HI 96813

Ms. Letitia Uyehara, Interim Director
Office of Environmental Quality Control
550 Halekauwila Street, Room 301
Honolulu, Hawaii 96813

Dear Ms. Uyehara:

Subject: Crystal Promenade Condominium Project

We have reviewed the Environmental Impact Statement for the
subject condominium project and have no comment to offer at
this time.

Sincerely,

Donnis H. Thompson
DONNIS H. THOMPSON
Chief of Policy

cc: Environmental Communications, Inc.

SUBJECT: Crystal Promenade Condominium
Environmental Impact Statement

Our review of the subject EIS for the 452 rental and condominium project
indicates that the impact on student enrollment will be negligible at the
following schools.

SCHOOL	GRADE
Kuhio Elementary	K-6
Washington Intermediate	7-9
Kaimuki High	9-12

Should there be any questions, please contact Mr. Howard Lau at 737-5231.

Sincerely,

Donnis H. Thompson

DONNIS H. THOMPSON
Superintendent of Education

DHT:HL:J1

cc: Mr. James Edington
✓ Environmental Communications, Inc.
Honolulu District

NO RESPONSE NECESSARY

NOV - 7 1983

AN EQUAL OPPORTUNITY EMPLOYER

NOV - 9 1983

ENVIRONMENTAL
COMMUNICATIONS
INC.

F. J. RODRIGUEZ
PRESIDENT

GEORGE R. ARITOSH
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF HEALTH
P. O. BOX 3178
HONOLULU, HAWAII 96801

CHARLES G. CLARK
DIRECTOR OF HEALTH

In reply, please refer to:
EPHSD-915

December 5, 1983

Ms. Donnis H. Thompson
Superintendent of Education
Department of Education
P.O. Box 2360
Honolulu, Hawaii 96804

Dear Ms. Thompson:

We are in receipt of your letter of November 4, 1983 for the Crystal Promenade Condominium Project Draft EIS. We appreciate your indicating to us of the projects negligible impact on student enrollment.

Thank you for your continuing interests.

Very truly yours,

F. J. Rodriguez

F. J. Rodriguez

FJR:ls

MEMORANDUM

To: Ms. Letitia N. Uyehara, Interim Director
Office of Environmental Quality Control

From: Deputy Director for Environmental Health

Subject: Environmental Impact Statement (EIS) for Crystal Promenade Condominium,
Honolulu, Oahu

November 7, 1983

Thank you for allowing us to review and comment on the subject EIS. On the basis that the project will comply with all applicable Administrative Rules, please be informed that we do not have any objections to this project.

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: Environmental Communications, Inc.

Melvin R. Rodriguez
MELVIN R. RODRIGUEZ

NOV - 9 1983

ENVIRONMENTAL
COMMUNICATIONS
INC.

F. J. RODRIGUEZ,
PRESIDENT



GEORGE F. ARVOSER
Kent M. Keith
John Pingree
DEPT. OF PLANNING
AND ECONOMIC DEVELOPMENT

KANAKAHI BUILDING, 2ND FLOOR, 1500 KALANIL'ANI AVENUE, HONOLULU, HAWAII 96813

Ref. No. 8362

November 14, 1983

COPY

MEMORANDUM

TO: Ms. Letitia Uyehara, Interim Director
Office of Environmental Quality Control

FROM: Kent M. Keith, Director *Kent M. Keith*

SUBJECT: Crystal Promenade Condominium EIS, Mollili, Oahu

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

Relative to park space available in the area, figures should be provided on the amount of public park space currently available per resident in the Date/Citron area and changes, if any, as a result of the proposed project. Information should also be provided on the current density in the area and changes with the development of the proposed project.

Further, a letter on page XII-32 states that the housing units will have a 65-year lease. This fact should be included within the project description section of the EIS, page II-1.

Thank you for the opportunity to comment.

cc: Mr. Fred J. Rodriguez,
Environmental Communications, Inc.

December 5, 1983

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

Dear Mr. Koizumi:

We are in receipt of your letter of November 7, 1983 regarding the Crystal Promenade Condominium Project Draft EIS. We appreciate your informing us you have no objections to the project.

Please be assured that upon finalization of plans, your office would be allowed to impose future environmental restrictions, if necessary.

Thank you for your continuing interests.

Very truly yours,

F. J. Rodriguez

F. J. Rodriguez

FJR:ls

NOV 18 1983

1152 BISHOP BUILDING SUITE 407 • P.O. BOX 536 • HONOLULU HAWAII 96809 • TELEPHONE (808) 521-8341

ENVIRONMENTAL
COMMUNICATIONS
INC.

December 5, 1983

Mr. Kent Keith, Director
Department of Planning and
Economic Development
250 South King Street
Honolulu, Hawaii 96813

Dear Mr. Keith:

We are in receipt of your letter of November 14, 1983 regarding the Draft
EIS for the Crystal Promenade project.

The information requested by your office regarding the amount of public
park space currently available per resident in the Date/Citron area was brought
to the attention of the City Department of Parks & Recreation. We were informed
by the Department, that determination of service area for parks in the general
vicinity would require an in-depth study, which would take some time to com-
plete. We are therefore, unable to provide you with your figures, since the
basic assumptions and data can not be provided to us.

The project site is located within the Development Plan for the Primary
Urban Center and is designated Medium Density (90 dwelling units per net
acre), with a maximum height of 150 feet. The project design is inconsistent
with the density and height limitations defined for the area.

Reference to the 65-year lease on housing units will be included in the
Final EIS.

Thank you for your comments.

Very truly yours,



F. J. Rodriguez

FJR:is



University of Hawaii at Manoa

Environmental Center
Crawford 317 • 2550 Campus Road
Honolulu, Hawaii 96822
Telephone (808) 948-7381

November 17, 1983

RE:0393

Ms. Letitia Uyebara, Interim Director
Office of Environmental Quality Control
550 Halekauwila Street
Honolulu, Hawaii 96813

Dear Ms. Uyebara:

Draft Environmental Impact Statement
Crystal Promenade Condominium
Molili, Honolulu, Oahu

The proposed condominium to which the EIS pertains is a combined development
project with the State of Hawaii Housing Authority (HHHA) and the developer, BAL Corporation.
As proposed, the developer will offer approximately 10 percent of the units (48) to HHHA
to house elderly citizens and will donate \$100,000 to a community group which would
utilize the income earned from the contribution to assist "the elderly and displaced renters
find adequate housing" (page 11-8). In return, it is proposed that the City Council exempt
the project from county regulations pursuant to the provisions of Chapter 359G, HRS.
Significant impacts resulting from this development will include: blocking viewplanes,
increased traffic and resulting increased air pollution. Social concerns and potential
seismic hazards have also been called to our attention.

This Environmental Center review was prepared with the assistance of Joseph Morgan,
Geography; Augustine Furumoto, Hawaii Institute of Geophysics; Jacquelin Miller and
Mark Ingoglia, Environmental Center. The following comments are offered for your consideration.

Aesthetics and View Planes

The DEIS suggests that since viewplanes are already disturbed by other structures
the condominium will have little effect on aesthetics and viewplanes (page V-27). This
conclusion seems particularly insensitive to social and environmental concerns. The argument
that "viewplanes from mauka perspectives are already impacted due to the existence
of buildings" and hence by implication that "one more won't make any difference" does
little to provide the substantive rationale necessary for decisions that will permit deviations
from regulations developed on the basis of overall optimum community planning design.
Furthermore, the DEIS analyzes only the impacts to the viewplane from Punchbowl and
Roundtop (page V-28). The impact of the proposed condominium on the viewplanes from
the Ala Wai Canal and other makai areas should be addressed in the Revised EIS. Mountain
views are equally important to makai residents as well as the tourist populations, and
the impact of the structure on these views needs to be considered.

AN EQUAL OPPORTUNITY EMPLOYER

NOV 23 1983

Mrs. Letitia Uyehara

-2-

November 17, 1983

Traffic and Air Pollution

As indicated in the DEIS, traffic impacts around the proposed condominium site will be significant. The design capacity of the street, (Appendix D, page 10) will be exceeded during AM peak hours and at the maximum capacities during the PM peak hours. In turn, this will place greater stress on general Honolulu traffic flow. The increase in traffic and resultant congestion will produce an increase in carbon monoxide emissions to the extent that State Ambient Air Quality Standards will be exceeded during peak hours for the next 20 years (page V-7). The potential health hazard of this pollutant, especially to the elderly living on the lower floors where the CO concentrations will be most likely to impact, should be discussed in the Revised EIS.

Social concerns

The DEIS indicates that three other proposals requesting variances to density and height limitations in this area are presently under consideration by the City Council. Inasmuch as this project could be considered as establishing a precedent for further relaxation of zoning controls, a discussion of the effects of the requested variance on modifications to zoning regulations in the community seems appropriate for inclusion in the revised EIS.

Seismic Hazard

There is no indication in the DEIS that seismic hazard considerations have been taken into account in the design of the structure and foundations of the proposed building structure, a very tall, slender building. It should be noted that although Oahu has been designated seismic Zone 1 (minimal seismic activity), this designation has been challenged by some seismologists who consider that Zone 2 designation is appropriate.

Yours truly,

Doak C. Cox
Doak C. Cox
Director

cc: Environmental Communications
Joseph Morgan
Augustine Furumoto
Jacquelin Miller
Mark Ingoglia

ENVIRONMENTAL
COMMUNICATIONS
INC.

December 5, 1983

J. RODRIGUEZ
PRESIDENT

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

Dear Dr. Cox:

Thank you for your comments on the proposed Crystal Promenade Condominium Project. We are responding to your comments in the following:

1. **Aesthetics and View Planes** We regret that the Environmental Center did not completely grasp the intent of the statement "viewplanes from mauka perspectives are already impacted due to the existence of buildings." This analysis was done to respond to the Department of Land Utilization's concerns that from the Punchbowl Scenic District, this proposed project at 350' height, would not create a significant impact on that particular viewplane perspective. We would disagree with the Center's comment "does little to provide the substantive rationale necessary for decisions that will permit deviations from regulations developed on the basis of overall optimum community planning design." Our disagreement is based on the existing availability of development in accordance with underlying zoning and Development Plan guidelines that would permit design and construction of a project up to 150' and with a density consistent with the prevailing zoning. Aesthetic impacts of the type described in your comments would still be a consideration, but would not be subject to review since the project would be in compliance with land use policies. The proposed project is in conflict with prevailing land use policies, but seeks exemption in return for economic benefits to both elderly tenants and first time buyers.

Regarding viewplanes in a mauka direction, obstruction of these viewplanes is unavoidable since the development of parcels of land consistent with zoning and Development Plan Guidelines permit this to occur. While this is detrimental to existing buildings and their occupants, there is still the right of the landowner to develop his parcel consistent with land use policies that prevail. These policies have had review and public input during the Development Plan for the Primary Urban Center and approval from the legislative branch of government.

2. **Traffic and Air Pollution:** Thorough discussions on Traffic and Air Pollution are contained in specific technical studies contained in Appendix C&D. In terms of air pollution impacts, Barry D. Root developed a carbon monoxide diffusion model using the traffic data provided by the traffic consultant. He states in his summary the following: "Traffic generated by the project will increase emissions of carbon monoxide in

Dr. Doak C. Cox
Page 2
December 5, 1983

the project area. Computer modeling of carbon monoxide levels after project construction indicate that the State of Hawaii standards for pollutant are likely to be exceeded under worst case traffic and meteorological conditions in the years immediately following construction, but by the year 2003 carbon monoxide concentrations are predicted to be within allowable State and Federal Ambient Air Quality Standards." In view of the concerns expressed by your review, the applicant now will provide individual air conditioning units which can alleviate both air pollution as well as noise impacts.

3. Social Concerns: The variance requests that are being made on behalf of this project under the auspices of the Hawaii Housing Authority's participation should not confuse the basic issue of zoning controls as provided for in the Comprehensive Zoning Code. The other projects described as being under consideration by the City Council are not Chapter 359 G type projects and do not have the comparable ability to request these variances as Crystal Promenade since Chapter 359 G participation is specific in what can or cannot be done. The City administration is extremely responsive to the problem of variance requests and what is permissible under prevailing zoning or Development Plans. We do not see this project's implementation under the aegis of Chapter 359 G as being the causal factor in modifying or relaxing prevailing zoning requirements and conditions.

4. Seismic Hazard: We feel that the discussions on seismic hazards for this project are at best premature since it is not conclusive as to the final building configuration, height, building mass, or density. We concur that these are real and valid concerns despite the designation of Oahu as seismic zone 1.

Thank you for your comments and continuing concerns.

Very truly yours,



F. J. Rodriguez

FJR:ls

GEORGE R. ARYDSHI
GOVERNOR



Letitia N. Uyehara
Interim Director
TELEPHONE NO.
548-6915

STATE OF HAWAII
OFFICE OF ENVIRONMENTAL QUALITY CONTROL
550 HALEAKALANUI ST.
ROOM 301
HONOLULU, HAWAII 96813

November 22, 1983

Mr. Fred Rodriguez
Environmental Communications, Inc.
P.O. Box 536
Honolulu, Hawaii 96809

Dear Mr. Rodriguez:

Subject: Crystal Promenade Condominium

We have reviewed this EIS and offer the following comments:

- 1) Traffic -- Traffic access and traffic flow is a major problem that is largely unresolved. Since this project is on the corner of a six-way intersection it is bound to cause major complications in traffic flow. Another major problem is that it appears to be easier to leave the project than to gain access to the project. Access to the project is almost impossible with the current traffic pattern. These two problems should be resolved in the final EIS since it will significantly affect many people.

NOV 25 1983

Mr. Fred Rodriguez
November 23, 1983
Page 2

F. J. RODRIGUEZ
PRESIDENT

ENVIRONMENTAL
COMMUNICATIONS
INC.

- 2) Water Quality -- While the water quality in Ala Wai Canal does not meet state standards, the Crystal Promenade Condominium will compound an already deteriorated water quality situation. Drainage for the project should still be installed. The do nothing alternative would be unacceptable.

Thank you for the providing us with the opportunity to comment.

Sincerely,

Letitia N. Uyehara

Letitia N. Uyehara
Interim Director

December 5, 1983

Ms. Letitia Uyehara
Interim Director
Office of Environmental Quality
Control
550 Halekauwila Street, #301
Honolulu, Hawaii 96813

Dear Ms. Uyehara:

Thank you for your comments on the proposed Crystal Promenade condominium project. We are responding to your comments in the following:

1. Traffic: The Traffic Impact Study by Parsons Brinckerhoff Quade & Douglas, Inc. addresses existing and future traffic conditions and identified the expected traffic impact of the proposed project. We recognize that existing traffic circulation will be affected by the proposed project and have considered alternatives for access which would minimize adverse impacts to the major flows. An example of this is the provision for only right turn movements at the Kapiolani Boulevard driveway.

Access to the site, however, is affected by this restriction. We agree with your observation that leaving the site would be easier than entering; however, because of the urban setting of the project and the many alternative routes available, access is possible. Some minor changes in route selection may be necessary but we do not consider these unreasonable.

The Traffic Study evaluated three access alternates, found that two of them would minimize adverse traffic impacts, and recommended these two equally. Other considerations which have been discussed in the DEIS review process will resolve which access alternate will be selected for the proposed project. This selection will be indicated in the FEIS.

2. Water Quality: Crystal Promenade does not intend to develop its' building without any provisions for drainage. If this was the understanding of OEQOC, we must hasten to correct that misunderstanding. We are providing a copy of a letter from Engineers-Surveyors Hawaii, Inc. that addresses the problems of drainage and other utilities. The "Do Nothing" was

Ms. Letitia Uyehara
Page 2
December 5, 1983

not exactly as stated; the cheapest alternate available was to do nothing and wait until the Moiliili Triangle improvements are constructed, not do nothing. We hope that this misunderstanding has been corrected.

Thank you for your continuing interest.

Very truly yours,

F. J. Rodriguez

F. J. Rodriguez

FJR:ls



WILLIAM B.C. HEE, P.E.
PRESIDENT
JERRY S. NAKAGAWA, L.S.
EXECUTIVE VICE PRESIDENT

SUITE NO. 1
BUILDING NO. 4
1020 ALAHI STREET
HONOLULU, HAWAII 96814
(808) 531-3116 (HONOLULU)
(808) 865-4590 (KAMUELA)

MEMORANDUM

Date: September 8, 1983
To: Fred Rodriguez
Environmental Communications Co.
From: William Hee
Engineers Surveyors Hawaii, Inc. *W.H.*
Subject: CRYSTAL PROMENADE UTILITY SERVICE

STORM DRAINAGE

At your request we had researched the storm water disposal system, available to this project in the Moiliili Triangle area. There are four options available to the developer;

1. Is to put in a drain intake and extend a new drain line, diagonally across the large intersection of Kapiolani, Kamoku and Date Street into a reinforced concrete box culvert on Date Street.
2. Construct a new storm drainage intake and piping system along Kapiolani Boulevard over to the University Avenue box drain.
3. Construct an intake and piping network, up to Kaaha Street then on to University Avenue connecting to the University Avenue box drain.
4. Do nothing.

The cheapest alternate available is to do nothing and wait until the Moiliili Triangle improvements are constructed. This will result in having a nuisance after minor storms of some light shallow puddling until the water can percolate into the ground. The improvements in the area would occur when the inner-connecting pipe on Kaaha Street is completed.

If it is not prudent to tolerate this minor puddling, the next most economical alternative is number 2, constructing an intake and piping system along Kapiolani Boulevard to the University

MEMORANDUM TO MR. FRED RODRIGUEZ
 SEPTEMBER 8, 1983
 PAGE 2

Avenue drain. The disadvantage of this alternative is the disruption to the heavy traffic on Kapiolani Boulevard during construction. And the other two alternatives are significantly more expensive and at this time would not be prudent to pursue.

WATER

The Board of Water Supply by letter, has confirmed availability of water to this building. No lateral size or meter size has yet been indicated. The construction plans need be prepared to determine the fixture unit count, as well as the average daily demand at that time, it is a routine matter for the selection of which main in Kapiolani or Kamoku Streets will be tapped for the water service connection.

SEWER

By letter, the Division of Sewers has approved a sewer connection setting forth both location and lateral size for this project. Copies of these letters have been forwarded to your office earlier.

William Hee



University of Hawaii at Manoa

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

19 November 1983

Ms. Letitia Uyehara, Interim Director
 Office of Environmental Quality Control
 550 Halekauwila St., Room 301
 Honolulu, Hawaii 96813

Dear Ms. Uyehara:

SUBJECT: Draft Environmental Impact Statement for the Proposed Crystal Promenade Development, Moiliili, Oahu. October 1983

We have reviewed the subject DEIS and offer the following comment. Page III-1, B. 2. Wind. It is stated that the prevailing northeasterly trade-winds occur 90% of the year. In actuality, 90% tradewind occurrence is in the summer, and 50% during the winter. So for the whole year, tradewind occurrence is about 70%, $(90+50 \div 2 = 70\%)$.

Sincerely,

Edwin T. Murabayashi
 Edwin T. Murabayashi
 EIS Coordinator

ETH:jm

cc: Env. Communications

AN EQUAL OPPORTUNITY EMPLOYER

NOV 30 1983

ENVIRONMENTAL
COMMUNICATIONS
INC.

F. J. RODRIGUEZ
PRESIDENT

GEORGE R. ARYOSHI
GOVERNOR



STATE OF HAWAII
DEPARTMENT OF DEFENSE
OFFICE OF THE ADJUTANT GENERAL
3848 DIAMOND HEAD ROAD, HONOLULU, HAWAII 96818

ALEXIS T. LUM
ADJUTANT GENERAL
DANIEL K. C. AU
COLONEL
DEPUTY ADJUTANT GENERAL

HIENG

26 OCT 1983

December 5, 1983

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

Dear Mr. Murabayashi:

We are in receipt of your letter dated November 19, 1983, but received in our office on November 30, 1983 regarding the Crystal Promenade Draft EIS.

The comment you provided on tradewind occurrence will be included in the Final EIS.

Thank you for your concerns.

Yours very truly,

F. J. Rodriguez

F. J. Rodriguez

FJR:ls

Ms. Letitia N. Uyehara
Interim Director
Office of Environmental Quality Control
550 Halekauwila Street, Room 301
Honolulu, Hawaii 96813

Dear Ms. Uyehara:

Crystal Promenade Condominium

Thank you for providing us the opportunity to review the above subject project Environmental Impact Statement.

We have completed our review and have no comments to offer at this time.

Yours truly,

Jerry M. Matsuda

JERRY M. MATSUDA
Major, HANG
Contr & Engr Officer

cc: ✓ Env. Communications, Inc.
Env Quality Commission w/EIS

NO RESPONSE NECESSARY

1152 BISHOP BUILDING SUITE 407 • P. O. BOX 536 • HONOLULU, HAWAII 96809 • TELEPHONE (808) 571-8391

OCT 28 1983



GEORGE B. ARYOSHII
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

Mailing Address:
P. O. Box 22159
Honolulu, Hawaii 96822

October 27, 1983

MEMORANDUM

To: Ms. Letitia Uyehara, Interim Director
Office of Environmental Quality Control

Subject: Environmental Impact Statement
Crystal Promenade Condominium
THK: 2-7-15: 1,2,30 Molokai, Oahu

The Department of Agriculture has reviewed the subject petition and does not have any comments to offer. The document is being returned for your further use.

Thank you for the opportunity to comment.

Encl.

cc: Environmental Communications, Inc.

NO RESPONSE NECESSARY

"Support Hawaiian Agricultural Products"

OCT 31 1983

NOV 3 1983

Ms. Letitia Uyehara
Interim Director
Office of Environmental Quality
Control
550 Halekauwila Street, Room 301
Honolulu, Hawaii 96813

Dear Ms. Uyehara:

Subject: Crystal Promenade Condominium
Environmental Impact Statement

We have reviewed the subject environmental impact statement and have no comments to offer.

Thank you for the opportunity to review the subject environmental impact statement.

Very truly yours,

[Signature]
RIKIO NISHIOKA
State Public Works Engineer

H1a:jl
cc: Environmental Communications, Inc.

NO RESPONSE NECESSARY

NOV - 4 1983



United States Department of the Interior

FISH AND WILDLIFE SERVICE

300 ALA MOANA BOULEVARD
P.O. BOX 50167
HONOLULU, HAWAII 96850

IN REPLY REFER TO:

ES
ROOM 6307

OCT 28 1983

Ms. Letitia Uyehara
Interim Director
Office of Environmental Quality Control
550 Hukilauville Street, Room 301
Honolulu, Hawaii 96813

Re: EIS, Crystal Promenade
Condominium, Moiliili, Oahu

Dear Ms. Uyehara:

Due to current manpower 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 Division of Forestry and Wildlife 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 R. Kramer
Project Leader
Office of Environmental Services

cc: Environmental Communications, Inc. ✓
BIES - WFO
BDR
OGE&C
EPA, San Francisco

OCT 31 1983

ENVIRONMENTAL
COMMUNICATIONS
INC.

F. J. RODRIGUEZ
PRESIDENT

December 5, 1983

Mr. William R. Kramer
Project Leader
Office of Environmental Services
United States Department of the
Interior
Fish and Wildlife Service
P.O. Box 50167
Honolulu, Hawaii 96850

Dear Mr. Kramer:

We are in receipt of your letter of October 28, 1983 regarding the Crystal Promenade Project. Please be assured that the EIS will address wildlife and other fauna species being impacted by the project. We welcome your review of any future actions related to this project and will keep your office apprised of the project's status.

Thank you for your interests.

Very truly yours,

F. J. Rodriguez

F. J. Rodriguez

FJR:ls

1152 KICKAPPO BUILDING SUITE 407 • P.O. BOX 538 • HONOLULU HAWAII 96809 • TELEPHONE (808) 521-8381



DEPARTMENT OF THE AIR FORCE
HEADQUARTERS 15TH AIR BASE WING (PACAF)
5000 RANDOLPH DRIVE, HONOLULU, HI 96809

REPLY TO
ATTN OF

DEEV (Mr Yamada, 449-1831)

28 OCT 1983

SUBJECT: Environmental Impact Statement for the Crystal Promenade Condominium

TO: Ms Letitia Uyehara, Interim Director
Office of Environmental Quality Control
550 Halekauwila 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 EIS is returned for your file.

Shozo Kimura
SHOZO KIMURA

Acting Chief, Engrg & Envtl Png Div
Directorate of Civil Engineering

1 Atch
EIS

cc: Environmental Communications, Inc. w/ Atch
P. O. Box 536
Honolulu, HI 96809

NO RESPONSE NECESSARY

NOV - 2 1983



HEADQUARTERS
NAVAL BASE PEARL HARBOR
BOX 110
PEARL HARBOR, HAWAII 96860

IN REPLY REFER TO:
002B:WKL:jam
Ser 2340

1 NOV 1983

Ms. Letitia Uyehara, Interim Director
Office of Environmental Quality Control
550 Halekauwila Street, Room 301
Honolulu, Hawaii 96813

Dear Ms. Uyehara:

Environmental Impact Statement
Crystal Promenade Condominium

The EIS for the Crystal Promenade Condominium has been reviewed and the Navy has no comments to offer. As this command has no further use for the EIS, the EIS is being returned to the Environmental Quality Commission, by copy of this letter.

Thank you for the opportunity to review the EIS.

Sincerely,

M. M. DALLAM
M. M. DALLAM
CAPTAIN, CEC, U. S. NAVY
FACILITIES ENGINEER
BY DIRECTION OF THE COMMANDER

Enclosure

Copy to:
Environmental Communications, Inc.
Environmental Quality Commission

NO RESPONSE NECESSARY

NOV - 3 1983

US Department
of Transportation
United States
Coast Guard



Commander (Jg1)
Fourteenth Coast Guard District

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

11000

Serial 612
02 NOV 1983


Ms. Letitia Uyehara, Interim Director
Office of Environmental Quality Control
550 Halekauwila Street, Room 301
Honolulu, Hawaii 96813

Dear Ms. Uyehara:

The Fourteenth Coast Guard District has reviewed the EIS
for the Crystal Promenade Condominium and has no objection
or constructive comments to offer at the present time.

NO RESPONSE NECESSARY

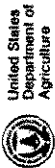
Sincerely,


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

Commander, Fourteenth Coast Guard District
Copy to: Environmental Communications, Inc., Honolulu

NOV - 7 1983

COPY



United States
Department of
Agriculture

Soil
Conservation
Service
P.O. Box 50004
Honolulu, Hawaii
96850

November 16, 1983

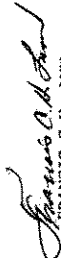
Ms. Letitia N. Uyehara, Interim Director
Office of Environmental Quality Control
550 Halekauwila Street, Room 301
Honolulu, HI 96813

Dear Ms. Uyehara:

Subject: Environmental Impact Statement for the Proposed Crystal
Promenade Condominium Development, Moiliili, Oahu, HI
We have reviewed the subject environmental impact statement and have
no comments to make.

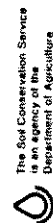
Thank you for the opportunity to review the document.

Sincerely,


FRANCIS C.H. LUM
State Conservationist

cc: Environmental Communications, Inc. ✓
P.O. Box 536
Honolulu, HI 96809

NO RESPONSE NECESSARY



NOV 18 1983

McCULLY/MOILIILI NEIGHBORHOOD BOARD NO. 8

c/o McCULLY/MOILIILI LIBRARY
2215 SOUTH KING STREET
HONOLULU, HAWAII 96826



November 21, 1983

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

Gentlemen:

Subject: Environmental Impact Statement - Proposed Crystal Promenade
Condominium Development

We appreciate the opportunity to address some of our concerns. In general, the above proposed project appears to have a significant adverse impact on the environment of this site that is not adequately mitigated. The community considers the following alternatives to the proposed action to be more appropriate:

- A. Development as allowed by current zoning
- B. No-action
- C. Other site.

In fact, the EIS does not adequately address these concerns:

Traffic

Information from Traffic Impact Study (Appendix D) demonstrates that the project will have a significant adverse impact on both local and regional traffic. Access Alternatives B and C predict that 210 to 215 cars will enter Date Street from Kamoku Street during the a.m. peak. This would increase the estimated volume of about 1,000 cars travelling east on Date Street at the Kamoku Street exit by 20 percent. Further, cars entering the project from Kapiolani Boulevard during the p.m. peak would increase the estimated 895 cars travelling east on Kapiolani at the project entrance by 19.5 percent. We believe that these are significant increases that will endanger the mental and physical health of the community.

- a. Please reference the traffic analysis to City, State, and OMPD estimates of traffic at this location at the proposed completion and occupation of the project in 1986.
- b. The analysis of the effect of the new on-ramp at Kapiolani Boulevard on the project site and traffic is deficient. Page V-17 states "No significant change in Kapiolani Boulevard traffic volume is expected" and is certainly premature. We suggest that a new analysis be performed that includes actual vehicle counts and time delays generated by the on-ramp.

Environmental Quality Commission
November 21, 1983
Page 2

- c. Analysis used in Alternatives B and C does not adequately examine the effect on the University Avenue/Date Street intersection by the 210 to 215 vehicles entering Date Street from Kamoku Street during the a.m. peak.
- d. Alternative A adequately addresses the significant impacts of access on internal streets of the Moiliili Triangle but similar analysis for Alternatives B and C are clearly deficient. For example, statements on page V-25 and others do not substantiate conclusions that many project residents returning from the Ala Moana and Downtown direction will not use these internal streets rather than take the longer way around.
- e. Is Alternative B or C the preferred alternative?
- f. Analysis of the impact of the project on existing available on-street parking is empirically deficient. The Board recognizes that the project would meet the parking requirements of the City's Comprehensive Zoning Code (CZC) but also acknowledges that in practice, high-rise condominiums tend to have a "multiplier-effect" that increases the demand for on-street parking in the vicinity. With regard to the Crystal Promenade, the Board cannot accept any study that does not evaluate this "multiplier effect" given the existing scarcity of on-street parking spaces in the project area caused by lack of curbing, defined spaces, driveways, and other features that will not alter before the project's completion.

Zoning and Planning

The proposed project is an obvious deviation from the Primary Urban Center Development Plan which stipulates that growth for McCully/Moiliili should be "limited to the development of medium-density apartments in combination with commercial and mixed use developments along major transportation corridors." In order to achieve these goals for the community, a 150 foot height limit and an A-2 zoning designation are set in the area of the proposed project.

- a. The Board disagrees with the EIS's contention that the project would not establish a precedent or contribute to a trend of waivers of height and density standards. How is this contention substantiated?
- b. Appendix B, "Benefits" gives a partial explanation of how the \$3 million savings to the developer are supposed to equal in value the 48 elderly rent subsidized units which will be deemed to HHA. Yet we would still like to know how a 135 percent increase in the allowed Floor Area Ratio (based on a 4.4 factor) and 133 percent increase in height can be fully justified in terms of return in investment to the developer's dollar versus return on investments to the taxpayer's dollar. The substantial Development Plan and zoning exemptions requested warrant further and more thorough justification to inform the public on what is being proposed as an "Affordable Housing Project."

NOV 28 1983

- c. With regard to park dedication requirements, please discuss the implications and costs incurred in the developer's proposed acquisition of the pumping station corner lot (shown in Figure 2, Page II-3, Site Plan). If this proposed acquisition is determined to be feasible, how will it affect the anticipated savings from the partial park dedication waiver currently being sought?
- d. You are well aware of the evolution of the currently adopted Primary Urban Center Development Plan, in which the McCully/Moiliili residents fought long and hard for a 40-foot height limit for their area. However, as a compromise, 150 feet was decided on by the city as the height limit. This of course meant that the residents accepted that the growth pattern would be of "medium density" to help accommodate current and future housing needs on Oahu and that government would adequately regulate this policy. Further elaboration on the social impact that acceptance of the project may generate regarding social unrest caused by loss of faith in City and State government practices is necessary.

Elderly Clientele

The Board acknowledges the intent of Hawaii Housing Authority and the BAH Corporation to relieve the shortage of "affordable housing" and realizes that the only way to implement this intent will be through thorough communication and cooperation between government decision-makers, agencies, developers and the community. Further, the Board at the public meeting of November 16, 1983 was pleased to hear Mr. Edwards describe HHA's monetary provision for individual air conditioners and other amenities for the elderly rental units. Further clarification is desired regarding this and other matters affecting health and safety:

- a. The social and health impacts resulting from the proximity of elderly housing units' windows to the six-story parking structure is inadequately researched. Specifically, the Board is concerned about the effects of noise and wind-borne pollutants originating in the parking area on the residents' health.
- b. Because of the project's location in a relatively high crime area and accommodation of the elderly on the lower floors, the Board feels that security measures incorporating door and elevator keys are insufficient. Further verbal and graphic description and analysis of architectural design features such as lighting, landscaping, and fields of view that might enhance security are requested.
- c. The relatively small size of some of the units indicates that on-site passive and active recreational facilities be developed to a greater degree than suggested in the EIS for the health and welfare of the residents. Space on the roof of the parking structure might be landscaped and used for this purpose.

Miscellaneous Concerns

We are including as attachments for your information:

- Letter to Councilmember Leigh-Wai Doo from Board of Directors, Terrace Towers, 2440 Date Street
- Letter to Councilmember Leigh-Wai Doo from Board of Directors, Regency Towers, 2525 Date Street
- The following summary of our rationale in determining the project's benefits and costs to the community:

GROUP	COST	BENEFIT
1. McCully-Moiliili Community	<ul style="list-style-type: none"> Density-4 x allowable Height-2.33 x allowable Traffic-increased sonic and visual pollution Undesirable precedent 	<ul style="list-style-type: none"> An unknown proportion of 48 elderly housing units
2. Elderly low income target group		<ul style="list-style-type: none"> Donation by developer of \$200,000 to a community
3. Developer	<ul style="list-style-type: none"> Estimated \$31,200,000 investment 	<ul style="list-style-type: none"> 48 subsidized housing units Return - \$39,326,000* Net Profit - \$8,126,000 Rate of Return - 26%

* Note: Return was determined by following method:

	No. of units	Average selling Price	Total Sales Price
STUDIOS :	190	x \$ 66,210	= \$12,579,900
1-BEDROOM:	94	x \$ 89,325	= \$ 8,396,550
2-BEDROOM:	120	x \$128,875	= \$15,465,000
			\$39,326,000

Sincerely,

Katherine Nakata
Katherine Nakata, Chair
Physical Planning Committee
Mary Jane McMurdo
Mary Jane McMurdo
Chairman

cc: Mr. Fred Rodrigues,
Environmental Communications Inc.
Councilmember Leigh-Wai Doo
Councilmember Marilyn Bornhorst
Neighborhood Board Members

Association of Apartment Owners
2525 Date Street
Honolulu, Hawaii 96826

26 October 1983

Honorable Leigh-Wai Doo
Councilman
City Council
City & County of Honolulu
Honolulu Hale
Honolulu, Hawaii 96813

Dear Councilman Doo,

It was with great consternation that the Board of Directors of Regency Tower received the information of the proposed BAL Corporation's Crystal Promenade development for the corner of Kapiolani Blvd. and Date St. The board was presented with the information at our regular monthly meeting, and, at that time, was also provided a copy of a letter addressed to you from the Terrace Towers Board of Directors. That letter reflects our viewpoint precisely.

I am attaching a copy of the letter from Terrace Towers in the understanding that the Regency Tower Board of Directors endorses its contents completely.

On behalf of the board, I can only emphasize that the proposed structure would overwhelm in every imaginable way the site, the 5-way street intersection, the surrounding neighbors and the neighborhood in general. The Regency Tower board requests that you give the matter careful study and vote against any waivers that would permit any construction that is not in the medium-rise, medium density design.

Sincerely,

Lindy Boyes (Miss)
President
Board of Directors
Regency Tower

cc: Board of Directors,
McCully/Moiliili Neighborhood Board #8

October 5, 1983

Honorable Leigh-Wai Doo
Councilman
City Council
City & County of Honolulu
Honolulu, HI 96813

Dear Councilman Doo:

At our last regular meeting held on Monday, October 23rd, the Board of Directors of the Terrace Towers Condominium, 2440 Date Street, Honolulu, unanimously resolved to oppose the location of the BAL Corporation's proposed Crystal Promenade development for the following reasons:

- 1) We would prefer that building heights in this residential area be maintained at 4 stories or less. We are quite reluctant to agree to a 150 foot height limitation as allowed by the present Development plan. We are quite against any proposal to allow more than 150 feet as we feel that this would completely destroy the atmosphere of our neighborhood. We also agreed that to allow any exceptions would take away our ability for refusing requests for similar developments in the future.
- 2) We feel that the neighborhood is already suffering from a density problem, which is evidenced by the high demand for on-street parking in the area, and the City government should consider this before granting any waivers in density limitations or floor area ratios in our neighborhood.
- 3) Although we appreciate the efforts of the Hawaii Housing Authority in providing adequate housing for our elderly, we do not feel that proposed Crystal Promenade location lends itself to this type of resident. The nearest shopping center is several blocks away and the development would be located at the intersection of two very noisy, heavily traveled streets. In addition, there are no nearby parks or other recreational facilities for elderly people and it is our understanding that no such facilities would be included in the project.

Honorable Leigh Wai Boo
October 5, 1983
Page 11

J. RODRIGUEZ
PRESIDENT

ENVIRONMENTAL
COMMUNICATIONS
INC.

December 5, 1983

We urge you to vote against any waivers that would allow this project to be constructed in our neighborhood as proposed. We would be happy to have you meet with the residents of Terrace Towers to discuss this issue in greater detail if you desire.

Very truly yours,

Michael R. Miller
Michael R. Miller
President
Board of Directors
Terrace Towers
2440 Date St., #101
Honolulu, HI 96826
941-7343

cc: Board of Directors
McCully/Moiliili Neighborhood Board #8

Ms. Katherine Nakata, Chairperson
Physical Planning Committee
McCully/Moiliili Neighborhood
Board No. 8
C/O McCully-Moiliili Library
2211 South King Street
Honolulu, Hawaii 96826

Dear Ms. Nakata:

We are in receipt of your letter of November 21, 1983 on the Crystal Promenade Draft EIS and would respond to your comments in the following:

Traffic

- a. Traffic estimates used in the Traffic Impact Study were based on field counts of traffic volumes. Agency estimates from computer modeling (OMPO, City) of future traffic volumes are made for "screenline" or regional analyses and should not be used for specific corridors; hence, were not used in this analysis. The latest State Department of Transportation (SDOT) estimates for specific state highway projects were made in 1977 and 1978 and reflect "design year networks," i.e., expected year 2000 conditions, and do not reflect peak hour counting on Kapiolani Boulevard. A comparison of the 1983 traffic counts and a straight-line interpolation of SDOT estimates is shown below. Use of the SDOT projection would not adequately address the proposed project's traffic impact.

Kapiolani Boulevard Traffic		May 1983 Count		Interpolation for 1983	
Location relative to Date St:		west	east	west	east
AM Peak Hour	WB	2552	2040	2510	1270
	EB	394	237	578	1600
PM Peak Hour	WB	1014	851	899	1270
	EB	1711	1063	1905	1700

- b. The Traffic Impact Study was prepared prior to the opening of the on-ramp from Kapiolani Boulevard to the H-1 Freeway. The best available information was used to predict possible effects of the on-ramp. Further studies would have to be taken in December 1983 or January 1984 to obtain reasonable results. The original study's findings that existing traffic exceeds calculated capacities are not expected to be altered by the additional data; the resulting delay cannot be justified since no change in the findings is expected.

- c. The Traffic Impact Report discussed the probable impacts at intersections which were judged to be critical. Observations of existing traffic conditions indicated that the Date Street and University Avenue intersection operated well below its capacity and could be expected to continue to do so in the future.

Questions about the project's traffic impact at this location led to a reevaluation of the intersection. Estimates of future (year 1986) peak hour traffic volumes were made using available 1978 and 1983 traffic count data from other nearby intersections; analyses resulted in Levels of Service C, with or without the project, for both AM and PM peak hours. These results support the initial finding that the intersection would not be critically affected by the proposed project.

- d. The traffic assignment used perceived travel times to select likely paths. While travel times between King Street/University Avenue and Kapiolani Boulevard/Kaaha Street may be less with a routing through the Moliili Triangle than via the Kapiolani and King intersection, total travel times for potential origins to the project are not expected to be better using the Triangle, because alternative routes are available. The assignments were used to compare the three Alternate access plans; the Final EIS will note that traffic in the Moliili Triangle could increase upon project completion.

- e. The Traffic Impact Study found only minor differences in traffic impacts between Alternates B and C and has recommended either Alternate on an equal basis. The Final EIS will indicate the preferred alternate.

- f. The study found that resident parking would be adequate; estimates of guest parking requirements would require extensive studies of existing similar projects to identify peak demands. A study of existing on-street parking in the Moliili Triangle would only confirm what is already known, i.e. lack of spaces due to poor delineation, narrow roadways, illegal parkings; this study will not provide a good basis for addressing potential impacts of a proposed action.

Zoning and Planning

- a. Please note that it is not the developer or HHA that determines if a project is to be implemented, but rather it is the City Council. We believe that the Council is a fair and able body which can determine if other projects are feasible and would benefit the public as a whole. Therefore, though other projects may be proposed due to Chapter 359 G, the Council has within its rights to disallow them. We believe that this will safeguard against this project's precedent setting potential.

- b. The "affordability" of the units being proposed is a subjective matter in

terms of who can afford to buy based on comparable units of similar size and project location. The applicant developer's position is that for comparable units of similar size and project location. The applicant developer's position is that for comparable units, his plan is to approach the market on a competitive basis, using present sales prices of other projects as the base guide. These units are normally, without government subsidy and in some instances, have been developed prior to the current economic picture (higher interest rates). It is no secret that costs today are nowhere near 2-5 years ago for financing, construction, materials, and labor. The participation of the Hawaii Housing Authority does permit the development of this project to proceed due to the financial aid provided in return for the elderly units.

- c. The intent of the project has been revised and will not attempt to acquire public lands for private use as previously stated in the Draft EIS. The Final EIS has been revised to reflect this and has also amended Figure 2, Site Plan. Under this proposal, there is a lack of sufficient on-site park space to comply with the park dedication requirement. The developer is therefore, currently exploring other means for compliance. As is required by law, the project will be in compliance with the Park Dedication Ordinance.
- d. Further elaboration on the social unrest caused by the loss of faith in government appears to be unnecessary, since we do not anticipate any community loss of faith. Note that the project is merely seeking exemptions and variances, and not an overhaul in land-use policy. Therefore, the Development Plan provisions for your area would still apply for other projects and developments.

Elderly Clientele

- a. The project construction will be in compliance with all applicable building codes and regulations and Department of Health standards. Further, note that if the project design was in direct compliance with the DP and zoning, a 150-foot building would be allowed at the site. There would be no need for Chapter 359 G, an EIS, or City Council approval, and the purported social and health impacts would still exist.

We believe that what is necessary is not the preparation of more studies on social and/or health impacts, but more discussions on what mitigative measures would be implemented to alleviate these impacts. The developer understands these problems and have committed themselves into providing air conditioning in those elderly rental units. We believe that this would adequately alleviate potentially significant noise and pollution impacts.

- b. Please be assured that all measures will be undertaken by the developer in

Ms. Katherine Nakata
Page 4
December 5, 1983

c. Your recommendation certainly has merit and is currently being considered.

Miscellaneous Concerns

a&b. We thank you for providing the letters.

c. To further clarify the project's benefits and costs, the following tables may be presented:

AVERAGE PRICE	NUMBER OF UNITS	SALES PRICE VALUE
<u>STUDIOS</u>		
Type A: \$62,300	92	\$ 5,731,600
Type B: \$67,225	90	\$ 6,050,250
Type C: \$73,300	6	\$ 439,800
<u>ONE BEDROOM</u>		
Type A: \$89,125	96	\$ 8,556,000
<u>TWO BEDROOM</u>		
Type A: \$121,275	30	\$ 3,638,250
Type B: \$117,850	60	\$ 7,071,000
Type C: \$139,850	30	\$ 4,195,500
Total Sales Value:	404	\$35,682,400
<u>Estimated Profit: Sales Value less Development Costs</u>		
		\$35,682,400
		-32,000,000
		\$3,682,400 Net Profit

As is indicated, there appears to be some discrepancies between your calculations and the above table. The following presents some of these discrepancies: (1) the

Ms. Katherine Nakata
Page 5
December 5, 1983

total sales value is \$ 35,682,400 and not \$ 39,326,000 (2) the estimated net profit is only \$ 3,682,400 and not \$ 8,126,000 (3) the rate of return is 12% and not 26%.

Thank you for your concerns,

Very truly yours,

F. J. Rodriguez

F. J. Rodriguez

FJR:ls

MAKIKI/LOWER PUNCHBOWL/TANTALUS BOARD NO. 10

510 MAKIKI LIBRARY
1527 KEEAUMOKU STREET
HONOLULU, HAWAII 96822



November 22, 1983

Ms. Letitia Uyehara
Interim Director
Office of Environmental Quality Control
550 Halekauwila Street, Room 301
Honolulu, Hawaii 96813

Dear Ms. Uyehara:

Subject: Crystal Promenade Condominium
E.I.S., Moiliili, O'ahu

We have reviewed the subject draft environmental impact statement and the answers to our letter on the E.I.S. preparation notice and have the following comments.

Exhibit A, Summary of Benefit Calculations, in Appendix B, doesn't show the benefits of the use of Kamoku Street and the pumping station property as part of the project area. Since the project is a 65 year leasehold (Pg. XII-32), the lease rent should be shown as a benefit in Exhibit A.

We received no assurance on the affordability of the market type housing in the statement (Pg. XII-32) that the units will be affordable to most households earning the median income or higher. Since these households of median income or higher are now living in more owner occupied units than rentals, this project is just another commercial investment for apartment buyers with State assistance. Also, in 65 years, the building becomes the property of the landowner.

Sincerely,

Dorothy S. Murdock

Dorothy S. Murdock
President
Makiki/Lower Punchbowl/Tantalus
Neighborhood Board No. 10

cc: Fred J. Rodriguez
Neighborhood Commission

NOV 22 1983

ENVIRONMENTAL
COMMUNICATIONS
INC.

F. J. RODRIGUEZ
PRESIDENT

December 5, 1983

Mrs. Dorothy S. Murdock, President
Makiki/Lower Punchbowl/Tantalus
Neighborhood Board No. 10
C/O Makiki Library
1527 Keesumoku Street
Honolulu, Hawaii 96822

Dear Mrs. Murdock:

Thank you for your comments on the proposed Crystal Promenade condominium project. Your comments are responded to in the following:

1. Summary of Benefit Calculations - The intent of the project has been revised and will not attempt to acquire public lands for private use as previously stated in the Draft EIS. Therefore, the pumping station property and Kamoku Street will not be acquired. It is unnecessary then, to include benefits resulting from their acquisition in any subsequent calculations.

Lease rent figures that would include Kamoku Street and the pumping station lands have not been calculated to be included in the final lease rents to be charged.

2. Market Type Housing Affordability - The "affordability" of the units being proposed is a subjective matter in terms of who can afford to buy based on comparable units of similar size and project location. The applicant developer's position is that for comparable units, his plan is to approach the market on a competitive basis, using present sales prices of other projects as the base guide. These units are normally without government subsidy and in some instances have been developed prior to the current economic picture (higher interest rates). It is no secret that costs today are nowhere near 2-5 years ago for financing, construction, materials, and labor. It should be stated here that the values received and trade-offs between the developer and the Hawaii Housing Authority are intricate and rather detailed. Simply put, the costs to develop the project to the height and density being sought would involve the purchase or acquisition of 91,000 s.f. to achieve the comparable Floor Area Ratio. In return for the Hawaii Housing Authority's development waivers, the savings of \$1.6 million dollars is achieved by the use of Chapter 359 G Authority; the transfer of the 48 elderly units is compensation to the Authority for this use of their development waivers in addition to the revenue producing loan that the Authority provides to the developer at interest rates below market interest rates. When the savings achieved through the Authority's development waivers are added up, the total is \$3 million dollars. It should also be said that the developer is not obtaining interest free loans however, and while the interest rates are below market rates, the obligation to the Authority is binding in every way. There will be a comparison table provided in the response to Neighborhood Board #8 which will

Mrs. Dorothy S. Murdock
Page 2
December 5, 1983

prove helpful to you if there is any further question you may have on this matter.

Thank you for your comments and continuing interest.

Very truly yours,

F. J. Rodriguez

F. J. Rodriguez

FJR:ls

COMPARISON TABLE FOR SQUARE FOOT COSTS

<u>1. 2500 Kapiolani</u>				
<u>Type Unit</u>	<u>Size S.F.</u>	<u>Sales Price</u>	<u>Per Sq. Ft. Cost</u>	
Studio	310	\$59,050		\$190
One Bedroom	500	\$84,150		\$168
2 Bedroom	780	\$113,500		\$146
<u>2. Pali Park</u>				
One Bedroom	702+116	\$104,000		\$148
Two Bedroom	920+162	\$133,500		\$145
<u>3. Crystal Park</u>				
One Bedroom	600	\$104,000		\$173
Two Bedroom	1000	\$162,000		\$162
Two Bedroom	944	\$138,750		\$147
<u>4. Kapiolani Banyan</u>				
Studio	401	\$74,000		\$185
One Bedroom	791+66	\$109,500		\$138.40
Two Bedroom	817	\$128,000		\$156.67
<u>5. King's Gate</u>				
One Bedroom	684+124	\$95,000		\$139
Two Bedroom	1226+234	\$199,500		\$163
<u>6. Ala Wai Plaza Skyrise</u>				

Source: MLS, November, 1983



MOILIILI
COMMUNITY
CENTER


November 22, 1983

Mr. Fred J. Rodriguez
Environmental Communications, Inc.
P. O. Box 536
Honolulu, Hawaii 96809

Dear Mr. Rodriguez:

Please find attached a copy of a letter sent to Mr. Eric Nagano, President of BAL Corporation affirming Moiliili Community Center's position relative to the Crystal Promenade Condominium Development.

Sincerely,


Dick Oshima
President

DO:yt

Enc.

A United Way Member Agency

2535 SOUTH KING STREET, HONOLULU, HAWAII 96826 - TELEPHONE (808) 955-1555

NOV 23 1983



MOILIILI
COMMUNITY
CENTER

November 22, 1983

Mr. Eric Nagano, President
BAL Corporation
1580 Makaloe Street, Suite 880
Honolulu, Hawaii 96814

Dear Mr. Nagano:

As you know, the Center's formal acceptance of your offer in support of our programs and services (Oshima to BAL, October 26, 1983) has become the focus of strongly divided opinion among our board, staff and constituents.

In effect, the central issue at hand is exactly the issue we were specifically intending to avoid, that is, to keep the Center free from taking a formal position at this time (pro or con) relative to the construction project per se. It appears clear, however, that a large number of persons has interpreted "acceptance" as support for the project.

This has been an unfortunate and admittedly unexpected outcome and one that does not seem resolvable in the context of any framework in which the Center might accept an offer from BAL in advance of your project's final approval.

To make our original position absolutely clear, we ask that you regard the acceptance letter of October 26 as rescinded subject to further review of the terms and conditions of your offer with our apologies for any inconvenience it may have caused you or your project.

Instead, we wish to simply acknowledge receipt of your offer with our thanks for your interest in our programs.

Also, we would like to request that due to the sensitivity of this issue, BAL refrain from implying in its promotional material that Moiliili Community Center has taken a formal position in favor of the project.

I hope you will understand that we are sincerely grateful for your regard for the Center's programs and services. This

A United Way Member Agency

2535 SOUTH KING STREET, HONOLULU, HAWAII 96826 - TELEPHONE (808) 955-1555

Mr. Eric Nagano

- 2 -

November 22, 1983

F. J. RODRIGUEZ
PRESIDENT

ENVIRONMENTAL
COMMUNICATIONS
INC.

action to clarify the Center's current neutral position is necessary as a best resolution of an internal Center issue, and is not intended to reflect in any way on BAL or its efforts.

Sincerely,

MOILIILI COMMUNITY CENTER



Dick Oshima
President

DO:yt

cc: City Council Members
City Departments
Hawaii Housing Authority
State Representatives
Districts 17, 19, 20
Community Organizations

December 5, 1983

Mr. Dick Oshima
Moiliili Community Center
2535 South King Street
Honolulu, Hawaii 96826

Dear Mr. Oshima:

Thank you for forwarding a copy of the Moiliili Community Center letter to Eric Nagano on the subject of the intended contribution. It is duly noted and will be included in the Final EIS.

Very truly yours,



F. J. Rodriguez

FJR:ls

Mr. F.J. Rodriguez
Environmental Communications Inc.
P.O. Box 536
Honolulu, Hawaii, 96809

November 22, 1983

Dear Mr. Rodriguez:

The following are my comments on the Environmental Impact Statement of the Proposed Crystal Promenade Condominium Development (Draft, October 17, 1983).

I am concerned about the high construction cost and the clarification of developers' profits.

Using the project description data it appears that the building would cost well over \$ 100.00/square foot (approximately \$ 140.00/square foot). Although I am quite aware that there is a very wide range of construction costs, I must point out that the norm encountered for new high rise construction, both here and on the mainland, is between \$ 90.00 and \$ 100.00/square foot.

It seems to me that, because the project is meant to offer moderately priced units and also because the project is seeking HHA collaboration, it should keep its cost within the norm to provide really affordable units.

The project description should be more analytical in the statement of its costs and benefits. The community must be aware of what is receiving in terms of \$ values and what is trading. There is a trade-off of about \$ 3 million (worth of 48 units for the elderly) on the developer side and of about \$ 3 millions worth of excise tax exemptions, land value zoning exemptions, low financing interest rates) on the community side.

The profit, that would accrue to the developer from the sale of the additional units because of the permission to build above the current zoning, should be detailed in the above calculation of the EIS because it is a part of the trade-off. The community cannot make a determination on the merit of the project unless all the components of the trade-off are spelled out. Developers' profit must be clearly stated because they are part of the cost/benefit analysis.

From a study of the sale price per square foot of apartment units not defined as moderately priced in the same neighborhood appears that the sale price per square foot of the Crystal

Promenade project is higher.

Thank you for your attention,

Daniela Minerbi, McCully-Moillili Resident

Daniela Minerbi

NOV 23 1983

ENVIRONMENTAL
COMMUNICATIONS
INC.

December 5, 1983

Mrs. Daniela Minerbi
2444 Hihiiwai Street, Apt. 2005
Honolulu, Hawaii 96826

Dear Mrs. Minerbi:

Thank you for your comments on the proposed Crystal Promenade Condominium project. We respond to your comments in the following:

1. The calculations that you have determined on the per square foot costs to complete the project are definitely high. They are high due to the fact that the \$140/s.f. cost you have calculated includes all costs including land costs, financing, furniture, fixtures, equipment, landscaping, and promotion of sales, etc. The actual costs for construction only is \$24 million dollars which yields slightly over \$100/s.f. and which is comparable to the costs you have depicted as being reasonable. We are also providing for your use, a table of comparable costs for condominium projects that are in the Kapiolani District as well as the most recently announced residential project to be developed on City lands, the Pali Park project. We feel that you will be interested in these comparable per square foot costs for projects that have already been developed and occupied.
2. It should be stated here that the values received and trade-offs between the developer and the Hawaii Housing Authority are intricate and rather detailed. Simply put, the costs to develop the project to the height and density being sought would involve the purchase or acquisition of 91,000 s.f. to achieve the comparable Floor Area Ratio. In return for the Hawaii Housing Authority's development waivers, the savings of \$1.6 million dollars is achieved by the use of Chapter 359 G authority; the transfer of the 48 elderly units is compensation to the Authority for this use of their development waivers in addition to the revenue producing loan that the Authority provides to the developer at interest rates below market interest rates. When the savings achieved through the Authority's development waivers are added up, the total is \$3 million dollars. It should also be said that the developer is not obtaining interest free loans however, and while the interest rates are below market rates, the obligation to the Authority is binding in every way. There will be a comparison table provided in the response to Neighborhood Board #8 which will prove helpful to you if there is any further question you may have on this matter.
3. Developer profit is also a subject that is often misunderstood since the popular idea is that the developer is in effect taking advantage of the

Mrs. Daniela Minerbi
Page 2
December 5, 1983

Hawaii Housing Authority. In fact, the retained profit that accrues to the developer after total sales are completed, is in the 10-15% range and this is necessary to assure the lenders for the project that in the event of the delays encountered during the processing of the project variances, and the marketing of the project, the project can withstand the expenses involved during the delays. The developer's profit is the sales price less the development cost or \$35,682,400 less \$32,000,000 = \$3,682,400 profit.

We hope that we have responded adequately to your comments; thank you for your continuing interest.

Yours very truly,



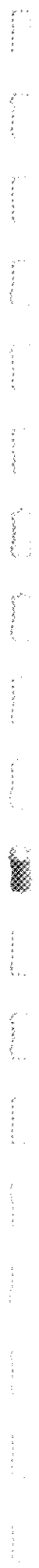
F. J. Rodriguez

FJR:ls

COMPARISON TABLE FOR SQUARE FOOT COSTS

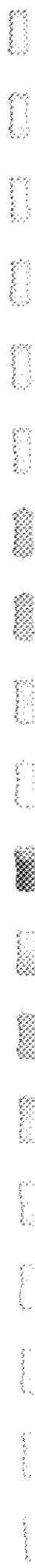
					AVERAGE PRICE	NUMBER OF UNITS	SALES PRICE VALUE
<u>1. 2500 Kapiolani</u>							
	Type Unit	Size S.F.	Sales Price	Per Sq. Ft. Cost			
	Studio	310	\$59,050	\$190	Type A: \$62,300	92	\$5,731,600
	One Bedroom	500	\$84,150	\$168	Type B: \$67,225	90	\$6,050,250
	2 Bedroom	780	\$113,500	\$146	Type C: \$73,300	6	\$439,800
<u>2. Pali Park</u>							
	One Bedroom	702+116	\$104,000	\$148	ONE BEDROOM:		
	Two Bedroom	920+162	\$133,500	\$145	Type A: \$89,125	96	\$8,556,000
<u>3. Crystal Park</u>							
	One Bedroom	600	\$104,000	\$173	TWO BEDROOM:		
	Two Bedroom	1000	\$162,000	\$162	Type A: \$121,275	30	\$3,638,250
					Type B: \$117,850	60	\$7,071,000
					Type C: \$139,850	30	\$4,195,500
<u>4. Kapiolani Banyan</u>							
	Two Bedroom	944	\$138,750	\$147	Total Sales Value:	404	\$55,682,400
<u>5. King's Gate</u>							
	Studio	401	\$74,000	\$185	Estimated Profit: Sales Value less Development Costs		
	One Bedroom	791+66	\$109,500	\$138.40			\$35,682,400
	Two Bedroom	817	\$128,000	\$156.67			-32,000,000
							\$3,682,400 Net Profit
<u>6. Ala Wai Plaza Skyrise</u>							
	One Bedroom	684+124	\$95,000	\$139			
	Two Bedroom	1226+234	\$199,500	\$163			

Source: M.L.S., November, 1983



XIII. REFERENCES

1. City and County of Honolulu; Comprehensive Zoning Code, Section 21-2.35 (f); 1978.
2. Department of Health, Pollution Investigation and Enforcement Branch, Environmental Protection and Health Services Division, State of Hawaii; Water Quality Segment Criterion Document; April, 1981.
3. Department of Transportation, Highways Division, Planning Branch, Traffic count Stations SL-53 (1978, 1979, 1981), SL-54 (1978, 1981), 700 (1978) and 701 (1978).
4. Department of Transportation, Highways Division, Planning Branch, Traffic Assignment Project TA77-19, Kapiolani Interchange On-Ramp, Project No. I-H1(79).
5. Hawaiian Telephone Company; Oahu Telephone Directory, Civil Defense Tsunami Inundation Maps; February, 1982.
6. National Academy of Sciences - National Research Council, Highway Research Board, Special Report 87, Highway Capacity Manual 1965, Washington, D.C. 1965.
7. The Traffic Institute, Northwestern University, Traffic Control and Design Techniques Workshop, December, 1979.
8. Transportation Research Board, National Academy of Sciences, Transportation Research Circular, Number 212, Interim Materials on Highway Capacity, January, 1980.



Appendix A
CHAPTER 359 G
(EXCERPT)

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HOUSING AUTHORITY

Sec. 359G-1

[CHAPTER 359G] HAWAII HOUSING AUTHORITY - HOUSING PROJECTS

Note. This chapter was enacted as 359A but has been renumbered 359G by the revisor, chapter number 395A having previously been assigned to L 1969, c 164.

SECTION	
359G-1	PURPOSE
359G-1.1	DEFINITIONS
359G-2	SPECIAL ASSISTANT FOR HOUSING
359G-3	HOUSING AUTHORITY; STAFF AND CONTRACT SERVICES
359G-3.1	HOUSING ASSISTANCE UNIT
[359G-3.3]	CONTRACTUAL STAFF RESERVE FUND
[359G-3.5]	CRITERIA
359G-4	POWERS AND DUTIES, GENERALLY
359G-4.1	HOUSING DEVELOPMENT; EXEMPTION FROM STATUTES, ORDINANCES, CHARTER PROVISIONS, RULES
359G-5	EMINENT DOMAIN, EXCHANGE OR USE OF PUBLIC PROPERTY
359G-6	DWELLING UNIT PROJECT, CONSTRUCTION AND SPONSORSHIP OF
359G-7	BOND FINANCING
359G-8	SALE, MORTGAGES, AGREEMENT OF SALE, OTHER INSTRUMENTS
359G-9	REPEALED
359G-9.1	REPEALED
359G-9.2	DWELLING UNITS; RESTRICTIONS ON TRANSFER, WAIVER OF RESTRICTIONS
359G-9.3	DWELLING UNITS; RESTRICTIONS ON USE
359G-10	REVOLVING FUND
359G-10.1	REPEALED
359G-10.5	INDEPENDENT DEVELOPMENT OF PROJECTS
359G-11	PRIVATE DEVELOPMENT OF PROJECTS
359G-11.1	INTERIM FINANCING OF PROJECTS
359G-12	STATE MORTGAGE GUARANTEE
359G-12.1	MORTGAGE GUARANTY AGREEMENTS
[359G-13]	LABOR, TRAINING OF
[359G-14]	MATERIALS AND RESEARCH
[359G-14.1]	HOUSING INFORMATION SYSTEM
[359G-14.2]	HOUSING DESIGN RESEARCH
359G-15	EXEMPTION FROM GENERAL EXCISE TAX
359G-16	DOWNPAYMENT LOANS
359G-17	QUALIFICATIONS FOR DOWNPAYMENT LOAN
[359G-18]	RESTRICTIONS ON BORROWER
[359G-19]	DEFAULT
359G-20	REPEALED
[359G-20.5]	HOUSING OPPORTUNITY ALLOWANCE PROGRAM
359G-21	PARTICIPATION IN LOANS
359G-22	LOANS QUALIFYING FOR PARTICIPATION LOANS
359G-23	QUALIFICATION OF BORROWERS
[359G-24]	APPLICATION AND REVIEW OF APPLICATION
[359G-25]	SERVICE FEE
[359G-26]	PRIVATE LENDER TAKE-OVER
[359G-27]	DEFAULT
[359G-28]	RESTRICTIONS ON BORROWER
359G-29	REPEALED
359G-30	ARBITRAGE PROVISION; INTEREST RATE
359G-31	COMMERCIAL, INDUSTRIAL, AND OTHER USES
[359G-32]	REHABILITATION AND RENOVATION OF EXISTING HOUSING

§359G-1 Purpose. The legislature of the State of Hawaii has determined that there exists in the State a critical shortage of housing units for lower income residents. Various studies have indicated the need for from between 40,000 to

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SOCIAL SERVICES

50,000 units at the present time. These studies show that the forces of population increase and obsolescence will combine to create a need for over 250,000 units by 1985. Since 1961, the economy has been producing an average of less than 10,000 units annually. The population increase, the obsolescence of existing housing and the rate at which housing units are presently being built will combine to intensify the present shortage. The legislature has further determined and hereby determines that shortage of housing, or inadequate housing, for persons of whatever level of income has an effect upon the availability and quality of housing for persons of other levels of income; that a shortage of housing leads to impairment of existing housing through use of such existing housing for occupancy in excess of that for which it is designed; and that a shortage of housing contributes to the occurrence of slums, slum conditions and unsanitary and unsafe housing and to the recurrence of slums, slum conditions and unsanitary and unsafe housing in areas in which slums, slum conditions and unsanitary and unsafe housing have previously been eliminated.

The legislature has also determined that decent shelter and the responsibility of home ownership contributes to the pride and dignity of man and makes him a greater asset to the community and that the lack of decent shelter and the responsibility of home ownership contributes to harmful frustration in our community. The home is the basic source of shelter and security in society, the center of our society which provides the basis for the development of our future citizens. Frustration in the basic necessity of decent shelter, in the satisfaction of the basic drive in man to provide a decent home for his family, provokes an unrest in our community that is harmful to the overall fiber of our society.

Studies have pointed out that the causes for the high cost of housing are multiple. They include the cost and availability of land, the cost of development, the cost and availability of financing, the cost added by government regulation, the cost and availability of labor and materials, the inflationary state of the economy that makes high cost housing more profitable to produce and more attractive to "risk" capital. In the most elemental way the housing shortage is caused by conflicting priorities in our pluralistic society. Additionally, the legislature is aware that the housing market is a total market and that neglecting the interests of renters or higher income potential homeowners would not be proper.

When conflicting priorities, otherwise wholesome in a great state, combine to frustrate one of the basic needs of that state so as to endanger its general health and welfare, the elected representatives of the people of such state have the obligation to provide to the best of their ability the means whereby these priorities can be resolved.

The legislature of the State has determined that the problem of providing reasonable priced housing in Hawaii is so complex that existing institutions cannot solve it without a comprehensive overview and direction. The legislature has determined that the problem must be solved for the general well-being of the State and that the legislature has the duty to provide the overview and the direction. [L 1970, c 105, pt of §1; am L 1971, c 192, §4]

§359G-1.1 Definitions. Unless otherwise clear from the context, as used in this chapter:

- (1) "Eligible bidder" means a person, partnership, firm, or corporation

HOUSING AUTHORITY

Sec. 359G-1.1

- (A) To be qualified by experience and financial responsibility to construct housing of the type proposed to be contracted;
 - (B) To have submitted the lowest acceptable bid; and
 - (C) To form a corporation to comply with chapter 416 to receive a lease of lands.
- (2) "Eligible developer" means any person, partnership, cooperative, firm, non-profit or profit corporation or public agency determined by the authority:
- (A) To be qualified by experience and financial responsibility and support to construct housing of the type described and of the magnitude encompassed by the given project;
 - (B) To have submitted plans for a project adequately meeting the objectives of this chapter, the maintenance of aesthetic values in the locale of the project, and the requirements of all applicable environmental statutes, and rules;
 - (C) To be fully capable, on the basis of experience and reputation to complete all sales of the project in a nondiscriminatory fashion and without encountering complaints under chapters 342, 378, 396, 515, or suits under any applicable state or federal civil or human rights statute, if applicable; and
 - (D) To meet all other requisites the authority deems to be just and reasonable, and all requirements stipulated in this chapter.
- (3) "Land" or "property" includes vacant land or land with site improvements whether partially or entirely finished in accordance with governmental subdivision standards, or with complete dwellings.
- (4) "Mortgage holder" includes the United States Department of Housing and Urban Development, Federal Housing Administration, United States Department of Agriculture, Farmers Home Administration, any other federal or state agency engaged in housing activity, Administrator of Veterans Affairs, Federal National Mortgage Association, Government National Mortgage Association, Federal Home Loan Mortgage Corporation, private mortgage lender, private mortgage insurer, and their successors, grantees, and assigns.
- (5) "Mortgage lender" means any bank or trust company, savings bank, national banking association, savings and loan association maintaining an office in the State, any insurance company authorized to transact business in the State, or any mortgagee approved by the Federal Housing Administration and maintaining an office in the State.
- (6) "Purchaser's equity" means the difference between the original cost of the dwelling unit to the purchaser, and the principal amount of any mortgages, liens, or notes outstanding.
- (7) "Qualified resident" means a person who:
- (A) Is a citizen of the United States or a declarant alien;
 - (B) Is at least eighteen years of age;
 - (C) Is a bona fide resident of the State and has a bona fide intent to reside in the dwelling unit purchased or rented under this chapter; and
 - (D) In the case of purchase of a dwelling unit in fee simple or

Sec. 359G-1.1

SOCIAL SERVICES

Any person whom the authority finds to be within one of the following classes, shall not be eligible to become a purchaser of a dwelling unit, to wit:

- (A) A person who himself or whose husband or wife or both (when husband and wife are living together) owns or own in fee simple or leasehold any lands suitable for dwelling purposes; and
 - (B) A person who himself or whose husband or wife (when husband and wife are living together) has pending an unrefused application to purchase a dwelling unit under this chapter from the authority.
- (8) "Short term project notes" means evidences of indebtedness issued by the State for specified housing projects and secured by such projects the terms of which call for complete repayment by the State of the face amount in not less than two nor more than ten years. [L 1976, c 225, §4(1)]

§359G-2 Special assistant for housing. There shall be in the office of the governor a special assistant for housing to be appointed by the governor without regard to chapters 76, 77, and 78. The special assistant shall be an ex officio member of the Hawaii housing authority with a vote. [L 1970, c 105, pt of §1; am L 1974, c 171, §3]

§359G-3 Housing authority; staff and contract services. The Hawaii housing authority shall administer this chapter. The authority may employ staff, subject to chapters 76, 77, and 78. Other persons may be hired on a contractual basis not subject to chapters 76, 77, and 78, when, in the judgment of the authority, the services to be performed are unique and essential to the execution of the functions and purposes of this chapter. No contract shall be for a period longer than two years, and no person hired under contract shall be employed beyond a maximum of six years; provided that services may be contracted for a time, for the completion of specified tasks, or for the duration of the development of a dwelling unit project; provided further that where services are to be contracted for the duration of the development of a dwelling unit project, the two-year contract limitation shall not apply. [L 1970, c 105, pt of §1; am L 1974, c 171, §4; am L 1975, c 106, §1(1); am L 1976, c 225, §4(2)]

§359G-3.1 Housing assistance unit. The governor by executive order may establish a housing counseling and referral unit within the authority. The unit shall be responsible for providing counseling to prospective homeowners seeking to purchase a home, and to homeowners seeking to rehabilitate or renovate existing housing, and for providing listing and referral services to tenants seeking to rent homes. [L 1974, c 178, §4; am L 1976, c 178, §2 and c 225, §4(3)]

[§359G-3.3] Contractual staff reserve fund. (a) There is created a contractual staff reserve fund. The fund shall be financed first out of the dwelling unit revolving fund created pursuant to section 359G-10 and then, if necessary, out of the general revenues of the State, and shall be used in accordance with the purposes set forth in section 359G-3. [L 1974, c 171, §9]

[§359G-3.5] **Criteria.** In administering the provisions of this chapter and the other laws of the State applicable to the supplying of housing or the assistance in obtaining housing, the authority shall give preference to those applicants most in need of assistance in obtaining housing, in light of the amount of moneys available for the various programs. In doing so the authority shall take into consideration the applicant's household income and number of dependents; the physical handicaps of the applicant or those living with him; whether or not the present housing of the applicant is below standard; whether or not the applicant's need for housing has arisen by reason of displacement of the applicant by governmental action; and such other factors as it may deem pertinent. [L 1971, c 192, §5]

§359G-4 Powers and duties, generally. (a) The authority shall develop fee simple or leasehold property, construct dwelling units thereon, including condominiums and planned units, and sell, lease or rent or cause to be leased or rented the land and the completed units at the lowest possible price to qualified residents of the State, in partnership with a qualified partner or in its own behalf.

(b) The authority shall require all applicants for the purchase of dwelling units to make application therefor under oath, and may require additional testimony or evidence under oath in connection with any application. The determination of any applicant's eligibility under this chapter by the authority shall be conclusive as to all persons thereafter dealing with the property; but the making of any false statement knowingly by the applicant or other person to the authority in connection with any application shall constitute perjury and be punishable as such. The authority shall establish a system to determine preferences by lot in the event that it receives more qualified applications than it has units available.

(c) The authority shall adopt, in accordance with chapter 91, all rules necessary to carry out the purpose of this chapter, including rules relating to determining preference among applicants for housing and determining qualification for and recompense or profit distribution to any partner.

(d) Upon direction from the governor and for such period as he shall authorize, rules on health, safety, building, planning, zoning, and land use which relate to the development, subdivision, and construction of dwelling units in projects in which the State, through the authority, shall participate; provided that these rules shall not contravene any safety standards or tariffs approved by the public utilities commission; provided further that these rules shall follow existing law as closely as is consistent with the production of low cost housing with standards which meet minimum requirements of good design, pleasant amenities, health, safety, and coordinated development.

Upon the adoption of such rules they shall have the force and effect of law and shall supersede, for all projects in which the State through the authority shall participate, all other inconsistent laws, ordinances, and rules relating to the use, zoning, planning, and development of land, and the construction of dwelling units thereon; provided that any rules shall, before becoming effective, be presented to the legislative body of each county in which they will be effective and the legislative body of any county may within forty-five days approve or disapprove, for that county, any or all of the rules by a majority vote of its members. On the forty-sixth day after submission any rules not disapproved shall be deemed to have been approved by the county.

(e) The authority may acquire, by eminent domain, exchange, or negotiation, land or property required within the foreseeable future for the purposes of this chapter. Whenever land with a completed dwelling or dwellings thereon is acquired by exchange or negotiation, the exchange value or purchase price for each such dwelling, including land, shall not exceed its appraised value. Land or property acquired in anticipation of future use may be leased for the interim period by the authority for such term and rent as it deems appropriate.

(f) The authority may make and execute contracts or other instruments necessary or convenient to carry out the purpose of this chapter.

(g) Upon authorization by the legislature, the authority shall cause the State to issue general obligation bonds to finance:

- (1) Land acquisition;
- (2) The development and improvement of land;
- (3) The construction of dwelling units;
- (4) The purchase, lease or rental of land and dwelling units by qualified residents under this chapter;
- (5) Payment of any services contracted for under this chapter, including profit or recompense paid to partners, and including community information and advocacy services deemed necessary by the authority to provide for citizen participation in the development of housing projects, the implementation of this chapter, and the staffing of any citizen advisory committee the authority may establish;
- (6) The cost of repurchase of units under section 359G-9.2;
- (7) Loans for the rehabilitation and renovation of existing housing; and
- (8) Any other moneys required to accomplish the purposes of this chapter.

(h) Do all things necessary and convenient to carry out the purposes of this chapter. [L 1970, c 105, pt of §1; am L 1971, c 111, §§1, 2, 7 and c 192, §6; am L 1972, c 2, pt of §14 and c 178, §1; am L 1974, c 171, §§5, 10; am L 1976, c 178, §3 and c 225, §4(4)]

Cross References

Perjury and related offenses under the Penal Code, see §§710-1060 to 710-1068.

§359G-4.1 Housing development; exemption from statutes, ordinances, charter provisions, rules. The authority may develop, on behalf of the State or in partnership, housing projects which shall be exempt from all statutes, ordinances, charter provisions, and rules of any governmental agency relating to zoning and construction standards for subdivisions, development and improvement of land and the construction and sale of homes thereon; provided that:

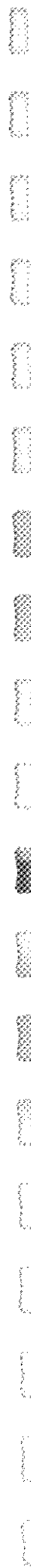
- (1) The authority finds the project is consistent with the production of housing under this chapter, and meets minimum requirements of good design, pleasant amenities, health, safety and coordinated development and in harmony with the general purpose and intent of this chapter;
- (2) The development of the proposed project does not contravene any safety standards or tariffs approved by the public utilities commission for public utilities; and
- (3) The authority shall have first presented the plans and specifications for the project to the legislative body of the county in which the

HOUSING AUTHORITY

Sec. 359G-5

project is to be situated, and the legislative body, which shall have the right to approve or disapprove the project within forty-five days after presentment, shall have approved the project within forty-five days. On the forty-sixth day after presentment, a project not disapproved shall be deemed approved by the legislative body of the county. The approval shall be based, or deemed to be based, upon a finding that the spirit of any applicable ordinance of that county in maintaining public welfare and safety is not prejudiced by the variance of the proposed project from such ordinance.

The final plans and specifications for the project approved by the legislative body, shall constitute the zoning, building, construction and subdivision standards for that project. No action shall be prosecuted or maintained against any county, its officials or employees, on account of actions taken by them in reviewing, approving or disapproving such plans and specifications. For purposes of sections 501-85 and 502-17, the executive director of the authority or the responsible county official may certify maps and plans of lands connected with the project as having complied with applicable laws and ordinances relating to consolidation and subdivision of lands, and such maps and plans shall be accepted for registration or recordation by the land court and registrar. [L 1976, c 225, §4(5)]



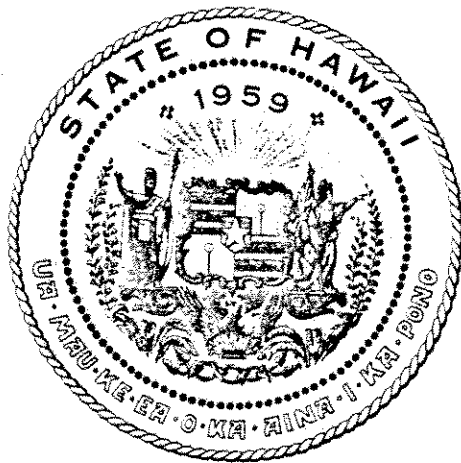
HAWAII REVISED STATUTES

1982 SUPPLEMENT

VOLUME 4

TITLES 18-20, CHAPTERS 296-367

FOR USE WITH THE CORRESPONDING VOLUME
IN THE MAIN SET



PUBLISHED BY AUTHORITY

**[CHAPTER 359G]
HAWAII HOUSING AUTHORITY-HOUSING PROJECTS**

Sec. 359G-1.1

SOCIAL SERVICES

[PART I. GENERAL PROVISIONS]

SECTION

- 359G-1.1 DEFINITIONS
- 359G-3 REPEALED
- 359G-4 POWERS AND DUTIES, GENERALLY
- 359G-4.1 HOUSING DEVELOPMENT; EXEMPTION FROM STATUTES, ORDINANCES, CHARTER PROVISIONS, RULES
- 359G-5 EMINENT DOMAIN, EXCHANGE OR USE OF PUBLIC PROPERTY
- 359G-6 DWELLING UNIT PROJECT, CONSTRUCTION AND SPONSORSHIP OF
- [359G-6.5] ADDITIONAL POWERS
- 359G-7 BOND FINANCING
- 359G-7.5 REPEALED
- 359G-8 SALE, MORTGAGES, AGREEMENT OF SALE, OTHER INSTRUMENTS
- 359G-9.2 DWELLING UNITS; RESTRICTIONS ON TRANSFER, WAIVER OF RESTRICTIONS
- 359G-9.3 DWELLING UNITS; RESTRICTIONS ON USE
- [359G-9.4] RESTRICTIONS ON USE, SALE AND TRANSFER OF DWELLING UNITS; EFFECT OF AMENDMENT OR REPEAL
- 359G-12 STATE MORTGAGE GUARANTEE
- 359G-15 EXEMPTION FROM GENERAL EXCISE TAX
- 359G-21 PARTICIPATION IN LOANS
- 359G-32 REHABILITATION AND RENOVATION OF EXISTING HOUSING
- 359G-33 EMPLOYEE HOUSING

[PART II.] LIMITED-EQUITY HOUSING COOPERATIVES

- [359G-51] DEVELOPMENT PRIORITY
- [359G-52] QUALIFICATIONS FOR LOANS

[PART I. GENERAL PROVISIONS]

Note. Part I. designation added in view of addition of part II.

§359G-1.1 Definitions. Unless otherwise clear from the context, as used in this chapter:

- (1) "Eligible bidder" means a person, partnership, firm, or corporation determined by the authority:
 - (A) To be qualified by experience and financial responsibility to construct housing of the type proposed to be contracted;
 - (B) To have submitted the lowest acceptable bid; and
 - (C) To form a corporation to comply with chapter 416 to receive a lease of lands.
- (2) "Eligible developer" means any person, partnership, cooperative, firm, non-profit or profit corporation, or public agency determined by the authority:
 - (A) To be qualified by experience and financial responsibility and support to construct housing of the type described and of the magnitude encompassed by the given project;
 - (B) To have submitted plans for a project adequately meeting the objectives of this chapter, the maintenance of aesthetic values in the locale of the project, and the requirements of all applicable environmental statutes, and rules;
 - (C) To be fully capable, on the basis of experience and reputation, to complete all sales of the project in a nondiscriminatory fashion and without encountering complaints under chapters 342, 378, 396, 515, or suits under any applicable state or federal civil or human rights statute, if applicable; and
 - (D) To meet all other requisites the authority deems to be just and reasonable, and all requirements stipulated in this chapter.

HOUSING AUTHORITY

Sec. 359G-1.1

"Eligible developer" includes limited-equity housing cooperatives as defined in section 421G-1(2) which provide housing for persons and families of low or moderate income.

- (3) "Land" or "property" includes vacant land or land with site improvements whether partially or entirely finished in accordance with governmental subdivision standards, or with complete dwellings.
- (4) "Mortgage holder" includes the United States Department of Housing and Urban Development, Federal Housing Administration, United States Department of Agriculture, Farmers Home Administration, any other federal or state agency engaged in housing activity, Administrator of Veterans Affairs, Federal National Mortgage Association, Government National Mortgage Association, Federal Home Loan Mortgage Corporation, private mortgage lender, private mortgage insurer, and their successors, grantees, and assigns.
- (5) "Mortgage lender" means any bank or trust company, savings bank, national banking association, savings and loan association maintaining an office in the State, any insurance company authorized to transact business in the State, or any mortgagee approved by the Federal Housing Administration and maintaining an office in the State.
- (6) "Purchaser's equity" means the difference between the original cost of the dwelling unit to the purchaser, and the principal amount of any mortgages, liens, or notes outstanding.
- (7) "Qualified resident" means a person who:
 - (A) Is a citizen of the United States or a resident alien;
 - (B) Is at least eighteen years of age;
 - (C) Is a bona fide resident of the State and has a bona fide intent to reside in the dwelling unit purchased or rented under this chapter;
 - (D) In the case of purchase of a dwelling unit in fee simple or leasehold, has a gross income sufficient to qualify for the loan to finance the purchase; and
 - (E) Is not found by the authority to be within one of the following classes:
 - (i) A person who himself or whose husband or wife or both (when husband and wife are living together) owns or own in fee simple or leasehold any lands suitable for dwelling purposes; or
 - (ii) A person who himself or whose husband or wife (when husband and wife are living together) has pending another unrefused application to purchase a dwelling unit under this chapter from the authority.
- (8) "Short term project notes" means evidences of indebtedness issued by the State for specified housing projects and secured by such projects the terms of which call for complete repayment by the State of the face amount in not less than two nor more than ten years. [L 1976, c 225, §4(1); am L 1978, c 142, §4; am L 1979, c 105, §37; am L 1982, c 259, §4]

Amendment Note

- L 1979 added definition of "short term project notes".
 L 1982 amended definition of "eligible developer".

§359G-3 REPEALED. L 1978, c 141, §7.

§359G-4 Powers and duties, generally. (a) The authority may develop fee simple or leasehold property, construct dwelling units thereon, including condominiums and planned units, and sell, lease, or rent or cause to be leased or rented, at the lowest possible price to qualified residents of the State, in partnership with a qualified partner or in its own behalf, either:

- (1) Fully completed dwelling units with the appropriate interest in the land on which the dwelling unit is located; or
- (2) Units which are substantially complete and habitable with the appropriate interest in the land on which the dwelling unit is located; or
- (3) The land with site improvements (other than the dwelling unit) either partially or fully developed.

* * *

(d) The authority shall adopt upon direction from the governor and for such period as he shall authorize, rules on health, safety, building, planning, zoning, and land use which relate to the development, subdivision, and construction of dwelling units in projects in which the State, through the authority, shall participate; provided that these rules shall not contravene any safety standards or tariffs approved by the public utilities commission; provided further that these rules shall follow existing law as closely as is consistent with the production of low cost housing with standards which meet minimum requirements of good design, pleasant amenities, health, safety, and coordinated development.

Upon the adoption of such rules they shall have the force and effect of law and shall supersede, for all projects in which the State through the authority shall participate, all other inconsistent laws, ordinances, and rules relating to the use, zoning, planning, and development of land, and the construction of dwelling units thereon; provided that any rules shall, before becoming effective, be presented to the legislative body of each county in which they will be effective and the legislative body of any county may within forty-five days approve or disapprove, for that county, any or all of the rules by a majority vote of its members. On the forty-sixth day after submission any rules not disapproved shall be deemed to have been approved by the county.

(e) The authority may acquire, by eminent domain, exchange, or negotiation, land or property required within the foreseeable future for the purposes of this chapter. Whenever land with a completed or substantially complete and habitable dwelling or dwellings thereon is acquired by exchange or negotiation, the exchange value or purchase price for each such dwelling, including land, shall not exceed its appraised value. Land or property acquired in anticipation of future use may be leased for the interim period by the authority for such term and rent as it deems appropriate.

* * *

[am L 1978, c 142, §§5 and 6; am L 1979, c 105, §38]

Revision Note

Only the subsections amended are included in this Supplement.

Amendment Note

L 1978 amended subsections (a) and (e).

L 1979 added first four words in subsection (d).

HOUSING AUTHORITY

Sec. 359G-5

§359G-4.1 Housing development; exemption from statutes, ordinances, charter provisions, rules. (a) The authority may develop, on behalf of the State or in partnership, or may assist under a government assistance program in the development of housing projects which shall be exempt from all statutes, ordinances, charter provisions, and rules of any governmental agency relating to zoning and construction standards for subdivisions, development and improvement of land and the construction of units thereon; provided that:

- (1) The authority finds the project is consistent with the purpose and intent of this chapter, and meets minimum requirements of health and safety;
- (2) The development of the proposed project does not contravene any safety standards or tariffs approved by the public utilities commission for public utilities; and
- (3) The legislative body of the county in which the project is to be situated shall have approved the project.
 - (A) The legislative body shall approve or disapprove the project within forty-five days after the authority has submitted the plans and specifications for the project to the legislative body. If after the forty-fifth day a project is not disapproved, it shall be deemed approved by the legislative body.
 - (B) No action shall be prosecuted or maintained against any county, its officials, or employees, on account of actions taken by them in reviewing, approving, or disapproving the plans and specifications.
 - (C) The final plans and specifications for the project approved by the legislative body, shall constitute the zoning, building, construction, and subdivision standards for that project. For purposes of sections 501-85 and 502-17, the executive director of the authority or the responsible county official may certify maps and plans of lands connected with the project as having complied with applicable laws and ordinances relating to consolidation and subdivision of lands, and such maps and plans shall be accepted for registration or recordation by the land court and registrar.

(b) For the purposes of this section, "government assistance program" means a housing program qualified by the authority and administered or operated by the authority or the United States or any of their political subdivisions, agencies, or instrumentalities, corporate or otherwise. [L 1976, c 225, §4(5); am L 1981, c 76, §1]

Amendment Note

L 1981 amended section generally.

A BILL FOR AN ACT

RELATING TO HOUSING.

BE IT ENACTED BY THE LEGISLATURE OF THE STATE OF HAWAII:

SECTION 1. Section 359G-4.1, Hawaii Revised Statutes,
is amended by amending subsection (a) to read as follows:

"(a) The authority may develop, on behalf of the State
or in partnership, or may assist under a government assistance
program in the development of housing projects which shall
be exempt from all statutes, ordinances, charter provisions,
and rules of any governmental agency relating to zoning and
construction standards for subdivisions, development and
improvement of land, and the construction of units thereon;
provided that:

(1) The authority finds the project is consistent
with the purpose and intent of this chapter, and
meets minimum requirements of health and safety;

(2) The development of the proposed project does not
contravene any safety standards or tariffs

H. B. NO.

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C.D. 1

approved by the public utilities commission for public utilities; and

(3) The legislative body of the county in which the project is to be situated shall have approved the project.

(A) The legislative body shall approve or disapprove the project within forty-five days after the authority has submitted the preliminary plans and specifications for the project to the legislative body. If after the forty-fifth day a project is not disapproved, it shall be deemed approved by the legislative body.

(B) No action shall be prosecuted or maintained against any county, its officials, or employees, on account of actions taken by them in reviewing, approving, or disapproving the plans and specifications.

(C) The final plans and specifications for the project shall be deemed approved by the legislative body if the final plans and specifications do not deviate from the preliminary plans and specifications. The

1 final plans and specifications for the
2 projects [approved by the legislative body,]
3 shall constitute the zoning, building,
4 construction, and subdivision standards for
5 that project. For purposes of sections 501-85
6 and 502-17, the executive director of the
7 authority or the responsible county official
8 may certify maps and plans of lands connected
9 with the project as having complied with
10 applicable laws and ordinances relating to
11 consolidation and subdivision of lands, and
such maps and plans shall be accepted for
13 registration or recordation by the land court
14 and registrar."

15 SECTION 2. Statutory material to be repealed is
16 bracketed. New material is underscored.

17 SECTION 3. This Act shall take effect upon its approval.

18 Approved by the
Governor on

JUN 02 1983



IRGE R. ARIYOSHI
GOVERNOR

PAUL A. TOM
EXECUTIVE DIRECTOR

STATE OF HAWAII
DEPARTMENT OF SOCIAL SERVICES AND HOUSING
HAWAII HOUSING AUTHORITY
P. O. BOX 17907
HONOLULU, HAWAII 96817

IN REPLY REFER

TO:

June 24, 1983

MEMORANDUM

TO: Councilman Lee Wai Doo

FROM: Rex Johnson, Assistant Executive Director

SUBJECT: Background report on the Hawaii Housing and Act 105

The Hawaii Housing Authority (HHA) is the primary and lead agency for housing in the State. HHA was established by Act 190, SLH 1935, and operated as a separate agency under the Executive Branch until 1959. Under the Hawaii State Government Reorganization Act of 1959, HHA became a unit under the Department of Social Services and Housing (DSSH).

To carry out its mission and fulfill its goal of providing affordable housing, HHA is vested with the power to lease, sell, rent, own, finance, and develop housing projects. Also vested with HHA is the power to request exemptions from "all statutes, ordinances, chapter provisions, and rules of any governmental agency relating to zoning and construction standards for subdivisions, development, and improvement of land and the construction of units thereon ... provided that the Authority finds the project is consistent with the purpose and intent of this Chapter "(359G)", and meets minimum requirements of health and safety...."

This Housing Development program was established by Act 105, SLH 1970, and was codified as Chapter 359G, HRS. Under the provisions of Chapter 359G, (popularly referred to as "Act 105") HHA has been instrumental in the delivery of 7,483 dwelling units (as of June 30, 1982). 5,173 units are located on Oahu; 1,293 on Hawaii; 597 on Kauai; and 420 on Maui. Of the 7,483 units, 4,774 have been offered for sale to qualified buyers and 2,709 are rental units for families and the elderly.

HAWAII HOUSING AUTHORITY

MEMORANDUM - Councilman Lee Wai Doo

Page 2

June 24, 1983

To develop these units, HHA has employed a variety of development instruments and programs, such as, participation with, and sponsorship from the U. S. Department of Housing and Urban Development (HUD) and Farmers Home Administration; the provision of interim loans; utilizing joint ventures; granting development rights; acquiring existing or purchased turnkey projects; and participating with local and mainland financial institutions such as the State Employees' Retirement System, banks, and savings and loan associations.

Many of these units have been made possible because of the exemption process as the time savings and cost reductions provided the necessary extra push to make these projects real. The attached list is a compilation of housing projects developed with HHA assistance. The highlighted projects are developments on Oahu which utilized the 359G exemption process in achieving realization.


Assistant Executive Director

Attachment

[illegible]

*Underscored projects were those constructed under Chapter 359 G.

***The above format has been revised from the exhibits presented to Councilman Doo in an effort to save space.



Appendix B

BENEFITS

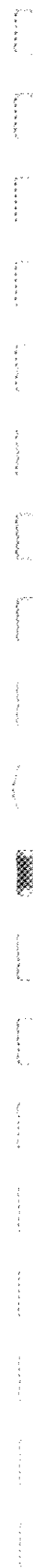


EXHIBIT A

Summary of Benefit Calculations

2512 Kapiolani Blvd.

I. Summary of Benefits

Benefits of the proposed development include the following:

- A. G.E. Tax Exemption
- B. Dwelling Unit Revolving Fund (D.U.R.F.) Interim Construction Loan
- C. Zoning Exemption (Height, Density and side-yard setback and partial Park Dedication.)

II. Relation of Benefits to Number of Elderly Units.

The value of the benefits will be translated to units by taking the dollar value of the Benefits received by the developer and trading this value for units.

III. G.E. Tax Exemption

A. Exemption Requested

The proposed project would include a one time gross excise tax exemption for the entire project. This would apply to any construction and other taxable costs.

B. Value Calculations

Total Construction & other taxable costs	\$25,860,000
Less Total attributable to elderly (10.6%)	- \$ 2,734,000
	<hr/> \$23,126,000

$\$23,126,000 \times 4.16\% = \$962,000$

say \$960,000

IV. D.U.R.F. Interim Construction Loan

A. Request

Based on current estimates, the entire project will cost \$31.2 million to complete. The government is requested to provide an interim construction loan in the amount of \$5.6 million. A loan fee of 2 points would be paid to the government and the loan would carry an interest rate of 2 points below the prime rate. Pay-off of this loan would come from the proceeds of the sale of units and long term take-out financing.

B. Value of loan

\$5.6 million for 18 months, 4 point differential from market rate.

$$\$5,600,000 \times .04 \times 1.5 = \$336,000$$

V. Zoning Exemptions

A. Request

It is requested that the project be exempt from current zoning regulations in terms of height, density, and one side yard setback. In addition a partial waiver of the Park Dedication.

B. Value

The calculation of the dollar value of benefits to be provided by HHA for the G.E. tax exemption and the cost savings of the D.U.R.F. interim loan are relatively straight forward mathematical computations. Determination of the values associated with the requirements to be pre-empted are somewhat harder to derive as several approaches are possible and many more variables are involved.

Possibly the most accurate approach to determine this value is to "assess" the developer for the value of additional land which would have to be acquired to achieve the proposed density. The developer has sufficient land to build 106,800 sq. ft. of building area as evidenced by the permit he currently holds. As the proposed design (exclusive of HHA units) has a floor area of 205,445 sq. ft., 98,645 sq. ft. of floor area is in excess. Using the current density requirements of the site and the land value established by the City when the earlier project (at higher density) was processed, 52,751 sq ft. of additional land would be required to build the additional 98,645 sq. ft. of floor area which would have a value of \$1,688,032.

No additional dollar value is attached to the partial park dedication waiver as the "theoretical" project, having a lot area of 91,320 sq. ft., would meet the open space requirements.

Similar analysis of the height issue lead to the conclusion that no dollar value should attach, as the increased sales price of units on higher floors is largely, if not totally, offset by the increased costs of high rise construction, given the moderate pricing of units. Additional consideration included the relative ease with which an aesthetically acceptable and hence saleable building could be produced on the larger "theoretical" lot. A final consideration was the preference to tall slender structures as opposed to shorter bulkier buildings from an urban design standpoint.

VI. Summary of Value

G.E. Tax Exemption	\$ 960,000
D.U.R.F. Interim Loan	\$ 336,000
Zoning Exemption	\$ 1,688,000
	<hr/>
	\$ 2,984,000

Appendix C

AIR QUALITY

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AIR QUALITY STUDY
FOR
CRYSTAL PROMENADE
CONDOMINIUM PROJECT

HONOLULU, HAWAII

TABLES

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Prepared by:
Barry D. Root
Air Pollution Consultant
Kaneohe, Hawaii

October 11, 1983

1. PROJECT DESCRIPTION

The proposed Crystal Promenade Condominium Project involves construction of 452 residential units on a 38,570 square foot parcel of land located at the intersection of Kapiolani Boulevard and Kamoku Street in Honolulu (Figure 1). Proposed construction consists of a 44 story building with a six floor parking garage. The project site is currently occupied by a two story apartment building.

2. AIR QUALITY STANDARDS

State of Hawaii and Federal Ambient Air Quality Standards (AQS) have been established for six classes of pollutants as shown in Table 1. An AQS is a concentration not to be exceeded over a specified time

period which varies for each pollutant depending upon the type of exposure that has been associated with adverse effects. Each of the regulated pollutants has the potential to cause some form of adverse health effect or to produce environmental degradation when present in sufficiently high concentration.

Federal AQS for some pollutants have been divided into Primary and Secondary levels. Primary AQS are designed to prevent adverse health impacts while Secondary AQS refer to welfare impacts such as decreased visibility, diminished comfort levels, damage to vegetation, animals or property, or a reduction in the overall aesthetic quality of the atmosphere. State of Hawaii AQS have been set at single levels which for most pollutants are significantly more stringent than comparable Federal limits.

3. PRESENT AIR QUALITY

A summary of air pollutant measurements from State of Hawaii long term monitoring stations located nearest to the project is presented in Table 2. Data from five different sampling stations are included in the tabulation.

The sampling station for particulates and sulfur dioxide was originally located at the sewer pumping station in Ala Moana Park, but in February, 1977, it was moved to the park's McCoy Pavilion, and then in December, 1979, it was moved again to Fort Derussy in Waikiki. The Ala Moana Park monitoring stations were about 1.5 miles west of the project site, while the new Fort Derussy station is about 0.6 miles southwest. Nitrogen dioxide was also monitored at the Ala Moana Park location during the first few months of 1976.

Carbon monoxide concentrations were monitored at the Department of Health building at Punchbowl and Beretania Streets in urban Honolulu until September 1979. The Department of Health building is about 2.4 miles northwest of the project site. During 1981 carbon monoxide was monitored at the Fort Derussy location, but during 1982 the only carbon monoxide monitoring station was located at Leahi Hospital in Kalaheiki, about 1.5 miles east southeast of the project.

Ozone levels were also measured at the Department of Health building until December, 1980, when the monitor was relocated to Sand Island (about 3.5 miles west of the project site). During 1981 nitrogen dioxide was also monitored at the Sand Island location.

From the data presented in Table 2 it appears that the State of Hawaii 24-hour AQS for particulates is presently being exceeded in the Ala Moana/Waikiki area at a rate of not more than once per year. No values above Federal AQS have occurred during the last seven years, and the last high particulate reading in 1980 was recorded during an unusually severe January windstorm which created greatly increased levels of natural pollutants such as blowing dust and sea spray. A once-per-year particulate level of this nature is of no major regulatory concern and it seems reasonable to conclude that there are no present problems with particulate pollution in the project area. Table 2 also shows that sulfur dioxide and nitrogen dioxide levels in the area are running well below allowable AQS.

On the other hand, Table 2 indicates that there could be a potential problem with carbon monoxide concentrations in urban areas of Oahu. During the years from 1975 to 1979 when carbon monoxide was measured at the Department of Health building there were numerous violations of the State of Hawaii peak one-hour AQS for this pollutant. There was, however, an encouraging trend toward fewer violations each year and average peak hour values were steadily decreasing until the monitor was moved to Leahi in late 1979. The Leahi site is low density residential and the 1982 readings shown in Table 2 from that site are probably indicative of background levels of carbon monoxide at sites well removed from major highways and urban traffic.

In any case the data in Table 2 clearly show that carbon monoxide would be the pollutant most likely to cause difficulty in meeting allowable State of Hawaii AQS as a result of new residential development in Honolulu.

4. DIRECT AIR QUALITY IMPACT OF PROJECT CONSTRUCTION

During the demolition, site preparation and construction phases of this project it is inevitable that a certain amount of fugitive dust will be generated. Field measurements of such emissions from shopping center and apartment construction projects has yielded an estimated emission rate of 1.2 tons of dust per acre of activity per month of activity. This figure assumes medium level activity in a semi-arid climate with a moderate soil silt content. In fact actual emissions from this project can be expected to vary daily depending upon the amount of activity and the moisture content of the exposed soil in work areas. Because the project site is relatively small and nearly level there should be a minimum of dirt moving and hauling so that monthly emission rates of fugitive dust may be even lower than the average emission rate cited above.

The major generator of fugitive dust is heavy construction equipment moving over unpaved surfaces. This problem can be mitigated to a certain extent by completing and paving work areas as early in the development process as possible. Given that most of the area adjacent to the project site is already in high density residential use, dust control will have to be an area of special concern. Applicable control regulations and mitigative measures that can be employed to control dust emissions from construction projects such as this one are described later in this report.

It is also inevitable that construction equipment will emit some air pollutants in their exhausts as they are used at various points within or adjacent to the project site. The largest equipment is generally diesel-powered. Carbon monoxide emissions from large diesel engines are usually no more than those of the average automobile, but nitrogen dioxide emissions can be quite high. Fortunately nitrogen dioxide emissions from other sources in the area should be relatively low and the overall impact of pollutant emissions from construction equipment should be minor compared to levels generated by normal traffic on Kapiolani Boulevard nearby.

5. AIR QUALITY IMPACT OF INCREASED ENERGY UTILIZATION

Based on typical use rates for all-electric apartments, the 452 units proposed for this project could require as much as 2.5 million KWH of electricity per year. This would require consumption of an additional 25.9 billion BTU of fuel energy at electrical power plants, or about 4500 additional barrels of fuel oil per year if this demand is met strictly by burning fuel oil.

This projected energy requirement could be reduced somewhat by installing solar water heaters at the time the project is constructed.

Hawaiian Electric Company also has some options available other than burning fuel oil to meet this projected demand. These options include wind farms at Kahuku and the possibility of an Ocean Thermal Energy Conversion Plant off the leeward coast.

The major impact of burning fuel oil to supply the future energy needs of the proposed project, however, will be increased sulfur dioxide and particulate levels in the vicinity of present Hawaiian Electric power plants, particularly the Kahe Plant on the Waianae coast.

6. INDIRECT AIR QUALITY IMPACT OF INCREASED TRAFFIC

Once construction is completed the proposed project will not in itself constitute a significant direct source of air pollutants other than minor fugitive cooking aromas. By providing parking and serving as an attraction for increased motor vehicle traffic in the area, however, the project must be considered to be a significant indirect air pollution source.

Motor vehicles, especially those with gasoline-powered engines, are prodigious emitters of carbon monoxide. They also produce measurable quantities of nitrogen dioxide. Those burning fuel which contains lead as an additive contribute some lead particles to the atmosphere as well. The major control measure designed to limit lead emissions is a Federal law requiring the use of unleaded fuel in most new automobiles. As older cars are removed from the vehicle fleet, these lead emissions are expected to exhibit a steadily decreasing rate. Federal control regulations also call for increased efficiency in removing carbon monoxide and nitrogen dioxide from vehicle exhausts. By 1995 carbon monoxide emissions from the vehicle fleet then operating are mandated to be just a little more than half the amounts now emitted.

In order to evaluate the air quality impact of increased traffic and decreasing emission levels per vehicle in the project area a detailed carbon monoxide modeling study has been carried out. This study was designed to yield carbon monoxide concentration values which could be directly compared to allowable State and Federal Air Quality Standards.

7. CARBON MONOXIDE DIFFUSION MODELING

Four critical receptor sites (shown on Figure 2) were selected for analysis: sites 1 and 4 on the Diamond Head side of Kapiolani Boulevard, site 2 near Kamoku Street, and site 3 on the makai side of Date Street. Sites 1, 2, and 3 were selected to evaluate the impact of increased project-related traffic in the vicinity of the Kapiolani/Date/Kamoku Intersection. Site 4 was selected to evaluate the air pollution impact of vehicles moving within the project's planned six-story parking garage. Expected worst case concentrations of carbon monoxide were computed at these receptor sites as described below for the morning peak hour period with and without the proposed project.

The traffic study for the project shows existing peak hour traffic on roadways in the project area (Figure 3), peak hour volumes expected to be generated by the project (Figure 4), and combined future volumes after project completion in 1986 (Figure 5). Morning peak hour in the project area is taken to be from 0700 to 0800.

As stated in the traffic study, this intersection is already operating at a critical volume to capacity ratio that is greater than 100 percent. The effect of the project will be to increase this ratio by approximately three percent. Although most of the Kapiolani/Date Street neighborhood has already been developed to allowable capacity and the traffic study for the project indicates little future growth in traffic between now and the time of project completion, this air pollution analysis addresses a time period that stretches from now to twenty years in the future and for that time frame it is assumed that increased population density in locations that serve as feeder areas to the Kapiolani/Date Intersection could increase by as much as 10 percent.

The existing mix of vehicles at this intersection is as follows: 80% gasoline-powered light duty vehicles (automobiles); 10% gasoline-powered light duty trucks and vans; 1% gasoline-powered heavy duty vehicles; 2% diesel powered automobiles and light duty trucks (estimated); 2% diesel-powered heavy duty trucks and buses, and 1% motorcycles.

This vehicle mix is important in estimating vehicular air pollutant emission rates. Gasoline-powered vehicles are heavy emitters of carbon monoxide. Diesel-powered vehicles, on the other hand, are relatively low emitters of carbon monoxide, but they emit significant quantities of nitrogen dioxide and produce unpleasant odors and irritants such as sulfuric acid, aldehydes, phenols, and oxygenates.

By the year 2003 it has been predicted that the percentage of diesels in the vehicle fleet could increase to as much as 16%. Since the cost differential between gasoline and diesel fuel has been decreasing in recent years while gasoline-powered cars have at the same time been gaining in the fuel economy ratings, the disadvantages of higher initial cost, limited fuel availability, more frequent oil changes, and other inconveniences associated with diesel-powered vehicle ownership would seem to mitigate against any significant increase in the percentage of diesel-powered vehicles on the roadways in future years. It is therefore assumed in this study that the vehicular mix in the project area will remain essentially unchanged between 1983 and 2003.

Vehicular carbon monoxide emission rates for the years studied were determined using the EPA's computerized Mobile Source Emissions Model (MOBILE 2). An ambient temperature of 55 degrees F was used to simulate worst case emissions for a cold winter morning during rush hour. About 21 percent of the intersection traffic was assumed to be operating in the less efficient cold-start mode. For traffic operating within the parking garage a cold-start percentage of 75 was assumed.

At the Kapiolani/Date/Kamoku Intersection, traffic on Kapiolani Boulevard has a green light 30 percent of the time. The same percentage applies for traffic on the southeast leg of Date Street. On the northwest leg of Date Street traffic has a green light only 25 percent of the time. Traffic on the north leg of Kamoku Street is regulated by a stop sign with a right turn onto Date Street as the only permitted movement. Vehicle speeds upstream from red lights were assumed to be 5 mph, while downstream from traffic lights, stop signs and turns traffic was assumed to move at 15 mph. Traffic within the parking garage was assumed to move at 5 mph.

The EPA computer model HIWAY-2 was used to calculate carbon monoxide concentrations at selected receptor sites with and without project-related traffic. Stability category D (4) was used for determining diffusion coefficients. This stability category represents the most stable (least favorable) atmospheric condition that is likely to exist in an urban area such as this.

To simulate worst case wind conditions a uniform wind speed of one meter per second was assumed with the worst case wind direction for site 1 being the predominant northeast tradewind, while that at site 2 was a rare south wind. For sites 3 and 4 the worst case wind was a more common north wind.

At each receptor site concentrations were computed at a height of 1.5 meters to simulate levels that would exist within the normal human breathing zone.

Background concentrations of carbon monoxide from sources or roadways not directly considered in the analysis were assumed to be about 1 milligram per cubic meter in 1983, 0.8 in 1986, and 0.5 in 2003. The decrease in background level by 2003 reflects the expected increase in emissions control effectiveness for the vehicle fleet that is then operating.

Emissions from the proposed parking garage were treated as elevated line sources in the HIWAY 2 modeling analysis.

Results of the peak hour carbon monoxide analysis are presented in Table 3. At all four critical receptor sites present morning rush hour carbon monoxide concentrations are estimated by the model to be at or somewhat in excess of the allowable State of Hawaii one hour AQS. By 1986, when the proposed project has been completed and is fully occupied, project-related traffic is predicted to add 0.3 to 0.5 milligrams per cubic meter to the carbon monoxide levels that then exist, except in the case of site 4, where parking garage traffic is predicted to add substantially to the carbon monoxide levels created by traffic on Kapiolani Boulevard. By the year 2003, however, concentrations of carbon monoxide are predicted to be within allowable State and Federal AQS with or without the proposed project at all of the selected critical receptor sites even under the worst case traffic and meteorological conditions considered in this analysis.

Predicted worst case eight hour carbon monoxide levels at these same receptor sites are presented in Table 4. These values are based on the results of the peak hour analysis as modified by the application of a 'meteorological persistence factor' of 0.6 as recommended in EPA guidelines to account for the fact that meteorological dispersion conditions are likely to be more variable (and hence more favorable) over an eight hour period than they are for a one hour period. Once again the projected concentrations are within allowable Federal and State AQS by the year 2003.

8. MITIGATION MEASURES

A. SHORT TERM

As indicated by the foregoing analysis, the only direct adverse air quality impact that the proposed project is likely to create is the emission of fugitive dust during demolition and construction. State of Hawaii Department of Health Administrative Rules stipulate the control measures that are to be employed to reduce this type of emissions. Primary control consists of wetting down loose soil areas with water or suitable chemicals. An effective watering program can reduce particulate emission levels from construction sites by as much as 50 percent. Other control measures include good housekeeping on the jobsite and pavement or landscaping of bare soil areas as quickly as possible.

B. LONG TERM

Once completed, the proposed Crystal Promenade Condominium Project is expected to have little direct impact on the air quality of the surrounding area. The only potential long term indirect impact will be in the form of increased power plant emissions associated with provision of electric power to residential units within the project and increased vehicular emissions from residents and guests arriving and departing from the project parking garage.

9. SUMMARY

It is possible to cut down electrical requirements considerably by installing solar water heaters, but project planners can do very little to decrease emission levels from vehicles operating within the project area. Reductions in these emissions depend on actions by the Federal government and given the nascent recovery of the U.S. automobile industry it is difficult to tell if the stringent emissions reduction program that has been set forth will in fact be followed in coming years. It is possible that the emission values used here to predict future pollutant concentrations will prove to be too optimistic. On the other hand this analysis did not consider the possibility that technological innovation may lead to new vehicular propulsion systems which create little or none of the air pollutants that are presently of concern.

In any case the modeling study carried out for this project indicates that within 20 years of project construction air pollutant concentrations from vehicular sources in and around the project can be expected to be within allowable air quality standards even under worst case traffic and meteorological conditions. For this reason no special mitigation measures are recommended in this regard.

1. The proposed Crystal Promenade Condominium Project involves site preparation and construction of a 44-story, 452-unit condominium with attached 6-story parking garage on a 38,570 square foot parcel of land at the mauka-Diamond Head corner of the Kapiolani Boulevard/Kamoku Street intersection in Honolulu.

2. Present air quality in the project area is estimated to be acceptable for all regulated pollutants except carbon monoxide.

3. Except for short term dust emissions during the construction phase of the project no significant direct air quality impacts are expected.

4. Indirect air quality impacts are expected to result from demands for electrical energy. These impacts are most likely going to occur in the Waianae area near the Kahae Power Plant where increased particulate and sulfur dioxide emissions can be expected.

5. Traffic generated by the project will increase emissions of carbon monoxide in the project area. Computer modeling of carbon monoxide levels after project construction indicate that State of Hawaii standards for that pollutant are likely to be exceeded under worst case traffic and meteorological conditions in the years immediately following construction, but by the year 2003 carbon monoxide concentrations are predicted to be within allowable State and Federal Ambient Air Quality Standards.

6. Solar water heating is suggested as a mitigative measure to reduce the impact of increased electrical demand. Adequate control measures are available to limit emissions of fugitive dust from construction activities. No special measures to control emissions from motor vehicles are apparent.

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1. U.S. ENVIRONMENTAL PROTECTION AGENCY, User's Guide to MOBILE 2: Mobile Source Emissions Model, February, 1981.
2. U.S. ENVIRONMENTAL PROTECTION AGENCY, User's Guide to HWAY 2, A Highway Air Pollution Model, May, 1980.
3. U.S. ENVIRONMENTAL PROTECTION AGENCY, Guidelines for Air Quality Maintenance Planning and Analysis, Volume 9: Evaluating Indirect Sources, January, 1975.
4. CALIFORNIA DEPARTMENT OF TRANSPORTATION, Energy and Transportation Systems, December, 1978.
5. Parsons, Brinkerhoff, Quade & Douglas, Inc., Draft Traffic Impact Study for Crystal Promenade, July, 1983.
6. Cernansky, N.P., Diesel Exhaust Odor and Irritants: A Review, Journal of the Air Pollution Control Association, February, 1983, p.97.

TABLE 1

SUMMARY OF HAWAII AND NATIONAL AMBIENT AIR QUALITY STANDARDS (Micrograms per Cubic Meter)

POLLUTANT	SAMPLING PERIOD	AMBIENT AIR QUALITY STANDARDS	
		• NATIONAL	HAWAII
		Primary	Secondary
Particulates	Annual Geometric Mean	75	60
	Annual Arithmetic Mean	--	--
	Maximum 24-Hour Average	260	150
Sulfur Dioxide	Annual Arithmetic Mean	80	--
	Maximum 24-Hour Average	365	--
	Maximum 3-Hour Average	1300	400
Nitrogen Dioxide	Annual Arithmetic Mean	100	70
	Maximum 1-Hour Average	240	100
Carbon Monoxide	Maximum 8-Hour Average	10	5
	Maximum 1-Hour Average	40	10
Lead	Calendar Quarter	1.5	1.5

- Notes: 1. Carbon Monoxide Standards are in milligrams per cubic meter.
2. National Standards based on 40 CFR Part 50; Hawaii Standards based on Title 11, Administrative Rules, Chapter 59.

TABLE 2

SUMMARY OF AIR POLLUTANT MEASUREMENTS AT NEAREST MONITORING STATIONS

POLLUTANT	1976	1977	1978	1979	1980	1981	1982
PARTICULATE MATTER							
No. of Samples	73	53	61	57	57	40	51
Range of Values	24-130	18-109	21-79	20-102	20-116	18-78	15-52
Average Value	65	40	38	39	36	36	29
No. of Times							
State AQS Exceeded	1	1	0	1	1	0	0
SULFUR DIOXIDE							
No. of Samples	70	54	61	48	52	32	30
Range of Values	<5-7	<5-15	<5-15	<5-13	<5-15	<5-15	<5-15
Average Value	<5	<5	<5	<5	<5	<5	<5
No. of Times							
State AQS Exceeded	0	0	0	0	0	0	0
CARBON MONOXIDE							
No. of Samples	355	359	365	207		286	311
Range of Values	5-24.2	0-19.6	0-20.7	0-17.3	1.2-13.8	0-4.6	0-4.6
Average Value	5.4	3.5	3.1	2.9	5.1	1.2	1.2
No. of Times							
State AQS Exceeded	41	22	19	10	13	0	0
OXIDANT (OZONE)							
No. of Samples	322	300	284	338	295	314	335
Range of Values	2-127	4-61	10-84	10-80	10-84	10-104	0-151
Average Value	40	25	33	39	48	37	32
No. of Times							
State AQS Exceeded	1	0	0	0	0	1	2
NITROGEN DIOXIDE							
No. of Samples	21					46	
Range of Values	24-61					6-77	
Average Value	44					25	
No. of Times							
State AQS Exceeded	0					0	

NOTES: See text for locations of monitoring stations. Carbon monoxide reported in milligrams per cubic meter; other pollutants in micrograms per cubic meter. Carbon monoxide and ozone readings are daily peak one hour values; other pollutant values are for a 24 hour sampling period.

SOURCE: State of Hawaii Department of Health

TABLE 3

RESULTS OF PEAK HOUR CARBON MONOXIDE ANALYSIS
(milligrams per cubic meter)

SITE 1		1983	1986	2003
Without Project		10.4	8.3	6.1
With Project			8.6	6.3
SITE 2				
Without Project		9.8	7.7	5.5
With Project			8.1	5.8
SITE 3				
Without Project		13.2	10.3	7.4
With Project			10.8	7.7
SITE 4				
Without Project		11.5	8.9	6.4
With Project			11.7	8.3

STATE OF HAWAII AQS: 10
FEDERAL AQS: 40

NOTE: See Figure 2 for location of receptor sites.

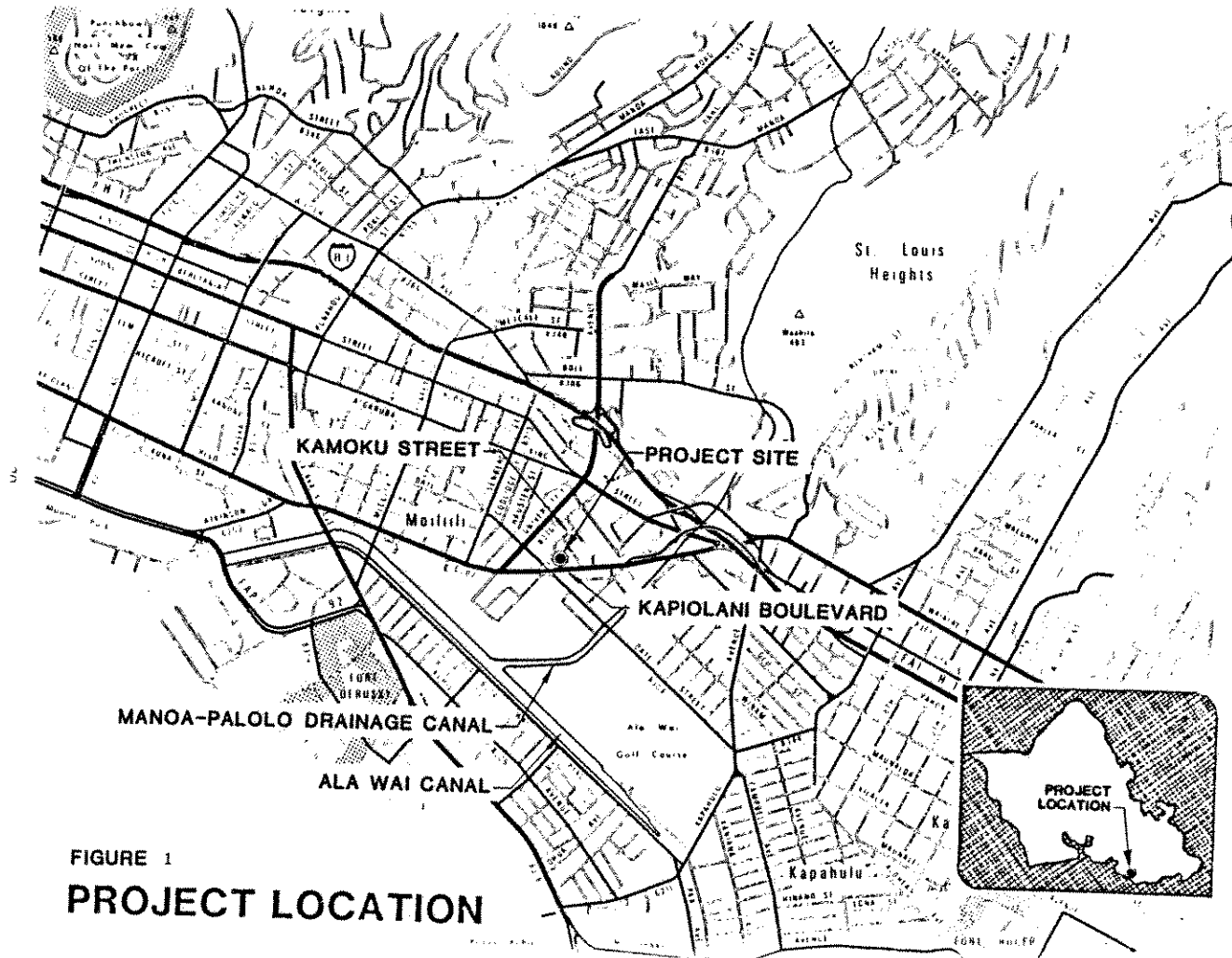


FIGURE 1
PROJECT LOCATION

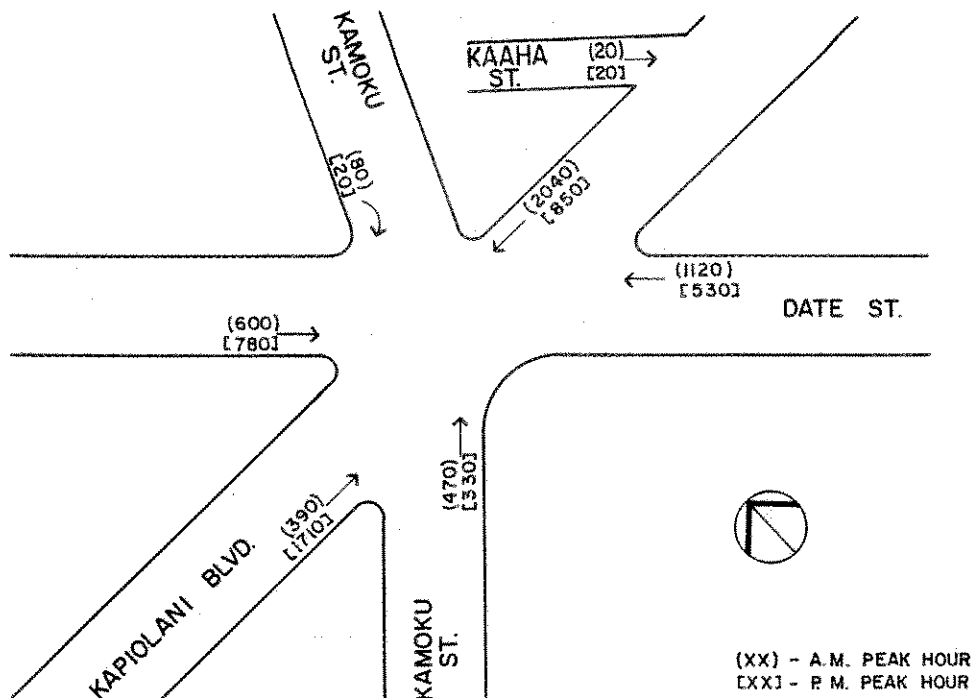
TABLE 4

RESULTS OF EIGHT HOUR CARBON MONOXIDE ANALYSIS
(milligrams per cubic meter)

	1983	1986	2003
SITE 1			
Without Project		5.0	3.7
With Project	6.2	5.2	3.8
SITE 2			
Without Project		4.6	3.3
With Project	5.9	4.9	3.5
SITE 3			
Without Project		6.2	4.4
With Project	7.9	6.5	4.6
SITE 4			
Without Project		5.3	3.8
With Project	6.9	7.0	5.0

STATE OF HAWAII AQS: 5
FEDERAL AQS: 10

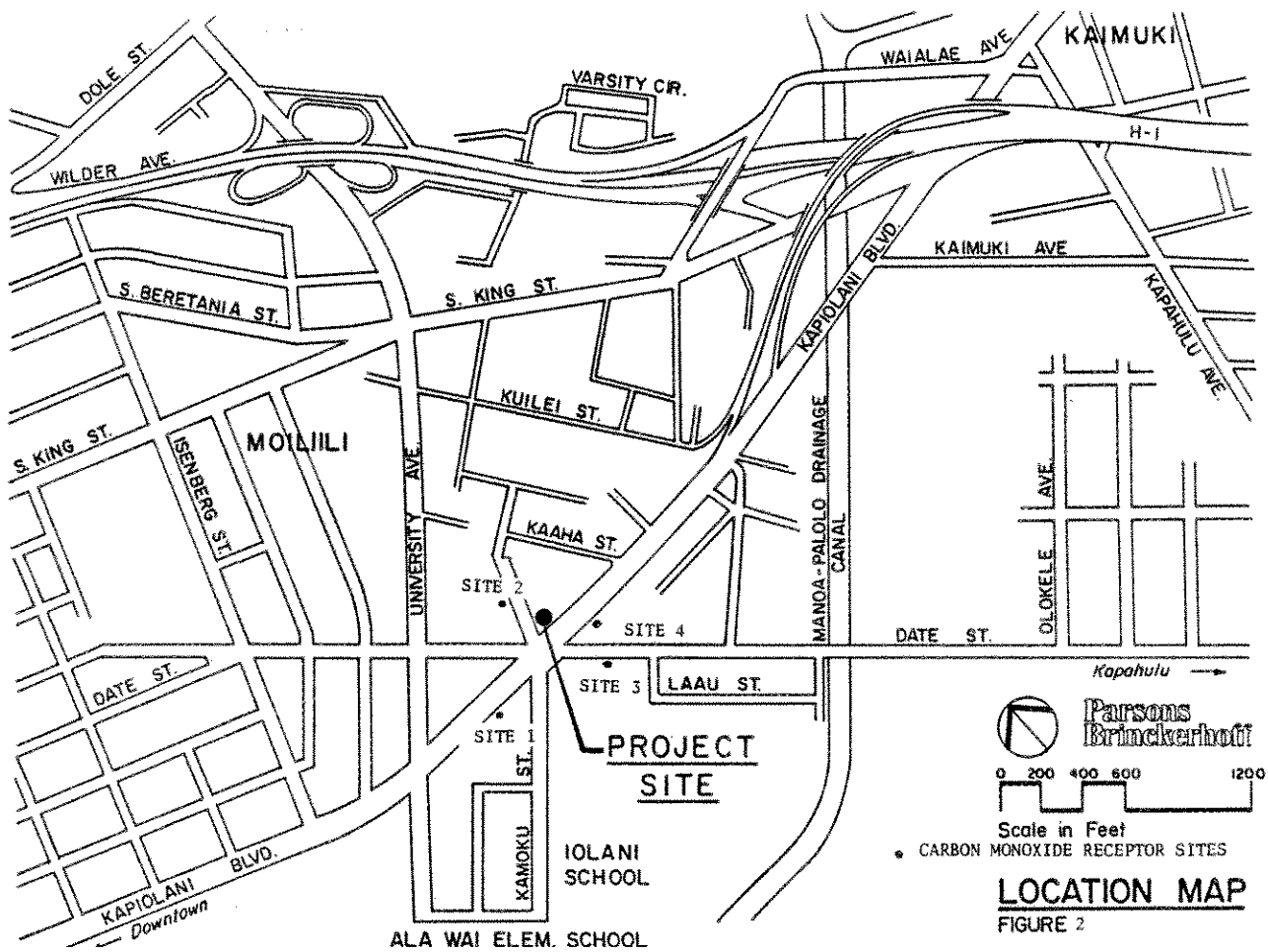
NOTE: See Figure 2 for location of receptor sites.

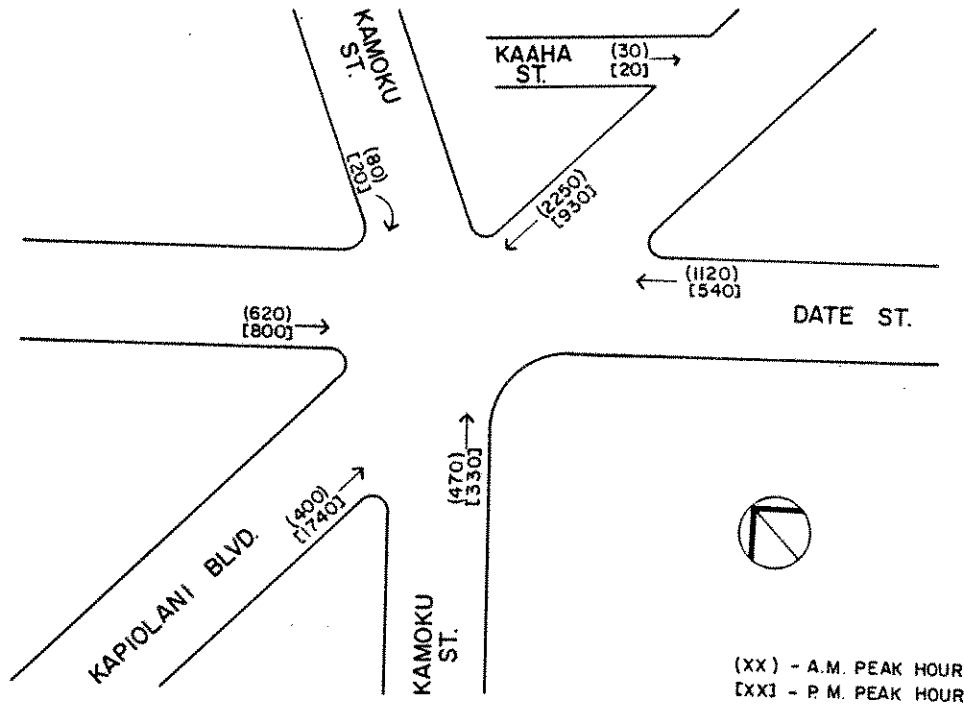


TRAFFIC ASSIGNMENT WITHOUT PROJECT

FIGURE 3

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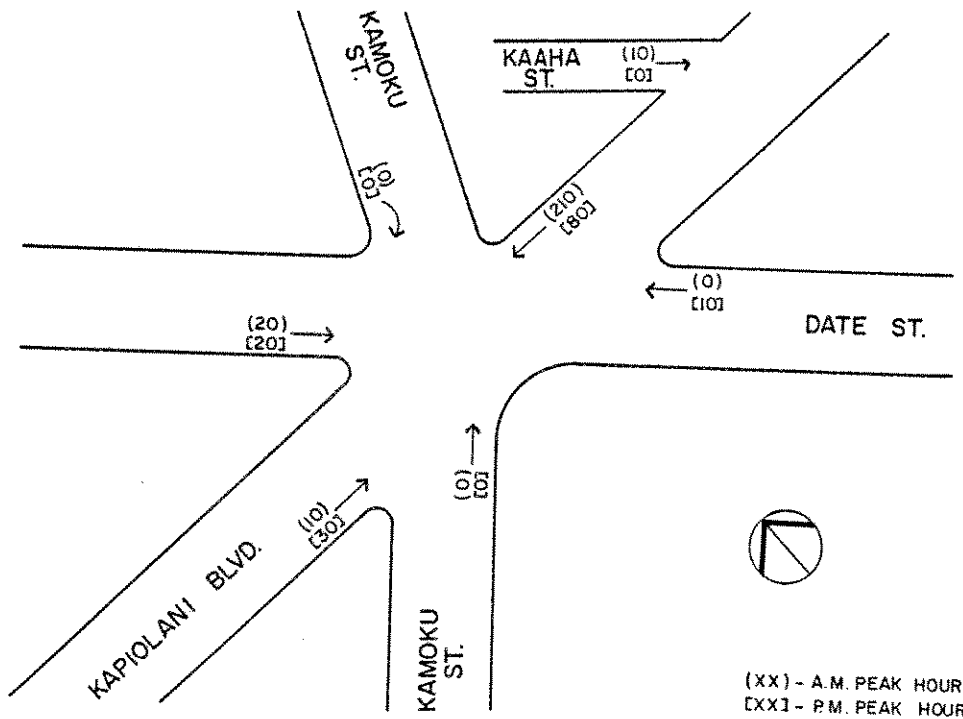




TRAFFIC ASSIGNMENT WITH PROJECT

FIGURE 5

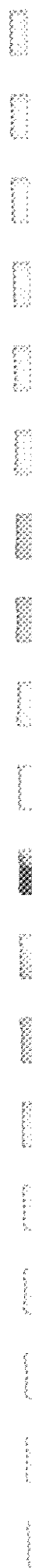
Parsons
Brinckerhoff



PROJECT TRAFFIC

FIGURE 4

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Appendix D

TRAFFIC



TRAFFIC IMPACT STUDY

CRYSTAL PROMENADE
HONOLULU, HAWAII

Prepared for : BAL Corporation

October 3, 1983

Submitted by : Parsons Brinckerhoff
Quade & Douglas, Inc.

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INTRODUCTION

BAL Corporation has proposed to build Crystal Promenade, a 452-unit condominium, on the mauka-kokohead corner of the Kapiolani Boulevard and Kamoku Street intersection. Forty-eight units will be reserved for rentals to the elderly. The project site is currently occupied by a two-story apartment building.

This report summarizes the findings of a study of the expected traffic impacts due to the proposed project. The morning (AM) and afternoon (PM) traffic peak hours in the vicinity have been identified as 7:00-8:00 a.m. and 4:30-5:30 p.m., respectively. Descriptions of the expected trip generation, distribution and traffic assignment of the proposed project have also been included in this report. Three alternate access schemes were studied and compared.

EXISTING CONDITIONS

The project site presently contains a two-story apartment building with access provided onto Kapiolani Boulevard. The reduction of traffic due to the displacement of existing uses on the site is small and has been conservatively overlooked. The site is bordered by Kapiolani Boulevard and Kamoku Street (See Figure 1).

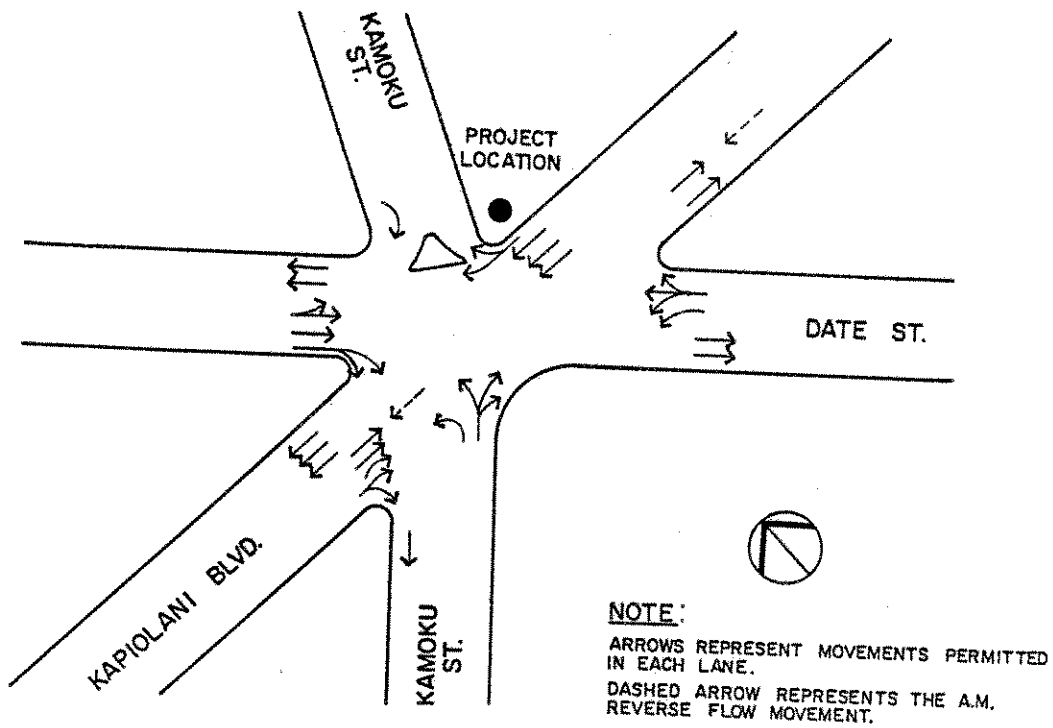
Existing Roadways

Kapiolani Boulevard is a major arterial connecting the downtown area with Moiliili and Kaimuki. Kapiolani Boulevard has eight approach lanes at its intersection with Date and Kamoku Streets. During the PM peak hour and off-peak hours, ewa-and kokohead-bound traffic each have four approach lanes at this intersection. However, during the AM peak hour, Kapiolani Boulevard is coned for reversed traffic, with an additional ewa-bound lane and one less kokohead-bound lane.

Date Street is a collector street between the Moiliili and Kapahulu areas. Kamoku Street is a local street serving Iolani School, Ala Wai Elementary School and surrounding residential area. The existing laneage configuration of the Kapiolani Boulevard and Date and Kamoku Streets intersection is shown in Figure 2.

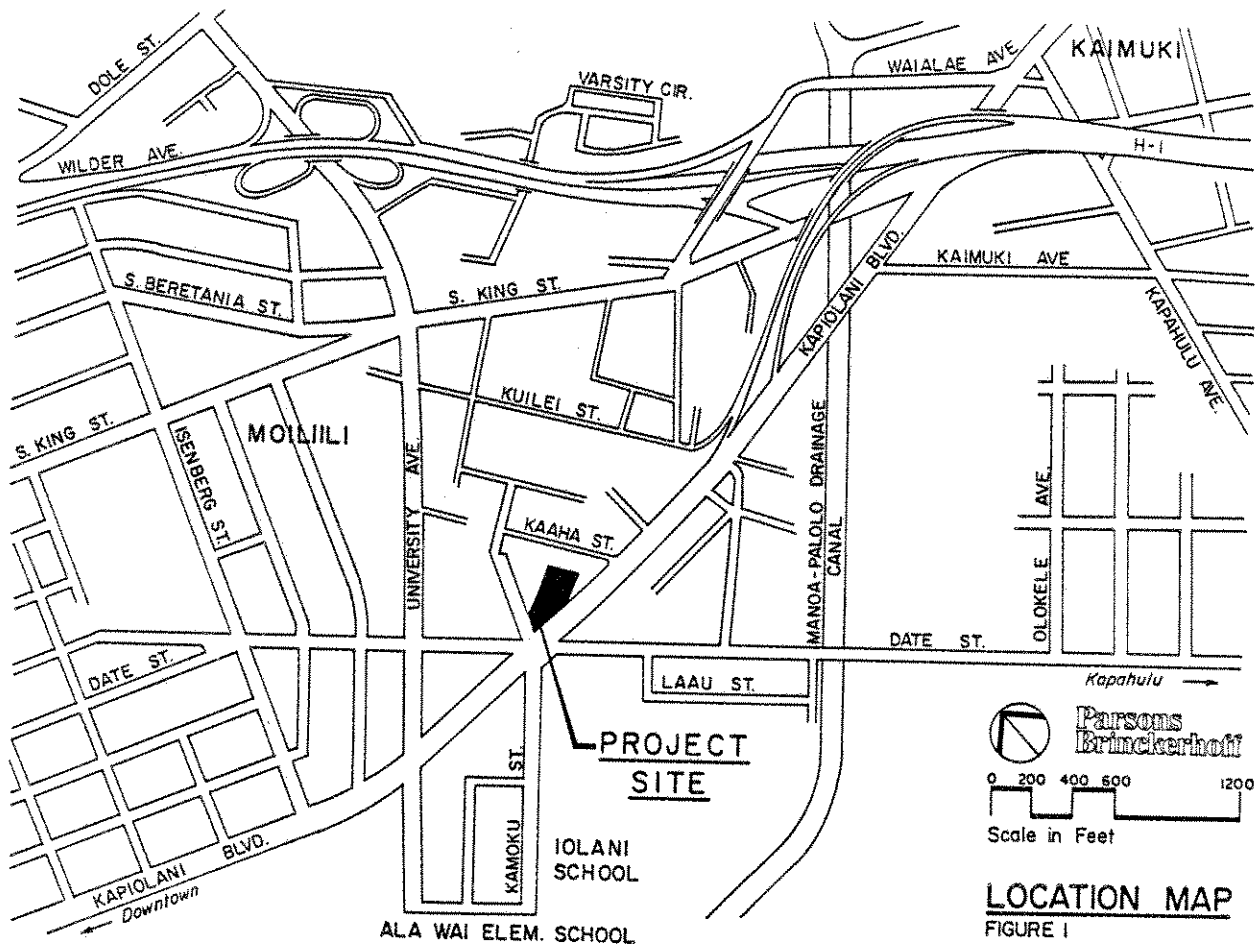
Kaaha Street intersects Kapiolani Boulevard at a T-intersection approximately 600 feet kokohead of Date Street. At this location, four ewa-bound lanes and two kokohead-bound lanes are provided at Kapiolani Boulevard. Present coning practice in the AM peak hour extends beyond this intersection. Kaaha Street is a minor street serving the "Moiliili Triangle" area, and connects Kapiolani Boulevard to Kamoku Street via Kaaloa Street.

Descriptions of the existing traffic conditions are based on the latest available State Highways Division counts¹ and field counts and



**EXISTING LANEAGE
 CONFIGURATION**
 FIGURE 2

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 Brinckerhoff



observations taken in May and July, 1983. Peak hour traffic volumes from this data are shown in Table 1.

The Kapiolani Boulevard/Kamoku Street/Date Street intersection is controlled by a four-phase traffic signal. Kapiolani Boulevard and Kamoku Street are each allotted one phase, while Date Street has separate phases for the kokohead-bound and ewa-bound approaches. The mauka leg of Kamoku Street is limited to right-turns in from Kapiolani Boulevard and right-turns out to Date Street. Left turns are not permitted from Kapiolani Boulevard onto either Kamoku or Date Streets. In addition, left turns from Date Street kokohead-bound to Kapiolani Boulevard are prohibited during the AM peak hour, allowing additional green time for the Date Street ewa-bound through movement. The existing volume for each approach is shown in Figure 3.

The existing conditions at the Kapiolani Boulevard/Kamoku Street/Date Street intersection have been analyzed by the Highway Capacity Manual,² Critical Movement Analysis,³ and Traffic Institute⁴ methods. All methods show the intersection operating over calculated capacities during the AM peak hour. Results from the Critical Movement Analysis indicate that the intersection is over capacity by 10 percent in the AM peak hour.

The conditions observed during field surveys indicate Levels of Service (defined in the Appendix) D and E. Ewa-bound queues on Kapiolani Boulevard were observed past Kaaha Street during a portion of AM peak hour. Queues that formed during the PM peak hour were usually able to clear in the next green phase. Right turns from the Moiliili Triangle using Kamoku Street turning onto Date Street are controlled by a stop sign. Ewabound traffic on Date Street include vehicles from Date Street proceeding straight ahead and right turn traffic from Kapiolani Boulevard. Existing Levels of Service are B (AM) and A (PM).

Left turns into and out of Kaaha Street experienced considerable delays during the morning peak hour. The long queues in the Kapiolani

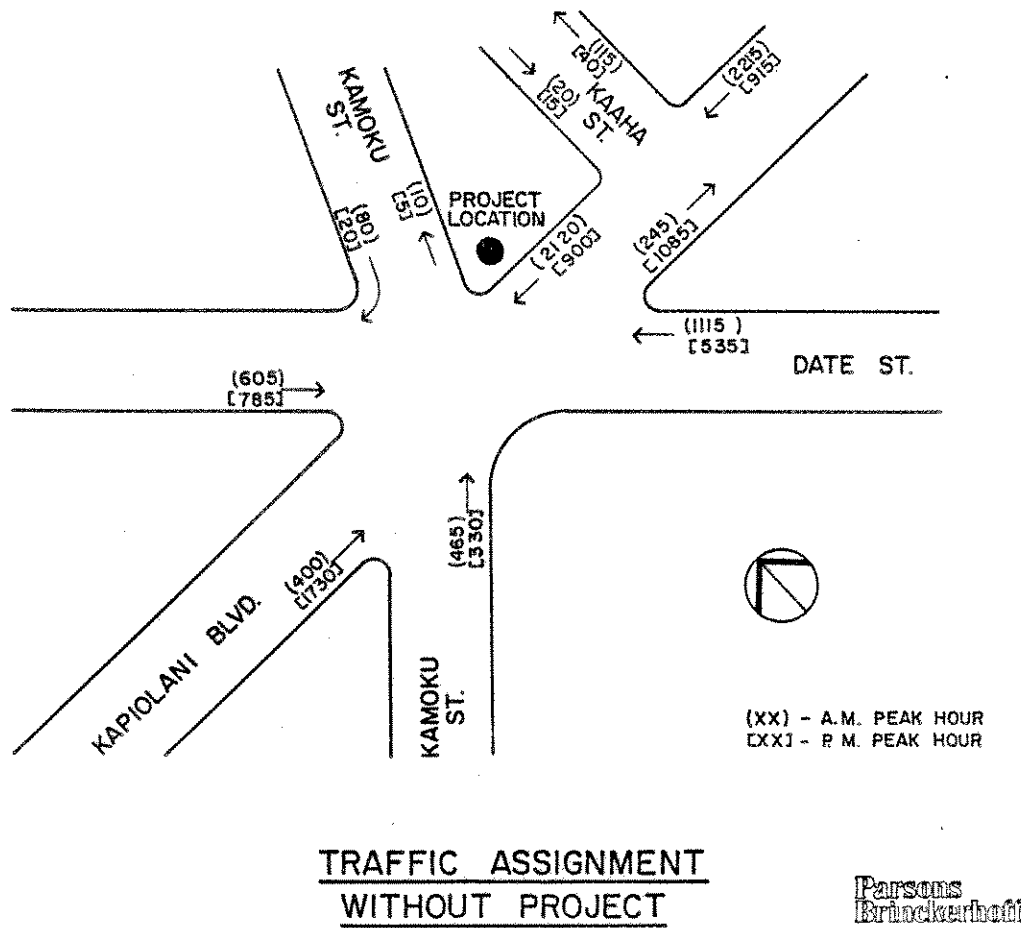


FIGURE 3

Table 1

PEAK HOUR TRAFFIC COUNTS

Kapiolani Boulevard/Date Street/Kamoku Street

Approach Volumes (counted)		Kapiolani Blvd.		Date Street		Kamoku Street	
Direction of Travel: Kapiolani Blvd./Date Street/ Kamoku Street Intersection		Ewa	KKH	Ewa	KKH	Ewa	KKH
AM Peak Hour							
SDOT 2/1/78		2193	396	974	491	350	
SDOT 5/18/78		--	392	--	--	--	
PBOD 5/18/83		2040	394	1115	604	466	
PBOD 7/07/83		2205	--	--	--	--	
PM Peak Hour							
SDOT 1/31/78		808	1469	434	735	205	
PBOD 5/13/83		851	1711	534	783	327	
PBOD 7/07/83		946	--	--	--	--	
Manoa-Patolo Drainage Canal Screenline							
AM Peak Hour							
SDOT February 1978		897	332	636	507	--	
SDOT September 1979		948	409	707	548	--	
SDOT May 1981		1023	319	766	561	--	
PM Peak Hour							
SDOT February 1978		576	1168	389	1046	--	
SDOT September 1979		504	1042	469	1112	--	
SDOT May 1981		515	1055	482	1076	--	

Abbreviations Used:

KKH = Kokohead
SDOT = State DOT, Highways Division
PBOD = Parsons Brinckerhoff Quade
& Douglas, Inc.

AM = 7:00 a.m. - 8:00 a.m.
PM = 4:30 p.m. - 5:30 p.m.

Boulevard ewa-bound lanes often blocked the unsignalized Kaaha Street intersection and, in effect, caused a right turn in, right turn out situation at Kaaha Street during the AM peak hour. An analysis of the traffic volumes at the Kapiolani Boulevard/Kaaha Street intersection indicates that it would operate at Level of Service D if it were not blocked by queues. Left turns out of Kaaha Street encountered some delay (Service Level D) during the PM peak hour, but the intersection was not blocked by Kapiolani Boulevard queues.

FUTURE CONDITIONS

The proposed project is expected to be completed in 1986. A "future" traffic estimate was developed to identify non-project traffic expected in that year. Historical traffic counts do not indicate any growth except from specific developments in the immediate vicinity (See Table 1). No other project affecting traffic in the area has been identified, except for the Kapiolani Interchange.

The Kapiolani Interchange on-ramp to the H-1 freeway is currently under construction and is expected to be completed by the end of 1983. The project would not generate additional traffic in the overall area; as a transportation facility, however, it is expected to alter travel patterns and may have localized effects. The State DOT traffic assignment⁵ for the Kapiolani Interchange project indicates that over 800 vehicles are expected to use the on-ramp during the PM peak hour. A correlating decrease in kokohead-bound on-ramp traffic from King Street is expected to occur as a result. Some of the traffic destined for Maialae and Harding Avenues presently using Kapiolani Boulevard would be expected to then divert to King Street as traffic on the overall street system adjusts to the new pattern. No significant change in Kapiolani Boulevard traffic volume is expected.

Trip Generation

Trip generation rates used in this study are based on rates collected and compiled by the Institute of Transportation Engineers.⁶ Forty-eight of the 452 units will be reserved for the elderly. A separate set of trip generation rates was used for the elderly units, since the elderly's vehicular trip generation rates are lower than that of the average condominium occupant. Table 2 shows the generation rates used in this study and Table 3 shows the trips in terms of total vehicles.

Traffic Distribution and Assignment

Traffic distribution predicts the locations to or from which the proposed project's generated traffic is expected to travel. Oahu population 7 and employment⁸ distributions were used to predict project trip distribution.

The street network serving the project site was studied to determine the various possible travel paths to or from the project. Existing turn restrictions at the Kapiolani/Date/Kamoku intersection were considered in assigning project generated traffic.

The traffic assignments were based on seven traffic distribution zones. Productions (traffic leaving the project) and attractions (traffic entering the project) were analyzed separately. Average travel times for each zone were assigned and a gravity model applied to determine traffic distribution, shown in Table 4.

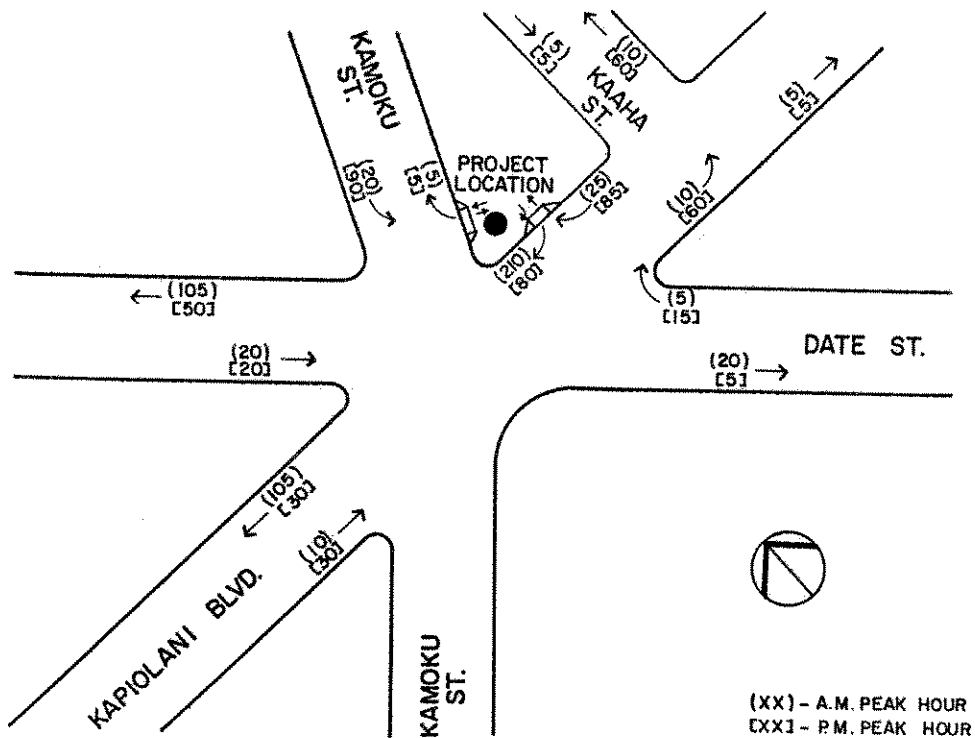
Peak hour traffic assignments were modelled using the above distribution. Both productions and attractions in the PM peak hour were assumed to be affected equally by population and employment distributions. In the AM peak hour, production distribution was modelled entirely on employment distribution, while attractions were based on population only. Figures 4a, 4b, and 4c show the traffic generated by or affected by the project and assigned to the street system for three alternate access schemes.

Table 2

TRIP GENERATION RATES (Vehicles Per Dwelling Unit)		
	Elderly	Condominium
Daily (Enter and Exit)	3.3	6.1
AM Peak Hour Enter Exit	0.07 0.33	0.1 0.5
PM Peak Hour Enter Exit	0.27 0.13	0.4 0.2

Table 3

TRIP GENERATION	Vehicles
Daily (Enter and Exit)	2620
AM Peak Hour Enter Exit	45 215
PM Peak Hour Enter Exit	175 85



PROJECT TRAFFIC

FIGURE 4A
(ACCESS ALTERNATE A)

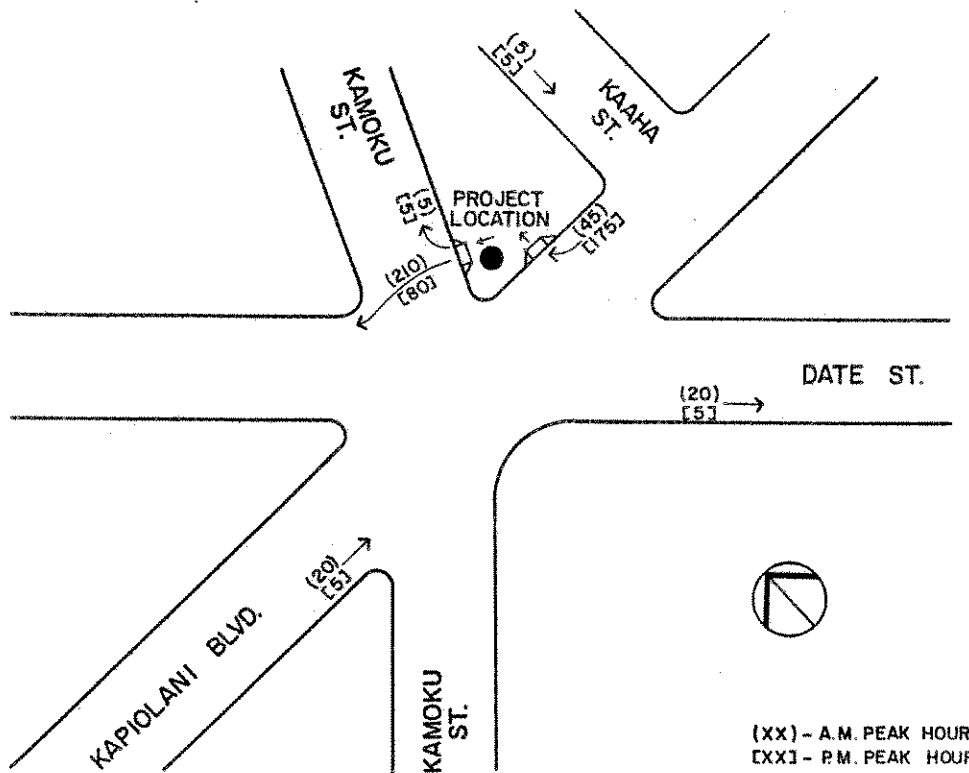
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Table 4

TRAFFIC DISTRIBUTION

	Productions		Attractions	
	Employment Base	Population Base	Employment Base	Population Base
Honolulu (Makai)	40%	6%	28%	6%
McCully	10	19	6	14
University/Manoa	11	12	17	16
Waialae	1	3	1	2
H-1 East	4	13	5	16
H-1 West	26	35	35	38
Kapahulu	9	11	8	8

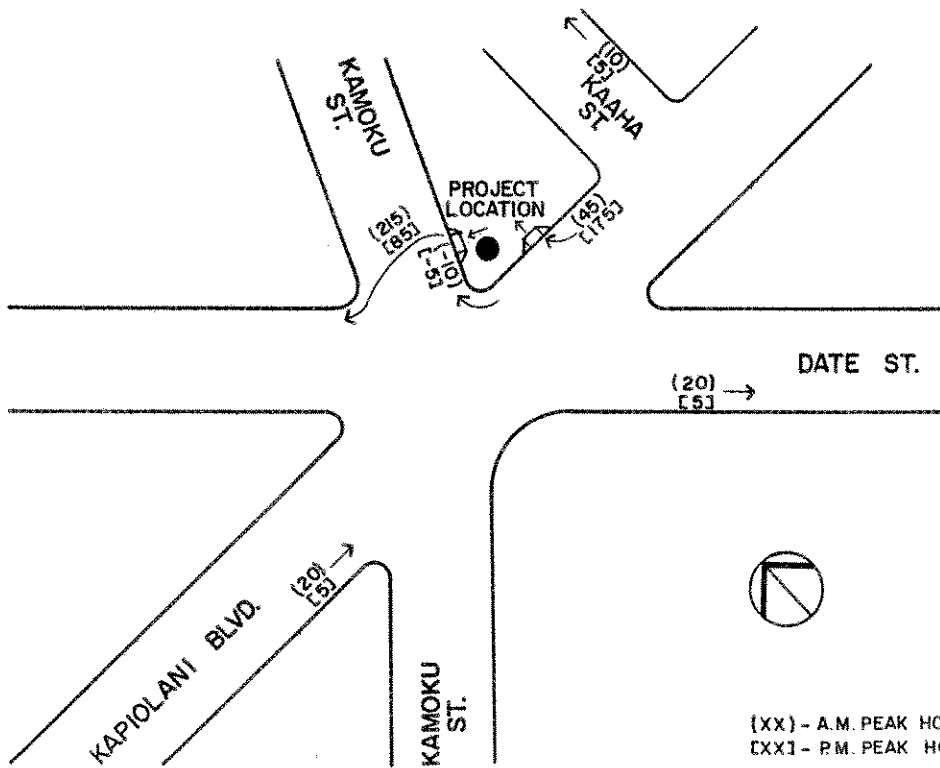
Note: Percentages may not add to 100% of rounding.



PROJECT TRAFFIC

FIGURE 4B
(ACCESS ALTERNATE B)

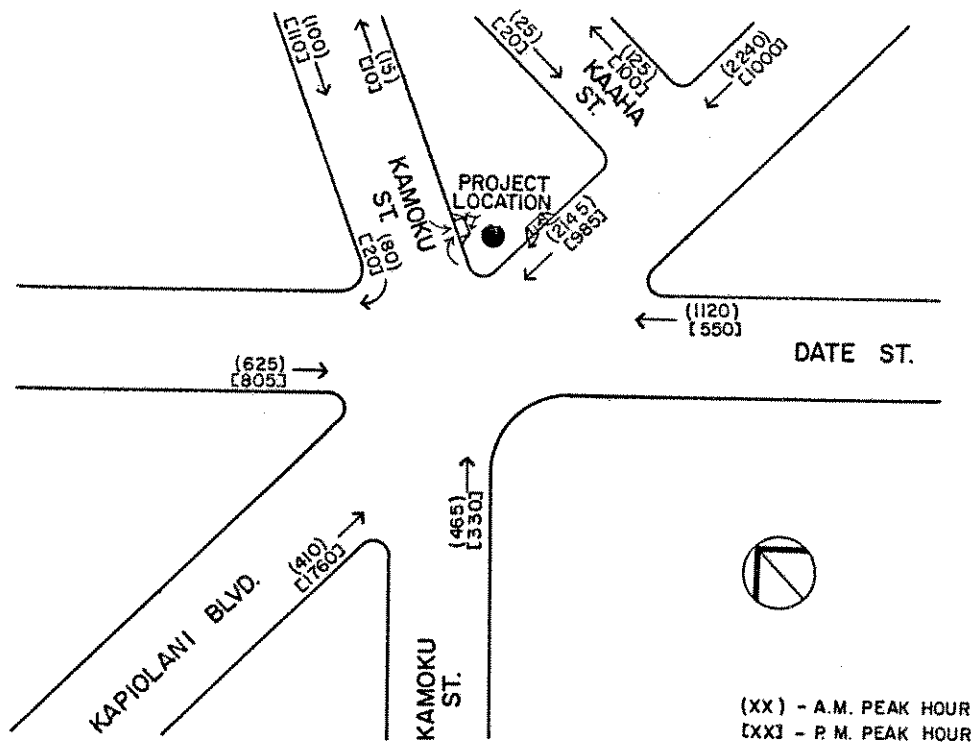
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PROJECT TRAFFIC EFFECTS

FIGURE 4C
(ACCESS ALTERNATE C)

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TRAFFIC ASSIGNMENT WITH PROJECT

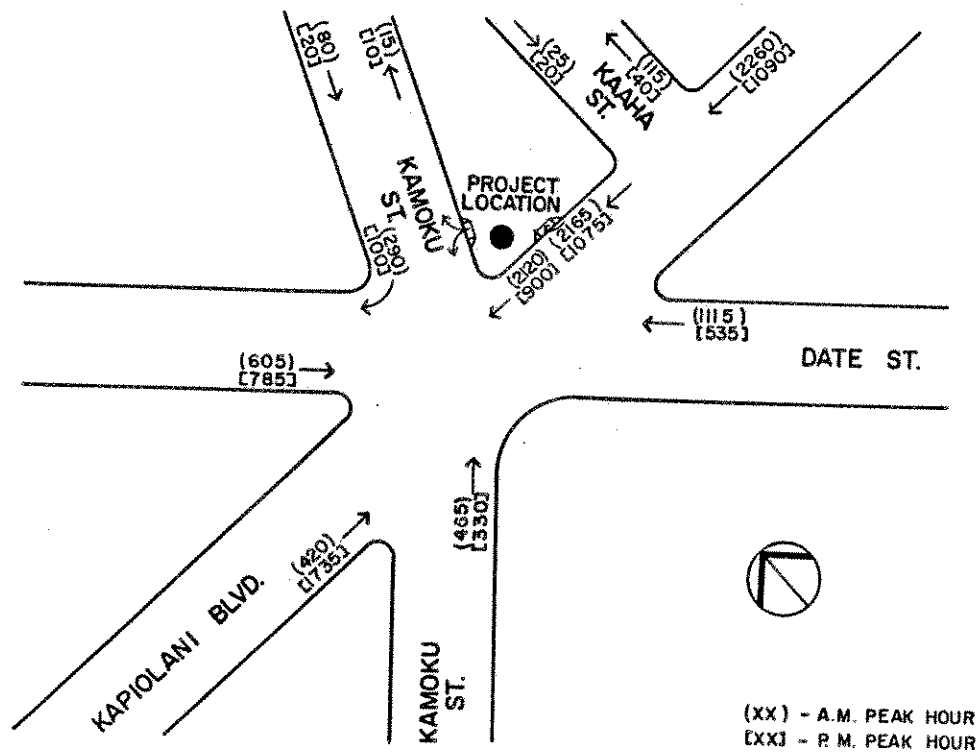
FIGURE 5A
(ACCESS ALTERNATE A)

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IMPACT OF THE PROPOSED PROJECT

Two access points are proposed, one each on Kapiolani Boulevard and Kamoku Street. Three alternative operational schemes for access were considered. In Access Alternate A, only right turn movements would be allowed at the Kapiolani Boulevard driveway. Alternate B would have a one-way pattern; only eastbound traffic from Kapiolani Boulevard could enter, and traffic leaving the project would exit onto Kamoku Street. Alternate C would be similar to B except that Kamoku and Kaaloa Streets, makai of Kaaha Street, would be converted to one-way (makai-bound) traffic only. Existing mauka-bound traffic would use Kaaha Street to enter the Moiliili Triangle. In Alternate C, the existing right turn lane into Kamoku Street would be closed. Otherwise, the intersections of Kapiolani Boulevard/Kamoku Street/Date Street and Kaaha Street/Kapiolani Boulevard are assumed to retain their existing configuration. Figures 5a, 5b, and 5c show the traffic volumes with the addition of the expected project traffic.

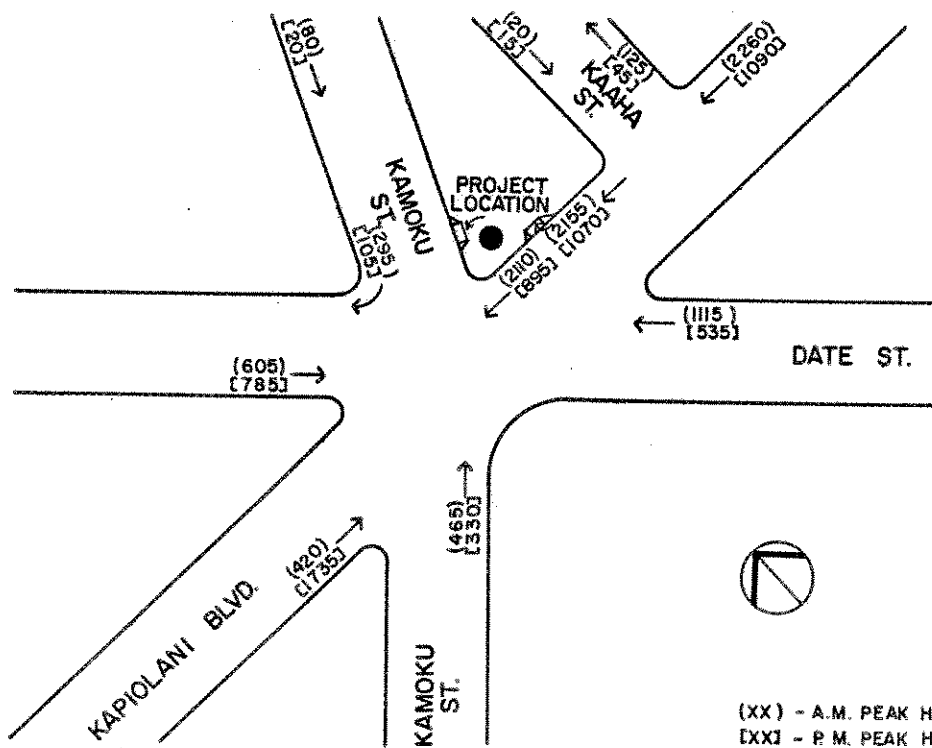
The traffic generated by the proposed project is expected to increase traffic volumes in the project area. Analyses of conditions over capacity are not detailed in the current methods; however, the ratio of critical volume-to-capacity at the Kapiolani Boulevard/Kamoku Street/Date Street intersection is reported in Table 5 to give an indication of the proposed project's impact. The Critical Movement method uses the sum of conflicting movements at an intersection as the indicator for service levels; the capacity of a four-phase signal is defined as 1650 passenger cars per hour. The proposed project is expected to increase the critical volume-to-capacity ratio by approximately 3 percent.



TRAFFIC ASSIGNMENT WITH PROJECT

FIGURE 5B
(ACCESS ALTERNATE B)

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TRAFFIC ASSIGNMENT WITH PROJECT

FIGURE 5C
(ACCESS ALTERNATE C)

Parsons
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The right turn from Kamoku Street to Date Street would have increased traffic; Levels of Service would be lower (worse), becoming C or D depending on the Alternate selected. Levels of Service at the Kapiolani Boulevard/Kaaha Street intersection would not change despite the small increases in traffic. The analyses of these unsignalized intersections assumed that they were not affected by conditions at the signalized Kapiolani Boulevard/Date Street/Kamoku Street intersection; results are shown in Table 6.

Traffic on the internal Moiliili Triangle streets would also be affected by the proposed project. In Alternate A, traffic entering the project from ewa of the site would be expected to use these streets and the Kamoku Street driveway. In Alternates A and B, exiting traffic desiring to go in the kokohead direction could exit on Kamoku Street, use Kaaloa and Kaaha Streets and turn left onto Kapiolani Boulevard. In Alternate C, traffic now turning into Kamoku Street is assumed to turn at Kaaha Street. Increases in internal street traffic are indicated by changes at the Kaaloa and Kaaha Streets intersection as shown in Table 7.

Alternate C would eliminate an existing allowed traffic movement, the right turn from ewa-bound Kapiolani Boulevard to mauka-bound Kamoku Street. A reasonable alternative routing is available; traffic would turn right off of Kapiolani Boulevard at Kaaha Street then left (assuming destinations on Kamoku Street) at Kaaloa Street, and proceed makai onto Kamoku Street.

The volume of traffic affected has been estimated to be 100 vehicles per day. Peak period manual traffic counts in May, 1983 tallied a four-hour (6:30 a.m. to 8:30 a.m. and 3:45 p.m. to 5:45 p.m.) total of 31 vehicles. Typical K-factors (hourly volume/daily volume) for this type of street are about 8 percent for peak traffic hours.

TABLE 5

Critical Volume to Capacity Ratio
Kapiolani Boulevard/Kamoku Street/Date Street

	AM Peak Hour	PM Peak Hour
Existing	1.10	0.98
With Proposed Project		
Access Alternate 1	1.13 [*]	1.00
(Change)	(+3%)	(+2%)
Access Alternate 2	1.10	0.98
(Change)	(0%)	(0%)
Access Alternate 3	1.10	0.98
(Change)	(0%)	(0%)

TABLE 6

Levels of Service
Unsignalized Intersections

With Project

Existing Alt. A Alt. B Alt. C

Kamoku Street to Date Street

Right Turn AM peak hour
" PM peak hourB C D D
A A A AKapiolani Boulevard to Kaaha
StreetLeft Turn AM peak hour
" PM peak hourB B B B
A A A AKaaha Street to Kapiolani
BoulevardRight Turn AM peak hour
" PM peak hourA A A A
A A A ALeft Turn AM peak hour
" PM peak hourD D D D
D D D D

Table 7

ADDED TRAFFIC, INTERNAL STREETS

Peak Hour Vehicles at Kaaloa/Kaaha Streets

AM Peak Hour PM Peak Hour

Alternate A

94

Alternate B

7

5

Alternate C

8

6

OFF-STREET PARKING

The proposed project's 452 dwelling units include studio, one-bedroom, and two-bedroom apartments. Forty-eight units are set aside for rentals to the elderly; of the 404 remaining dwelling units, 120 have floor areas of 780 square feet, while all other units are less than 600 square feet in area. The off-street parking required by the City's zoning code⁹ is shown in Table 8.

Table 8

OFF STREET PARKING REQUIRED

Type of Dwelling	Units	Rate (stalls/unit)	Total
Elderly	48	0.25	12
Multiple-family 600-800 sq. ft.	120	1.25	150
Less than 600 sq. ft.	284	1.00	284
Regular size stalls required =			446
Stalls required (60%) =			268

Off-street parking for the proposed project will be in a separate structure on the site. A total of 467 stalls (276 regular and 191 compact) will be provided. The number of stalls to be provided exceeds the requirements shown above.

A separate analysis evaluated the proposed project's parking adequacy independently from the City's zoning requirement. Data on vehicle availability from a study for the Oahu Metropolitan Planning Organization¹⁰ was used to estimate the total number of parking spaces needed by residents of the project. Several assumptions of household sizes and income were made to apply this data; for the characteristics shown in Table 9, the number of resident vehicles would be 449. The parking provided, 467 stalls, exceeds the estimated resident vehicles requiring parking space.

Table 9

VEHICLE AVAILABILITY ASSUMPTIONS

Household Income

Less than \$25,000/year (1981 dollars): all elderly and 50% of condo.

More than \$25,000/year: 50% of condominium units

Household size (units) persons:	1	2	3	4
Elderly, studio	34	0	0	0
Condominium studio	0	14	0	0
1 bedroom	152	38	0	0
2 bedrooms	47	47	0	0
	0	40	60	20

CONCLUSIONS AND RECOMMENDATIONS

Traffic volumes in the vicinity of the proposed project are expected to increase because of the project. The analyses show increases in critical movements at the Kapiolani Boulevard/Date Street/Kamoku Street intersection of less than 3 percent in any of the alternatives.

Existing morning peak hour counted traffic volumes were found to exceed calculated roadway capacities (Level of Service F). Peak hour levels of service observed during the field counting, however, were higher (i.e. better) than calculated, being judged to be Level E in the AM, and Level D in the PM peak hours. This indicates that a 3 percent increase in critical movements would not exceed actual roadway capacity.

The proposed project is in a developed area; widening of the arterial streets would be unlikely and is not considered a feasible alternative to provide additional capacity. Additional turn restrictions could increase intersection capacity, but the high existing turn volume makes this alternative impractical. Therefore, no improvements to the arterial street system are recommended.

Three alternate schemes were analyzed for access to the project using driveways onto Kapiolani Boulevard and Kamoku Street. Alternate A allows all driveway movements except left turns in or out at Kapiolani Boulevard. Although this scheme would have the least impact to the Kamoku-to-Date Streets right turn, it would have the greatest impact to Kapiolani Boulevard and to the internal Moiliili Triangle streets.

Alternates B and C have similar traffic impacts. Levels of service on Kapiolani Boulevard and Date Street would not be affected, but users would be inconvenienced. In both Alternates, project traffic can only enter from the ewa-bound curb lane of Kapiolani Boulevard and exit to Kamoku Street. In Alternate C, existing traffic turning right from

ewa-bound Kapiolani Boulevard to Kamoku Street would use Kaaha Street instead to enter the area. Impacts of either Alternates B or C to traffic within the Moiliili Triangle is expected to be minor and similar in volume.

Alternate B would provide adequate project access with the least impact to existing traffic. Alternate C would have a small impact on existing traffic but could allow for other uses of existing street area. Alternate B or Alternate C are recommended for the proposed project.

REFERENCES

1. State of Hawaii, Department of Transportation, Highways Division, Planning Branch, Traffic count Stations SL-53 (1978, 1979, 1981), SL-54 (1978, 1981), 700 (1978) and 701 (1978).
2. National Academy of Sciences - National Research Council, Highway Research Board, Special Report 87, Highway Capacity Manual 1965, Washington, D.C., 1965.
3. Transportation Research Board, National Academy of Sciences, Transportation Research Circular, Number 212, Interim Materials on Highway Capacity, January, 1980.
4. The Traffic Institute, Northwestern University, Traffic Control and Design Techniques Workshop, December, 1979.
5. State of Hawaii, Department of Transportation, Highways Division, Planning Branch, Traffic Assignment Project TA77-19, Kapiolani Interchange On-Ramp, Project No. I-HI-1(79).
6. Institute of Transportation Engineers, Trip Generation, Arlington, Virginia, 1979.
7. State of Hawaii, Department of Planning and Economic Development, The State of Hawaii Data Book 1982, Table 9. (1980 Resident Population from census data)
8. State of Hawaii, Department of Planning and Economic Development, The State of Hawaii Data Book 1980, Table 8. (1975 Employment data by census tracts)

9. City and County of Honolulu, Comprehensive Zoning Code.

10. Oahu Metropolitan Planning Organization, Oahu Model Update Study, Final Report Volume II, December 1982 (prepared by Schimpeler Corradino Associates). Tables 12-20 and 12-23.

APPENDIX

Although the Highway Capacity Manual and the Critical Movement Analysis require different calculations in the determination of service levels, the service level definitions in both methods are similar. Six levels of service, labelled A through F, from the best to worst conditions are defined. Characteristics of each level of service for intersections are described below. Level of Service D is considered adequate for urban arterials.

Signalized 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.

Unsignalized Intersections (stop or yield control)

Level of Service A: Little or no delay

Level of Service B: Short traffic delays

Level of Service C: Average traffic delays

Level of Service D: Long traffic delays

Level of Service E: Very long traffic delays at extreme congestion-failure

Level of Service F: Intersection blocked by external causes.

Appendix E

POTABLE WATER



BOARD OF WATER SUPPLY

CITY AND COUNTY OF HONOLULU

630 SOUTH BERETANIA

HONOLULU, HAWAII 96843



May 26, 1983

EILEEN R. ANDERSON, Mayor

YOSHIE H. FUJINAKA, Chairman
ROBERT A. SOUZA, Vice-Chairman
MILTON J. AGADER
MICHAEL J. CHUN
WALTER A. DODS, JR.
RYOKICHI HIGASHIONNA
DONNA M. HOWARD

KAZU HAYASHIDA
Manager and Chief Engineer

Mr. William B. C. Hee
President
Engineers-Surveyors Hawaii, Inc.
Building No. 6, Suite 1
1020 Auahi Street
Honolulu, Hawaii 96814

Dear Mr. Hee:

Subject: Your Letter of May 10, 1983
on Water Service for the Proposed
44-Story Apartment Building,
Tax Map Key: 2-7-15:1

We have no objections to the proposed apartment building on Kapiolani Boulevard. The availability of water for the project will be determined when the building permit application is submitted for our review and approval. If the development plans require action by the City Department of Land Utilization, they should first be approved by that department before we will take action on the proposed development.

If water is made available for the project, the developer will be assessed our water development charge covering the development of source, reservoir, and transmission facilities to provide service to the project.

At the present time, our existing water system is adequate to serve the proposed project. Our Customer Service Division will be assisting you with the service connection details when you submit a layout of the proposed building.

If you have any questions, please contact Albert Koga at 527-6123.

Very truly yours,

KAZU HAYASHIDA
Manager and Chief Engineer

RECEIVED
JUN 5 1983

cc:✓ Fred Rodriguez

ENGINEERS SURVEYORS HAWAII, INC.



Appendix F

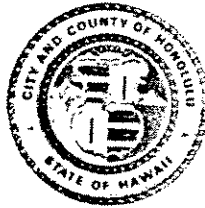
SEWER



DEPARTMENT OF PUBLIC WORKS
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET
HONOLULU, HAWAII 96813

EILEEN R. ANDERSON
MAYOR



MICHAEL J. CHUN
DIRECTOR AND CHIEF ENGINEER

WPC 83-82

July 25, 1983

Mr. William B.C. Hee, President
Engineers-Surveyors Hawaii, Inc.
1020 Auahi Street, Ste. No. 1 Bldg. No. 6
Honolulu, Hawaii 96814

Dear Mr. Hee:

Subject: Proposed 479 Unit Condominium
Development - Crystal Promenade
Tax Map Key: 2-7-15: 1

The public sewer system is available and adequate to accommodate the proposed project. However, the point of connection is the 12-inch sewer line located in Kapiolani Boulevard.

If you have any questions, please call Mr. Dennis Nishimura at 527-6091.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Michael J. Chun".
for MICHAEL J. CHUN

Director and Chief Engineer

✓cc: Mr. Fred Rodriguez

RECEIVED
AUG 2 1983

ENGINEERS SURVEYORS HAWAII, INC.

AUG - 8 1983